

**BOARD OF SUPERVISORS
PUBLIC HEARING
STAFF REPORT**

SUBJECT: ZRTD-2019-004, SPEX-2019-0037, SPEX-2019-0038 &
SPEX-2019-0039, Bles Park

ELECTION DISTRICT: Algonkian

CRITICAL ACTION DATE: January 18, 2021

STAFF CONTACTS: Rob Donaldson, Project Manager, Planning and Zoning
James David, Acting Director, Planning and Zoning

APPLICANT: Robert Balinger, Loudoun County Department of
Transportation and Capital Infrastructure (DTCI)

PURPOSE: To consider a Zoning Conversion in the Route 28 Tax District (ZRTD) to convert 3.4 acres from the Planned Development – Research and Development Park (PD-RDP) zoning district under the 1972 Loudoun County Zoning Ordinance (1972 Zoning Ordinance) to the PD-RDP zoning district under the Revised 1993 Loudoun County Zoning Ordinance (Revised 1993 Zoning Ordinance). The applicant is also requesting approval of three Special Exception (SPEX) applications to: 1) expand the existing park and its amenities; 2) allow incidental structures such as benches, pavilions, etc., with a total area greater than 840 square feet (SF) in the Floodplain Overlay District (FOD); and 3) allow for an impervious area greater than three percent (3%) but no more than ten percent (10%) within the FOD.

RECOMMENDATIONS:

Planning Commission: At the Planning Commission (Commission) Work Session on October 14, 2021, the Commission forwarded (5-2-2: Miller and Salmon opposed; Barnes and Vance absent) the application to the Board of Supervisors (Board) with a recommendation of denial, subject to the Findings of Denial read into the record by Commissioner Kirchner at the Work Session.

Staff: Staff supports Board approval of the application subject to the Proffer Statement (Attachment 1) and Conditions of Approval (Attachment 2) and based on the Findings for Approval (Attachment 3). This application supports the *Loudoun County 2019 General Plan* (2019 GP) policies to provide passive and active recreational amenities and park facilities in eastern Loudoun. There are no outstanding issues. The application is ready for Board action.

APPLICATION INFORMATION:	
APPLICANT: Department of Transportation and Capital Infrastructure Robert Balinger 703-777-0553 Robert.Balinger@loudoun.gov	REPRESENTATIVE: GORDON Chris Stephenson 703-889-2350 cstephenson@gordon.us.com
PARCELS/ACREAGE:	
PIN	Acreage
038-26-8806	132.25
ACCEPTANCE DATE: October 24, 2019	LOCATION: 44830 Bles Park Dr, Ashburn, VA 20147
ZONING ORDINANCE: 1972 & Revised 1993	EXISTING ZONING: Planned Development – Research and Development Park (PR-RDP) and Townhouse/Multifamily Residential-16 (R-16)
POLICY AREA: Suburban	PLACE TYPE: Suburban Neighborhood

CONTEXT:

Location/Site Access – This site is located north of Harry Byrd Highway (Route 7), and on the east side of Bles Park Drive (Route 1052). The site is accessed from Bles Park Drive (Route 1052).

Existing Conditions – The subject property is currently developed with parks and recreational facilities including five natural turf soccer fields. Additionally, the Eastern Loudoun Adult Day Center is located on a southeastern portion of the property.

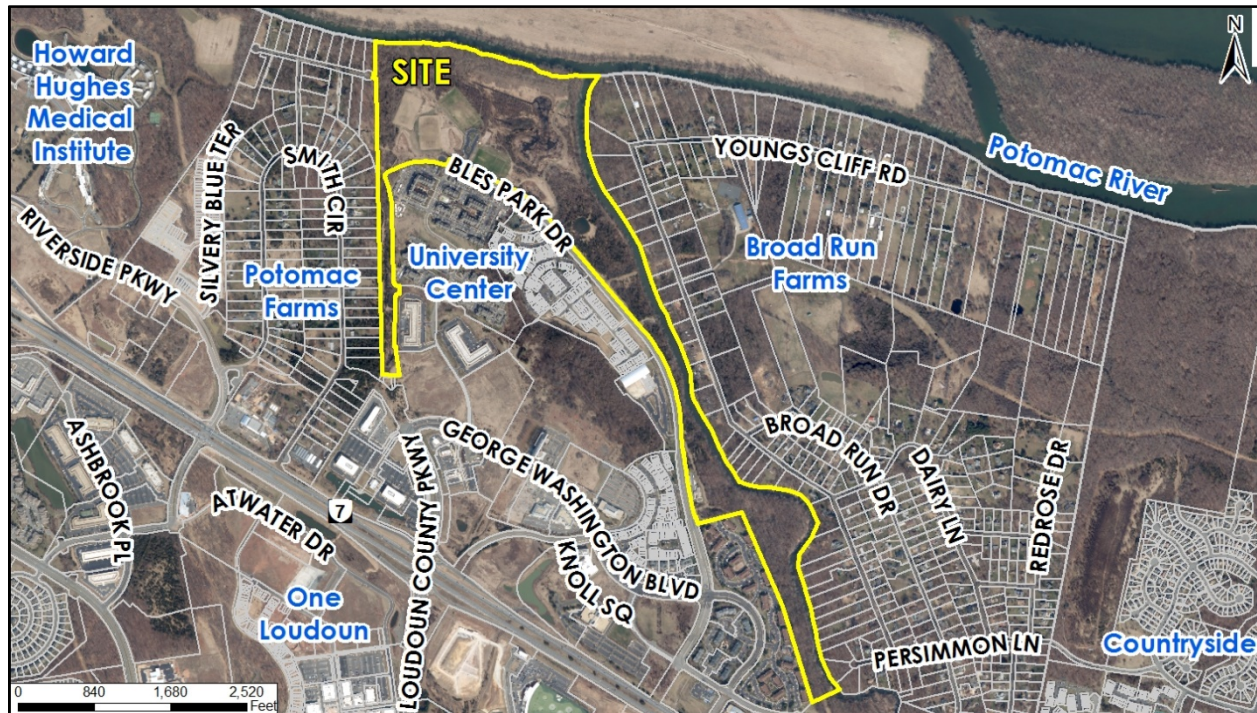
Surrounding Properties –

	<i>Land Use</i>	<i>Zoning District(s)</i>	<i>Place Type</i>
<i>North</i>	N/A (Potomac River and Maryland)	N/A (Potomac River and Maryland)	N/A (Potomac River and Maryland)
<i>South</i>	Multi-Family, Townhouse, Educational	R-16, R-8, PD-RDP	Suburban Mixed Use
<i>West</i>	Single Family, Office Building, Retail Store, Vacant Land	A-3, R-8, PD-OP, PD-IP, PD-CC(CC)	Suburban Neighborhood
<i>East</i>	Single Family, Vacant Land	A-3, CR-1, PDH3	Suburban Neighborhood

Directions – From Leesburg, head east 2.8 miles on Route 7, take the Loudoun County Parkway exit. Continue straight onto Loudoun County Parkway for 0.3 miles. Use the right two lanes to turn right onto George Washington Boulevard. Continue straight to stay on George Washington

Boulevard. Turn Left onto Bles Park Drive and continue for 0.2 miles; the entrance will be on the right.

Figure 1: Vicinity Map



PROPOSAL: As a part of an overall Master Plan for Bles Park, the applicant is requesting several legislative applications:

1. ZRTD-2019-0004 – A request to convert 3.4 acres from the PD-RDP zoning district under the 1972 Zoning Ordinance to the PR-RDP zoning district under the Revised 1993 Zoning Ordinance;
2. SPEX-2019-0037 – A request to expand the park area with various program amenities that include pavilions, canoe/kayak launch, multi-generation playgrounds, skate spots, off-leash dog area, tennis and pickleball courts, overlook areas, and un-programmed open lawn;
3. SPEX-2019-0038 – A request to allow incidental structures such as benches, pavilions, etc., greater than 840 SF in the FOD; and
4. SPEX-2019-0039 – A request to allow impervious area greater than three percent but no more than ten percent within the FOD.

Related to the SPEX applications, the applicant has received funding for parking, pavilion areas, canoe/kayak launch, and the multi-generation playground. The remaining proposed amenities for the park will be constructed as funding is made available.

BACKGROUND: The existing park sits on 132 acres and was built in the late 1990s and early 2000s. Existing facilities at Bles Park include four soccer fields, parking lot, playground, and restroom facility.¹

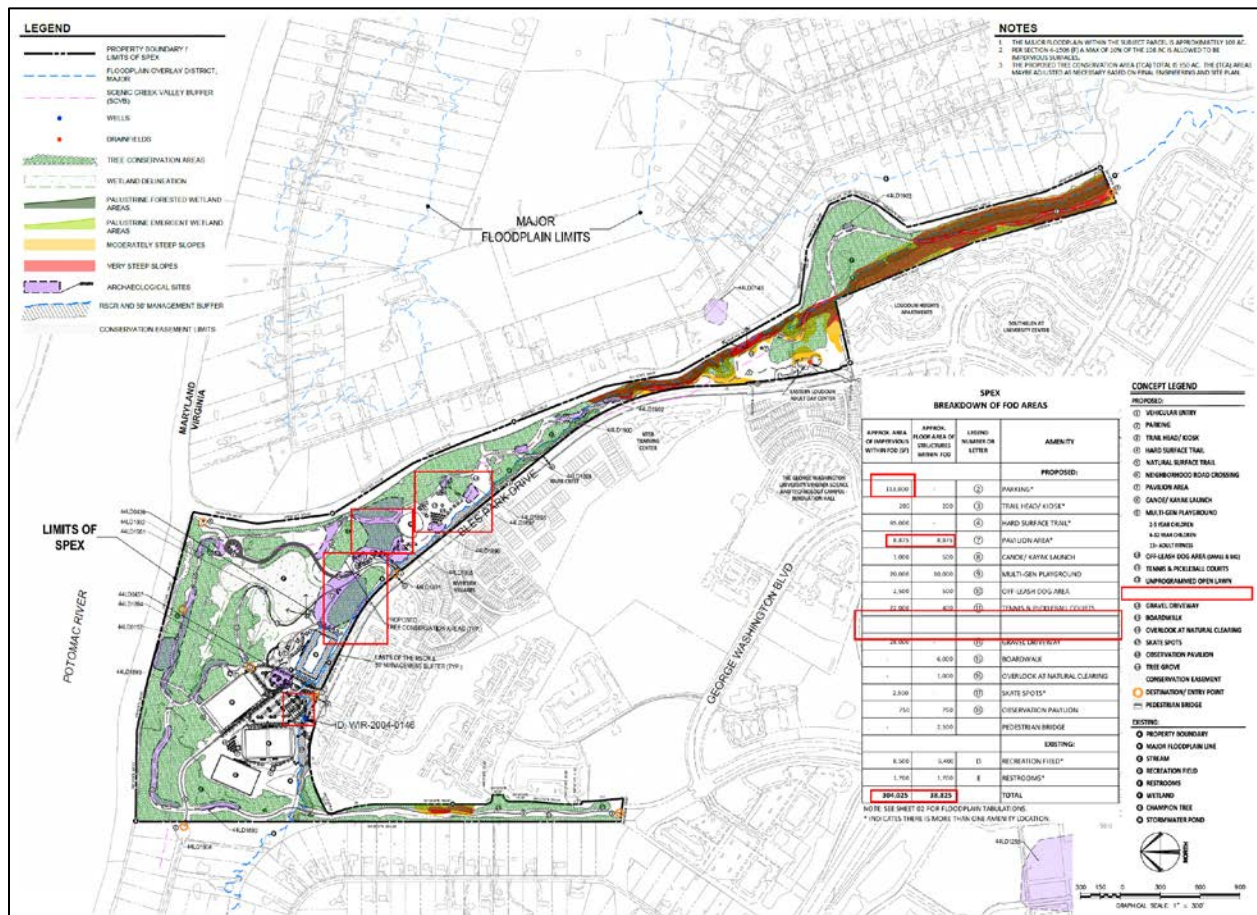
Planning Commission: The Commission held a Public Hearing on [June 22, 2021](#). The Commission requested that the applicant provide revisions to the Concept Development Plan (CDP) to address concerns about the impact to the existing natural environment of the site raised by Commissioners and members of the public who spoke at the public hearing. Specifically, the Commission raised concerns about the extent of multiple uses and impervious surfaces (i.e., open lawn areas, multi-purpose courts, boardwalks, maintenance facility, and parking) within the floodplain and whether tree conservation areas could be expanded. The Commission forwarded (8-0-1: Miller absent) the applications to a future work session.

After the Commission Public Hearing, the applicant worked with staff and Commissioners to make several updates to its applications. The changes are summarized as follows:

- 1) Decreased total impervious surface area by 12 percent (12%).
- 2) Decreased incidental structures by 19 percent (19%).
- 3) Decreased proposed parking areas by ten percent (10%).
- 4) Decreased a proposed open lawn area by 57 percent (57%).
- 5) Increased the proposed Tree Conservation Area by one acre.
- 6) Removed a proposed maintenance facility.
- 7) Removed five proposed pavilions.
- 8) Relocated proposed multi-purpose courts closer to existing active recreational uses and parking areas.

¹ Additionally, the park contains walking trails and the Eastern Loudoun Adult Day Center.

Figure 2: Conceptual Design Plan / Redline Changes



The Commission held a Work Session on this item on [October 14, 2021](#). Specifically, the Commission discussed the timing and necessity for additional parking; the justification for the location of the canoe/kayak launch and anticipated parking demand at that location; the necessity of multi-use courts and other proposed amenities at this park relative to approved housing in the area; the ability to utilize other parcels in the area for multi-use courts and boat ramps; and the appropriateness of the park's transition from a community park to a destination park. The Commission determined that even after the applicants' amendments (see above) the proposal was too intense ecologically, the mitigation of impacts through tree conservation areas was not sufficient, and ultimately that the environmental impact of the proposed amenities outweighed the potential benefit to the community. The Commission forwarded (5-2-2: Miller and Salmon opposed; Barnes and Vance absent) the application to the Board with a recommendation of denial, subject to the Findings of Denial read into the record by Commissioner Kirchner at the Work Session.

Commission's Findings for Denial were as follows:

- 1) The application proposal is contrary to the *Loudoun County 2019 General Plan* (2019 GP) policies that call for the protection of natural, environmental, and heritage resources.
- 2) The proposed increase in impervious surface, structures and development at Bles Park will destroy habitats for rare and sensitive plant and animal species and species of greatest concern.
- 3) The application proposal puts exemplary natural communities and ecosystems at increased and unnecessary risk.
- 4) There are alternative solutions to locate appropriate amenities and additions outside of the flood plain and/or away from sensitive habitat areas so as to safeguard the natural resources, wildlife habitat, and environmental community benefits in Bles Park that exist nowhere else in the county, much less eastern Loudoun, and are irreplaceable for our residents.

The Commission approved an additional motion (7-0-2: Commissioners Barnes and Vance absent) recommending that the Board direct staff to take the following actions:

- 1) Pursue an initiative to develop expertise in wildlife biology, natural ecosystems, and native plant and animal communities.
- 2) Pursue the opportunities uncovered and developed during this application process including alternative parking solutions, an alternative for the board walk, an alternative kayak launch location at Bles Park, and construction of proposed active recreational amenities at other close-by locations.

The applicant held a public input session for members of the surrounding community on April 23, 2019, where the Park Master Plan was presented in order to utilize public input to update the presented plan. Staff has received one comment on the Loudoun Online Land Applications System (LOLA) which suggested that the proposed skate spots be moved closer to the existing skate spots. The staff reports and associated attachments can be viewed online at www.loudoun.gov/lola; search "SPEX-2019-0037."

OUTSTANDING ISSUES: There are no outstanding issues identified by staff. The additional Commission motion recommending the Board direct several follow up actions has been reviewed by Staff and a response is provided below.

- 1) Pursue an initiative to develop expertise in wildlife biology, natural ecosystems, and native plant and animal communities.

Staff Response: The County Urban Forester and other subject matter experts of the Natural Resources Team (NRT) located within the Department of Building and Development are

knowledgeable in these areas through a combination of education, training and work experience. Additional resources available to County Staff include the Virginia Department of Conservation and Recreation (DCR), Virginia Department of Wildlife Resources (DWR), U.S Fish and Wildlife Service (USFWS), the Virginia Department of Environmental Quality (DEQ) and the U.S. Army Corps of Engineers (USACE). “Experts” in these respective areas would require either additional training of existing staff or additional FTEs. However, the applicability of these skill sets to site development and conservation of resources is limited to County development ordinances and the Virginia State Code. Staff resources could also be augmented by consultant services should the Board wish to consider additional review of the matters identified by the Planning Commission.

- 2) Pursue the opportunities uncovered and developed during this application process including alternative parking solutions, an alternative for the board walk, an alternative kayak launch location at Bles Park, and construction of proposed active recreational amenities at other close-by locations.

Staff Response: Planning and Zoning Staff have worked with PRCS and DTCI staff to find an appropriate balance between park amenities that respond to public need and minimal impact to onsite natural resources. As noted in this report, PRCS and DTCI staff amended the applications in response to the noted opportunities and alternatives or responded why such options were not viable. Any changes to the location of these improvements will require additional amendments to the SPEX Plats.

POLICY ANALYSIS:

A. Land Use:

ZO §6-1210(E)(1) Appropriateness of the proposed uses based on the Comprehensive Plan, trends in growth and development, the current and future requirements of the community as to land for various purposes as determined by population and economic studies and other studies and the encouragement of the most appropriate use of land throughout the locality. ZO §6-1309(1) Whether the proposed minor special exception or special exception is consistent with the Comprehensive Plan. (5) Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public.

Analysis – There are no outstanding land use issues identified by staff. The subject property is located within the Suburban Neighborhood Place Type of the 2019 GP. This Place Type encourages primarily single family detached and attached residential uses that are integrated in a walkable street pattern. The existing Bles Park is considered a conditional Parks & Recreation use under the Place Type.

The 2019 GP acknowledges the interrelatedness of land use, growth management, fiscal management, and facilities planning. This policy approach ensures the provision of public facilities, which include passive and active recreational amenities in accordance with the County’s larger planning and fiscal policies. Additionally, the 2019 GP recognizes that the Department of

Parks, Recreation, and Community Services (PRCS) faces significant challenges securing additional parks and trails to meet the service demands of the County's growing population. A lack of available land in eastern Loudoun, where the facilities are needed most, complicates the County's ability to provide the desired facilities. The proposed SPEX uses will expand existing park facilities such as soccer fields and parking at the site; allow an increase in incidental structures such as pavilions, trail heads and trashcans from 8,100 SF to 38,825 SF; and allow the applicant to increase impervious areas in the floodplain from approximately 10,000 SF to 304,025 SF. The applicant lowered the impervious area and incidental structure impact on the floodplain, after it received feedback from the Commission. The applicant achieved the reduced impact by removing a proposed maintenance facility, five pavilions and reducing the size of the proposed parking lot by ten percent.

Table 1: Changes to the Impervious and Floor Area within the FOD						
Amenity	Approximate Area of Impervious within FOD in SF			Approximate Floor Area of Structures Within FOD in SF		
	(Public Hearing Submission)	(Work Session Submission)	SF Change	(Public Hearing Submission)	(Work Session Submission)	SF Change
Parking	135,000	113,000	-22,000	N/A	N/A	N/A
Pavilion Area	12,000	8,875	-3,125	12,000	8,875	-3,125
Maintenance Facility	18,000	Removed	-18,000	6,000	Removed	-6,000
Total	347,150	304,025	-43,125	47,950	38,825	-9,125

Figure 3: Parking Lot Reduction / Multi-Purpose Court Relocation

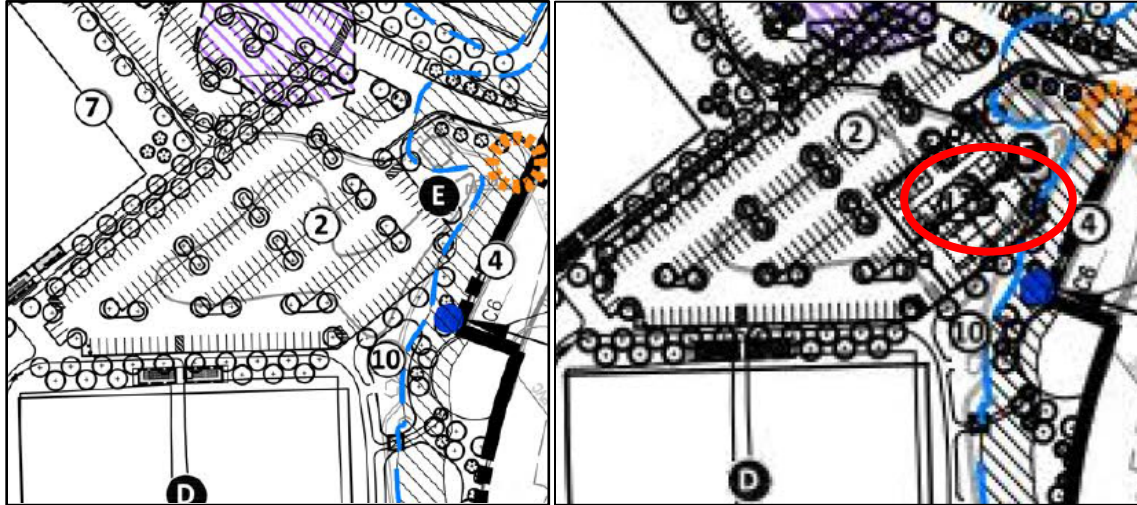


Figure 3: From the first submission (left), the number of proposed parking spaces has been reduced by ten percent (10%) (±30 spaces). Also, the multi-purpose court has been moved to the parking area (circled in red).

Figure 4: Maintenance Facility (Removed)

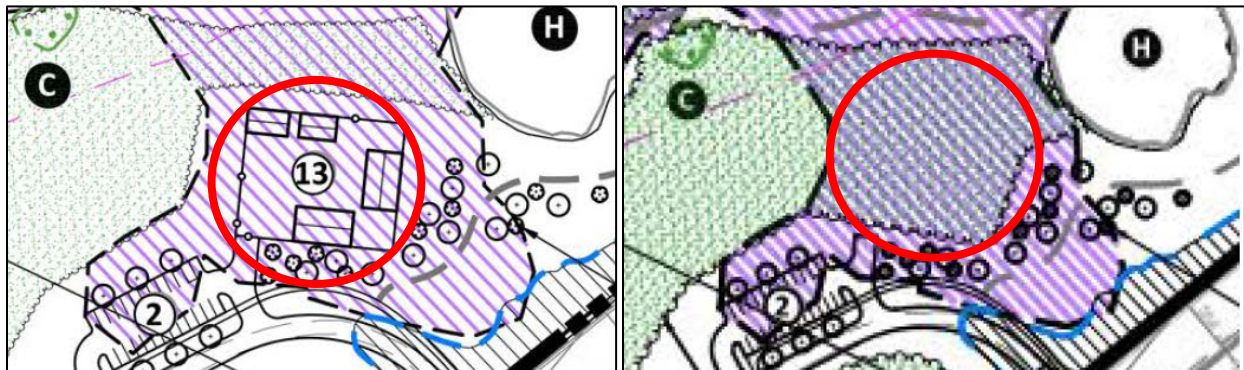


Figure 4: The proposed maintenance facility (red circle) was removed completely in this submission, which reduced the amount of impervious area by 18,000 SF and the incidental structure area by 6,000 SF.

Figure 5: Unprogrammed Lawn Area (Reduced)

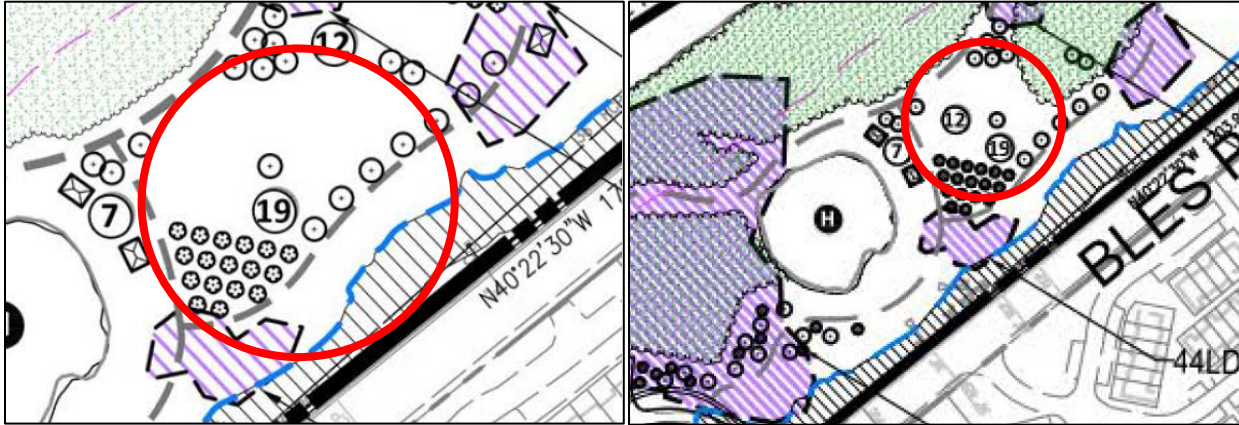


Figure 5: The proposed unprogrammed lawn area (red circle) was reduced by 57% in this submission.

The 2019 GP does not list impervious trails and active recreation uses in the floodplain as permitted uses (Chapter 3, RSCR Policy 2, Permitted Uses in the RSCR). However, as noted above, staff recognizes that there is an increased challenge for PRCS to provide parks facilities in eastern Loudoun. Therefore, staff has worked to find an appropriate balance between the substantial public benefits of providing additional park amenities and minimizing any negative impacts of these additions on the floodplain.

The proposed ZRTD requests to bring an approximate 3.4-acre piece of the park into administration under the Revised 1993 Zoning Ordinance instead of the 1972 Zoning Ordinance. The applicant seeks to bring this piece of the park under the Revised 1993 Zoning Ordinance so that the park will be uniformly administered under a single ordinance for any future park development. The existing and proposed park uses in the PD-RDP administered under the current Zoning Ordinance are consistent with the Suburban Neighborhood Place Type. The proposal is appropriate at this existing park location and presents no outstanding land use issues.

B. Compatibility:

ZO §6-1210(E)(2) *The existing character and use of the subject property and suitability for various uses, compatibility with uses permitted and existing on other property in the immediate vicinity, and conservation of land values. ZO §6-1309(2)* *Whether the level and impact of any noise, light, glare, odor or other emissions generated by the proposed use will negatively impact surrounding uses. (3) Whether the proposed use is compatible with other existing or proposed uses in the neighborhood, and on adjacent parcels.*

Analysis

ZRTD – There are no outstanding compatibility issues identified by staff. This site is an existing park and is compatible with the surrounding residential properties. Although the PD-RDP zoning district is not a typical zoning district for parks throughout Loudoun County, it lists parks as a by-right use. This zoning conversion would bring the entirety of the park under the Revised 1993 Zoning Ordinance.

SPEX – Staff has identified no outstanding compatibility issues. Bles Park has existed on this site and served the community since the late 1990s. The expansions of the existing soccer field use and addition of other recreational facilities are supported by the surrounding community. The proposed passive recreation incidental structures and facilities (see Figure 8 below for examples) will be compatible with the parks and recreation nature of the existing site. The requested active recreation additions (see Figure 9 below for examples) will provide the community with additional amenities and will increase utilization of the park.

To address compatibility concerns, the Commission raised several items for the applicant to address. These items include: the relocation of the proposed multi-purpose courts; alternative canoe/kayak launch locations; evaluation of an alternative overflow parking area; alternative planting enhancement of an existing pond; looking into alternative boardwalk configurations; and exploring reforestation/invasive species removal opportunities.

Relocation of Multi-Purpose Courts. To address compatibility issues raised by the Commission, the applicant has relocated the proposed multi-purpose courts to be by the parking lot and existing soccer fields (Figures 3 & 6). Staff finds that this location will have less impact on those who are seeking to enjoy the natural elements of the park, while still providing an amenity that was requested by the community.

Figure 6: Multi-Use Court (Relocated)

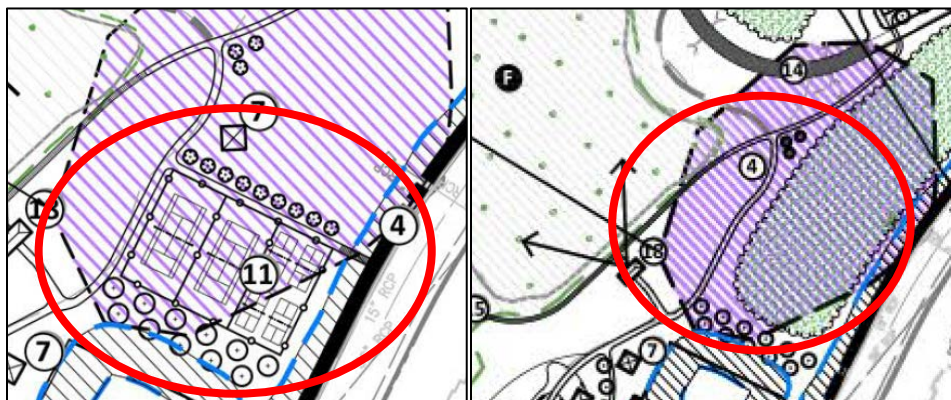


Figure 6: The proposed multi-use courts (red circle) were moved from the original proposal (left) to the parking lot shown in Figure 3.

Evaluation of Alternative Canoe/Kayak Launch Locations. The applicant evaluated an alternative location for a canoe/kayak launch near Bishop Terrace and Abram Terrace. It was determined that that location is subject to a Loudoun Water sanitary sewer easement and would likely require additional impervious surface to be added to be accessible. Additionally, there is no on-street parking in the vicinity.

Evaluation of Alternative Overflow Parking Area. The applicant was asked by the Commission to evaluate the use of an existing grassy area (Figure 7 – circled in red) for overflow parking. The applicant determined that it would be difficult to control access to this area and that this would likely expand the development footprint with additional impervious area.

Figure 7: Proposed Overflow Parking Area



Alternative Planting Enhancement of Existing Ponds. The applicant responded that to maximize the parking potential of this project without significantly expanding the development footprint, the existing Storm Water Management (SWM)/ Best Management Practices (BMP) will need to be impacted. The applicant proposes to offset this impact through fifty acres of tree conservation and a 2:1 mitigation of impacts with reforestation and invasive species removal.

Alternative Boardwalk Configurations. The applicant evaluated the boardwalk several times since the Public Hearing. It found that the proposed alignment of the boardwalk generally avoids the wetland and is primarily located along the fringe of man-made wetland mitigation area. The applicant would like to keep the proposed amenity as is. The applicant addresses these issues further and provides examples of similar existing boardwalks in Attachment 8.

Reforestation/Invasive Species Removal Opportunities. The applicant has agreed to a Condition to provide a 2:1 mitigation of impacts through reforestation and invasive species control.

Figure 8: Passive Recreation Examples



TRAIL HEAD

FOR LOCATIONS ALONG THE NATURAL SURFACE TRAILS

KIOSK

FOR MAIN ENTRANCES TO THE TRAIL AND HIGH TRAFFIC AREAS



LARGE PAVILION

FOR LOCATIONS NEAR THE RECREATIONAL FIELDS FOR PICNICKING

SMALL PAVILION

FOR SECLUDED LOCATIONS ALONG THE NATURE TRAILS



BOARDWALK

FOR SCENIC VIEWS OF THE EXISTING WETLANDS

TREE GROVE

ALONG THE TRAIL FOR A CALMING EXPERIENCE



OVERLOOK AT NATURAL CLEARING

FOR SCENIC VIEWS OF BROAD RUN

CANOE LAUNCH

AT THE MOUTH OF BROAD RUN

Figure 9: Active Recreation Examples

MULTI-GEN PLAYGROUND
FUN FOR ALL AGES



OFF-LEASH DOG AREA



TENNIS COURTS



PICKLEBALL COURTS



SKATE SPOTS



C. Environmental and Heritage Resources:

ZO §6-1210(E)(5) Potential impacts on the environment or natural features including but not limited to wildlife habitat, wetlands, vegetation, water quality (including groundwater), topographic features, air quality, scenic, archaeological, and historic features, and agricultural

and forestal lands and any proposed mitigation of those impacts. ZO §6-1309(4) Whether the proposed special exception or minor special exception adequately protects and mitigates impacts on the environmental or natural features including, but not limited to, wildlife habitat, vegetation, wetlands, water quality (including groundwater), air quality, topographic, scenic, archaeological or historic features, and agricultural and forestal lands.

Analysis

ZRTD – There are no outstanding environmental or heritage resources issues identified by staff. Staff has identified significant major flood plain and environmental features on this site; however, this ZRTD is not proposing any development or changes to the existing structures on this site.

SPEX – There are no outstanding environmental or heritage resources issues identified by staff. Through the referral process, staff had identified several areas of concern on this site. Specifically: protecting the River and Stream Corridor Resources (RSCR), protecting forest resources, providing adequate stormwater management, and protecting historic and archeologic resources. The applicant has worked with staff to address these issues as further discussed below.

RSCR/Forest Resources. To protect the RSCR, staff placed conditions on the application for enhanced erosion and sediment control measures as well as providing tree conservation areas (TCA) across the property to make sure that the area will be protected for future generations.

The Commission asked the applicant to investigate whether it was possible to add more TCA to the site. The applicant was able to provide an additional acre of TCA by removing the proposed maintenance facility, reducing the size of the proposed open lawn area by 57 percent (57%), and relocating the multi-purpose courts.

Stormwater Management. The applicant seeks to address water quality through a combination of purchasing nutrient credits and utilizing Virginia Runoff Reduction Method conserved/open space easements. Staff previously suggested the implementation of pervious parking lots and low impact development (LID) measures throughout the site; however, staff acknowledges that pervious parking located within the floodplain would be problematic as the silt deposited during a flood would clog the pervious material as happened in another area of the park. Similarly, staff recognizes that LID measures will not be viable everywhere on the site. Staff has drafted conditions for the applicant to utilize at least two different LID measures where applicable throughout the site.

Historic Resources. A Phase 1 Archeological Survey has been provided by the applicant, and the County Archaeologist has identified several areas of potential historical and archeological significance. Initially, staff recommended that the applicant complete a more in-depth Phase 2 Archeological Survey for the impacted sites. However, the applicant was not sure of the exact final location for the proposed amenities or if all of the requested amenities will receive funding in the future. Therefore, staff has drafted a condition requiring the applicant to submit a Phase 2 Archeological Survey and potentially a Phase 3 Archeological Survey when/if amenities would be impacted at the site plan stage.

Figure 10: Recommended Locations for Additional Phase I Archeological Survey

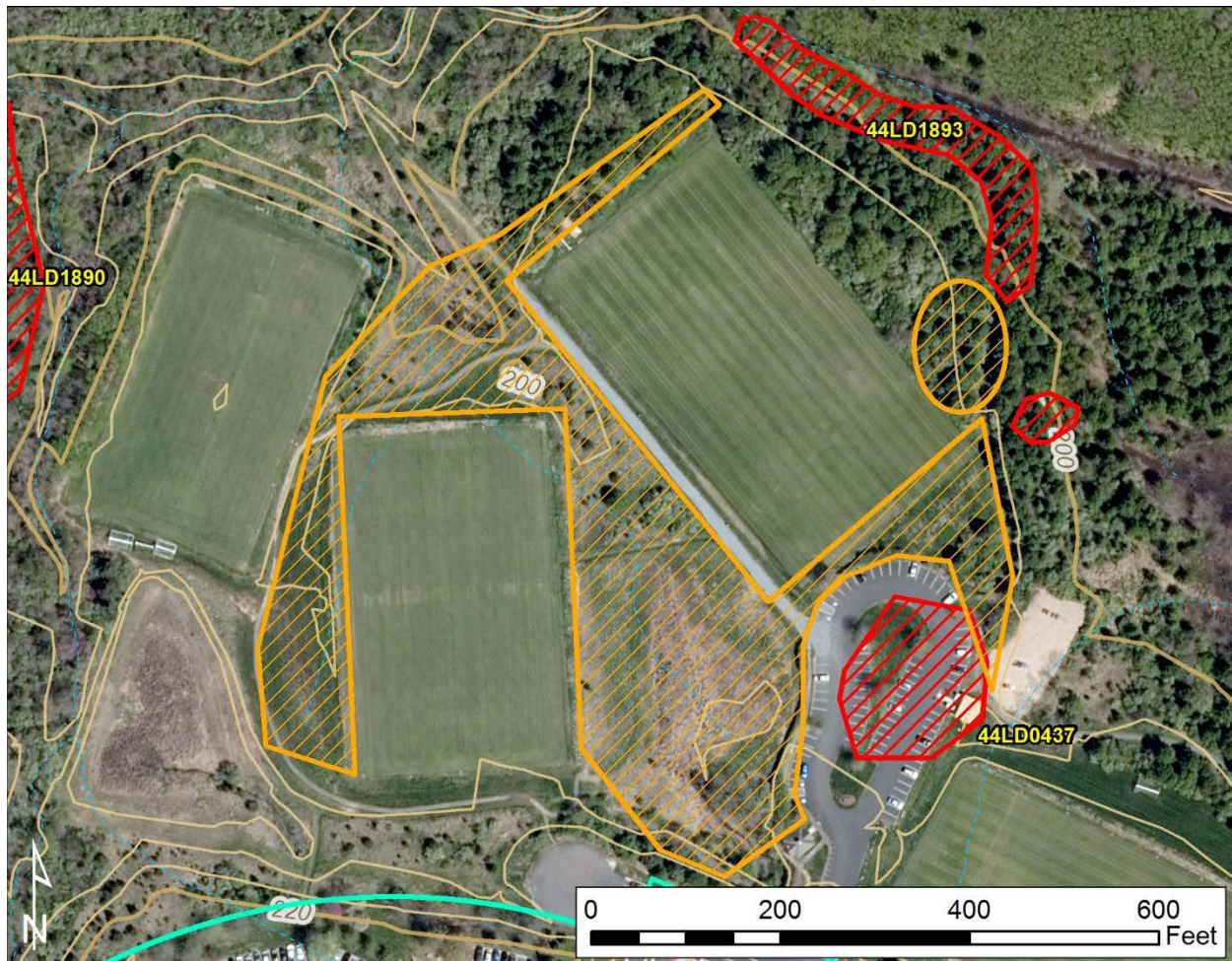


Figure 10: Map of Bles Park showing area (orange hatching) where additional Phase I archaeological survey is recommended. The red hatched areas are sites already recorded with the Virginia Department of Historic Resources.

D. Transportation:

ZO §6-1210(E)(3) Adequacy of sewer and water, transportation, and other infrastructure to serve the uses that would be permitted on the property if it were reclassified to a different zoning district [emphasis added]. **ZO §6-1309(6)** Whether the proposed special exception can be served adequately by public utilities and services, roads, pedestrian connections and other transportation services and, in rural areas, by adequate on-site utilities [emphasis added].

Analysis – Staff has identified no outstanding transportation issues. Staff has determined that the increase in amenities and parking spaces would increase the number of weekly trips by 545 to this site; however, the existing road infrastructure is adequate to handle the increase in trips. The applicant is proposing to utilize the existing natural trails that loop throughout the park, with paved surfaces in the flood plain being used mostly around the existing soccer fields to improve accessibility for people with disabilities. The proposed application will further support the Broad Run Stream Valley Trail Corridor by providing a starting point for filling gaps in the trail network

[identified by staff south of Bles Park](#). Additionally, the proposed improvements in this application will provide more opportunities for the public to access Bles Park from the planned Potomac Heritage National Scenic Trail of Northern Virginia.

E. Fiscal Impacts:

ZO §6-1210(E)(4) *The requirements for airports, housing, schools, parks, playgrounds, recreational areas and other public services.*

Analysis – There are no outstanding fiscal issues. The parking, pavilion area, canoe/kayak launch and the multi-generation playground have already been funded by the Board through an [amendment to the FY 2017 – FY 2022 Capital Improvement Program \(CIP\)](#) that appropriated \$3,425,000 in cash proffers from the Public Facilities Fund and transferred that amount to the Capital Projects Fund in order to provide funding for the Bles District Park Facility Improvement project.² All other uses proposed as part of this application will only be built if funded by the Board.

F. Public Utilities/Public Safety:

ZO §6-1210(E)(3) *Adequacy of sewer and water, transportation, and other infrastructure to serve the uses that would be permitted on the property if it were reclassified to a different zoning district.*
(6) *The protection of life and property from impounding structure failures [emphasis added].* **ZO §6-1309(6)** *Whether the proposed special exception can be served adequately by public utilities and services, roads, pedestrian connections and other transportation services and, in rural areas, by adequate on-site utilities [emphasis added].*

Analysis – There are no outstanding public utility or public safety issues. The subject property is served by public water and sewer. Fire and Rescue services are provided by Kincora Fire Company 24 and Rescue Company 35. The average response time for this site is nine minutes.

ZONING ANALYSIS: This proposal is in conformance with the requirements of the Revised 1993 Zoning Ordinance. If approved, the zoning conversion will bring the subject property into the current Revised 1993 Zoning Ordinance and add consistency with the applicable zoning regulations in the County. The Special Exception, if approved, will allow for incidental structures totaling 38,825 SF and Passive and Recreation Uses with an impervious surface area of 304,025 SF.

DRAFT MOTIONS:

1. I move that the Board of Supervisors forward ZRTD-2019-0004, SPEX-2019-0037, SPEX-2019-0038 & SPEX-2019-0039, Bles Park, to the January 18, 2022, Board of Supervisors Business Meeting for action.

OR

² The \$3,425,000 in cash proffers, were provided through proffer - SEQ# 99073904 – associated with University Center Parcel P1, ZMAP-2012-0010. Zoning Administration issued a cash proffer determination, ZCOR 2018-0044, stating that it was appropriate to use available cash proffer funds for the proposed Bles Park facility improvements.

2a. I move that the Board of Supervisors suspend the rules.

AND

2b. I move that the Board of Supervisors approve ZRTD-2019-0004, SPEX-2019-0037, SPEX-2019-0038 & SPEX-2019-0039, Bles Park, subject to the Proffer Statement dated June 14, 2021, and the Conditions of Approval dated October 7, 2021, and based on the Findings for Approval provided as Attachments 1, 2, and 3 to the December 15, 2021, Board of Supervisors Public Hearing Staff Report.

OR

3a. I move that the Board of Supervisors suspend the rules.

AND

3b. I move that the Board of Supervisors deny ZRTD-2019-0004, SPEX-2019-0037, SPEX-2019-0038 & SPEX-2019-0039, Bles Park, subject to the Findings for Denial provided as Attachment 4 to the December 15, 2021, Board of Supervisors Public Hearing Staff Report.

OR

4. I move an alternate motion.

ATTACHMENTS:

1. Proffer Statement (June 14, 2021)
2. Conditions of Approval (October 7, 2021)
3. Findings of Approval
4. Commission Findings for Denial
5. Revised Concept Development Plan (August 13, 2021)
6. Statement of Justification
7. Review Agency Comments
8. Response to Referral Comments
9. Commissioner Comment Response Letter

**Bles Park
ZRTD-2019-0004**

PROFFER STATEMENT

June 14, 2021

The BOARD OF SUPERVISORS OF LOUDOUN COUNTY, the owner (“Owner”) of the property described as Loudoun County Tax Map /63/E16/////A/ (PIN 038-26-8806), on behalf of itself and its successors in interest, hereby voluntarily proffers pursuant to Section 15.2-2303 of the Code of Virginia (1950) as amended, that in the event that the approximately 3.4 acre portion of the above referenced parcel labeled as limits of ZRTD on the Concept Development Plan referenced in Proffer 1 below (“Property”) is rezoned by the Board of Supervisors of Loudoun County, Virginia, to the PD-PRD Planned Development-Research and Development Park zoning district administered under the Revised 1993 Loudoun County Zoning Ordinance, as may be amended or recodified from time to time (the “Zoning Ordinance”), as substantially set forth in the Concept Development Plan referenced in Proffer 1 below, and further described in its application ZRTD-2019-0004 (“Application”), the development of the Property shall be in substantial conformance with the following conditions (“Proffers”).

1. CONCEPT DEVELOPMENT PLAN

The development of the Property shall be in substantial conformance with Sheet 09 of the twelve (12) sheet plan set titled “BLES PARK”, dated August 30, 2019, with revisions through August 13, 2021, prepared by Gordon and incorporated herein by reference as Exhibit A (“Concept Development Plan”). The Concept Development Plan shall control the general development, layout and configuration of the Property, provided that all requirements and use limitations of the PD-PRD zoning district of the Zoning Ordinance must be complied with and will take precedence over the Concept Development Plan.

[SIGNATURE PAGES FOLLOW]

The undersigned hereby warrants that all the owners of any legal interest in the Property have signed the foregoing proffer statement, that no signature from any additional party is necessary for these Proffers to be binding and enforceable in accordance with their terms, that he/she has full authority to bind the Property to these conditions and that the foregoing proffers are entered into voluntarily.

BY: _____
Signature

Name: _____

Title: _____

Date: _____

STATE OF _____

COUNTY/CITY OF _____, to-wit:

I, the undersigned notary public, in and for the state and city/county aforesaid, do hereby certify that _____, as the _____ of _____, whose name is signed to the foregoing proffer statement has acknowledged the same before me.

Subscribed and sworn to before me this _____ day of _____ 2021.

My Commission Expires:

Date

Notary Public

Notary Registration Number _____

Conditions of Approval
Bles Park, SPEX 2019-0037
(Expansion of existing park)

10/7/2021

1. **Substantial Conformance.** The development of the Special Exception use described in Condition 2 below shall be in substantial conformance with Sheets 1, 2, 3, 3A, 4, 5, 6, 7, and 8 of 11 of the plan set entitled “BLES PARK SPECIAL EXCEPTION (SPEX 2019-0037, SPEX-2019-0038, & SPEX-2019-0039)” dated August 30, 2019 and revised through April 13, 2021 as prepared by Gordon, Inc. (the “**SPEX Plat**”), incorporated herein by reference, and the Revised 1993 Loudoun County Zoning Ordinance (the “**Zoning Ordinance**”). Approval of this application for the portion of the 132.24-acre property identified as PIN 038-26-8806 (the “**Property**”) that is designated as “LIMITS OF SPEX” on Sheet 6 of the SPEX Plat shall not relieve the applicant or the owners of the Property, their successors, or parties developing, establishing, or operating the approved Special Exception use (collectively, the “**Applicant**”) from the obligation to comply with and conform to any other applicable Zoning Ordinance, Codified Ordinance or regulatory requirement.
2. **Uses Permitted.** This Special Exception grants approval to expand an existing Park and other amenities (the “**SPEX Use**”) in accordance with Section 1-103(F)(2) of the Zoning Ordinance.
3. **Floodplain Overlay District.** The development of the SPEX Use shall be conducted in such a manner as to limit the disturbance in the Major Floodplain as depicted on Sheets 5 and 6 of the SPEX Plat with only passive and existing active recreational uses permitted within said floodplain. Any areas within the Major Floodplain that are disturbed during or subsequent to development shall be replanted at Applicant’s expense, subject to review and approval by the County.
4. **Floodplain Study/Floodplain Alteration.** The Applicant will provide a floodplain study and if necessary, a floodplain alteration that shall be approved prior to site plan approval for the SPEX use.
5. **Archaeological Sensitive Sites.** Prior to the approval of the first site plan or construction plans and profiles for the SPEX Use, the Applicant shall conduct an additional Phase I archaeological survey in the area highlighted in orange hatching in Figure 1 and, if determined appropriate by staff, the Applicant shall conduct any recommended Phase II significance evaluation studies and Phase III data recovery excavations if significant archaeological resources are identified and cannot be avoided as further described below. As used herein, the term site plan includes any site plan amendment.

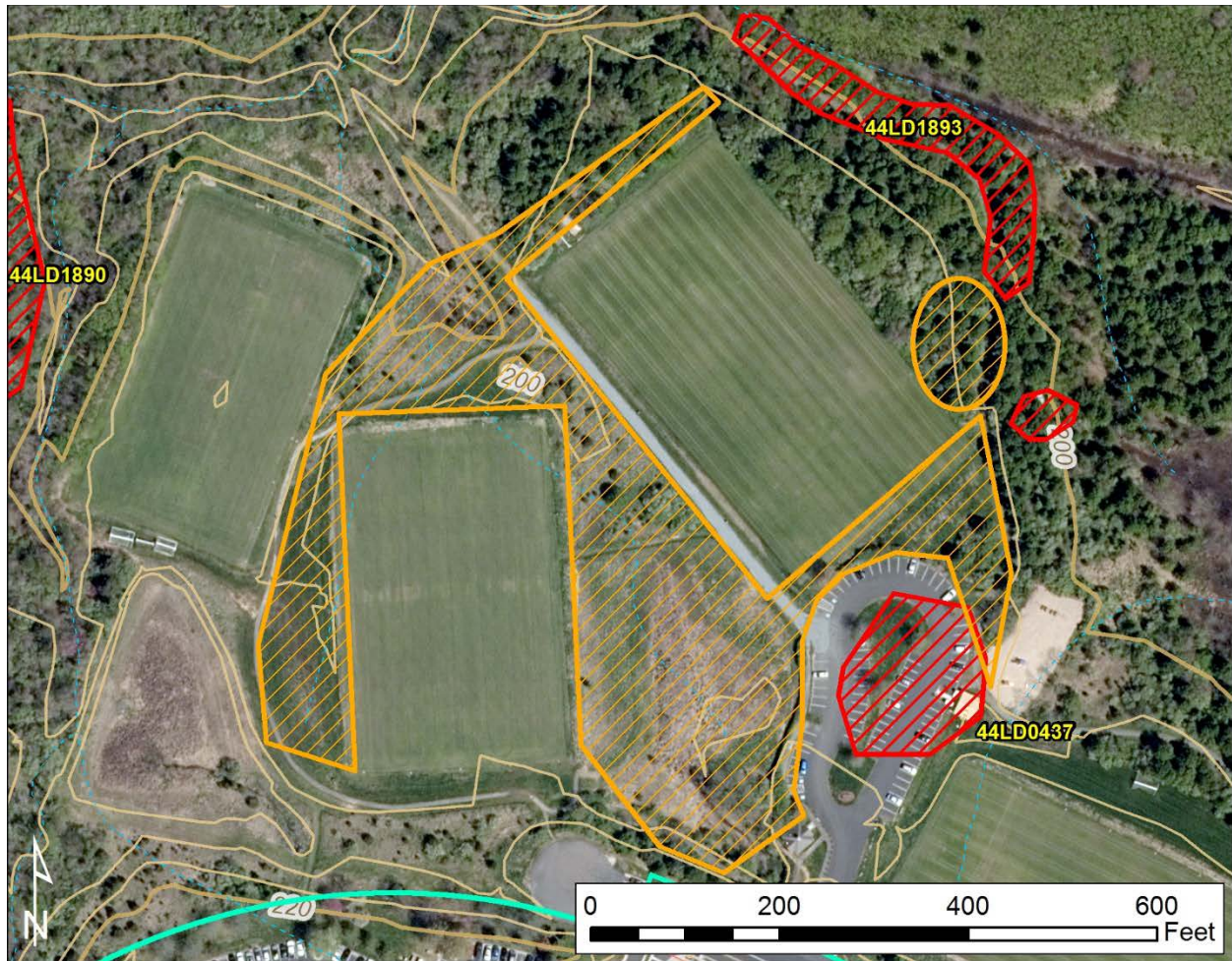


Figure 1: Map of Bles Park showing area (orange hatching) where additional Phase I archaeological survey is recommended.

Prior to the approval of the first site plan or construction plans and profiles for the SPEX Use, whichever is first in time, the Applicant shall conduct Phase II significance evaluations for archaeological sites **44LD0157**, **44LD1895**, **44LD1892**, **44LD1893**, and **44LD1904** shown on page 3 of SPEX plat. The Phase II archaeological evaluation will be undertaken by an archaeologist who meets the professional qualifications established by the U.S. Secretary of the Interior. The Applicant will provide historic preservation staff with a copy of the findings of the Phase II archaeological study prior to approval of such site plan or construction plans and profiles application and the initiation of land disturbing activities on the Property. Should the Phase II study determine significant archaeological resources be identified in any of these locations and avoidance of impacts to any of these resources not be possible, the Applicant further agrees to undertake Phase III data recovery excavations and potentially other measures identified by staff as a means to mitigate adverse effects to the resources caused by development. County historic preservation staff will be afforded the opportunity to review Phase II and Phase III research designs, as applicable. In the event that significant archaeological resources are identified on the Property, then, following the completion of Phase II and Phase III investigation and

reporting, the Applicant will transfer ownership, without cost, of all artifacts and copies of all site records to the County for long-term curation in the County's artifact repository.

6. **Enhanced Erosion and Sediment Control Inspections.** The Applicant shall commit to enhanced Erosion and Sediment Control inspections to monitor and minimize impacts related to development around karst features. Prior to approval of any grading or building/zoning permit sought pursuant to the SPEX Use, the Applicant shall provide documentation of enhanced Erosion and Sediment Control procedures to the Department of Building and Development for review and approval by the County Soil Scientist.
7. **Reforestation and Invasive Species Control.** The Applicant shall consult with the County's Urban Forester to identify appropriate open areas for reforestation adjacent to the major floodplain in an amount equal to the area of the proposed parking shown on Sheet 6 of the SPEX Plat over the existing of the SWM/BMP facility (Approximately 42,500 SF). The Applicant shall also provide invasive species removal in addition to the reforestation, both at a 2 to 1 ratio

Reforestation plantings shall consist of plant species native to Northern Virginia. The Applicant shall submit a reforestation plan, prepared by a Certified Arborist, Urban Forester, or Landscape Architect, in accordance with the reforestation standards set forth in the Loudoun County Facilities Standards Manual ("FSM") for the reforestation area(s) prior to the approval of the first site plan or construction plan and profiles proposing the development of any area that encroaches into the existing SWM/BMP facility for review and approval by the County Urban Forester or Zoning Administrator. The reforestation plan shall be implemented in accordance with the reforestation standards of the FSM, including the maintenance and restocking provisions, concurrently with the development of the areas subject to such site plans or construction plans and profiles prior to occupancy or use. In the event that the targeted stocking is not achieved, the Owner, shall, in consultation with the County Urban Forester or Zoning Administrator, provide a one-time supplemental planting within two (2) years to achieve the full, initial stocking.

**Conditions of Approval
Bles Park, SPEX 2019-0039**

(Incidental structures greater than 840 square feet in the Floodplain Overlay District)

10/7/2021

1. **Substantial Conformance.** The development of the Special Exception use described in Condition 2 below shall be in substantial conformance with Sheets 1, 2, 3, 3A, 4, 5, 6, 7, and 8 of 11 of the plan set entitled “BLES PARK SPECIAL EXCEPTION (SPEX 2019-0037, SPEX-2019-0038, & SPEX-2019-0039)” dated August 30, 2019 and revised through April 13, 2021 as prepared by Gordon, Inc. (the “**SPEX Plat**”), incorporated herein by reference, and the Revised 1993 Loudoun County Zoning Ordinance (the “**Zoning Ordinance**”). Approval of this application for the portion of the 132.24-acre property identified as PIN 038-26-8806 (the “**Property**”) that is designated as “LIMITS OF SPEX” on Sheet 6 of the SPEX Plat shall not relieve the applicant or the owners of the Property, their successors, or parties developing, establishing, or operating the approved Special Exception use (collectively, the “**Applicant**”) from the obligation to comply with and conform to any other applicable Zoning Ordinance, Codified Ordinance or regulatory requirement.
2. **Uses Permitted.** This Special Exception grants approval of Incidental structures, greater than 840 square feet of floor area, associated with permitted or approved special exception uses in the Floodplain Overlay District (the “**SPEX Use**”) in accordance with Section 4-1506(E) of the Zoning Ordinance.
3. **Floodplain Overlay District.** The development of the SPEX Use shall be conducted in such a manner as to limit the disturbance in the Major Floodplain as depicted on Sheets 5 and 6 of the SPEX Plat with only passive and existing active recreational uses permitted within said floodplain. Any areas within the Major Floodplain that are disturbed during or subsequent to development shall be replanted at Applicant’s expense, subject to review and approval by the County.
4. **Floodplain Study/Floodplain Alteration.** The applicant will provide a floodplain study and if necessary, a floodplain alteration that shall be approved prior to site plan approval for the SPEX use.
5. **Archaeological Sensitive Sites.** Prior to the approval of the first site plan or construction plans and profiles for the SPEX Use, the Applicant shall conduct an additional Phase I archaeological survey in the area highlighted in orange hatching in Figure 1 and, if determined appropriate by staff, the Applicant shall conduct any recommended Phase II significance evaluation studies and Phase III data recovery excavations if significant archaeological resources are identified and cannot be avoided as further described below. As used herein, the term site plan includes any site plan amendment.

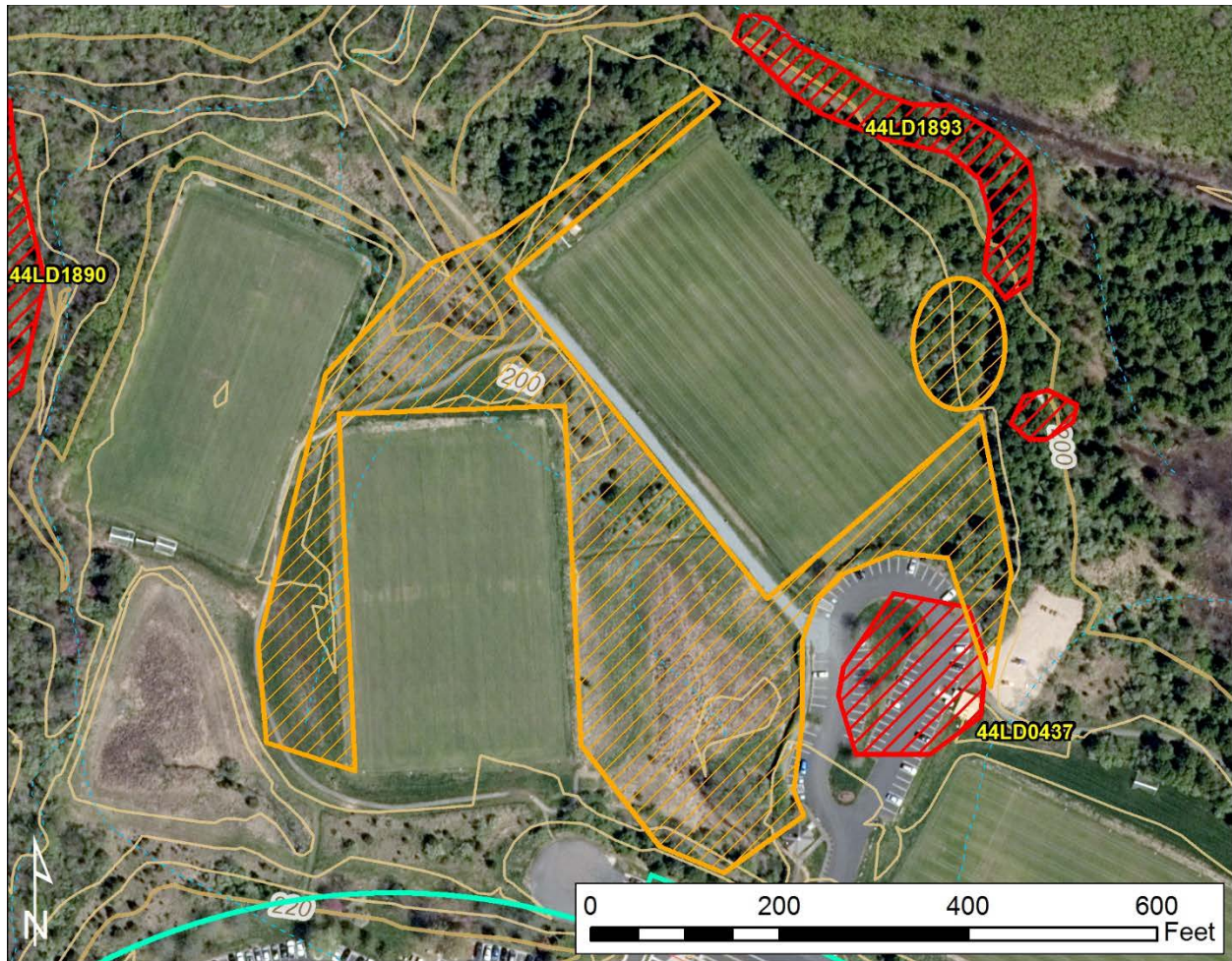


Figure 2: Map of Bles Park showing area (orange hatching) where additional Phase I archaeological survey is recommended.

Prior to the approval of the first site plan or construction plans and profiles for the SPEX Use, whichever is first in time, the Applicant shall conduct Phase II significance evaluations for archaeological sites **44LD0157**, **44LD1895**, **44LD1892**, **44LD1893**, and **44LD1904** shown on page 3 of SPEX plat. The Phase II archaeological evaluation will be undertaken by an archaeologist who meets the professional qualifications established by the U.S. Secretary of the Interior. The Applicant will provide historic preservation staff with a copy of the findings of the Phase II archaeological study prior to approval of such site plan or construction plans and profiles application and the initiation of land disturbing activities on the Property. Should the Phase II study determine significant archaeological resources be identified in any of these locations and avoidance of impacts to any of these resources not be possible, the Applicant further agrees to undertake Phase III data recovery excavations and potentially other measures identified by staff as a means to mitigate adverse effects to the resources caused by development. County historic preservation staff will be afforded the opportunity to review Phase II and Phase III research designs, as applicable. In the event that significant archaeological resources are identified on the Property, then, following the completion of Phase II and Phase III investigation and

reporting, the Applicant will transfer ownership, without cost, of all artifacts and copies of all site records to the County for long-term curation in the County's artifact repository.

6. **Enhanced Erosion and Sediment Control Inspections.** The Applicant shall commit to enhanced Erosion and Sediment Control inspections to monitor and minimize impacts related to development around karst features. Prior to approval of any grading or building/zoning permit sought pursuant to the SPEX Use, the Applicant shall provide documentation of enhanced Erosion and Sediment Control procedures to the Department of Building and Development for review and approval by the County Soil Scientist.
7. **Reforestation and Invasive Species Control.** The Applicant shall consult with the County's Urban Forester to identify appropriate open areas for reforestation adjacent to the major floodplain in an amount equal to the area of the proposed parking shown on Sheet 6 of the SPEX Plat over the existing of the SWM/BMP facility (Approximately 42,500 SF). The Applicant shall also provide invasive species removal in addition to the reforestation, both at a 2 to 1 ratio

Reforestation plantings shall consist of plant species native to Northern Virginia. The Applicant shall submit a reforestation plan, prepared by a Certified Arborist, Urban Forester, or Landscape Architect, in accordance with the reforestation standards set forth in the Loudoun County Facilities Standards Manual ("FSM") for the reforestation area(s) prior to the approval of the first site plan or construction plan and profiles proposing the development of any area that encroaches into the existing SWM/BMP facility for review and approval by the County Urban Forester or Zoning Administrator. The reforestation plan shall be implemented in accordance with the reforestation standards of the FSM, including the maintenance and restocking provisions, concurrently with the development of the areas subject to such site plans or construction plans and profiles prior to occupancy or use. In the event that the targeted stocking is not achieved, the Owner, shall, in consultation with the County Urban Forester or Zoning Administrator, provide a one-time supplemental planting within two (2) years to achieve the full, initial stocking.

**Conditions of Approval
Bles Park, SPEX 2019-0039**

(Impervious area greater than 3% but no more than 10% within the Floodplain Overlay District)

10/7/2021

1. **Substantial Conformance.** The development of the Special Exception use described in Condition 2 below shall be in substantial conformance with Sheets 1, 2, 3, 3A, 4, 5, 6, 7, and 8 of 11 of the plan set entitled “BLES PARK SPECIAL EXCEPTION (SPEX 2019-0037, SPEX-2019-0038, & SPEX-2019-0039)” dated August 30, 2019 and revised through April 13, 2021 as prepared by Gordon, Inc. (the “**SPEX Plat**”), incorporated herein by reference, and the Revised 1993 Loudoun County Zoning Ordinance (the “**Zoning Ordinance**”). Approval of this application for the portion of the 132.24-acre property identified as PIN 038-26-8806 (the “**Property**”) that is designated as “LIMITS OF SPEX” on Sheet 6 of the SPEX Plat shall not relieve the applicant or the owners of the Property, their successors, or parties developing, establishing, or operating the approved Special Exception use (collectively, the “**Applicant**”) from the obligation to comply with and conform to any other applicable Zoning Ordinance, Codified Ordinance or regulatory requirement.
2. **Uses Permitted.** This Special Exception allows impervious surface, not to exceed 10 percent (%) of the area of Major Floodplain located in the subject property (the “**SPEX Use**”) in accordance with Section 4-1506(F) of the Zoning Ordinance.
3. **Floodplain Overlay District.** The development of the SPEX Use shall be conducted in such a manner as to limit the disturbance in the Major Floodplain as depicted on Sheet 5 of 6 of the SPEX Plat with only passive and existing active recreational uses permitted within said floodplain. Any areas within the Major Floodplain that are disturbed during or subsequent to development shall be replanted at Applicant’s expense, subject to review and approval by the County.
4. **Floodplain Study/Floodplain Alteration.** The applicant will provide a floodplain study and if necessary, a floodplain alteration that shall be approved prior to site plan approval for the SPEX use.
5. **Archaeological Sensitive Sites.** Prior to the approval of the first site plan or construction plans and profiles for the SPEX Use, the Applicant shall conduct an additional Phase I archaeological survey in the area highlighted in orange hatching in Figure 1 and, if determined appropriate by staff, the Applicant shall conduct any recommended Phase II significance evaluation studies and Phase III data recovery excavations if significant archaeological resources are identified and cannot be avoided as further described below. As used herein, the term site plan includes any site plan amendment.

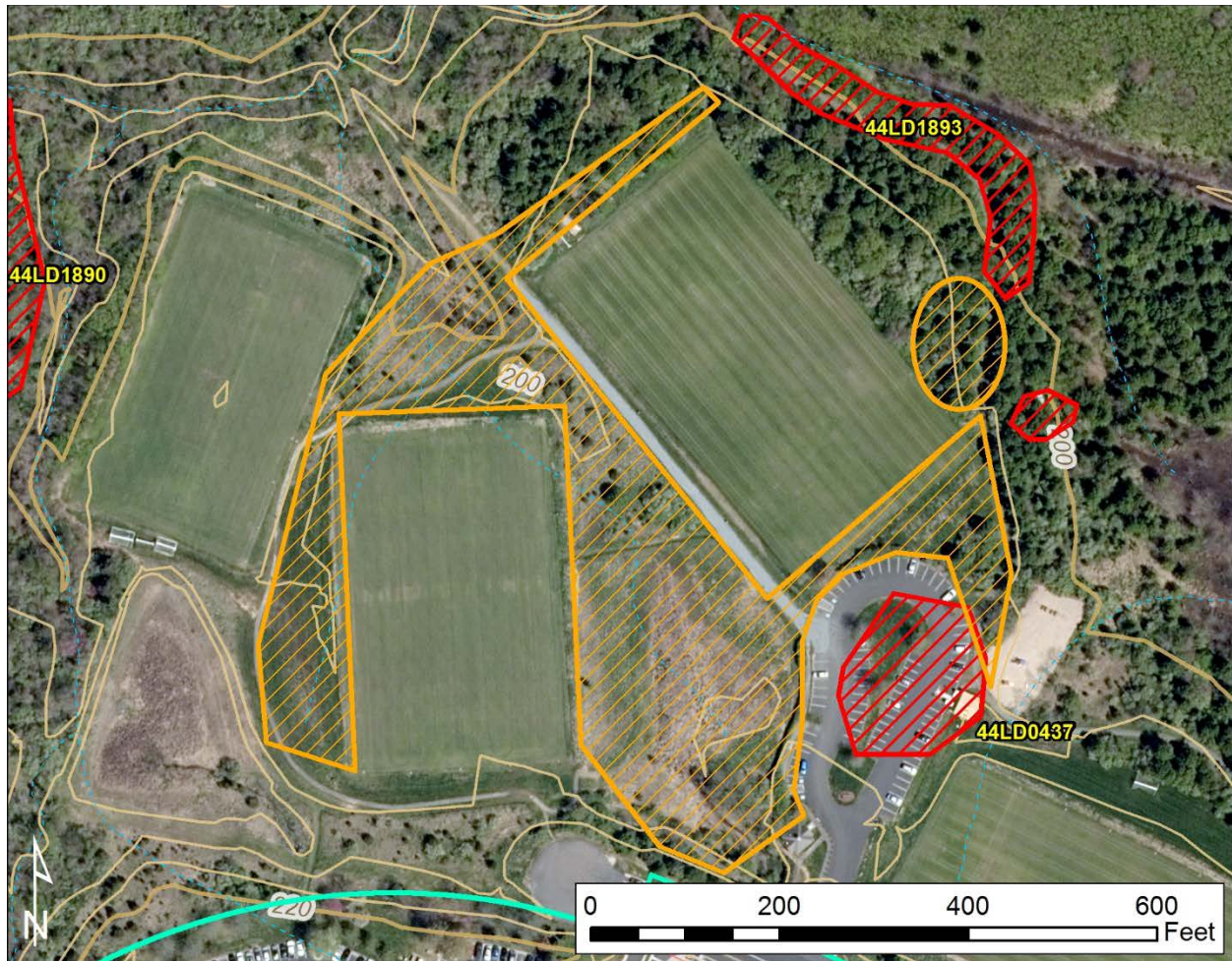


Figure 3: Map of Bles Park showing area (orange hatching) where additional Phase I archaeological survey is recommended.

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FINDINGS FOR APPROVAL
ZRTD-2019-0004, SPEX-2019-0037, SPEX-2019-0038,
SPEX-2019-0039
BLES PARK

1. The proposed amenities will provide additional recreational options for members of the surrounding communities.
2. The proposed paths will support patrons of the park and allow easier access to the entirety of the existing park.
3. The proposed Tree Conservation Areas and nutrient credits offset the impact of adding the proposed amenities to the existing park.
4. The majority of the property will be placed under conservation easement as part of this proposal, which should perpetually protect the wetlands and environmentally significant nature of this site.
5. PRCS faces significant challenges securing additional parks and trails to meet the service demands of the County's growing population. A lack of available land in eastern Loudoun, where the facilities are needed most, complicates the County's ability to provide the desired facilities. The improvements to Bles Park offset some of these challenges.

FINDINGS FOR DENIAL
ZRTD-2019-0004, SPEX-2019-0037, SPEX-2019-
0038, SPEX-2019-0039
BLES PARK

1. The application proposal is contrary to the Loudoun County 2019 General Plan (2019 GP) policies that call for the protection of natural, environmental, and heritage resources.
2. The proposed increase in impervious surface, structures and development at Bles Park will destroy habitats for rare and sensitive plant and animal species and species of greatest concern.
3. The application proposal puts exemplary natural communities and ecosystems at increased and unnecessary risk.
4. There are alternative solutions to locate appropriate amenities and additions outside of the flood plain and/or away from sensitive habitat areas so as to safeguard the natural resources, wildlife habitat, and environmental community benefits in Bles Park that exist nowhere else in the county, much less eastern Loudoun, and are irreplaceable for our residents.

BLES PARK

SPECIAL EXCEPTION (SPEX-2019-0037, SPEX-2019-0038 & SPEX-2019-0039) ZONING CONVERSION IN THE ROUTE 28 TAX DISTRICT (ZRTD-2019-0004)

OWNER

LOUDOUN COUNTY BOARD OF SUPERVISORS
1 HARRISON STREET, SE 5TH FLOOR
LEESBURG, VA 20177-7500
703-777-0204

APPLICANT

ROBERT BALINGER
LOUDOUN COUNTY DEPARTMENT OF
TRANSPORTATION AND CAPITAL INFRASTRUCTURE
101 BLUE SEAL DRIVE, SE, SUITE 102
PO BOX 7500
LEESBURG, VA 20177-7500
EMAIL: ROBERT.BALINGER@LOUDOUN.GOV

TRANSPORTATION

GOROVE/SLADE ASSOCIATES, INC.
3914 CENTREVILLE RD., SUITE 330
CHANTILLY, VA 20151
(703) 787-9595

ENGINEER / PLANNER

GORDON, INC.
4501 DALY DRIVE, SUITE 200
CHANTILLY, VA 20151
(703) 263-1900

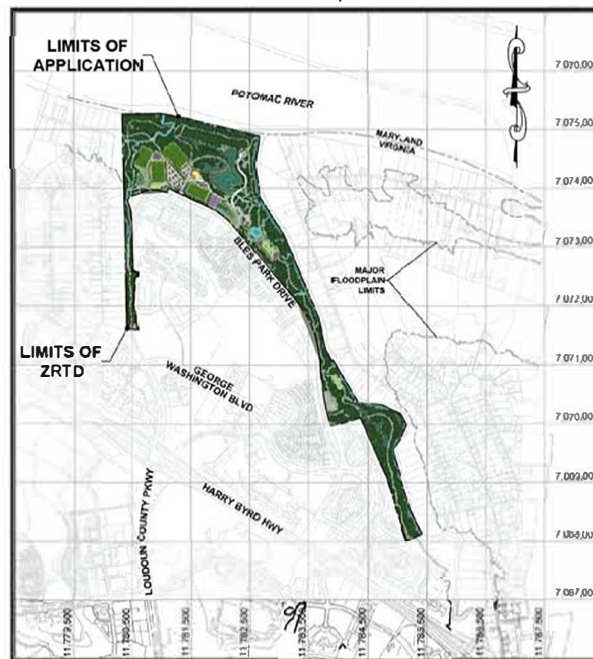
ENVIRONMENTAL

WETLAND STUDIES AND SOLUTIONS, INC.
5300 WELLINGTON BRANCH DRIVE, #100
GAINESVILLE, VIRGINIA 20155
(703) 679-5600

ALGONKIAN ELECTION DISTRICT LOUDOUN COUNTY, VIRGINIA

MCPI #: 038-26-8806 TAX MAP #: /63/E16/II/II/

AUGUST 30, 2019
SEPTEMBER 23, 2019
AUGUST 7, 2020
OCTOBER 30, 2020
DECEMBER 4, 2020
APRIL 9, 2021
AUGUST 13, 2021



VICINITY MAP
SCALE: 1" = 1,000'

SHEET INDEX

Sheet Number	Sheet Title
01	COVER SHEET
02	GENERAL NOTES
03	EXISTING CONDITIONS OVERALL
03A	TREE STAND EVALUATION OVERLAY
04	EXISTING CONDITIONS 1
05	EXISTING CONDITIONS 2
06	SPEX PLAT
07	SPEX 1
08	SPEX 2
09	CONCEPT DEVELOPMENT PLAN
10	ILLUSTRATIVE
11	PRECEDENT IMAGERY

BLES PARK

SPEX 2019 0037, SPEX 2019 0038, SPEX 2019 0039 & ZRTD 2019 0004
ALGONKIAN ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA



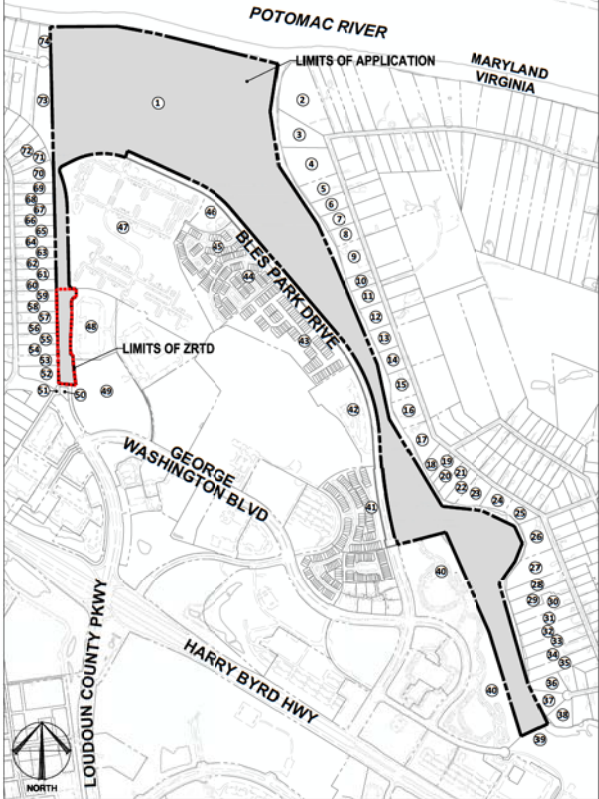
4501 Daly Drive
Chantilly, VA 20151
Phone: 703 263 1900

PROGRAMMING AND PLANNING
CIVIL ENGINEERING
LANDSCAPE ARCHITECTURE
SURVEY AND MAPPING
SECURITY CONSULTING

LIMITS OF SPEX = ±5,760,810 SF / 132.25 AC
LIMITS OF ZRTD = ±148,635 SF / 3.41 AC

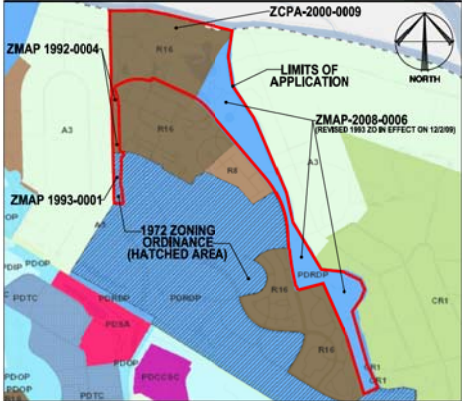
KEY MAP

SCALE: 1" = 400'



ZONING MAP

SCALE: NTS



PROPERTY INFORMATION

PROPERTY INFORMATION:

#	PIN	ADDRESS	OWNER	EXISTING LAND USE
1	03020004	44032 BLES PARK DR ARLINGTON VA 22204	LOUDOUN COUNTY BOARD OF SUPERVISORS	MISC IMPROVEMENTS

ADJACENT PARCEL INFORMATION

ADJACENT PARCELS WITHIN 100' OF PROPERTY:

#	PIN	ADDRESS	OWNER	EXISTING LAND USE
1	03020004	44032 BLES PARK DR ARLINGTON VA 22204	LOUDOUN COUNTY BOARD OF SUPERVISORS	MISC IMPROVEMENTS
2	03020001	18005 YOUNG CLIFF RD STERLING VA 20165	POOLEY JACK & JULIE	SINGLE FAMILY
3	03020002	4055 SHADOWN RD FARMER VA 20153-2001	BOOMER JAMES H & MARGARET L	UNCERTAIN LAND
4	03020003	45454 FELLOWS ST STERLING VA 20165	COOMBS ALBERT H & MONICA	UNCERTAIN LAND
5	03020009	18790 YOUNG CLIFF RD STERLING VA 20165	BOYD WALLY ELLYN	MISC IMPROVEMENTS
6	03021772	18748 YOUNG CLIFF RD STERLING VA 20165	HANABICK CORIANNE	UNCERTAIN LAND
7	03021406	20058 BROAD RUN DR STERLING VA 20165	DCB ONE LLC	UNCERTAIN LAND
8	03021407	18608 YOUNG CLIFF RD STERLING VA 20165	NEARY MICHAEL J	UNCERTAIN LAND
9	03021407	1204 N JOHNSON RD STERLING VA 20165	PRINTER JOHN & PRINTER ALICE	UNCERTAIN LAND
10	03021409	1907 FORMAL RD MC LEAN VA 22101-5549	CULMER SUZANNE TRUSTEE C/O S CULMER REV LIVING TRUST	SINGLE FAMILY
11	03021507	303 N 40TH ST STERLING VA 20164	STERLING TRADING LLC	UNCERTAIN LAND
12	03021638	19608 YOUNG CLIFF RD STERLING VA 20165-2577	PLANTE JONATHAN JACOB	UNCERTAIN LAND
13	03021728	43990 URBANCREST CT ARLINGTON VA 22204-3620	MOFFAT AREEN N	MISC IMPROVEMENTS
14	03021805	1202 PETER PL MC LEAN VA 22101-2153	MARGENAU CARL AUGUST	SINGLE FAMILY
15	03021806	19604 BROAD RUN DR STERLING VA 20165-2502	STEIGER RAMON WOLFGANG	SINGLE FAMILY
16	03021803	40308 TOWN LN STERLING VA 20165-2502	BRAYAN DOUGLAS MERCEDES	UNCERTAIN LAND
17	03021810	20045 BROAD RUN DR STERLING VA 20165-2505	WACHNER WILLIAM RICHARD JR	MISC IMPROVEMENTS
18	03021812	40304 CHATTEE STONE PINE HAMILTON VA 20165-3518	MEADOWS ANTHONY J & MELBA	UNCERTAIN LAND
19	03021809	30068 BROAD RUN DR STERLING VA 20165-2503	BROAD RUN FARMS CIVIC ASSOCIATION INC C/O MONTI D FEARNOW	UNCERTAIN LAND
20	03021810	30227 HARKEN CRT TAPPAH VA 20176-5089	KOONTZ RUTH A & JOHN WINGSTON ET AL C/O DEBORAH ANN MILLIKEN GRAYS	UNCERTAIN LAND
21	03021810	1704 CACOGNATE DR LEEBURG VA 20176-7054	ELMER MCNEIL	UNCERTAIN LAND
22	03021808	13194 FOX HUNT LN HENDON VA 20171-5354	KALVALA RAMESH ET AL	UNCERTAIN LAND
23	03021812	20121 YOUNG CLIFF RD STERLING VA 20165	HANNAH HANDED E & SAMAKHOGHACHADIAN	SINGLE FAMILY
24	03021812	20148 YOUNG CLIFF RD STERLING VA 20165	JACKSON CHARLES E	UNCERTAIN LAND
25	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
26	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
27	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
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42	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
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57	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
58	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
59	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
60	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
61	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
62	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
63	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
64	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
65	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
66	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
67	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
68	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
69	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
70	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
71	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
72	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
73	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY
74	03021812	20149 YOUNG CLIFF RD STERLING VA 20165	LANCOK CHARLES E	SINGLE FAMILY

NOTE: PARCEL INFORMATION OBTAINED FROM LOUDOUN COUNTY G.I.S. DATA ON SEPTEMBER 4, 2019.

FLOODPLAIN TABULATIONS

FLOODPLAIN TABULATION WITHIN SPEX AREA			
STRUCTURES WITHIN FLOOD (SEC. 4-1504(E))	ACREAGE	SQUARE FOOTAGE	
MAJOR FLOODPLAIN	108	4,704,480	
WITHIN SPEX AREA			
INCIDENTAL STRUCTURES	0.02	840	
(+ 840 SF PERMITTED)			
EXISTING INCIDENTAL			
STRUCTURES SF	0.19	8,100	
PROPOSED INCIDENTAL			
STRUCTURES SF	0.71	30,725	
SPECIAL EXCEPTION REQUEST			
FOR MAXIMUM SQUARE			
FOOTAGE OF EXISTING AND			
PROPOSED INCIDENTAL			
STRUCTURES WITHIN FLOOD	0.80	38,825	

FLOODPLAIN TABULATION WITHIN SPEX AREA			
STRUCTURES WITHIN FLOOD (SEC. 4-1504(F))	ACREAGE	SQUARE FOOTAGE	PERCENTAGE OF FLOOD
MAJOR FLOODPLAIN	108	4,704,480	-
WITHIN SPEX AREA			
3% PERMITTED IMPERVIOUS	3.24	141,134.40	3.00%
EXISTING IMPERVIOUS AREA	0.23	10,200.00	0.22%
PROPOSED IMPERVIOUS AREA	0.75	293,825.00	0.25%
SPECIAL EXCEPTION REQUEST			
FOR MAXIMUM SQUARE			
FOOTAGE OF EXISTING AND			
PROPOSED IMPERVIOUS	0.98	304,025.00	0.46%

SPEX NARRATIVE

THE PURPOSE OF THIS APPLICATION IS SHOW THE MASTER PLAN FOR BLES PARK AND TO DEMONSTRATE HOW THE PROPOSED CHANGES AFFECTS THE MAJOR FLOODPLAIN.

THIS SPECIAL EXCEPTION APPLICATION IS TO ADDRESS ZCOR-2015-0021 WHICH STATED PER SECTION 1-103(F)(2), AN EXPANSION OF AN EXISTING SPEX APPROVAL REQUIRES A NEW SPEX.

IN ADDITION, THE PROPOSED MASTER PLAN FOR THE PARK WILL REQUIRE SPEX REQUESTS TO ACCOUNT FOR THE FOLLOWING:

- SECTION 4-1506 (E) FOR INCIDENTAL STRUCTURES GREATER THAN 840 SF WITHIN THE MAJOR FLOODPLAIN.
- SECTION 4-1506 (F) FOR INCREASE OF IMPERVIOUS AREA GREATER THAN 3% BUT NO MORE THAN 10% AND WHEN PASSIVE AND/OR RECREATION USES CAUSE THE BOUNDARY OF MAJOR FLOODPLAIN TO CHANGE AND/OR THAT CAUSE AN INCREASE IN BASE FLOOD ELEVATION.

THERE IS APPROXIMATELY 108 AC OF MAJOR FLOODPLAIN WITHIN THE SUBJECT PROPERTY AND THIS APPLICATION SEEKS THE ABILITY TO ALLOW FOR A POTENTIAL OF 0.46% IMPERVIOUSNESS AND UP TO 38,825 SF OF INCIDENTAL STRUCTURES WITHIN THE MAJOR FLOODPLAIN.

GENERAL NOTES

THE SUBJECT PROPERTY FOR THE LIMITS OF THE SPEX IS SHOWN HEREON IS IDENTIFIED ON LOUDOUN COUNTY TAX MAP NO. 431616/01A AND P/N 038-26-8008. THE SUBJECT PROPERTY IS LOCATED IN THE ROUTE 28 TAX DISTRICT.

- THE SUBJECT PROPERTY IS CURRENTLY SPLIT-ZONED PD-RDP UNDER THE 1972 LOUDOUN COUNTY ZONING ORDINANCE AND REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE (ZONING ORDINANCE) AND R-16 UNDER THE REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE.
- THE PROPERTY CONSISTS OF 132.24 ACRES.
- THE TOPOGRAPHIC SURVEY WAS PERFORMED IN DECEMBER 2018, BY QUANTUM SPATIAL USING PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 12/06/2018.
- HORIZONTAL DATUM IS REFERENCED TO THE VIRGINIA COORDINATE SYSTEM, NORTH ZONE (NAD83).
- VERTICAL DATUM IS REFERENCED TO NAVD 1988
- BOUNDARY INFORMATION IS FROM A FIELD RUN BOUNDARY SURVEY BY GORDON DATED NOVEMBER OF 2018
- WATERS OF THE U.S. AND WETLAND DELINEATION HAS BEEN PERFORMED BY WSDI DATED 12/21/18.
- THERE IS FLOODPLAIN ON THE PROPERTY THAT IS THE SUBJECT OF THIS APPLICATION. THE CURRENT FLOOD INSURANCE RATE MAP (FIRM) OF LOUDOUN COUNTY COMMUNITY PANEL NUMBERS FOR THE PROPERTY THAT IS THE SUBJECT OF THIS APPLICATION ARE 511070205SE, 511070206SE AND 511070206EE, EFFECTIVE FEBRUARY 17, 2017. THE DEPICTED BOUNDARY OF THE EXISTING FLOODPLAIN IS BASED ON THE FIRM.
- TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY GRAVE, OBJECT OR STRUCTURE MARKING A PLACE OF BURIAL ON THIS PROPERTY.
- TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY HISTORIC SITES ON THIS PROPERTY.
- TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY ENDANGERED SPECIES HABITAT ON THIS PROPERTY.
- TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY HAZARDOUS OR TOXIC SUBSTANCE ON THIS PROPERTY.
- TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO ADDITIONAL FEDERAL & STATE REGULATIONS SUBJECT TO THIS PROPERTY.
- ALL LAND, ON OR OFF SITE, WHICH IS DISTURBED BY THIS DEVELOPMENT, AND WHICH IS NOT BUILT UP OR SURFACED, SHALL BE ADEQUATELY STABILIZED TO CONTROL EROSION AND SEDIMENTATION.
- THE CLIENT, CONTRACTOR, AND/OR SURVEYOR SHALL BE RESPONSIBLE FOR NOTIFYING GORDON OF ANY CONDITIONS FOUND IN THE FIELD THAT VARY FROM WHAT IS SHOWN ON THE PLANS. OBSERVATIONS REGARDING APPARENT INCONSISTENCIES IN THE PLANS SHALL BE BROUGHT TO GORDON'S ATTENTION FOR VERIFICATION PRIOR TO SIGNATURE.
- ALL HANDICAPPED PARKING SPACES SHALL CONFORM WITH THE REQUIREMENTS OF THE AMERICANS WITH DISABILITIES ACT (ADA - CURRENT VERSION). ALL TRAILS/DEWALKS SHALL COMPLY WITH ADA REQUIREMENTS.
- ADJACENT BOUNDARY INFORMATION SHOWN OBTAINED FROM LOUDOUN COUNTY G.I.S. DATA.
- ADJACENT PROPERTY OWNER INFORMATION OBTAINED FROM THE LOUDOUN COUNTY REAL ESTATE TAX, ASSESSMENT & PARCEL DATABASE.
- TREE COVER INFORMATION SHOWN OBTAINED FROM LOUDOUN COUNTY G.I.S. DATA.
- WELLS, DRAINFILLS AND POLLUTION SOURCE INFORMATION SHOWN OBTAINED FROM LOUDOUN COUNTY G.I.S. DATA.
- ANY MINOR CHANGES AND/OR REVISIONS TO THE SPEX PLAN ARE PERMITTED PURSUANT TO THE REGULATIONS OF 6-1313 AND 6-1314.
- PREVIOUSLY APPROVED APPLICATION ASSOCIATED WITH THIS PROPERTY INCLUDES:
ZMAP-1992-0004 APPROVED 01/06/93
ZMAP-1992-0009 APPROVED 01/06/93
STPL-1998-0075 APPROVED 09/23/00
ZCPA-2000-0009 APPROVED 12/02/02
ZMAP-2008-0006 APPROVED 12/02/08
- PARKING TO BE PROVIDED PURSUANT TO SECTION 5-1100 OF THE LOUDOUN COUNTY ZONING ORDINANCE AND WILL BE PROVIDED AT SITE PLAN.
- DEVELOPMENT OF THE PROPERTY SHALL BE IN SUBSTANTIAL CONFORMANCE WITH THIS SPECIAL EXCEPTION PLAT (SHEETS 6-8). LAYOUT AND CONFIGURATION OF THE PROPERTY IS SUBJECT TO FINAL ENGINEERING DESIGN AND TO MEET LOUDOUN COUNTY ZONING, AND LAND DEVELOPMENT REGULATIONS.
- THE BUFFERING AND SCREENING AND PARKING LOT LANDSCAPING REQUIRED PURSUANT TO SECTION 5-1400 WILL BE PROVIDED AT SITE PLAN.
- A WAIVER HAS BEEN GRANTED FOR THE FOLLOWING CHECKLIST ITEMS: J. TREE SURVEY, K. ARCHAEOLOGICAL SURVEY AND L. ENVIRONMENTAL FEATURES.
- MODERATELY STEEP AND VERY STEEP SLOPES SHOWN IS OBTAINED FROM LOUDOUN COUNTY G.I.S. DATA.
- A TREE STAND EVALUATION HAS BEEN PREPARED BY WSDI DATED 05/28/20 (SEE SHEET 3A)
- THE NATURAL SURFACE TRAILS WILL FOLLOW THE EXISTING CONTOURS, WILL NOT TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 50 PER CENT, AND THE TRAIL ALIGNMENT WILL BE DEFINED BASED ON A SLOPE ANALYSIS TO COMPLY WITH THE STEEP SLOPE STANDARDS AT THE TIME OF SITE PLAN.
- THERE WILL BE NO BULK STORAGE OF FUELS, FERTILIZER OR CHEMICALS WITHIN THE MAINTENANCE FACILITY.

FLOODPLAIN NARRATIVE

DEVELOPMENT IS PROPOSED ON THE PROPERTY WITHIN THE MAJOR FLOODPLAIN. THE DEVELOPMENT APPROACH AND FLOODPLAIN IMPACTS WERE DISCUSSED WITH THE LOUDOUN COUNTY FLOODPLAIN ADMINISTRATOR IN JUNE 2019.

THE MAJOR FLOODPLAIN IS IN A BACKWATER CONDITION FROM THE POTOMAC RIVER ON THE SUBJECT PROPERTY. THE EXISTING FLOODPLAIN BOUNDARY IS MAPPED ON THE SITE PLAN. THE FEMA FIRM BASE FLOOD ELEVATIONS THE ACTUAL DELINEATION OF THE FLOODPLAIN MAY VARY WITH THE IMPLEMENTATION OF EACH PHASE OF DEVELOPMENT AND IS SUBJECT TO FINAL ENGINEERING DESIGN. THE DEVELOPMENT SHALL BE COORDINATED WITH THE FLOODPLAIN ADMINISTRATOR AT THE TIME OF FINAL SITE PLAN.

IT IS THE OPINION OF GORDON THAT THE PROPOSED CHANGES WITHIN THE MAJOR FLOODPLAIN WILL NOT IMPACT THE CONFIGURATION OF THE NATURAL ACTIVE CHANNEL OR BASE FLOOD ELEVATION. THE MODEST INCREASE IN IMPERVIOUSNESS AND AMOUNT OF INCIDENTAL STRUCTURES AND MINOR GRADING WITHIN THE MAJOR FLOODPLAIN IS SMALL COMPARED TO THE OVERALL SIZE OF THE POTOMAC RIVER WATERSHED AND FLOODPLAIN AREA. A MAJOR FLOODPLAIN ALTERATION WILL BE PROCESSED WITH LOUDOUN COUNTY. IF APPROVED AS A CONDITION OF SITE PLAN APPROVAL, IF THERE IS NO CHANGE TO THE BASE FLOODPLAIN ELEVATION, THEN A COLOR SUBMISSION TO FEMA IS NOT ANTICIPATED. A LOMR SUBMISSION TO FEMA WILL BE PROCESSED WITH THE DEVELOPMENT AS-BUILT CONDITION SHOULD THE FLOODPLAIN BOUNDARY OR BASE FLOOD ELEVATION CHANGE.

REGULATORY AND PLANNING
CONSULTING
4501 Dally Drive
Chantilly, VA 20151
SALES AND MARKETING
Phone: 703-263-1900
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Gordon

REVISIONS

DATE	DESCRIPTION
1. 10/07/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS
2. 08/07/2020	REVISED PER COUNTY COMMENTS
3. 10/07/2020	REVISED PER COUNTY COMMENTS
4. 12/04/2020	REVISED PER COUNTY COMMENTS
5. 01/07/2021	REVISED PER COUNTY COMMENTS
6. 03/07/2021	REVISED PER COUNTY COMMENTS
7. 05/07/2021	REVISED PER COUNTY COMMENTS
8. 07/07/2021	REVISED PER COUNTY COMMENTS
9. 09/07/2021	REVISED PER COUNTY COMMENTS
10. 11/07/2021	REVISED PER COUNTY COMMENTS
11. 01/07/2022	REVISED PER COUNTY COMMENTS
12. 03/07/2022	REVISED PER COUNTY COMMENTS

SUR: K. LINE
DES: J. LINE
CHK: C. THOMPSON
DATE: 03/07/2022

SEAL:

GENERAL NOTES

BLES PARK

SPEX

ALGONKIAN ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA

SCALE: HORIZ: AS NOTED
VERT: 1/2"

DATE: 03/07/2022

JOB: 1164-1001

PRO: SPEX & ZRTD

CADD: 1164-1001-C-03-002 (DWG)

NCS: 1164-1001-C-03-002

NUMBER: 02 OF 11

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SYMBOL	SOIL TYPE	SLOPE	POTENTIAL FOR GENERAL DEVELOPMENT	HYDROLOGIC GROUP
5A	ROWLAND SILT LOAM	0-3%	IV F - VERY POOR POTENTIAL; SUBJECT TO FLOODING	C
6A	DOWMANVILLE SILT LOAM	0-3%	IV F - VERY POOR POTENTIAL; SUBJECT TO FLOODING	C
7A	HUNTINGTON SILT LOAM	0-3%	IV F - VERY POOR POTENTIAL; SUBJECT TO FLOODING	A
8A	LINDSIDE SILT LOAM	0-3%	IV F - VERY POOR POTENTIAL; SUBJECT TO FLOODING	C
14B	MANASSAS SILT LOAM	1-8%	II W - FAIR POTENTIAL; LOW BEARING CAPACITY & SHORT DURATION FLOODED WATER TABLES	B
60C	CATLETT-ROCK OUTCROP COMPLEX	25-45%	IV RS - VERY POOR POTENTIAL; SHALLOW TO ROCK AND STEEP SLOPES	D
62B	KELLY-SYCOON COMPLEX	3-8%	II WP - POOR POTENTIAL; HIGH SHRINK-SWELL CLAYS AND MODERATE DURATION FLOODED WATER TABLE	D/C
64C	LEGORE LOAM	8-15%	II R - FAIR POTENTIAL; ROCK OUTCROPS	B
64D	GAHILL GRVELLY SILT LOAM, VERY STONY	15-25%	II RS - POOR POTENTIAL; ROCK OUTCROPS AND STEEP SLOPES	C
66A	WAKPOOL SILT LOAM	0-3%	IV FW - VERY POOR POTENTIAL; HIGH SHRINK-SWELL CLAYS AND PROLONGED FLOODED WATER TABLE	D
67B	HAYMARKET AND JACKLAND SOILS	3-8%	IV P - VERY POOR POTENTIAL; HIGH SHRINK-SWELL CLAYS AND SEASONAL FLOODED WATER TABLE	D
68B	HAYMARKET AND JACKLAND SOILS, VERY STONY	3-8%	IV P - VERY POOR POTENTIAL; WETNESS AND HIGH SHRINK-SWELL CLAYS	D
68C	HAYMARKET AND JACKLAND SOILS, VERY STONY	8-15%	IV P - VERY POOR POTENTIAL; WETNESS AND HIGH SHRINK-SWELL CLAYS	D
69A	ELBERT SILTY CLAY LOAM	0-3%	IV FW - VERY POOR POTENTIAL; WETNESS AND HIGH SHRINK-SWELL CLAYS	D
78A	DULLES SILT LOAM	0-3%	IV W - VERY POOR POTENTIAL; LOW SOIL STRENGTH AND PROLONGED FLOODED WATER TABLE	C
93B	HEBLER SILT LOAM	0-5%	IV FW - FAIR POTENTIAL; HIGH SEASONAL WATER TABLE, FLOODING	B
99A	KINKORA-DELANCO COMPLEX	0-3%	IV FW - VERY POOR POTENTIAL; PROLONGED WATER TABLE AND HIGH SHRINK-SWELL CLAYS	D/C

SOURCE: LOUDOUN COUNTY SOILS MAPS
 THIS SITE DOES CONTAIN CLASS II AND IV SOILS PER THE LATEST COUNTY SOILS MAP AND AS IDENTIFIED BY THE INTERPRETATIVE GUIDE TO SOILS MAPS, LOUDOUN COUNTY, VIRGINIA.

LEGEND

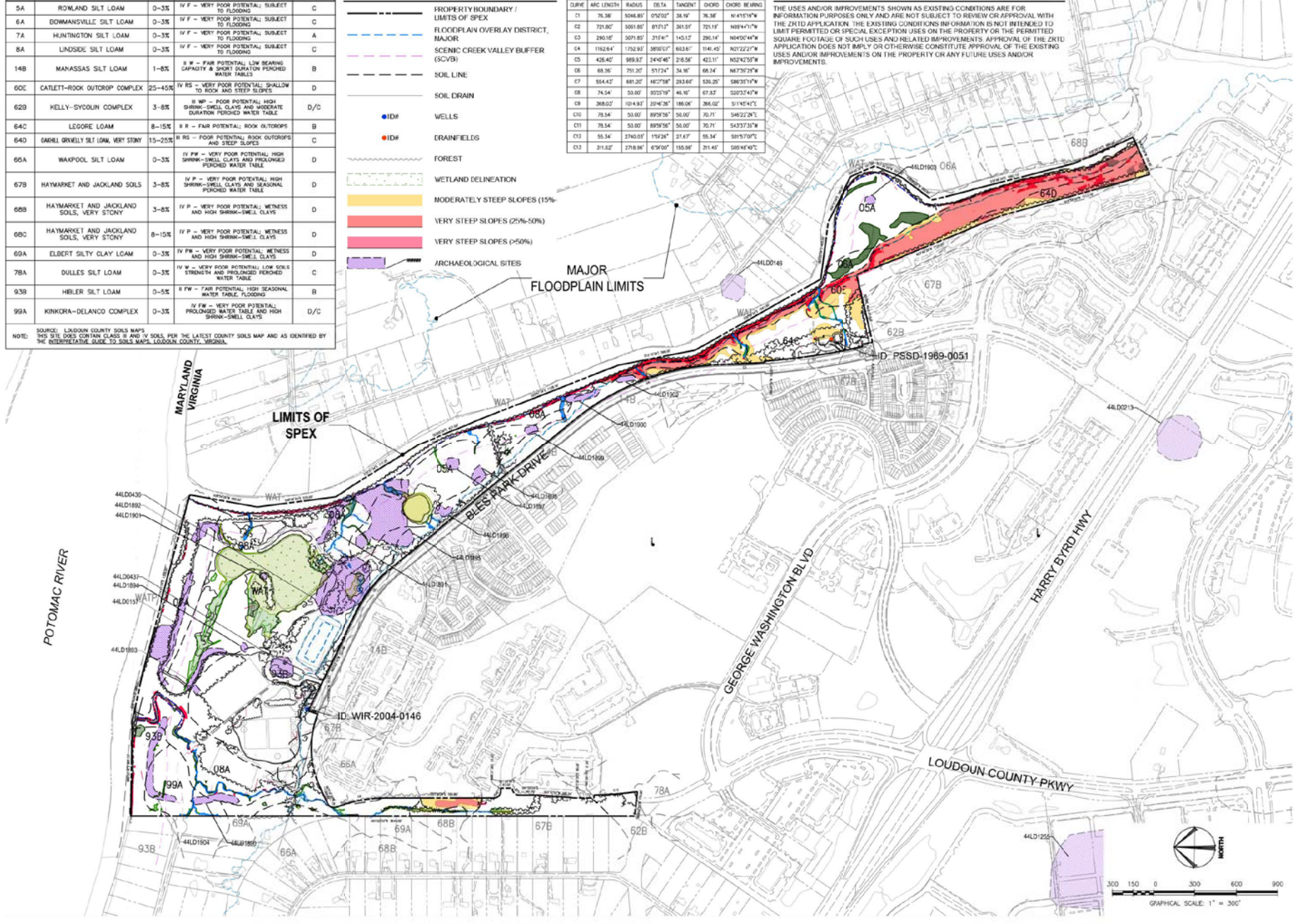
- PROPERTY BOUNDARY / LIMITS OF SPEX
- FLOODPLAIN OVERLAY DISTRICT, MAJOR
- SCENIC CREEK VALLEY BUFFER (SCVB)
- SOIL LINE
- SOIL DRAIN
- WELLS
- DRAINFIELDS
- FOREST
- WETLAND DELINEATION
- MODERATELY STEEP SLOPES (15%)
- VERY STEEP SLOPES (25%-50%)
- VERY STEEP SLOPES (>50%)
- ARCHAEOLOGICAL SITES

CURVE TABLE

CURVE	ARC LENGTH	RADIUS	DELTA	TANGENT	CHORD	CHORD BEARING
C1	76.38'	5046.85'	0°02'00"	38.19'	76.38'	N 4°01'11"W
C2	721.80'	3081.89'	8°15'17"	381.51'	721.19'	N 89°41'11"W
C3	290.38'	3091.89'	2°16'47"	145.12'	288.14'	N 84°52'44"W
C4	1192.64'	1792.85'	38°00'00"	603.91'	1191.40'	N 02°02'27"W
C5	426.40'	889.87'	24°04'48"	216.58'	423.11'	N 62°02'33"W
C6	68.35'	751.37'	5°12'34"	34.90'	68.34'	N 87°39'29"W
C7	584.43'	681.30'	46°27'58"	293.69'	536.28'	N 80°33'17"W
C8	74.34'	50.00'	90°00'00"	46.18'	67.83'	S 03°03'47"W
C9	388.02'	1014.93'	10°42'30"	186.08'	386.02'	S 1°16'41"E
C10	75.54'	50.00'	89°59'56"	50.00'	70.71'	S 89°22'28"E
C11	75.54'	50.00'	89°59'56"	50.00'	70.71'	S 89°37'33"W
C12	55.34'	2740.03'	1°19'24"	27.47'	55.34'	S 81°57'00"E
C13	311.82'	2718.96'	6°50'00"	155.96'	311.45'	S 88°46'40"E

EXISTING CONDITIONS NOTE

THE USES AND/OR IMPROVEMENTS SHOWN AS EXISTING CONDITIONS ARE FOR INFORMATION PURPOSES ONLY AND ARE NOT SUBJECT TO REVIEW OR APPROVAL WITH THE ZONING APPLICATION. THE EXISTING CONDITIONS INFORMATION IS NOT INTENDED TO LIMIT PERMITTED OR SPECIAL EXCEPTION USES ON THE PROPERTY OR THE PERMITTED SQUARE FOOTAGE OF SUCH USES AND RELATED IMPROVEMENTS. APPROVAL OF THE ZONING APPLICATION DOES NOT IMPLY OR OTHERWISE CONSTITUTE APPROVAL OF THE EXISTING USES AND/OR IMPROVEMENTS ON THE PROPERTY OR ANY FUTURE USES AND/OR IMPROVEMENTS.



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REVISION	DATE	DESCRIPTION
1. 10/07/2019	REVISED PER CHECKOUT COMPLIANCE COMMENTS	
2. 08/07/2020	REVISED PER COUNTY COMMENTS	
3. 10/26/2020	RE-CALC PLANS	
4. 12/04/2020	RE-CALC PLANS	
5. 04/09/2021	REVISED PER COUNTY COMMENTS	
6. 08/13/2021	REVISED PER PLANNING COMMISSION COMMENTS	

SUR:	DESIGN
SURVEY BY:	K.C. CLINE
DRW:	CHK:
K.C. CLINE	C. STEPHENSON

EXISTING CONDITIONS OVERALL
BLES PARK SPEX
 ALLEGIAN ELECTRONIC DISTRICT
 LOUDOUN COUNTY, VIRGINIA

HORIZ:	1" = 300'
SCALE:	VERT: N/A
DATE:	AUGUST 2020
PLAN:	3164-1001
JOB:	SPEX & ZPD
CADD:	3164-1001-C-WP-101.DWG
NCS:	3164-1001-C-KP-101
NUMBER:	03 OF 11

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LEGEND

- PROPERTY BOUNDARY / LIMITS OF SPEC
- FLOODPLAIN OVERLAY DISTRICT, MAJOR
- SCENIC CREEK VALLEY BUFFER (SCVB)
- SOIL LINE
- SOIL DRAIN
- WELLS
- DRAINFIELDS
- FOREST
- WETLAND DELINEATION

LEGEND

- TREE STAND BOUNDARY (WITH FOREST STAND TYPE)
- APPROXIMATE LOCATION OF SPECIMEN TREE



EXISTING CONDITIONS NOTE

THE USES AND/OR IMPROVEMENTS SHOWN AS EXISTING CONDITIONS ARE FOR INFORMATION PURPOSES ONLY AND ARE NOT SUBJECT TO REVIEW OR APPROVAL WITH THE ZTRD APPLICATION. THE EXISTING CONDITIONS INFORMATION IS NOT INTENDED TO LIMIT PERMITTED OR SPECIAL EXCEPTION USES ON THE PROPERTY OR THE PERMITTED SQUARE FOOTAGE OF SUCH USES AND RELATED IMPROVEMENTS. APPROVAL OF THE ZTRD APPLICATION DOES NOT IMPLY OR OTHERWISE CONSTITUTE APPROVAL OF THE EXISTING USES AND/OR IMPROVEMENTS ON THE PROPERTY OR ANY FUTURE USES AND/OR IMPROVEMENTS.

MAJOR FLOODPLAIN LIMITS

Existing Forest Narrative

- Wetland Studies and Solutions, Inc. (WSS) conducted a forest stand evaluation for the Bles Park study area project. The field work was conducted by Jennifer M. Fanta, PWS, Jenelle Bernsey, WHIT, and David Means, ASLA, ISA Certified Arborist #8-0119 on May 11 and 12, 2020.
- The following were used as the basis for this plan:
 - 2018 natural color aerial imagery and soils information provided by Loudoun County CMAA Digital Data
 - Boundary and topographic information was provided by Loudoun County Digital Data
- Four forest stand types are present within the site. The stand types and other wooded areas are as follows:
 - A. Eastern Red Cedar** - overstocked, even-aged stand with a mean dbh of 6 inches and an approximate basal area of 126 ft²/acre. Eastern red cedar was the dominant species. Additional species included autumn olive (*Elaeagnus umbellata*), Bradford pear (*Pyrus californica*), and black locust (*Robinia pseudoacacia*). This stand had a thick herbaceous understory that included Japanese stiltgrass (*Microstegium vimineum*), Kentucky blue grass (*Poa pratensis*), and mulberry rose (*Rosa multiflora*). The following invasive species were observed within this stand type: autumn olive in medium-high density, Japanese stiltgrass in high density, garlic mustard (*Alliaria petiolata*) in low density, and Bradford pear in medium density. Invasive species did not affect regeneration of native woody species. Some areas of this stand type were non-forested agricultural use prior to the mid-1950s, while other areas remained forested since the mid-1950s, which then was cleared in the 1970s. Natural reforestation and succession followed. Harvesting history is unknown.
 - B. Boxelder / Green Ash** - fully stocked, even-aged stand with a mean dbh of 12" and an approximate basal area of 135 ft²/acre. Box elder (*Acer negundo*) was the dominant species and green ash (*Fraxinus pennsylvanica*) was a codominant species. Other species noted in this stand include autumn olive and maple species. Dominant herbaceous species include Japanese stiltgrass and garlic mustard. The following invasive species were observed within this stand type: autumn olive in medium-high density, garlic mustard in low density, Japanese honeysuckle (*Lonicera japonica*) in low density, and Japanese stiltgrass in high density. Invasive species did not affect regeneration of native woody species. Most areas of this stand type were non-forested agricultural use prior to the mid-1950s. Natural reforestation and succession followed. Harvesting history is unknown.
 - C. Mixed Hardwood** - fully stocked, even-aged stand with an approximate basal area of 111 ft²/acre and average stand dbh of 16 inches. White oak (*Quercus alba*) was the dominant species. Other species noted in this stand include northern red oak (*Quercus rubra*), pin oak (*Quercus palustris*), paper birch (*Betula papyrifera*), black cherry (*Pyrus amara*), sassafras (*Sassafras albidum*), American holly (*Ilex opaca*), white pine (*Pinus strobus*), pawpaw (*Asimina triloba*), southern arrowwood (*Viburnum dentatum*), slippery elm (*Ulmus glabra*), and redbud (*Carpinus caroliniana*). This stand had a sparse herbaceous understory that included Japanese stiltgrass and cowberry (*Symphoricarpos alba*). The following invasive species were observed within this stand type: Japanese honeysuckle in medium-high density, Japanese stiltgrass in medium-high density, and Japanese stiltgrass in medium-high density. Invasive species did not affect regeneration of native woody species. Most areas of this stand type along Broad Run have been relatively intact since the mid-1950s, then portions along the eastern edge of the site were cleared in the early 1990s. Natural reforestation and succession followed. Harvesting history is unknown.
 - D. Bottomland Hardwood** - overstocked, even-aged stand with an approximate basal area of 130 ft²/acre and average stand dbh of 23 inches. Sycamore (*Platanus occidentalis*) was the dominant species and silver maple (*Acer saccharinum*) was a codominant species. Other species noted include persimmon, river birch (*Betula nigra*), and hackberry (*Celtis occidentalis*). Dominant herbaceous species include Japanese stiltgrass, garlic mustard, and Virginia wildrice (*Elymus virginicus*). The following invasive species were observed within this stand type: Japanese stiltgrass in medium-high density and garlic mustard in low density. Invasive species did not affect regeneration of native woody species. Most areas of this stand type along the Potomac River have been relatively intact since the mid-1950s. Natural reforestation and succession followed. Harvesting history is unknown.

New Forest Recommendations

Utility Easement

A maintained right-of-way for utilities is located within the south-central and southernmost portions of the site.

Soccer Fields

The soccer fields with parking lots which comprise a moderate portion of the site are located in the central portion of the site.

Maintained Trails

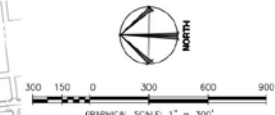
There are several gravel walking trails located throughout the site.

Old Field

A small portion in the southwestern portion of the site consists of an abandoned field.

Buildings

There are several buildings located on the site, including an adult day center and public restrooms located in the southeastern and south central portions of the site, respectively.



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Phone: 703.263.1900
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REVISION	NUMBER	DATE	DESCRIPTION
1. 12/07/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS		
2. 05/07/2020	REVISED PER COUNTY COMMENTS		
3. 03/20/2020	REVISED PER COUNTY COMMENTS		
4. 03/20/2020	REVISED PER COUNTY COMMENTS		
5. 03/20/2020	REVISED PER COUNTY COMMENTS		
6. 03/20/2020	REVISED PER COUNTY COMMENTS		

SUB	DES
SURVEY BY	K. CLINE
DRW	CHL
K. CLINE	C. STEPHENSON

SCALE

TREE STAND EVALUATION OVERLAY

BLES PARK

SPEX

ALBORGAN ELECTION DISTRICT
LOUDBON COUNTY, VIRGINIA

HORIZ	1" = 300'
SCALE	1/8" = 1'
DATE	AUGUST 2020
PLAN	3164-1001
JOB	SPEX & ZTRD
CADD	3164-1001-C-01-101.DWG
NCS	3164-1001-C-01-101
NUMBER	03A of 11

Gordon

KEY MAP

SHEET 05

SHEET 04

LIMITS OF APPLICATION

44LD0436
44LD1892
44LD1901

44LD0437
44LD1894
44LD0157

44LD1893

LIMITS OF SPEX

ID: WIR-2004-0146

LEGEND

- PROPERTY BOUNDARY / LIMITS OF SPEX
- FLOODPLAIN OVERLAY DISTRICT, MAJOR
- SCENIC CREEK VALLEY BUFFER (SCVB)
- WELLS
- DRAINFIELDS
- FOREST
- WETLAND DELINEATION
- MODERATELY STEEP SLOPES (15%-25%)
- VERY STEEP SLOPES (25%-50%)
- VERY STEEP SLOPES (>50%)
- ARCHAEOLOGICAL SITES
- SEE ADJACENT PARCEL INFORMATION TABLE ON SHEET 02

CURVE TABLE

CURVE	ARC LENGTH	RADIUS	DELTA	TANGENT	CHORD	CHORD BEARING
C1	78.35	5048.85	0°52'02"	38.13	78.35	N04°51'51"W
C2	721.80	5081.85	8°10'02"	381.51	721.15	N09°04'11"W
C3	290.18	5071.85	3°16'44"	145.13	290.14	N04°05'44"W
C4	1163.64	1753.97	38°50'37"	663.67	1141.45	N21°32'37"W
C5	426.40	988.33	24°40'16"	216.56	423.11	N32°42'53"W
C6	66.26	751.20	5°12'24"	34.10	66.24	N67°39'28"W
C7	554.63	981.20	48°37'08"	293.60	559.23	S86°30'19"W
C8	74.54	50.00	85°25'18"	46.15	67.83	S20°33'40"W
C9	368.13	1014.93	20°46'18"	186.06	366.03	S11°05'47"E
C10	78.54	50.00	89°56'18"	50.00	75.71	S48°22'24"E
C11	78.54	50.00	89°56'18"	50.00	75.71	S43°37'36"W
C12	55.34	2740.02	1°09'28"	27.67	55.34	S01°37'07"E
C13	201.62	2738.96	9°24'10"	155.95	201.42	S05°16'41"E

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REVISION	DATE	DESCRIPTION
1. 10/02/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS	
2. 09/02/2020	REVISED PER COUNTY COMMENTS	
3. 12/28/2020	RE-DRAW PLANS	
4. 12/28/2020	RE-DRAW PLANS	
5. 01/13/2021	REVISED PER COUNTY COMMENTS	
6. 02/13/2021	REVISED PER PLANNING COMMISSION COMMENTS	

SUB	DES
SURVEY BY	K. CLINE
DRAWN	C. STEPHENSON
K. CLINE	

SCALE

EXISTING CONDITIONS 1
**BLES PARK
SPEX**

ALGONKIAN ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA

HORIZ.	1" = 150'
SCALE	1" = 150'
DATE	8/6/23
PLAN	3164-1001
JOB	SPEX & 2ND
CADD	3164-1001-C-SP-101.DWG
NCS	3164-1001-C-SP-101
NUMBER	04 of 11

Gordon

KEY MAP

SHEET 05

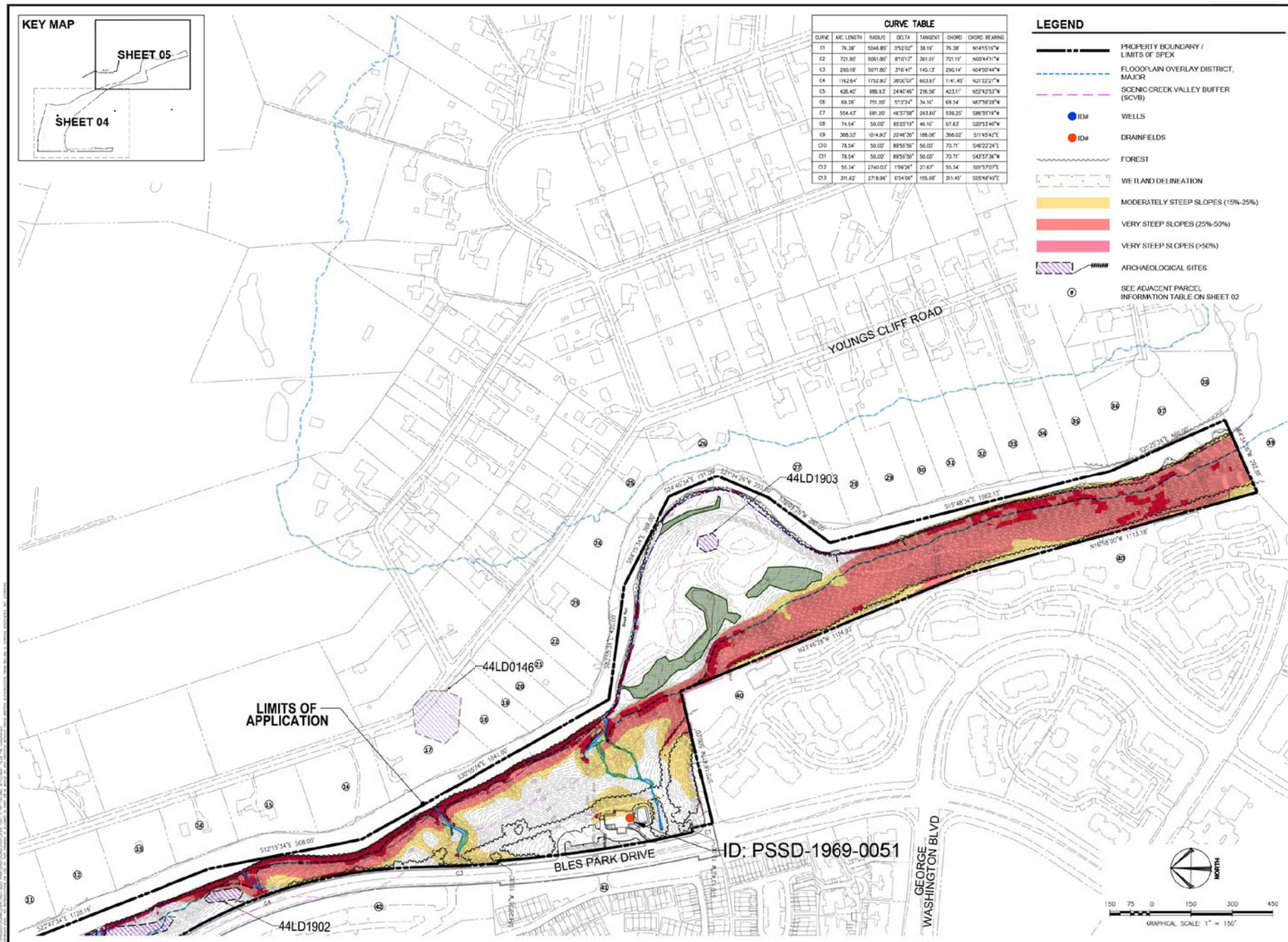
SHEET 04

CURVE TABLE									
CURVE	ARC LENGTH	RADIUS	DELTA	TANGENT	CHORD	CHORD BEARING			
C1	76.38'	5046.88'	95.02°	38.19'	76.38'	N45°51'W			
C2	721.80'	5061.88'	81°01'3"	361.51'	721.10'	N09°41'W			
C3	290.18'	5071.88'	37°16'4"	145.13'	290.14'	N04°50'44"W			
C4	1162.64'	1752.98'	38°00'01"	603.61'	1146.40'	N27°22'27"W			
C5	426.40'	389.93'	24°40'40"	216.56'	423.11'	N52°42'53"W			
C6	68.26'	791.30'	51°32'4"	34.16'	68.34'	N87°59'28"W			
C7	554.43'	681.20'	44°37'58"	283.60'	539.25'	N89°50'19"W			
C8	74.54'	50.02'	85°25'19"	46.10'	67.83'	S29°53'48"W			
C9	368.03'	1014.93'	20°46'30"	186.06'	366.02'	S11°55'42"E			
C10	78.54'	50.02'	89°58'50"	50.00'	73.71'	S49°22'24"E			
C11	78.54'	50.02'	89°58'50"	50.00'	73.71'	S49°22'24"E			
C12	55.34'	2740.03'	1°09'28"	27.63'	55.34'	S01°57'03"E			
C13	311.62'	2778.96'	0°54'00"	155.08'	311.45'	S05°46'49"E			

LEGEND

- PROPERTY BOUNDARY / LIMITS OF SPEX
- FLOODPLAIN OVERLAY DISTRICT, MAJOR
- SCENIC CREEK VALLEY BUFFER (SCVB)
- ID#
- ID#
- WELLS
- DRAINFIELDS
- FOREST
- WETLAND DELINEATION
- MODERATELY STEEP SLOPES (15%-25%)
- VERY STEEP SLOPES (25%-50%)
- VERY STEEP SLOPES (>50%)
- ARCHAEOLOGICAL SITES

SEE ADJACENT PARCEL INFORMATION TABLE ON SHEET 02



REVISION	NUMBER	DATE	DESCRIPTION
1. 10/02/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS		
2. 09/07/2020	REVISED PER COUNTY COMMENTS		
3. 10/20/2020	RE-SHAPE PLANS		
4. 12/04/2020	RE-SHAPE PLANS		
5. 01/07/2021	REVISED PER PLANNING COMMISSION COMMENTS		
6. 02/13/2021	REVISED PER PLANNING COMMISSION COMMENTS		

SUB	DES
SURVEY BY	K. CLINE
DRW	CHL
K. CLINE	C. STEPHENSON

SCALE

EXISTING CONDITIONS 2

**BLES PARK
SPEX**

ALBORGAN ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA

HORIZ	1" = 150'
SCALE	VERT. 1" = 15'
DATE	AUGUST 2020
PLAN	3164-1001
JOB	SPEX & 2ND
CADD	3164-1001-C-01-01.DWG
NCS	3164-1001-C-01-01-101
NUMBER	05 of 11

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LEGEND

- PROPERTY BOUNDARY / LIMITS OF SPEX
- FLOODPLAIN OVERLAY DISTRICT, MAJOR
- SCENIC CREEK VALLEY BUFFER (SCVB)
- WELLS
- DRAINFIELDS
- TREE CONSERVATION AREAS
- WETLAND DELINEATION
- PALLUSTINE FORESTED WETLAND AREAS
- PALLUSTINE EMERGENT WETLAND AREAS
- MODERATELY STEEP SLOPES
- VERY STEEP SLOPES
- ARCHAEOLOGICAL SITES
- RSCR AND 50' MANAGEMENT BUFFER
- CONSERVATION EASEMENT LIMITS

NOTES

1. THE MAJOR FLOODPLAIN WITHIN THE SUBJECT PARCEL IS APPROXIMATELY 108 AC. PER SECTION 4-1506 (F) A MAX OF 10% OF THE 108 AC IS ALLOWED TO BE IMPERVIOUS SURFACES.
2. THE PROPOSED TREE CONSERVATION AREA (TCA) TOTAL IS 250 AC. THE (TCA) AREAS MAY BE ADJUSTED AS NECESSARY BASED ON FINAL ENGINEERING AND SITE PLAN.

MAJOR FLOODPLAIN LIMITS

SPEX BREAKDOWN OF FOD AREAS

APPROX. AREA OF IMPERVIOUS WITHIN FOD (SF)	APPROX. FLOOR AREA OF STRUCTURES WITHIN FOD	LEGEND NUMBER OR LETTER	AMENITY
113,000	-	(2)	PARKING*
200	200	(3)	TRAIL HEAD/ KIOSK*
95,000	-	(4)	HARD SURFACE TRAIL*
8,875	8,875	(7)	PAVILION AREA*
1,000	500	(8)	CANOE/ KAYAK LAUNCH
20,000	10,000	(9)	MULTI-GEN PLAYGROUND
2,500	500	(10)	OFF-LEASH DOG AREA
22,000	400	(11)	TENNIS & PICKLEBALL COURTS
28,000	-	(14)	GRAVEL DRIVEWAY
-	6,000	(15)	BOARDWALK
-	1,000	(16)	OVERLOOK AT NATURAL CLEARING
2,300	-	(17)	SKATE SPOTS*
750	750	(18)	OBSERVATION PAVILION
-	2,500		PEDESTRIAN BRIDGE
8,500	6,400	D	RECREATION FIELD*
1,700	1,700	E	RESTROOMS*
304,025	38,825		TOTAL

NOTE: SEE SHEET 02 FOR FLOODPLAIN TABULATIONS.
* INDICATES THERE IS MORE THAN ONE AMENITY LOCATION.

CONCEPT LEGEND

PROPOSED:

- ① VEHICULAR ENTRY
- ② PARKING
- ③ TRAIL HEAD/ KIOSK
- ④ HARD SURFACE TRAIL
- ⑤ NATURAL SURFACE TRAIL
- ⑥ NEIGHBORHOOD ROAD CROSSING
- ⑦ PAVILION AREA
- ⑧ CANOE/ KAYAK LAUNCH
- ⑨ MULTI-GEN PLAYGROUND
- ⑩ OFF-LEASH DOG AREA (SMALL & BIG)
- ⑪ TENNIS & PICKLEBALL COURTS
- ⑫ UNPROGRAMMED OPEN LAWN
- ⑬ GRAVEL DRIVEWAY
- ⑭ BOARDWALK
- ⑮ OVERLOOK AT NATURAL CLEARING
- ⑯ SKATE SPOTS
- ⑰ OBSERVATION PAVILION
- ⑱ TREE GROVE
- ⑲ CONSERVATION EASEMENT
- ⑳ DESTINATION/ ENTRY POINT
- ㉑ PEDESTRIAN BRIDGE

EXISTING:

- ① PROPERTY BOUNDARY*
- ② MAJOR FLOODPLAIN LINE
- ③ STREAM
- ④ RECREATION FIELD
- ⑤ RESTROOMS
- ⑥ WETLAND
- ⑦ CHAMPION TREE
- ⑧ STORMWATER POND

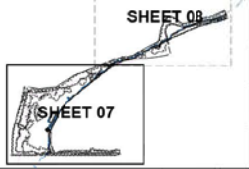
REVISION	NUMBER	DATE	DESCRIPTION
1. 12/07/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS		
2. 05/07/2020	REVISED PER COUNTY COMMENTS		
3. 12/20/2020	REVISED PER COUNTY COMMENTS		
4. 12/20/2020	REVISED PER COUNTY COMMENTS		
5. 02/03/2021	REVISED PER PLANNING COMMISSION COMMENTS		
6. 02/13/2021	REVISED PER PLANNING COMMISSION COMMENTS		

SUB: SURVEY BY: K.C. CLINE	DES: K.C. CLINE
DRAWN: K.C. CLINE	CHECKED: C. STEPHENSON

SPEX PLAT
BLES PARK SPEX
ALLEGANIAN ELECTION DISTRICT
LOUBOUN COUNTY, VIRGINIA

HORIZ: SCALE: 1" = 300'	DATE: AUGUST 2020
PLAN: 316A-1001	JOB: SPEX & ZPD
CADD: 316A-1001-C-CS-101.DWG	NCS: 316A-1001-C-CS-101
NUMBER: 06 OF 11	

KEY MAP



LEGEND

- PROPERTY BOUNDARY / LIMITS OF SPEX
- FLOODPLAIN OVERLAY DISTRICT, MAJOR
- SCENIC CREEK VALLEY BUFFER (SCVB)
- WELLS
- DRAINFIELDS
- TREE CONSERVATION AREAS
- WETLAND DELINEATION
- PALUSTRINE FORESTED WETLAND AREAS
- PALUSTRINE EMERGENT WETLAND AREAS
- MODERATELY STEEP SLOPES
- VERY STEEP SLOPES
- ARCHAEOLOGICAL SITES TO AVOID
- RSCR AND 50' MANAGEMENT BUFFER

CONCEPT LEGEND

PROPOSED:

- ① VEHICULAR ENTRY
- ② PARKING
- ③ TRAIL HEAD/ KIOSK
- ④ HARD SURFACE TRAIL
- ⑤ NATURAL SURFACE TRAIL
- ⑥ NEIGHBORHOOD ROAD CROSSING
- ⑦ PAVILION AREA
- ⑧ CANOE/ KAYAK LAUNCH
- ⑨ MULTI-GEN PLAYGROUND
- ⑩ 2-5 YEAR CHILDREN
- ⑪ 6-12 YEAR CHILDREN
- ⑫ 13+ ADULT FITNESS
- ⑬ OFF-LEASH DOG AREA (SMALL & BIG)
- ⑭ TENNIS & PICKLEBALL COURTS
- ⑮ UNPROGRAMMED OPEN LAWN

- ⑯ GRAVEL DRIVEWAY
- ⑰ BOARDWALK
- ⑱ OVERLOOK AT NATURAL CLEARING
- ⑲ SKATE SPOTS
- ⑳ OBSERVATION PAVILION
- ㉑ TREE GROVE
- ㉒ CONSERVATION EASEMENT
- ㉓ DESTINATION/ ENTRY POINT
- ㉔ PEDESTRIAN BRIDGE

EXISTING:

- ① PROPERTY BOUNDARY
- ② MAJOR FLOODPLAIN LINE
- ③ STREAM
- ④ RECREATION FIELD
- ⑤ RESTROOMS
- ⑥ WETLAND
- ⑦ CHAMPION TREE
- ⑧ STORMWATER POND

ID: WIR-2004-0146



GRAPHICAL SCALE: 1" = 150'

REVISION	DATE	DESCRIPTION
1. 10/02/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS	
2. 09/02/2020	REVISED PER COUNTY COMMENTS	
3. 10/20/2020	RE-SHAPE PLANS	
4. 12/04/2020	RE-SHAPE PLANS	
5. 01/13/2021	REVISED PER COUNTY COMMENTS	
6. 02/13/2021	REVISED PER PLANNING COMMISSION COMMENTS	

SUB	DES
SURVEY BY	K. CLINE
DRW	CHL
K. CLINE	C. STEPHENSON

SEAL:

SPEX 1

BLES PARK SPEX

ALGONKIAN ELECTION DISTRICT
 LOUDOUN COUNTY, VIRGINIA

HORIZ:	1" = 150'
SCALE:	VERT: 1/4"
DATE:	8/6/2023
PLAN:	3164-1001
JOB:	SPEX & 2ND
CADD:	3164-1001-C-CS-101.DWG
NCS:	3164-1001-C-CS-101
NUMBER:	07 of 11

KEY MAP

SHEET 08

SHEET 07

CONCEPT LEGEND

PROPOSED:

- ① VEHICULAR ENTRY
- ② PARKING
- ③ TRAIL HEAD/ KIOSK
- ④ HARD SURFACE TRAIL
- ⑤ NATURAL SURFACE TRAIL
- ⑥ NEIGHBORHOOD ROAD CROSSING
- ⑦ PAVILION AREA
- ⑧ CANOE/ KAYAK LAUNCH
- ⑨ MULTI-GEN PLAYGROUND
- ⑩ 2-5 YEAR CHILDREN
- ⑪ 6-12 YEAR CHILDREN
- ⑫ 13+ ADULT FITNESS
- ⑬ OFF-LEASH DOG AREA (SMALL & BIG)
- ⑭ TENNIS & PICKLEBALL COURTS
- ⑮ UNPROGRAMMED OPEN LAWN

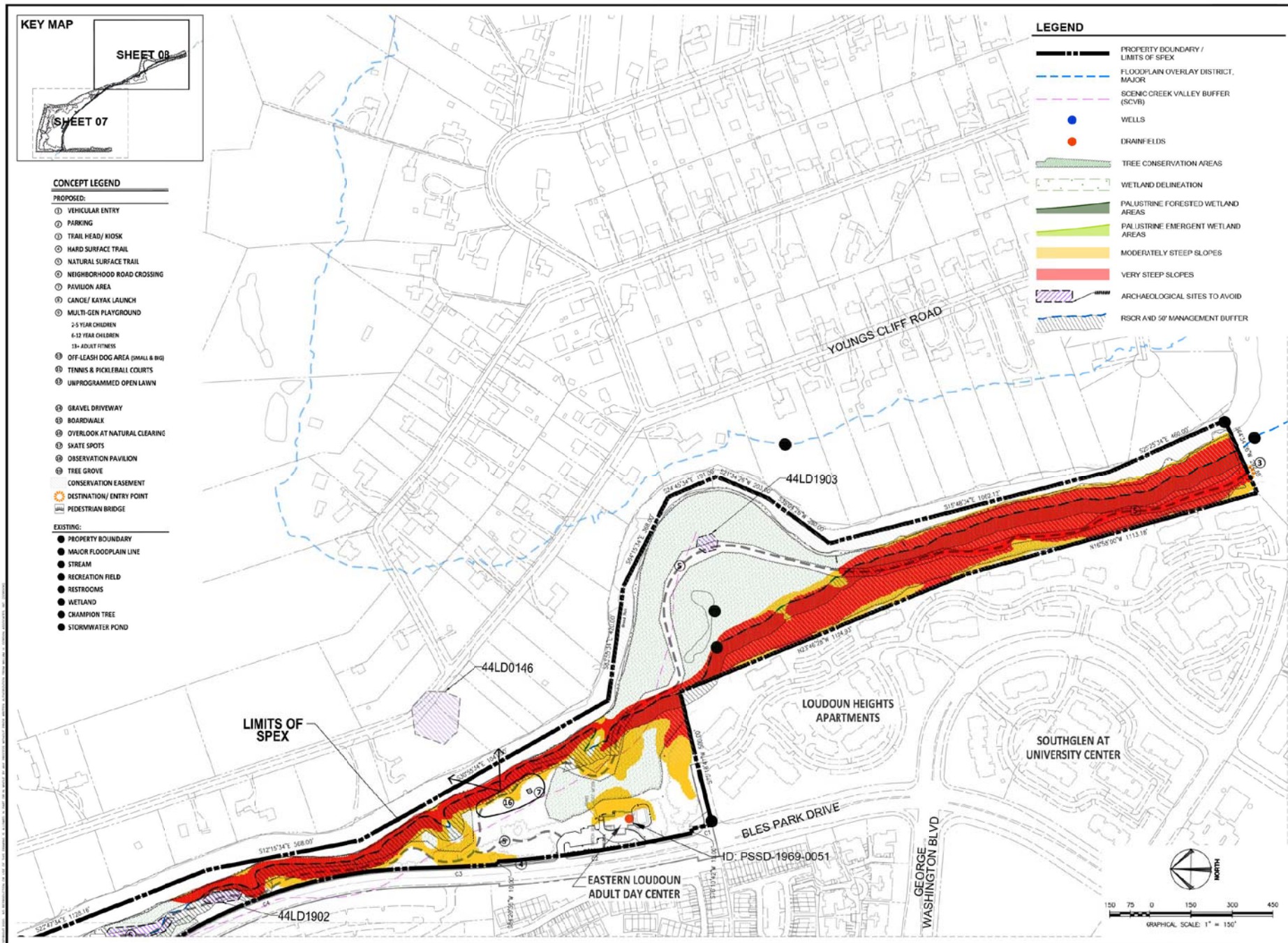
- ⑯ GRAVEL DRIVEWAY
- ⑰ BOARDWALK
- ⑱ OVERLOOK AT NATURAL CLEARING
- ⑲ SKATE SPOTS
- ⑳ OBSERVATION PAVILION
- ㉑ TREE GROVE
- ㉒ CONSERVATION EASEMENT
- ㉓ DESTINATION/ ENTRY POINT
- ㉔ PEDESTRIAN BRIDGE

EXISTING:

- PROPERTY BOUNDARY
- MAJOR FLOODPLAIN LINE
- STREAM
- RECREATION FIELD
- RESTROOMS
- WETLAND
- CHAMPION TREE
- STORMWATER POND

LEGEND

- PROPERTY BOUNDARY / LIMITS OF SPEX
- FLOODPLAIN OVERLAY DISTRICT, MAJOR
- SCENIC CREEK VALLEY BUFFER (SCVB)
- WELLS
- DRAINFIELDS
- TREE CONSERVATION AREAS
- WETLAND DELINEATION
- PALUSTRINE FORESTED WETLAND AREAS
- PALUSTRINE EMERGENT WETLAND AREAS
- MODERATELY STEEP SLOPES
- VERY STEEP SLOPES
- ARCHAEOLOGICAL SITES TO AVOID
- RSCR AND 50' MANAGEMENT BUFFER



REVISION	NUMBER	DATE	DESCRIPTION
1. 10/07/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS		
2. 09/07/2020	REVISED PER COUNTY COMMENTS		
3. 12/01/2020	REVISED PER COUNTY COMMENTS		
4. 12/01/2020	REVISED PER COUNTY COMMENTS		
5. 01/07/2021	REVISED PER COUNTY COMMENTS		
6. 09/13/2021	REVISED PER PLANNING COMMISSION COMMENTS		

SUB	DES
SURVEY BY	K. CLINE
DRN	CHL
K. CLINE	C. STEPHENSON

SCALE

SPEX 2

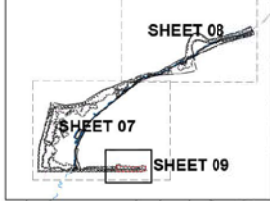
**BLES PARK
SPEX**

ALLEGIAN ELECTRON DISTRICT
LOUDOUN COUNTY, VIRGINIA

HORIZ	1" = 150'
SCALE	VERT. 1" = 15'
DATE	AUGUST 2020
PLAN	316A-1001
JOB	SPEX & 2ND
CADD	316A-1001-C-CS-101.DWG
NCS	316A-1001-C-CS-101
NUMBER	08 OF 11

Gordon

KEY MAP

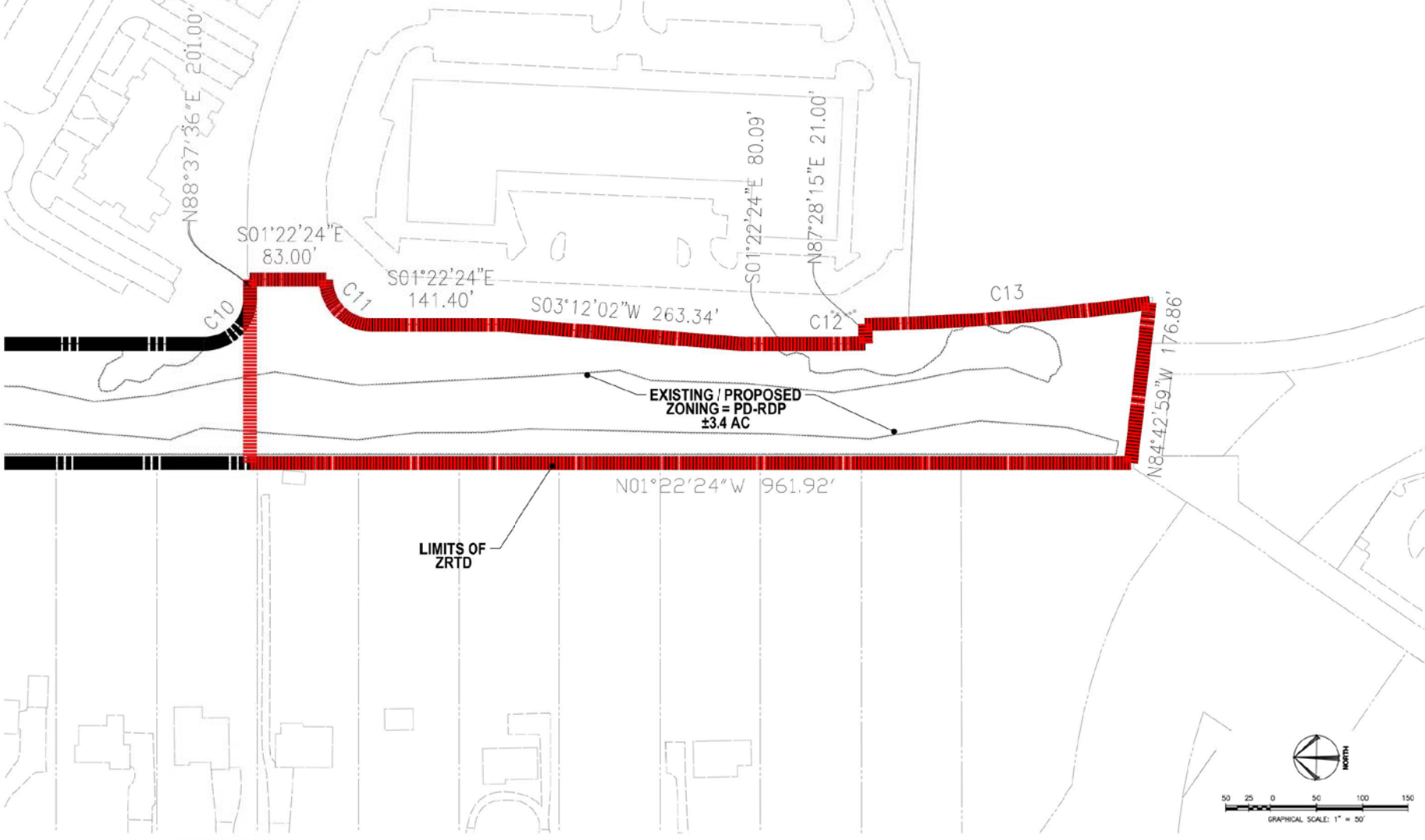


NOTES

1. THE ±3.4 ACRE PORTION OF PIN 038-25-8800 IS PROPOSED TO BE REMAPPED FROM THE PD-RDP ZONING DISTRICT UNDER THE 1973 ZONING ORDINANCE TO THE PD-RDP ZONING DISTRICT UNDER THE REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE, AS AMENDED.

LEGEND

- PROPERTY BOUNDARY / LIMITS OF SPEX
- LIMITS OF ZRTD



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 Chantilly, VA 20151
 Phone: 703-263-1900
 www.gordon-us.com

REVISION	NUMBER	DATE	DESCRIPTION
1. 10/07/2019 REVISED PER CHECKLIST COMPLIANCE COMMENTS			
2. 09/07/2020 REVISED PER COUNTY COMMENTS			
3. 03/20/2020 RE-SHAPE PLANS			
4. 07/26/2020 RE-SHAPE PLANS			
5. 08/13/2021 REVISED PER PLANNING COMMISSION COMMENTS			
6. 08/13/2021 REVISED PER PLANNING COMMISSION COMMENTS			

SUB	DES
SURVEY BY	K. CLINE
DRW	CHL
K. CLINE	C. STEPHENSON

SEAL:

CONCEPT DEVELOPMENT PLAN
BLES PARK
SPEX
 ALGONKIAN ELECTION DISTRICT
 LOUDOUN COUNTY, VIRGINIA

HORIZ	1" = 50'
SCALE: VERT	N/A
DATE	AUGUST 2020
PLAN	316A-1001
JOB	SPEX & ZRTD
CADD	316A-1001-C-CS-101.DWG
NCS	316A-1001-C-CS-101
NUMBER	09 of 11

Gordon



REVISION	NUMBER	DATE	DESCRIPTION
1	1	12/07/2019	REVISED PER CHECKLIST COMPLIANCE COMMENTS
2	2	05/07/2020	REVISED PER COUNTY COMMENTS
3	3	12/20/2020	REVISED PER COUNTY COMMENTS
4	4	12/20/2020	REVISED PER COUNTY COMMENTS
5	5	08/13/2021	REVISED PER PLANNING COMMISSION COMMENTS

SUB	DES
SURVEY BY	K. CLINE
DRW	CHL
	C. STEPHENSON

SEAL:

ILLUSTRATIVE
BLES PARK
SPX
ALLEGAN ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA

PASSIVE RECREATION PARK FEATURES



TRAIL HEAD
FOR LOCATIONS ALONG THE NATURAL
SURFACE TRAILS



KIOSK
FOR MAIN ENTRANCES TO THE TRAIL AND HIGH
TRAFFIC AREAS



LARGE PAVILION
FOR LOCATIONS NEAR THE RECREATIONAL
FIELDS FOR PICKNICKING



SMALL PAVILION
FOR SECLUDED LOCATIONS ALONG THE NATURE
TRAILS



SHADE STRUCTURE
FOR LOCATIONS NEAR THE RECREATIONAL
FIELDS FOR VIEWING



OPEN LAWN
FOR UNPROGRAMMED ACTIVITIES



BOARDWALK
FOR SCENIC VIEWS OF THE EXISTING WETLANDS



TREE GROVE
ALONG THE TRAIL FOR A CALMING EXPERIENCE



**OVERLOOK AT NATURAL
CLEARING**
FOR SCENIC VIEWS OF BROAD RUN



CANOE LAUNCH
AT THE MOUTH OF BROAD RUN

ACTIVE RECREATION PARK FEATURES

MULTI-GEN PLAYGROUND
FUN FOR ALL AGES



PLAYGROUND ACTIVITIES



OFF-LEASH DOG AREA



TENNIS COURTS



PICKLEBALL COURTS



SKATE SPOTS



NOTE: THIS SHEET IS FOR ILLUSTRATIVE PURPOSES ONLY. THE IMAGES, AND TEXT SHOWN ON THIS SHEET IS CONCEPTUAL AND INTENDED TO SHOW THE GENERAL CHARACTER OF THE PROPOSED PARK IMPROVEMENTS. THE USES, ACTIVITIES, AND MATERIALS DEPICTED ON THIS SHEET ARE SHOWN FOR CONCEPTUAL PURPOSES. THE FINAL PROPOSED USES, ACTIVITIES, AND MATERIALS ARE TO BE DETERMINED AT THE TIME OF FINAL SITE PLAN.

BLES PARK

STATEMENT OF JUSTIFICATION

August 30, 2019

October 7, 2019

Revised August 19, 2020

Re-dated October 30, 2020

**Special Exception (SPEX-2019-0037, SPEX-2019-0038 & SPEX-2019-0039)
Zoning Conversion (ZRTD-2019-0004)**

The subject property, known as Bles Park, is identified by PIN# 038-26-8806 and is owned and operated by Loudoun County. The park is located adjacent to Bles Park Dr. to the south, the Potomac River to the north, Broad Run Farms Subdivision to the east, the Riverside Villages and Overlook at University Center subdivisions to the south and the Potomac Farms subdivision to the west. The park sits on 132 acres and was built in the late 1990's / early 2000s and is currently home to four soccer fields, a parking lot, a playground and restroom facility, along with walking trails and the Eastern Loudoun Adult Day Center. The application proposes to expand the existing park with various program amenities that include pavilions, canoe / kayak launch, multi-generation playgrounds, skate spots, off-leash dog area, tennis & pickleball courts, and overlook areas and un-programmed open lawn. When completed, the project will offer a safe and accessible parks and recreation opportunities by means of inter-connected open space that provide diverse activities for all ages, interests, and abilities.

The application requests the following:

1. SPEX-2019-0037 Per Section 1-103(F)(2) expansion of an existing SPEX as noted in ZCOR-2015-0021 dated 10/14/15
2. SPEX-2019-0038 Per Section 4-1506 (E) for incidental structures greater than 840 SF within the major floodplain
3. SPEX-2019-0039 Per Section 4-1506 (F) for increase of impervious area greater than 3% but no more than 10% within the major floodplain
4. ZRTD-2019-0004 to convert approximately 3.4 AC zoned PD-RDP under the 1972 Zoning Ordinance to PD-RDP of the Revised 1993 Loudoun County Zoning Ordinance.

There is approximately 108 AC of major floodplain within the subject property limits and proposed application would seek to allow up to a maximum of 7.89% imperviousness and up to 53,950 SF of incidental structures.

The proposed site work associated with the field improvements will likely require minor grading revisions that may coincide directly with the limits of the major floodplain. The purpose of this application will demonstrate the proposed facility improvements changes within the major floodplain limits, which are based on a master planned approach for this existing park.

The major floodplain is in a backwater condition from the Potomac River on the subject property. The existing floodplain boundary is mapped on the site per the FEMA firm base flood elevations. It is the opinion that the proposed phased development within the major floodplain will not impact the configuration of the natural active channel or base flood elevation. The relative amount of site improvements fill within the major floodplain is small compared to the overall size of the Potomac River watershed and floodplain area.

The proposed improvements will optimize the utilization of the County owned facility and will have minimal impacts on the existing traffic volumes. The Traffic Memo submitted with this application demonstrates that impacts from the proposed development will be mitigated by previously proffered and installed transportation improvements. All the study intersections, including the site entrances, will operate at an acceptable level of service.

The portion of the property subject to ZRTD-2019-0004 will convert approximately 3.4 AC zoned PD-RDP under the 1972 Zoning Ordinance to PD-RDP of the Revised 1993 Loudoun County Zoning Ordinance as revised from time to time. The conversion to the Revised Ordinance via this ZRTD application would allow the continuation and linkage of the park amenities that otherwise would not be permitted under the 1972 Zoning Ordinance.

The Issues for Consideration contained in Section 6-1309 of the Zoning Ordinance are addressed below:

Zoning Ordinance Section 6-1309

1. Whether the proposed minor special exception or special exception is consistent with the Comprehensive Plan. **The subject area is within the Suburban Policy Area and is further support by the Suburban Neighborhood Place Type which offers Parks & Recreation as conditional uses. There is 30% open space design characteristics which includes active and passive recreational opportunities along with Community and/or Natural, environmental and heritage.**
2. Whether the level and impact of any noise, light, glare, odor or other emissions generated by the proposed use will negatively impact surrounding uses. **The change and expansion of the existing park will not negatively affect the surrounding and neighboring uses pertaining to noise, lighting, glare, odor or other emissions as the locations of the various amenities area spread out over the 132 acre site. The existing recreation fields will not be illuminated nor will other amenities beyond what is needed / required to provide security and maintenance.**
3. Whether the proposed use is compatible with other existing or proposed uses in the neighborhood and on adjacent parcels. **This park has been in operation since the late 1990's and has been subject to a number of legislative applications which established the use. The intent of this application is to show the expansion/ improvements to the park which service the surrounding community.**
4. Whether the proposed special exception or minor special exception adequately protects and mitigates impacts on the environmental or natural features including, but not limited to, wildlife habitat, vegetation, wetlands, water quality including groundwater), air quality, topographic, scenic, archaeological or historic features, and agricultural and forestal lands. **The site improvements will include study of the major and minor floodplains. Water quality treatments will be provided to ensure that the water quality leaving the site is better than the current conditions. Furthermore, this park will provide opportunities for the natural enjoyment of the natural / environmental features by means of controlled and direct access.**

5. Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public. **The proposed expansion and improvements will allow for greater utilization by the greater public and will help to fulfill the ever growing need for both passive and active recreational uses. This park will offer amenities that will appeal to a wide range of end users.**
6. Whether the proposed special exception can be served adequately by public utilities and services, roads, pedestrian connections and other transportation services and, in rural areas, by adequate on-site utilities. **This application will not require any additional public utility services. Water and sewer are already provided and no increases in flows are anticipated, and there will be no increase in the traffic peak volumes.**

The Standards for a Special Exception contained in Section 4-1507 of the Zoning Ordinance are addressed below:

Zoning Ordinance Section 4-1507

- A. The proposed use will not increase the danger to life and property due to increased flood heights or velocities. **The proposed use is in a backwater condition from the Potomac River. The proposed improvements will not impact the configuration or the natural active channel or base flood elevation. The expansion and redevelopment the existing park is relatively small and minor when compared to the overall size of the Potomac River Watershed and floodplain area. There will be no threat to increase the danger to life and property associated with this application.**
- B. The proposed use will not increase the danger that materials may be swept downstream to the injury of others. **As noted above, the proposed use is in a backwater condition from the Potomac River. The proposed improvements will not impact the configuration or the natural active channel or base flood elevation.**
- C. The proposed water supply and sanitation systems are designed to prevent disease, contamination, and unsanitary conditions. **The facility is existing and has been in operation since the late 1990's. There are no changes that will impact the water supply and sanitation systems.**
- D. The proposed use or structure shall be located and designed to limit its susceptibility to flood damage, and available alternative locations, not subject to flooding, for the proposed use shall be considered. **The proposed improvements are located just on the fringe of the floodplain limits and originally were constructed back in the late 1990's. There are no other locations on-site that would be suitable.**
- E. The proposed use is compatible with existing and planned development. **The use is existing and was subject to previous legislative application which approved the compatibility with the surrounding land uses. The proposed improvements will be an enhancement of the existing facility and help to full a greater public need for providing a variety of active and passive recreational opportunities.**

- F. The proposed use is in harmony with the Comprehensive Plan. **The Comprehensive Plan denotes the subject area as part of the Suburban Neighborhood place type which lists Parks & Recreation, as conditional uses. The design characteristics of this place type specify 30% of the site is to be open space comprised of active and passive recreational uses. This project is comprised entirely of open space, with approximately 20-25% being active recreation type use and the balance with passive uses.**
- G. The expected heights, velocity, duration, rate of rise and sediment transport of the flood waters expected at the site shall not cause significant damage. **The major of the more intensive or active recreational type of uses are located further away from water ways. While the more passive amenities associated with this application are located in closer proximity to the Potomac River and therefore having little impact if any to the existing conditions. Therefore changes to floodwaters height, velocity, duration, rate or rise and sediment transport is not expected.**

DEPARTMENT OF BUILDING AND DEVELOPMENT

COUNTY OF LOUDOUN

MEMORANDUM

DATE: November 22, 2019

TO: Steve Barney, Project Manager, Department of Planning and Zoning

FROM: Todd Taylor, Floodplain Engineer

THROUGH: Ryan Reed, Natural Resources Team Leader

CC: Maggie Auer, Floodplain Administrator
Kyle Dingus, Urban Forester
Kelly Williams, Community Planner, Department of Planning and Zoning
Rory Toth, Zoning Planner, Department of Planning and Zoning

SUBJECT: SPEX-2019-0037
Bles Park

The Natural Resources Team (NRT) reviewed the special exception application and offers the following comments:

Natural Resources:

- 1) To demonstrate compliance with the Steep Slope Standards in Revised 1993 Loudoun County Zoning Ordinance (R93ZO) Section 5-1508, please depict very steep slopes (greater than 25 percent) and moderately steep slopes (15 to 25 percent) on sheets 3-8 based on the 1-foot topography provided on the special exception plat (i.e. topographical analysis). (R93ZO 5-1508 and 6-407)
- 2) Depict the Scenic Creek Valley Buffer (SCVB) on sheets 3-8. The SCVB prohibits the construction of buildings, structures, parking lots, or other impermeable surfaces. The buffer is measured 250 feet and 150 feet from the channel scar line of the Potomac River and Broad Run, respectively. (R93ZO 5-1000)
- 3) General Note 7 on Sheet 2 references a 12/21/18 wetland delineation performed by WSSI. Please verify that all jurisdictional waters and wetlands are clearly depicted on sheets 3-8. (R93ZO 6-1309(4))

Recommendations

- 4) While trails are permitted in very steep slope areas, staff requests additional information regarding how the natural surface trails will be installed to minimize

impacts, especially in the southern portion of the property, where very steep slopes extend from the property line to Broad Run. As part of the topographical analysis, please also identify slopes greater than 50 percent, if applicable, to demonstrate the trail alignment avoids these sensitive areas.

- 5) The proposed canoe/kayak launch is located at the Broad Run/Potomac River confluence. Please provide information describing the proposed facility, including the access trail and measures to prevent root compaction of mature tree cover. A mulch chip trail should be considered at this location.
- 6) Portions of the property drains directly to Broad Run, which has been listed by the Virginia Department of Environmental Quality (DEQ) as impaired for aquatic life (aquatic insects and other small organisms that live on the stream bottom). In addition, the County's 2009 Stream Assessment Project found Broad Run, adjacent to the property, to be "suboptimal to marginal" for habitat. Impacts to water quality is a matter for consideration as part of a special exception application. Based on the close proximity of proposed improvements to the streams, please provide information describing the measures that will be incorporated to protect water quality. (R93ZO 6-1309(4))
- 7) Staff recommends depicting the River and Stream Corridor 50-foot Management Buffer around the major floodplain and adjacent very steep slopes on the special exception plat. (2019 General Plan (2019 GP) River and Stream Corridor Resources Strategy 2.2)
- 8) Active recreation uses are proposed within the River and Stream Corridor 50-foot Management Buffer, which is not a permitted use per River and Stream Corridor Resources policies in the 2019 GP. Consistent with River and Stream Corridor Resources Strategy 2.2 Action B, staff recommends incorporating mitigation measures to help offset the impacts of the encroachments. Examples of mitigation measures include reforestation, increasing tree conservation areas, buffering streams and wetlands outside of the management buffer, enhanced stormwater and erosion and sediment control measures, and invasive species control. (R93ZO 4-1507(F) and 6-1309(4))

Floodplain Management:

Recommendations

- 9) Staff request information regarding the proposed improvements identified in the legend/table on Sheet 6 to confirm that the square footage areas are listed under the appropriate column (impervious surface vs. floor area of incidental structures). Specifically, please provide details for the multi-gen playground, off-leash dog area, skate spots, boardwalks, and pedestrian bridges (i.e. type of surface, materials being used, brief description of the improvement).

- 10) Please review and verify that the floor area for the pedestrian bridges in the legend/table on Sheet 6 is correct and accounts for the site terrain in the area of the proposed crossings.
- 11) Update General Note 8 (Source of Floodplain Note) on Sheet 2 to reflect the correct Flood Insurance Rate Map (FIRM) of Loudoun County Community Panel Numbers: 51107C0255E, 51107C0265E, and 51107C0266E. (FSM 8.101.A.20)
- 12) For clarity, as minor floodplain is not present on the subject property and the Source of Floodplain Note is provided, please remove the first sentence in General Note 8 on Sheet 2. (FSM 8.101.A.20)
- 13) Staff recommends updating the first sentence in the last paragraph of the Floodplain Narrative on Sheet 2 as follows: “It is the opinion of Gordon that the proposed...”
- 14) Staff recommends updating the last two sentences in the last paragraph of the Floodplain Narrative on Sheet 2 as follows: “If there is no change to the base floodplain elevation, then a CLMOR submission to FEMA is not anticipated. A LOMR submission to FEMA will be processed with the development as-built condition should the floodplain boundary or base flood elevation change.”
- 15) Update the floodplain boundary (i.e. thicken the line work) on Sheet 6-8 (Special Exception Plat) so that the limits are clearly discernable. (R93ZO 4-1504(B))
- 16) Provide the total floodplain acreage/square footage on the property to demonstrate the that the total area of imperviousness provided in the table on Sheet 6 does not exceed the 10 percent maximum specified in R93ZO 4-1506(F).
- 17) Provide information regarding the activities and types of storage (fertilizers, herbicides, pesticides?) anticipated for the proposed maintenance facility. Also, include a note on the special exception plat indicating that bulk storage of gasoline, chemicals, fuels, or similar substances are prohibited at the maintenance facility. (R93ZO 4-1506(E))
- 18) Staff recommends clarifying or removing the last sentence in the section of the statement of justification pertaining to R93ZO 4-1507(B), which references open space and recreational fields between the Potomac River and the application area. (R93ZO 4-1507(B))
- 19) Update the section of the statement of justification pertaining to R93ZO 4-1507(F) to address harmony with the 2019 GP related to allowable uses within the River and Stream Corridor Resources buffer, including any proposed mitigation measures. (R93ZO 4-1507(F))

- 20) Please clarify the section of the statement of justification that pertains to R93ZO 4-1507(G). Is “proximity to the project size in comparison to the Potomac River” intended to highlight that the majority of the improvements are located on the fringe of the floodplain? (R93ZO 4-1507(G))

Urban Forestry:

Recommendations

- 21) Staff recommends that stabilization of trails and the canoe/kayak launch for recreational uses are done with as minimal impact as possible to tree roots. Wood chips are recommended for stabilization.
- 22) Staff recommends that invasive species control should be implemented to protect the biodiversity of the area.
- 23) Sheet 6- Existing exhibit G depicts a champion tree. Provide the species and context to champion status.

Please contact me if you have any questions or need additional information. Also, please ensure that any future submissions are referred to the NRT.

County of Loudoun
Department of Planning and Zoning
MEMORANDUM

DATE: November 25, 2019

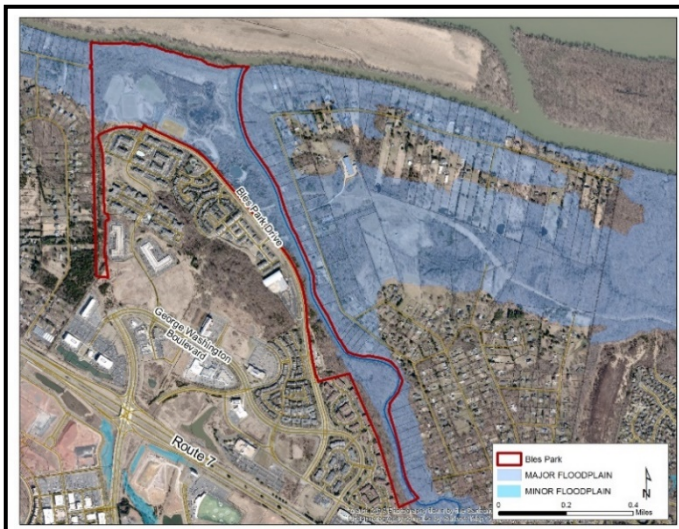
TO: Steve Barney, Project Manager, Land Use Review

FROM: Kelly Williams, Planner III, Community Planning

SUBJECT: SPEX 2019-0037, SPEX 2019-0038, Bles Park
SPEX 2019-0039, ZRTD 2019-0004

BACKGROUND

The applicant, the Loudoun County Department of Transportation and Capital Infrastructure (DTCI), is requesting three Special Exceptions (SPEX) and a Zoning Conversion (ZRTD) to modify and expand the facilities at the existing Bles Park in order to allow incidental structures greater than 840 square feet in the major floodplain, increase the impervious area to greater than 3% in the major floodplain, and convert 3.4 acres from the 1972 Loudoun County Zoning Ordinance to the Revised 1993 Loudoun County Zoning Ordinance.



The subject site consists of one parcel encompassing approximately 132 acres located on the north side of Bles Park Drive, east of Potomac Drive. The site is bordered to the south across Bles Park Drive by single-family and multi-family residential uses, to the east and west by single-family residential uses and vacant land, and to the north by the Potomac River and vacant land. The site is currently developed with four grass soccer fields, a playground, restrooms, and associated parking.

This application proposes to expand the existing park with various program amenities including pavilions, a canoe/kayak launch, multi-generation playgrounds, skate spots, an off-leash dog area, tennis & pickleball courts, overlook areas, and unprogrammed open lawn.

COMPLIANCE WITH THE COMPREHENSIVE PLAN

The site is located within the Suburban Policy Area and falls within an area designated as Suburban Neighborhood Place Type in the *Loudoun County 2019 General Plan* (2019 GP or

“the Plan”) (2019 GP, Chapter 2, Suburban Policy Area Place Types Map). Parks and Recreation uses are considered conditional uses within the Suburban Neighborhood Place Type. Providing additional parks and recreation facilities within the existing park is consistent with the place type; however, there are significant environmental issues related to the application as discussed below.

NATURAL, ENVIRONMENTAL, AND HERITAGE RESOURCES

Portions of the property drains to the Broad Run, which has been listed by the Virginia Department of Environmental Quality (DEQ) as impaired for aquatic life. In addition, the County’s 2009 Stream Assessment Project found Broad Run, adjacent to the property to be “suboptimal to marginal” for habitat.

River and Stream Corridor Resources

Major floodplain associated with the Potomac River and the Broad Run traverses the majority of the site (see Floodplain Map above). As called for in the 2019 GP, the floodplain and a 50-foot management buffer surrounding the floodplain together constitute the river and stream corridor resource (RSCR) (2019 GP, Chapter 3, Water Resources, Text). 2019 GP policies support the establishment of a 50-foot management buffer as part of the RSCR “to promote river and stream health (streambank/streambed stability, temperature moderation, nutrient removal, sediment removal, flood control, and aquatic food and habitat)” (2019 GP, Chapter 3, RSCR Action 2.2.B).

The 2019 GP identifies uses that will be permitted within the RSCR so long as they support or enhance the biological integrity and health of the river and stream corridor and have minimal adverse effects on natural, environmental, and heritage resources (2019 GP, Chapter 3, RSCR Strategy 2.2, Permitted Uses in the RSCR call-out box). The Plan lists passive recreation uses, such as paths and trails (permeable only), raised boardwalks, hiking, biking, camping, climbing, fishing, and wildlife viewing, as appropriate within the RSCR. Active recreation uses are permitted within the minor floodplain only; therefore, locating such uses as athletic fields, pavilions, maintenance facilities, and ball courts within the RSCR is inconsistent with the 2019 GP.

The existing facility has been at this location since the early 2000’s, prior to the adoption of the River and Stream Corridor policies of the previous Revised General Plan and the 2019 RGP; however, the proposed expansion of the parks and recreation uses is subject to the RSCR policies of the current Plan.

The application to expand Bles Park is not consistent with Plan policy, as it would locate active recreational uses within the RSCR; therefore, Community Planning Staff cannot support the application as proposed. Should the application be considered further, Community Planning Staff recommends the application include measures to help mitigate the impacts to the RSCR, such as reforestation of open areas adjacent to the Potomac River, the Broad Run, and floodplain; increasing Tree Conservation Areas (TCA) adjacent to the floodplain; and enhanced stormwater and erosion and sediment control measures (2019 GP, Chapter 3, RSCR Strategy 2.2, Mitigation Examples call-out box). Staff also recommends the use of pervious paving in the parking areas.

Application Materials

Community Planning Staff notes that the application materials are unclear as to the limits of disturbance and the area of impervious surface proposed. There are discrepancies between the amount of impervious surface labelled on the drawing and within the corresponding chart.

In order to fully analyze the proposal, Community Planning Staff recommends that subsequent application materials:

- ***Clarify the amount of impervious surface proposed in the chart and on the labels.***
- ***Clarify if the existing grass soccer fields, natural surface trail, tree grove, and unprogrammed lawn are impervious as labelled. The labels on the drawing do not match the information in the chart.***
- ***Provide a breakdown of the uses that are located in multiple areas throughout the site such as the pavilions, parking etc. in the chart.***
- ***Depict the limits of disturbance proposed for the site to determine the extent of the impacts to the RSCR.***

Sustainability

The County seeks to balance the needs of the present with those of future generations. As the County continues to grow, so do the opportunities and challenges related to the preservation and conservation of environmental and heritage resources. A focus on the protection of natural and heritage resources linked with sustainability concepts will help move the County into a future that protects the health, safety, and welfare of its residents. Development should consider sustainable development practices, such as energy efficient practices, long-term water conservation, green building practices, sustainable site design, renewable energy sources, and integrated energy management during the build-out of a project (2019 GP, Chapter 3, Sustainability Policies 8 and 9). The application materials do not provide any discussion of or commitment to the sustainability principles as outlined in the 2019 GP.

Community Planning Staff recommends the applicant incorporate and commit to sustainability practices such as green building design, water conservation, and sustainable site design.

Wetlands

Wetlands perform several functions; they trap sediment, reduce nutrient loads, provide wildlife habitat, replenish groundwater, and attenuate flood waters. Recognizing these functions, wetlands should be avoided to the greatest extent practicable to minimize water quality impacts.

Community Planning Staff recommends that the limits of clearing and grading be depicted on the SPEX plat in order to clarify the areas of wetlands that may be impacted. If impacts cannot be avoided mitigation measures should be provided to meet the County's goal to improve water quality in Loudoun.

Forests, Trees, and Vegetation

The 2019 GP calls for the preservation, protection, and management of forest resources for their environmental and economic benefits (*2019 GP, Chapter 3, Forests, Trees, and Vegetation, Strategy 4.1*). The 2019 GP encourages the preservation of existing trees within required landscape buffer areas and to screen uses (*2019 GP, Chapter 3, Forests, Trees, and Vegetation, Action 4.1.B*). The majority of the site is forested and impacts to forested areas are proposed. Although the applicant requested and was granted a waiver for the checklist Tree Survey requirement on the basis of previous legislative approvals governing development of the site, these approvals predate current checklist requirements and Community Planning Staff has no documentation that the required information was previously provided. Without this information, staff cannot review the application for compliance with 2019 GP Forests, Trees, and Vegetation policies.

Although the Tree Survey requirement was waived at checklist, one must be submitted in order to evaluate the site for compliance with the Forest, Trees and Vegetation policies.

Community Planning Staff recommends that TCAs be established to mitigate impacts to the RSCR as discussed above.

Natural Heritage Resources

The 2019 GP calls for the conservation and protection of natural heritage resources, including rare, threatened, and endangered plant and animal species; exemplary natural communities, habitats, and ecosystems; and significant geologic formations (*2019 GP, Chapter 3, Natural Heritage Resources, Strategy 6.1*). Development applications with the likelihood of impacting one or more natural heritage resources will conduct a species assessment and develop a plan for impact avoidance if a natural heritage resource is identified on the site (*2019 GP, Chapter 3, Natural Heritage Resources, Action 6.1.B*). As with the Tree Survey requirement, the applicant was granted a conditional waiver for the required Endangered Species Habitat study on the basis of previous legislative approvals. Lacking this required documentation, Community Planning Staff cannot review the application for compliance with 2019 GP policies.

Although the Endangered Species Habitat Assessment was waived at checklist, one must be submitted in order to evaluate the site for compliance with the Natural Heritage Resource policies.

Stormwater Management

The County seeks to improve stream quality and watershed health by decreasing the amount of stormwater runoff and associated pollutants from reaching streams (*2019 GP, Chapter 3, River and Stream Corridor Resources, Strategy 2.3*). The County also promotes the use of low-impact development (LID) techniques (*2019 GP, Chapter 3, River and Stream Corridor Resources Action 2.3.E*). LID uses natural vegetation and small-scale treatment systems to treat and infiltrate rainfall close to the source. LID's goal is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain stormwater runoff. LID locates water quality measures as close as possible to proposed impervious areas.

Community Planning Staff requests information regarding stormwater quality measures for the proposed application. Community Planning Staff recommends the applicant commit to providing LID onsite.

Historic, Archeologic, and Scenic Resources

The 2019 GP calls for the conservation and preservation of the County's cultural and scenic resources. Land development applications are expected to provide an archaeological and historic resources survey to identify resources and, if warranted, identify measures for preservation, mitigation, and adaptive reuse (2019 GP, Chapter 3, *Historic, Archaeologic, and Scenic Resources, Action 5.1.C*).

No systematic Phase 1 testing of the property appears to have been done. Three sites (44LD0157, 44LD0436, 44LD0437) were located in the 1980's by surface inspection and all relate to Native American occupation or use of the land. Site 44LD0437 may have been previously impacted. A Phase 1 survey is required where ground disturbance of any kind is proposed (structures, parking, trails, roads, driveways and crossing, pavilions, kayak launch, boardwalk, etc.). This will encompass the majority of the parcel with the exception of the existing wetlands.

Although the Phase I Archeological Survey was waived at checklist, this survey is required in order to evaluate the site for compliance with the Historic, Archeologic, and Scenic Resources policies.

RECOMMENDATION

Community Planning Staff cannot support the application as proposed to allow active recreation uses within the RSCR. Should the application move forward, Community Planning Staff recommends the following:

- The application materials be revised to clarify the limit of disturbance and amount of impervious surface being proposed.
- A Tree Survey, Phase I Archeological Survey and Endangered Species Habitat Assessment be submitted for review.
- Mitigation measures be provided to reduce the impact to the RSCR.

Staff is available to meet with the Applicant to discuss this referral and answer any questions.

Alaina Ray, AICP, Director, Planning and Zoning Department, Via e-mail
Dan Galindo, AICP, Program Manager, Community Planning, Via e-mail

MEMORANDUM

To: Rob Donaldson, Project Manager, Land Use Review

From: Kelly Williams, Planner III, Community Planning

Date: January 7, 2021

Re: SPEX 2019-0037, etc., Bles Park
Community Planning Second Referral

BACKGROUND

The applicant has responded to Community Planning's first referral comments dated November 25, 2019. The application includes a revised Special Exception (SPEX) plat, statement of justification (SOJ), and response letter to address the comments. While the overall concept of providing additional parks and recreation uses within an existing park is consistent with the Suburban Residential Neighborhood Place Type, the site is located almost entirely within the major floodplain where only passive recreational uses are supported per Plan policy. The outstanding issues have been outlined below.

NATURAL, ENVIRONMENTAL, AND HERITAGE RESOURCES

River and Stream Corridor Resources (RCSR)

As stated in the first referral, the application is not consistent with Plan policy, as it would locate active recreational uses within the RCSR. Therefore, Community Planning Staff recommended that should the application move forward it include measures to help mitigate the impacts to the RCSR, such as reforestation of open areas adjacent to the Potomac River, the Broad Run, and floodplain; increasing Tree Conservation Areas (TCA) adjacent to the floodplain; and enhanced stormwater and erosion and sediment control measures (2019 GP, Chapter 3, RCSR Strategy 2.2, Mitigation Examples call-out box). Staff also recommended the use of pervious paving in the parking areas.

In response, the applicant has designed the site to expand the active recreational uses in the RCSR farther away from waterways and locate the more passive amenities in closer proximity to the Potomac River. The applicant states that the areas of existing tree canopy not affected by the improvements will be placed into TCAs and that providing pervious paving will be taken into consideration. Additionally, the applicant states that the entire site is almost entirely within the RCSR and that depicting a 50' management buffer will offer little to no protection to the natural resources. While most of the site is within the major floodplain, there are areas where a 50' management buffer could be accommodated on the site.

While the applicant has revised the proposal to reduce impacts to the RSCR through design and placement of the proposed uses, no commitments to mitigation measures have been provided to offset the impacts. Therefore, Community Planning Staff recommends the following:

- ***Clarify the total area of incidental structures to be located within the major floodplain;***
- ***Commit to the location, type of construction materials, and design of the recreational amenities proposed;***
- ***Provide the 50' management buffer along the floodplain and adjacent steep slopes consistent with Plan policy;***
- ***Commit to mitigation measures for the impacts to the RSCR, such as reforestation of open areas, increasing TCAs within and/or adjacent to the floodplain, and/or providing enhanced stormwater and erosion and sediment control measures; and,***
- ***Commit to the use of pervious paving in the parking areas.***

Sustainability

In the first referral, Community Planning Staff recommended the applicant incorporate and commit to sustainability practices such as green building design, water conservation, and sustainable site design. In response the applicant has indicated that sustainability measures will be considered for the development.

Community Planning Staff continues to recommend that commitments be made to address the sustainability policies of the 2019 GP.

Forests, Trees, and Vegetation

The applicant has provided a Tree Survey in response to Community Planning's first referral comments and has indicated the desire to establish TCAs on land that will not be disturbed by the development. However, to date no TCAs have been identified on the plats.

Community Planning Staff continues to recommend that TCAs be identified to mitigate impacts to the RSCR as discussed above.

Stormwater Management

In the first referral, Community Planning Staff recommended the applicant address stormwater management for the proposed application and commit to providing LID measures onsite. Given most of the site is located within the RSCR, water quality is of utmost importance. The applicant responded that water quality requirements will be addressed by the purchase of nutrient credits and utilized Virginia Runoff Reductions Method (VVRM) conserved/open space easements. They state that LID practices will be considered during site planning.

Community Planning Staff continues to recommend commitments to LID measures and defers to the Natural Resource Team (NRT) for evaluation of the stormwater management measures proposed by the applicant.

Historic, Archeologic, and Scenic Resources

A Phase I Archeological Survey has been provided as requested in the first referral to evaluate the site for compliance with the Historic, Archeologic, and Scenic Resources policies. A review of the survey will be provided under separate cover from the County Archaeologist.

RECOMMENDATION

As stated in the previous referral, the 2019 GP policies do not support the development of active recreational uses within the major floodplain due to potential adverse impacts to the RSCR on the property; therefore, Community Planning Staff cannot support the proposed application. Should the application be considered further, Community Planning Staff recommends the applicant provide commitments to mitigation measures that offset impacts to the RSCR as discussed above.

Staff is available to meet with the Applicant to discuss this referral and answer any questions.

Alaina Ray, AICP, Director, Planning and Zoning Department, Via e-mail
Dan Galindo, AICP, Program Manager, Community Planning, Via e-mail

From: [Lowitz, Katy](#)
To: [Barney, Steve](#)
Cc: [Andrews, Avril](#); [Rizer, Buddy](#); [Gonski, Alex](#)
Subject: SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039 & ZRTD-2019-0004 Bles Park - 1st Referral
Date: Wednesday, December 4, 2019 1:59:07 PM
Attachments: [image001.png](#)

Hi Steve,

DED has no comments for the referenced applications.

Thanks!



Katy Lowitz, Development Process Manager
703-737-8274 (o) 571-991-6877 (m)

Loudoun County, Virginia Economic Development

#1 in business growth in Virginia 4 years running (2016 – 2019, SmartAsset)

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County of Loudoun

Department of Transportation and Capital Infrastructure

MEMORANDUM

DATE: January 6, 2021

TO: Rob Donaldson, Project Manager
Department of Planning and Zoning

FROM: Juliane Dixon-Crump, Senior Transportation Planner ^{JDC}
DTCI, Transportation Planning & Traffic Engineering Division

SUBJECT: SPEX 2019-0037, SPEX 2019-0038, SPEX 2019-0039 & ZRTD 2019-0004 – Bles Park
Second Referral

Background

This referral updates the status of comments noted in the first Department of Transportation and Capital Infrastructure (DTCI) referral, dated November 25, 2019 on these Special Exception (SPEX) and ZRTD applications that seek approval to: (1) expand an existing park and other amenities pursuant to Section 1-103(F)(2) of the Loudoun County Revised 1993 Zoning Ordinance; (2) allow incidental structures greater than 840 Sq. Ft. in the Flood Plain Overlay District pursuant to Section 4-1506(E) of the Loudoun County Revised 1993 Zoning Ordinance; (3) increase impervious area greater than 3% but not more than 10% in the Flood Plain Overlay District pursuant to Section 4-1506(F) of the Loudoun County Revised 1993 Zoning Ordinance and (4) a Zoning Map Amendment in the Route 28 Tax District (ZRTD) to convert approximately 3.4 acres in the PD-RDP Zoning District from the Loudoun County 1972 Zoning Ordinance to PD-RDP Zoning District under the Loudoun County Revised 1993 Zoning Ordinance.

The subject property (PIN# 038-26-8806) is a 132-acre County Park located north of Bles Park Drive (VA Route 1052) and east of Potomac Drive (VA Route 830). The property is within the Suburban Policy Area. The site is currently accessed via a driveway from Bles Park Drive near Broad Vista Terrace. An additional access is proposed via Bles Park Drive across from Broadview Drive.

This update is based on DTCI review of materials received from the Department of Planning and Zoning on December 9, 2020, including (1) an Information Sheet, dated December 7, 2020; (2) a Statement of Justification prepared by the Applicant, dated October 30, 2020; (3) an Applicant Response Letter, dated October 30, 2020 and (4) a SPEX and ZRTD Plat prepared by Gordon Inc., dated October 30, 2020.

Executive Summary

DTCI can support the approval of these applications as proposed with this submission.

Status of Transportation Comments and Recommendations

Staff comments from the first DTCI referral (November 25, 2019) as well as the Applicant's responses to these comments (October 30, 2020) are provided below. Based upon review of the

Applicant's revised submission materials, DTIC has provided updated statuses for its first referral comments.

Traffic Impact Study

1. Initial Staff Comment (November 25, 2019): DTIC has reviewed the Applicant's Traffic Impact Study and finds it to be an acceptable evaluation of the proposal.

Applicant's Response (October 30, 2020): Acknowledged and appreciated.

Comment Status: No further comments.

Roadway Network and Site Access

2. Initial Staff Comment (November 25, 2019): The proposed expansion of the existing County park to include up to 125,000 SF of incidental structures, impervious playground area and walking trails, 271 additional onsite parking spaces and associated amenities, does not conflict with any existing or planned roadways shown on the Loudoun County 2019 Countywide Transportation Plan (2019 CTP).

Applicant's Response (October 30, 2020): Acknowledged and appreciated.

Comment Status: No further comments.

3. Initial Staff Comment (November 25, 2019): Approval of the applications as proposed would not adversely affect the public roadway network in the vicinity of the site. No additional roadway improvements on Bles Park Drive are warranted or proposed with these applications.

Applicant's Response (October 30, 2020): Acknowledged and appreciated.

Comment Status: No further comments.

cc: John Thomas, PTP, Assistant Director, DTIC
Lou Mosurak, AICP, Senior Coordinator, DTIC
Rob Balinge, Civil Engineer, DTIC

County of Loudoun

Department of Transportation and Capital Infrastructure

MEMORANDUM

DATE: November 25, 2019

TO: Steve Barney, Project Manager
Department of Planning and Zoning

FROM: Juliane Dixon-Crump, Senior Transportation Planner ^{TD}
DTCI, Transportation Planning & Traffic Engineering Division

SUBJECT: SPEX 2019-0037, SPEX 2019-0038, SPEX 2019-0039 & ZRTD 2019-0004 – Bles Park First Referral

Background

These Special Exception (SPEX) application seeks approval to 1) expand an existing Park and other amenities pursuant to Section 1-103(F) (2) of the Revised 1993 Loudoun County Zoning Ordinance; 2) allow incidental structures greater than 840 Sq. Ft. in the Flood Plain Overlay District pursuant to Section 4-1506(E) of the Revised 1993 Loudoun County Zoning Ordinance; and 3) increase impervious area greater than 3% but not more than 10% in the Flood Plain Overlay District pursuant to Section 4-1506(F) of the Revised 1993 Loudoun County Zoning Ordinance. This application also seeks a Zoning Map Amendment in the Route 28 Tax District (ZRTD) to convert approximately 3.4 acres in the PD-RDP Zoning District from the 1972 Loudoun County Zoning Ordinance to PD-RDP Zoning District under the Revised 1993 Loudoun County Zoning Ordinance.

The subject property (PIN# 038-26-8806) is a 132-acre district park located north of Bles Park Drive (VA Route 1052) and east of Potomac Drive (VA Route 830). The property is within the Suburban Policy Area. The site is currently accessed via a driveway from Bles Park Drive near Broad Vista Terrace. An additional access is proposed via Bles Park Drive across from Broadview Drive. A vicinity map is provided as **Attachment 1**.

Department of Transportation and Capital Infrastructure (DTCI) review of this application is based on materials received from the Department of Planning and Zoning on October 25, 2019, including (1) an Information Sheet, dated October 24, 2019; (2) a Statement of Justification prepared by the Applicant, dated August 30, 2019 and revised through October 27, 2019; (3) Traffic Impact Study prepared by Gorove/Slade Associates Inc., dated July 12, 2019; and (4) a SPEX and ZRTD Plat prepared by Gordon Inc., dated October 7, 2019.

Executive Summary

DTCI can support the approval of these applications as proposed with this submission.

Countywide Transportation Plan Arterial and Collector Roadways

The existing and planned transportation network is subject to the policies of the Loudoun County 2019 Countywide Transportation Plan (2019 CTP). Arterial and collector roadways in the vicinity of the proposed development are described below.

Bles Park Drive – VA Route 1052

North of Broad Vista Terrace to George Washington Boulevard (VA Route 1050)

	Existing Condition	Ultimate Condition
<i>Functional Classification (CTP)</i>	Neighborhood Collector	Neighborhood Collector
<i>Section/Lanes</i>	U2 / 70 feet / 2 lanes	U2 / 70 feet / 2 lanes
<i>Bicycle and Pedestrian Facilities</i>	Sidewalk on the western side of the roadway from George Washington Boulevard to Broad Vista Terrace. On-Street bicycle lanes in both directions.	Sidewalk on both sides of the roadway.
<i>Speed Limit</i>	45 MPH	TBD
<i>VDOT Traffic Counts</i>	2,100 AADT (2018)	N/A
<i>Ultimate Improvements</i>	Left -turn lanes at major intersections when warranted. Completion of bike / ped facilities per CTP policy.	
<i>Programmed Improvements</i>	None	
<i>Notes</i>	Road diet completed for Bles Park Drive in 2019. Roadway reduced from 4 to 2 lanes with left-turn lanes at certain intersections, including at new site access opposite Broadview Terrace. Restriping with road diet included the addition of a parking lane on the east / north side of the road and on-street bicycle lanes in both directions.	

Summary of Traffic Impact Study

DTCI's assessment of the Applicant's traffic analysis and transportation impacts deriving from the proposed development is based on review the Applicant's submission materials, existing and planned transportation facilities, and applicable County policies.

Currently the site is operating as a County Park. The Applicant is seeking approval to expand the existing park and other amenities to include up to 125, 000 SF of incidental structures, impervious playground area and walking trails, increase existing onsite parking by 271 spaces (for a total of 350 spaces) and construct a new site access via Bles Park Drive across from Broadview Drive.

A review of safety and operations for existing roadways in the vicinity of the site indicates that within the past three years, the following incidents were reported to the Loudoun County Sheriff's Office:

- Bles Park Drive and Broad Vista Terrace: 1 crash, 0 injuries.
- Bles Park Drive and Site Entrance #1: 0 crashes.
- Bles Park Drive and Broadview Drive: 0 crashes.
- George Washington Boulevard and Bles Park Drive: 9 crashes, 4 injuries.

The Applicant submitted a Traffic Impact Study (TIS) dated July 12, 2019 analyzing the impacts of the proposed development noted above under Total Future 2022 conditions at the following intersections:

- Bles Park Drive/Broad Vista Terrace (Intersection #1)
- Bles Park Drive/Existing Site Entrance (Intersection #2)
- Bles Park Drive and Broadview Drive/Future Site Entrance (Intersection #3)
- George Washington Boulevard and Bles Park Drive (Intersection #4)

With trips to and from the subject property were distributed as follows:

- 2% of trips to and from the south on Broad Vista Terrace
- 2% of trips to and from the south on Broadview Drive
- 7% of trips to and from the south on Bles Park Drive
- 65% of trips to and from the west on George Washington Boulevard
- 24% of trips to and from the east on George Washington Boulevard

No trip reductions were assumed with these applications.

Based upon the existing development on the site, permitted development potential, and this proposal, the development would impact existing and potential site trip generation as follows:

Table 1: Existing and Proposed Trip Generation Comparisons for Bles Park

Development Program	AM Peak Trips	PM Peak Trips	Weekday Total Trips	Saturday Trips
<u>Total Existing Trips</u>	8	14	140	19
<u>Total Proposed Trips With These Applications</u>	35	62	620	84
Difference (Proposed minus Existing)	+27	+48	+480	+65

Sources: DTCI Staff and Bles Park Traffic Impact Study, Gorove/Slade Associates Inc., July 12, 2019, Page 21.

*For complete breakdown of trip generation, please consult the Applicant's TIS.

While the proposed development is forecasted to result in increased peak hour trip generation, the Traffic Impact Study indicates that the surrounding roadway network will be able to accommodate these increased traffic volumes without mitigation.

Transportation Comments and Recommendations

Based upon review of the Applicant's submission materials, DTCI has the following comments:

Traffic Impact Study

1. DTCI has reviewed the Applicant's Traffic Impact Study and finds it to be an acceptable evaluation of the proposal.

Roadway Network and Site Access

2. The proposed expansion of the existing County park to include up to 125, 000 SF of incidental structures, impervious playground area and walking trails, 271 additional onsite parking spaces and associated amenities, does not conflict with any existing or planned roadways shown on the Loudoun County 2019 Countywide Transportation Plan (2019 CTP).
3. Approval of the applications as proposed would not adversely affect the public roadway network in the vicinity of the site. No additional roadway improvements on Bles Park Drive are warranted or proposed with these applications.

ATTACHMENT

1. Site Vicinity Map

cc: Lou Mosurak, Senior Coordinator, DTCI

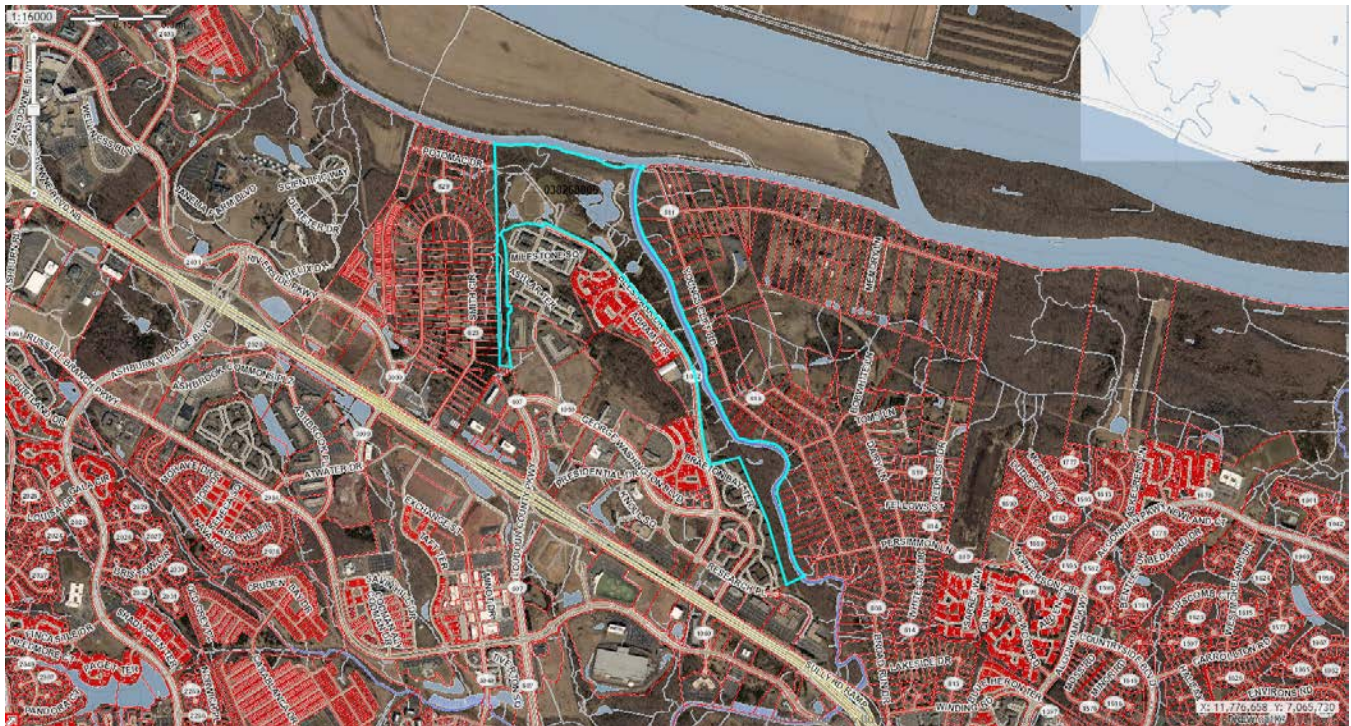
November 25, 2019



Loudoun County, Virginia
www.loudoun.gov

Print

(map not to scale)



**SPEX 2019-0037 SPEX 2019-0038 SPEX 2019-0039 & ZRTD 2019-0004
Bles Park**

ATTACHMENT 1



**Loudoun County, Virginia
Department of Fire and Rescue
Fire Marshal's Office**

23675 Belmont Ridge Road, Suite 150
Ashburn Virginia 20148
Phone 703-737-8600 Fax 703-737-8595



Memorandum

DATE: January 6, 2021

TO: Steve Barney, Project Manager, Engineering Division

FROM: Kevin Federline, Fire Inspector

THRU: Linda Hale, Chief Fire Marshal

SUBJECT: SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039, ZMOD-2019-0049, ZMOD-2020-0001, and ZRTD-2019-0004 **BLES Park, Second Submission**

The Loudoun County Fire Marshal's Office has no objections to the zoning and special exceptions for the project. The Loudoun County Fire Marshal's Office reserves the right to ensure Fire Code compliance when more detailed information is made available on the construction drawing submission. For example, but not limited to, the FMO will be looking for more information on the following if required: approved fire apparatus access roads located within an emergency access easement, fire lane identification for fire apparatus access roads, hydrant locations, hydrant coverage measured by 300 foot hose lay "as the hose lies" between and around obstructions from the hydrant to all portions of the building's exterior, fire apparatus access roads to be within 150 feet of the exterior of buildings first floor, turning radii/turning analysis using AASHTO - SU-40 on fire apparatus access roads, and immediate unobstructed access to fire department connections if provided.

Prior to the issuance of an occupancy permit for any facility, building, or portion of a building hereafter constructed, Fire Lane Identification shall be provided, permitted, and an approved inspection along any Fire Apparatus Access Road serving such facility, building, or portion of a building.

If there are any changes to the plans include the Fire Marshal's Office in review to ensure fire code compliance.

- I. Requirements: From the current Loudoun County Facilities Standards Manual (FSM) and the current Loudoun County Fire Prevention Code (LCFPC)**
 - 1. None.
- II. Concern:**
 - 1. None.
- III. Recommendations:**
 - 1. None.

Requirements for fire apparatus access roads:

1. Fire Apparatus Access Road is designed and maintained to a minimum of 20 feet of unobstructed width, 13.5 feet of unobstructed vertical clearance, support H-20 loading, be surfaced so as to provide all-weather driving capabilities, located within an "Emergency Access" easement, and identified as a fire lane in accordance with the FSM Chapter 4.

Information for requesting modifications to the LCFPC:

1. 106.5 Modifications. The fire official may grant modifications to any provision of the SFPC upon application by the owner or the owner's agent provided the spirit and intent of the SFPC are observed and public health, welfare, and safety are assured. Note: The current editions of many nationally recognized model codes and standards are referenced by the SFPC. Future amendments to such codes and standards do not automatically become part of the SFPC; however, the fire official should consider such amendments in deciding whether a modification request should be granted.
2. 106.5.1 Supporting data. The fire official shall require that sufficient technical data be submitted to substantiate the proposed use of any alternative. If it is determined that the evidence presented is satisfactory proof of performance for the use intended, the fire official shall approve the use of such alternative subject to the requirements of this code. The fire official may require and consider a statement from a professional engineer, architect or other competent person as to the equivalency of the proposed modification.

Pursuant to section 112.1 of the Fire Prevention Code:

If you have concerns about the application of the Fire Prevention Code (FPC) or to request a modification to the provisions of the FPC pursuant to section 106.5, please contact Chief Fire Marshal Linda Hale at 703/737-8600. The owner of a structure, the owner's agent or any other person involved in the design, construction or maintenance of the structure may appeal a decision of the fire official concerning the application of FPC or the fire official's refusal to grant modification. Persons wishing to file an appeal shall submit a written request for appeal to the Board of Building Code Appeals (BBCA), within 14 calendar days of receipt of the decision being appealed. Person's wishing to file an appeal shall address it to Deputy Fire Marshal at DutyFm@Loudoun.gov, or send by certified mail to the Loudoun Fire Marshal's Office at the above address. The appeal shall contain the name and address of the owner of the structure and the person appealing if not the owner. A copy of the written decision of the fire official shall be submitted along with the appeal. Failure to submit an appeal within the time limit established shall constitute acceptance of the fire official's decision.



Loudoun County Fire and Rescue

PO Box 7100
801 Sycolin Road SE, Suite 200
Leesburg, VA 20177-7100
Phone 703-777-0333 Fax 703-771-5359



Memorandum

To: Steve Barney, Project Manager
From: Maria Figueroa Taylor, Fire-Rescue Planner *JK*
Date: November 25, 2019
Subject: Bles Park
SPEX 2019-0037, 2019-0038, 0039 & ZRTD 2019-0004

Thank you for the opportunity to review the above captioned applications. The Fire and Rescue Planning Staff has no comments.

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

PIN	Kincora, Station 24/35 Travel Time
038-26-8806	7 minutes

Travel times are determined using ESRI GIS network analyst along the county's street centerline with distance and speed limit being the criteria. Travel time is reported in minutes. For the approximate response time two minutes is added for turnout time.

Approximate Response Time for Kincora, Station 24/35
9 minutes

The Fire and Rescue Planning Staff is not opposed at the proposed applications. However, the submitted materials do not provide enough detail to evaluate access and circulation of emergency vehicles. Staff respectfully requests that the Applicant demonstrates adequate access and circulation of emergency vehicles to all areas of the proposed development. Staff understands that this concern may be best addressed at the time of site plan. If you have any questions or need additional information, please contact me at 703-777-0333.

c: Project file



**Loudoun County, Virginia
Department of Fire and Rescue
Fire Marshal's Office**

23675 Belmont Ridge Road, Suite 150
Ashburn Virginia 20148
Phone 703-737-8600 Fax 703-737-8595



Memorandum

DATE: November 21, 2019

TO: Steve Barney, Project Manager, Engineering Division

FROM: Kevin Federline, Fire Inspector

THRU: Linda Hale, Chief Fire Marshal

SUBJECT: SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039 & ZRTD-2019-0004
BLES Park, First Submission

Due to the lack of necessary information required to determine Fire Code compliance, the Loudoun County Fire Marshal's Office abstains from support or objection of the zoning and special exceptions until such time that additional data is made available. Without additional details the Loudoun County Fire Marshal's Office cannot assure compliance with the Fire Code. The Loudoun County Fire Marshal's Office reserves the right to guarantee Fire Code compliance when more detailed information is made available.

If there are any changes to the plans include the Fire Marshal's Office in review to ensure fire code compliance.

- I. Requirements: From the current Loudoun County Facilities Standards Manual (FSM) and the current Loudoun County Fire Prevention Code (LCFPC)**
 - 1. None.
- II. Concern:**
 - 1. None.
- III. Recommendations:**
 - 1. None.
- IV. Questions:**
 - 1. None.

Requirements for fire apparatus access roads:

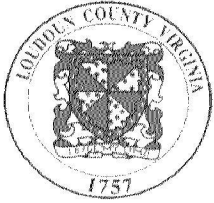
1. Fire Apparatus Access Road is a minimum of 20 feet unobstructed width, 13.5 feet of unobstructed vertical clearance, designed and maintained to support H-20 loading, be surfaced so as to provide all-weather driving capabilities, located within an "Emergency Access" easement, and identified as a fire lane in accordance with the FSM Chapter 4.

Information for requesting a modifications to the LCFPC:

1. 106.5 Modifications. The fire official may grant modifications to any provision of the SFPC upon application by the owner or the owner's agent provided the spirit and intent of the SFPC are observed and public health, welfare, and safety are assured. Note: The current editions of many nationally recognized model codes and standards are referenced by the SFPC. Future amendments to such codes and standards do not automatically become part of the SFPC; however, the fire official should consider such amendments in deciding whether a modification request should be granted.
2. 106.5.1 Supporting data. The fire official shall require that sufficient technical data be submitted to substantiate the proposed use of any alternative. If it is determined that the evidence presented is satisfactory proof of performance for the use intended, the fire official shall approve the use of such alternative subject to the requirements of this code. The fire official may require and consider a statement from a professional engineer, architect or other competent person as to the equivalency of the proposed modification.

Pursuant to section 112.1 of the Fire Prevention Code:

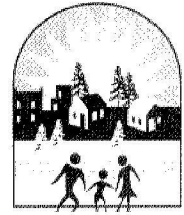
If you have concerns about the application of the Fire Prevention Code (FPC) or to request a modification to the provisions of the FPC pursuant to section 106.5, please contact Chief Fire Marshal Linda Hale at 703/737-8600. The owner of a structure, the owner's agent or any other person involved in the design, construction or maintenance of the structure may appeal a decision of the fire official concerning the application of FPC or the fire official's refusal to grant modification. Persons wishing to file an appeal shall submit a written request for appeal to the Board of Building Code Appeals (BBCA), within 14 calendar days of receipt of the decision being appealed. Person's wishing to file an appeal shall address it to Duty Fire Marshal at DutyFm@Loudoun.gov, or send by certified mail to the Loudoun Fire Marshal's Office at the above address. The appeal shall contain the name and address of the owner of the structure and the person appealing if not the owner. A copy of the written decision of the fire official shall be submitted along with the appeal. Failure to submit an appeal within the time limit established shall constitute acceptance of the fire official's decision.



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

Loudoun County Health Department

P.O. Box 7000
Leesburg VA 20177-7000



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

December 22, 2020

MEMORANDUM TO: Rob Donaldson, Project Manager MSC #62
Planning & Zoning

FROM: Roger R. Lewis, MSC #68
Sr. Environmental Health Specialist
Division of Environmental Health

SUBJECT: SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039, ZMOD-2019-0049, ZMOD-2020-0001 & ZRTD-2019-0004 Bles Park
PIN: 038268806000

This Department reviewed the package and the plat prepared by Gordon, dated October 30, 2020, and staff supports the approval of the application with the following reservations:

Both GIS and the attached plans identify one well and one septic system on the subject property.

WWIR-2004-0146 – Irrigation well
PSSD-1969-0051 – Individual onsite septic system

No abandonment records exist for the well or septic system. If they are no longer in use or if construction activities are to impact one or both of these systems, abandonment permits will be required by the Health Department.

If further information or clarification on the above project is required, please contact Roger R. Lewis at 703-737-8849.

W: Referrals/SPEX-2019-0037 thru SPEX-2019-0039 Bles Park (2)

RRL/JAH/rrl

JAH



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

November 5, 2019

MEMORANDUM TO: Steve Barney, Project Manager MSC #62
Planning & Zoning

FROM: Roger R. Lewis, MSC #68 *RRL*
Sr. Environmental Health Specialist
Division of Environmental Health

SUBJECT: SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039 &
ZRTD-2019-0004 Bles Park
PIN: 038268806000

This Department reviewed the package and the plat prepared by Gordon, dated October 7, 2019, and staff supports the approval of the application with the following reservations:

Both GIS and the attached plans identify one well and one septic system on the subject property.

WWIR-2004-0146 – Irrigation well
PSSD-1969-0051 – Individual onsite septic system

No abandonment records exist for the well or septic system. If they are no longer in use or if construction activities are to impact one or both of these of these systems, an abandonment permit will be required by the Health Department.

If further information or clarification on the above project is required, please contact Roger R. Lewis at 703-737-8849.

W: Referrals/SPEX-2019-0037 thru SPEX-2019-0039 Bles Park

RRL/JAH/rrl

November 22, 2019

Mr. Steve Barney
Department of Building and Development
1 Harrison Street, S.E.
P. O. Box 7000
Leesburg, Virginia 20177-7000

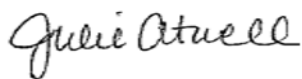
Re: **Bles Park; SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039, ZRTD-2019-0004**

Dear Mr. Barney:

Loudoun Water has reviewed the referenced referral application and offers no objection to its approval. Service would be contingent upon the developer's compliance with the Authority's Statement of Policy; Rates, Rules and Regulations; and Design Standards.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Julie Atwell
Engineering Administrative Specialist



From: Rutyna, Mark
To: [Barney, Steve](#)
Cc: [Wollard, Gregg](#)
Subject: [EXTERNAL] VARIOUS ZONING CHANGES - BLES PARK
Date: Monday, November 25, 2019 1:29:56 PM
Attachments: [image001.png](#)
[Bles Park New Contour Map_Final.pdf](#)

Steve,

Thank you for the opportunity to comment on BLES PARK and the proposal to introduce new facilities at the existing park. The park is approximately bounded by Bles Park Drive, Harry Byrd Highway and the Potomac River.

The Airports Authority does not object to the proposed facilities. Due to the park's alignment with the extended runway centerline of Washington Dulles International Airport's existing Runways 1C/19C and 1R/19L, the Airports Authority predicts that aircraft noise will be audible at the site. In addition, aircraft operations for these runways are projected to increase in the future. As a reminder, aircraft noise exposure to outdoor facilities cannot be mitigated. The Airports Authority confirmed that currently a relatively small portion of the park is within the County's Airport Impact Overlay District 60 DNL - 1 Mile Buffer contour, however, much of the park falls within the 60 DNL - 1 Mile Buffer Ultimate Conditions noise contour (final but not yet adopted by the County), as depicted in the attached graphic.

If the pavilions, skate spots or tennis courts are approved for development by the County, the Airports Authority does not object to the development provided that any associated lighting does not project light upward into the night sky. Because the height of the proposed infrastructure is not specified, filing of a Notice of Proposed Construction (form 7460) with the Federal Aviation Administration (FAA) under Title 14 of the Code of Federal Regulations CFR [Part 77](#) may be required. The referred website has a tool the applicant can use to identify if a 7460 form is required (<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>). As an added precaution, the Airports Authority recommends that the applicant submit a 7460 form regardless of the results of the tool.

If you have any questions, please let me know. Thank you.

Mark Rutyna, CAPM, C.M.
Airport Planner

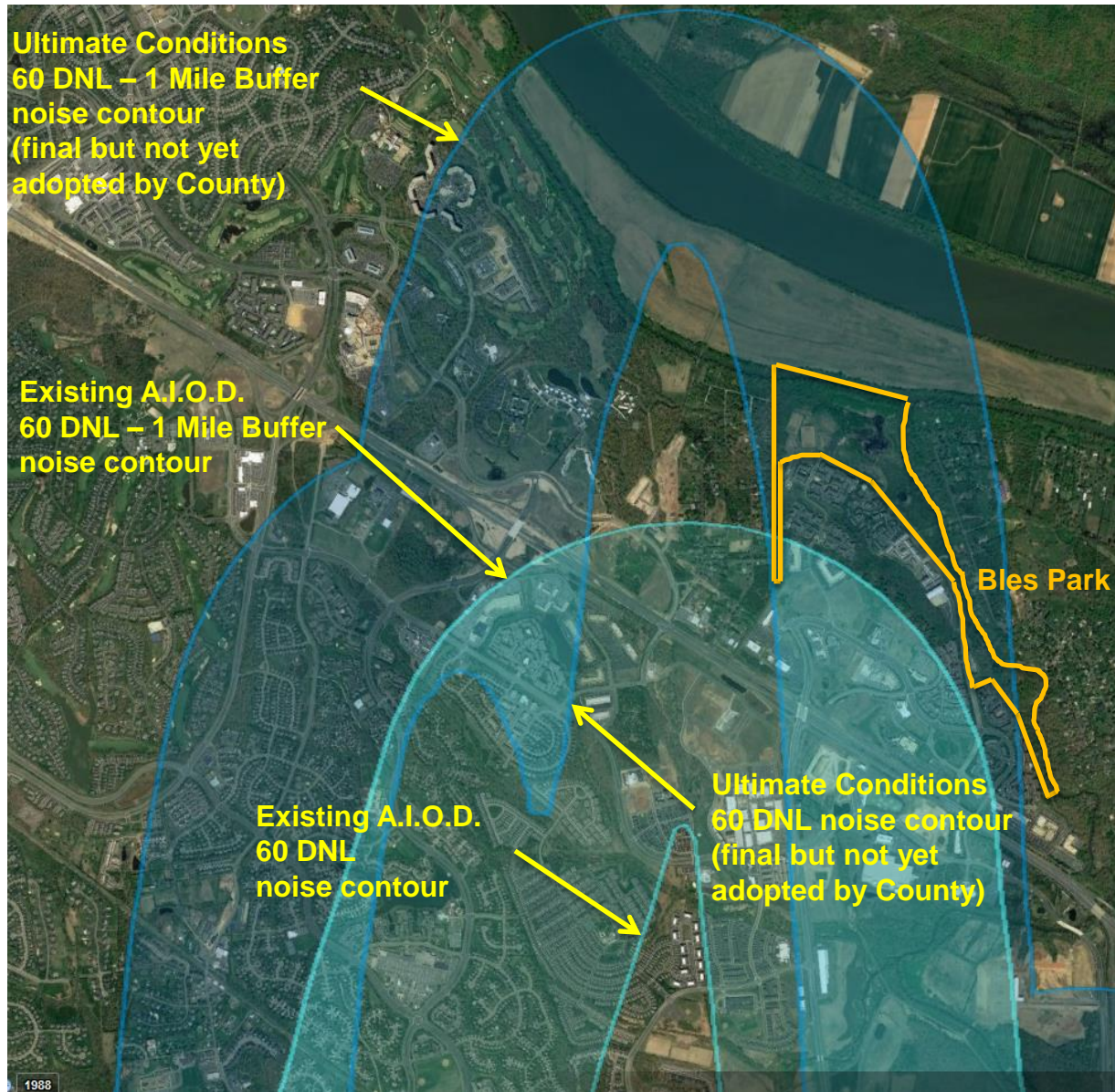


1 Aviation Circle, MA-32D
Washington, DC 20001-6000

T: 703-572-0262
F: 703-572-0299
Mark.Rutyna@mwaa.com

mwaa.com

IAD- Bles Park



DEPARTMENT OF BUILDING AND DEVELOPMENT

COUNTY OF LOUDOUN

MEMORANDUM

DATE: January 7, 2021

TO: Rob Donaldson, Project Manager, Department of Planning and Zoning

FROM: Todd Taylor, Floodplain Engineer

THROUGH: Ryan Reed, Natural Resources Team Leader

CC: Maggie Auer, Floodplain Administrator
Kyle Dingus, Urban Forester
Kelly Williams, Community Planner, Department of Planning and Zoning
Rory Toth, Zoning Planner, Department of Planning and Zoning

**SUBJECT: SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039,
ZMOD-2019-0049, ZMOD-2020-0001, and ZRTD-2019-0004
Bles Park
(2nd Submission)**

The Natural Resources Team (NRT) reviewed the special exception, zoning modification, and zoning conversion applications and offers the following comments:

Natural Resources:

- 1) To more accurately identify steep slope areas and evaluate compliance with the Steep Slope Standards, please depict moderately steep slopes (15 to 25 percent), very steep slopes (greater than 25 percent), and steep slopes greater than 50 percent, as applicable, based on the 1-foot topography provided on the plan set (i.e. topographical analysis). (R93ZO 5-1508 and 6-407)
- 2) Please remove the pavilion area and overlook of natural clearing (near the Eastern Loudoun Adult Day Center) from the Scenic Creek Valley Buffer (SCVB) buffer or pursue a reduction in accordance with R93ZO 5-1002(D). Note that if the overlook is constructed as a raised boardwalk, as pictured on Sheet 11, it would be considered pervious and be permitted within the buffer. (R93ZO 5-1003)

Recommendations

- 3) Impacts to wildlife habitat, vegetation, wetlands, and water quality are issues for consideration as part of a special exception application. Based on the location of the park and proposed improvements in proximity of the streams, please expand on the statement of justification to provide additional information and specific measures that

will be incorporated to provide protection and/or mitigation. For example, the Endangered and Threatened Species Review, dated December 3, 2018, identifies the potential for the white trout lily (state-rare species) and wood turtle (state-threatened) to occur on the park site and references an inventory/searches as part of the wetland permitting process. Please provide information regarding the status of the inventory/searches. (R93ZO 6-1309(4))

- 4) Consistent with the applicant's responses, staff recommends adding a note to Sheet 2 stating that the natural surface trails will follow the existing contours, will not traverse areas where slopes are greater than 50 percent, and the trail alignment will be refined based on a slope analysis to comply with the Steep Slope Standards at the time of site plan.
- 5) Staff continues to recommend depicting the River and Stream Corridor 50-foot Management Buffer around the major floodplain and adjacent very steep slopes on the special exception plat. (2019 General Plan (2019 GP) River and Stream Corridor Resources Strategy 2.2)
- 6) Consistent with River and Stream Corridor Resources Strategy 2.2 Action B, staff continues to recommend incorporating mitigation measures to help offset the impacts of the River and Stream Corridor 50-foot Management Buffer encroachments. (R93ZO 4-1507(F) and 6-1309(4))
- 7) Sheets 7 and 8 identifies a conservation easement. Please provide information describing the intent of this area, specifically the activities allowed.

Floodplain Management:

Recommendations

- 8) The last paragraph of the SPEX narrative on Sheet 2 states that this application seeks the ability to allow for a potential of 9.5% imperviousness and up to 125,000 square feet of incidental structures in the major floodplain. The tabulations on sheets 2 and 6 references the special exception request for a maximum of 371,150 square feet of impervious surfaces (7.89% impervious) and 53,950 square feet of incidental structures in the floodplain. Please review and correct this discrepancy. (R93ZO 4-1506)
- 9) Please clarify why the adult day center is included in the SPEX Breakdown of FOD Areas tabulation on Sheet 6 as the facility is not located in the floodplain. (R93ZO 4-1506)
- 10) Please review and verify that the floodplain tabulations provided on Sheet 2 are consistent with the SPEX Breakdown of FOD Areas tabulation on Sheet 6. For

example, it appears that the square footage of existing and proposed incidental structures is reversed in the table on Sheet 2. (R93ZO 4-1506)

- 11) Please clarify the need for the 10 percent contingency in the structures and impervious surfaces tables on Sheet 2. The existing square foot of existing structures is a known value and the proposed square footage should be a maximum that accounts for minor adjustments. (R93ZO 4-1506(E) and 4-1506(F))
- 12) As previously stated, as minor floodplain is not present on the subject property, please remove the first sentence in General Note 8 on Sheet 2. (FSM 8.101.A.20)
- 13) Staff was unable to locate the note referenced in the applicant's responses regarding the proposed maintenance facility. Please provide information regarding the activities and types of storage (fertilizers, herbicides, pesticides?) anticipated for the proposed maintenance facility. Also, include a note on the special exception plat indicating that bulk storage of gasoline, chemicals, fuels, or similar substances are prohibited at the maintenance facility. (R93ZO 4-1506(E))

Urban Forestry:

Recommendations

- 14) Staff recommends that stabilization of trails and the canoe/kayak launch for recreational uses are done with as minimal impact as possible to tree roots. Wood chips are recommended for stabilization.
- 15) Staff recommends that invasive species control should be implemented to protect the biodiversity of the area.
- 16) Staff suggests a time of site plan 80% of all landscaping to include all plant classifications of chapter 7 in the FSM be species native to Virginia. Additionally, any grasses used for landscaping purposes should be 100% native to Virginia.

Please contact me if you have any questions or need additional information. Also, please ensure that any future submissions are referred to the NRT.



COUNTY OF LOUDOUN PARKS, RECREATION AND COMMUNITY SERVICES REFERRAL MEMORANDUM

To: Steve Barney, Project Manager, Planning and Zoning (MSC #62)

From: Mark A. Novak, Chief Park Planner, Facilities Planning and Development (MSC #78)

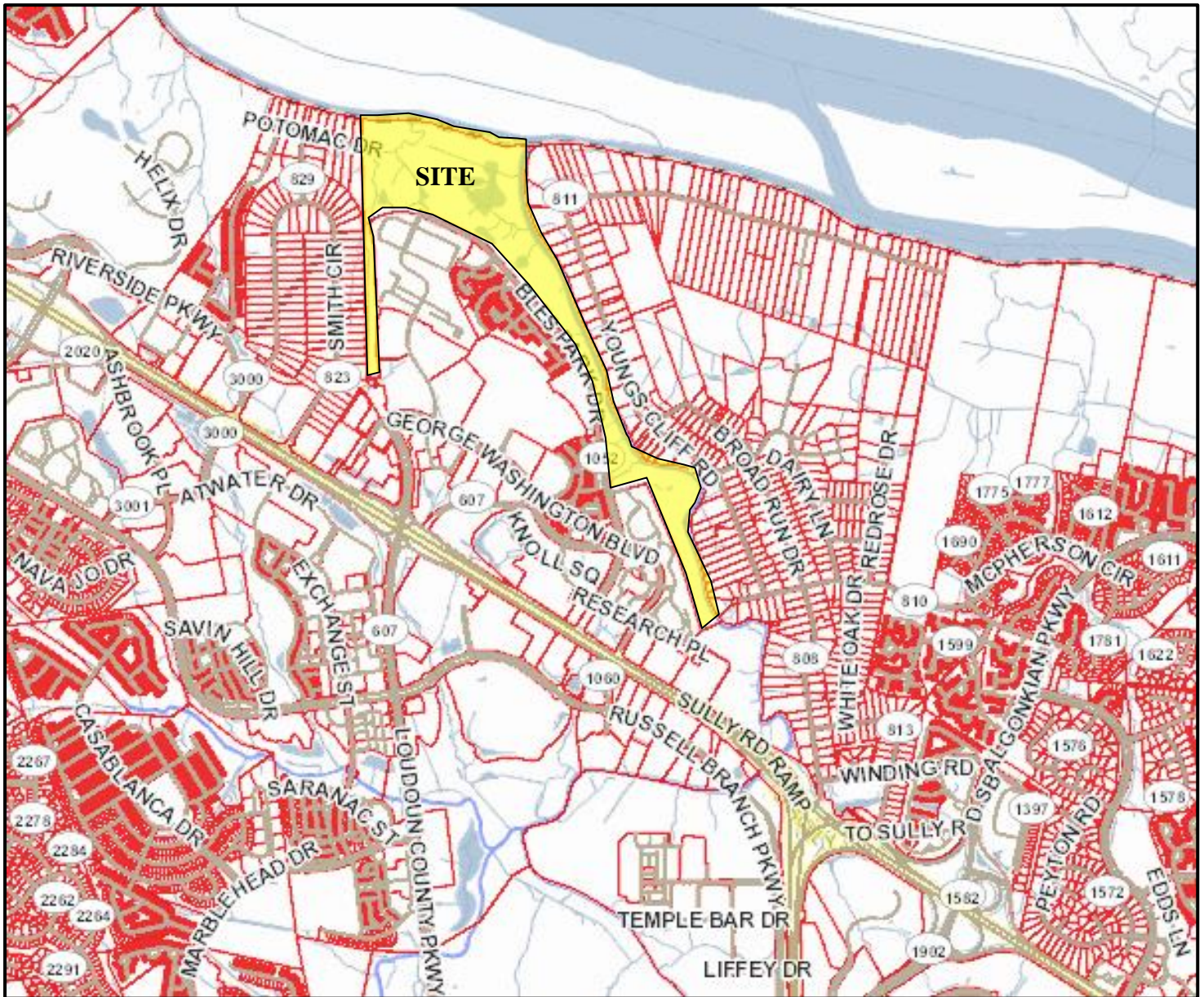
CC: Steve Torpy, Director
Karen Sheets, Deputy Director
Jeremy Payne, Deputy Director
Jefferson Miller, Assistant Park Planner
Kristen Blaylock-Reed, Chairman, PROS Board, Dulles District
Kelly Foltman, Vice Chairman, Open Space Member At-Large
James O'Connor, PROS Board, Algonkin District
Kenya Savage, PROS Board, Chair At-Large
Karla Etten, Open Space Member At-Large

Date: November 22, 2019

Subject: Bles Park | SPEX 2019-37, 0038 & 0039 ZRTD 2019-0004
Election District: Algonkian **Sub Planning Area:** Ashburn
MCPI # 038-26-8806

APPLICATION OVERVIEW:

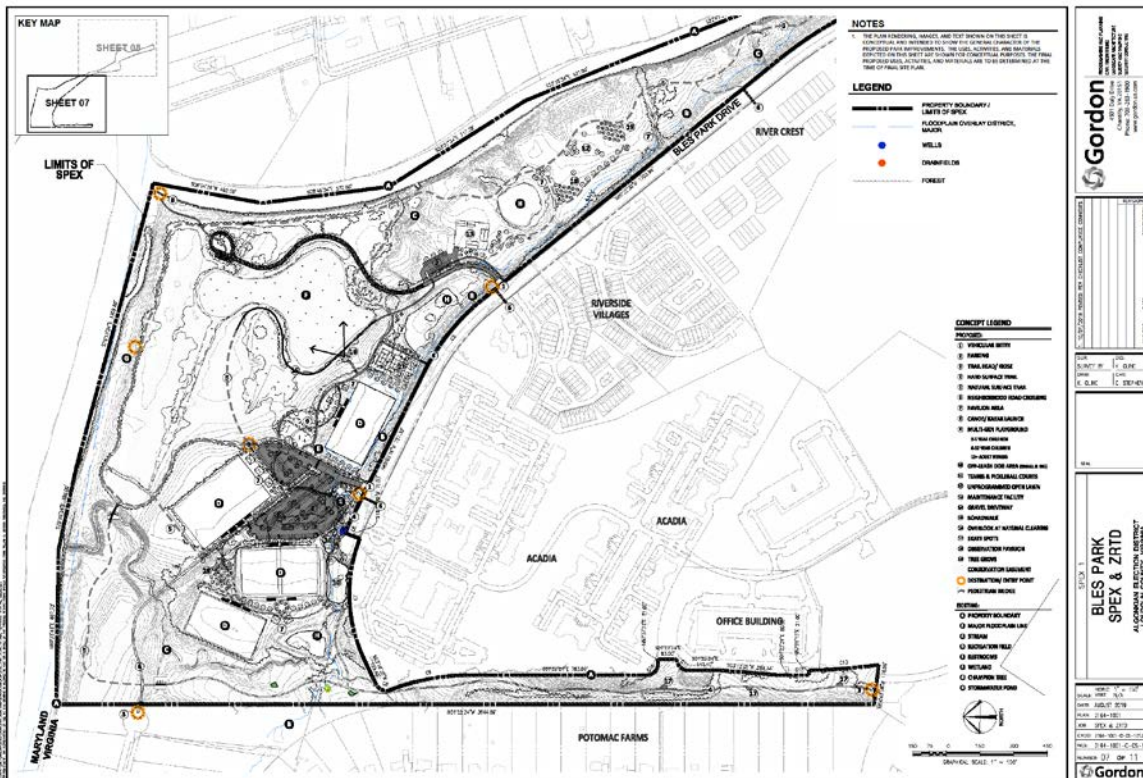
The subject property is located adjacent to Bles Park Dr. to the south, the Potomack River to the north, Broad Run Farms Subdivision to the east, the Riverside Villages and Overlook at University Center subdivisions to the south and the Potomac Farms subdivision to the west. The park sits on 132 acres with four soccer fields, a parking lot, a playground and restroom facility, along with walking trails and the Eastern Loudoun Adult Day Center. The application proposes to expand the existing park with various program amenities that include pavilions, canoe / kayak launch, multi-generation playgrounds, skate spots, off-leash dog area, tennis & pickleball courts, and overlook areas and un-programmed open lawn. When completed, the project will offer a safe and accessible parks and recreation opportunities by means of inter-connected open space that provide diverse activities for all ages, interests and abilities. To accomplish this the applicant is requesting approval of three special exceptions (SPEX) and a Rezoning in Rt. 28 District (ZRTD).



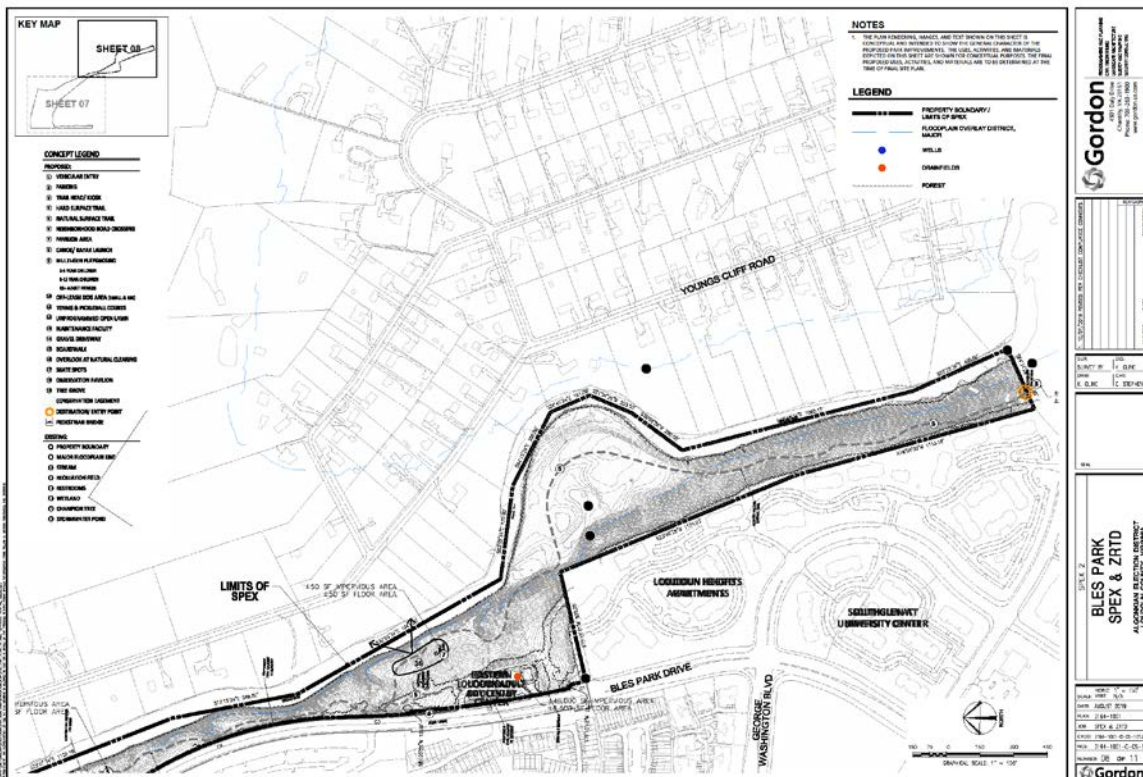
VICINITY MAP

PROJECT PROPOSAL:

The applicant proposes to expand the existing park with various program amenities that include pavilions, canoe / kayak launch, multi-generation playgrounds, skate spots, off-leash dog area, tennis & pickleball courts, and overlook areas and un-programmed open lawn. When completed, the project will offer a safe and accessible parks and recreation opportunities by means of inter-connected open space that provide diverse activities for all ages, interests and abilities.



SPEX & ZRTD 1 OF 2



SPEX & ZRTD 2 OF 2

COMMENTS/RECOMMENDATIONS:

The Department of Parks, Recreation and Community Services (PRCS) has reviewed the proposal application. As a co-applicant PRCS defers to other referral agencies for additional comments however, supports the application as presented.

If you have any questions or concerns regarding these comments, please do not hesitate to contact me at 703-737-8992 or mark.novak@loudoun.gov.

MEMORANDUM

To: Rob Donaldson, Project Manager, Land Use Review

From: Steve Thompson, PhD, RPA, County Archaeologist, Community Planning

Date: February 18, 2021

Re: SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039 & ZRTD-2019-0004, Bles Park; Archaeology 1st Referral

BACKGROUND

The applicant is requesting three Special Exceptions (SPEX) and a Zoning Conversion (ZRTD) to modify and expand the facilities at the existing Bles Park to allow incidental structures greater than 840 square feet in the major floodplain, increase the impervious area to greater than 3% in the major floodplain, and convert 3.4 acres from the 1972 Loudoun County Zoning Ordinance to the Revised 1993 Loudoun County Zoning Ordinance.

The 132.25-acre property, owned by the County, is located on the south bank of the Potomac River, west of its confluence with Broad Run. The property is bounded to the north by the river, to the east by the course of Broad Run and the Broad Run Farms subdivision, to the south by Bles Park Drive, and to the west by an unnamed seasonal stream and the Potomac Farms subdivision. Portions of the property are developed with four turf soccer fields, a playground, rest rooms, parking, several storm water management ponds, and extensive constructed/reclaimed wetlands. The remainder of the property, historically cleared for agricultural purposes, supports relatively young (20-year-old) successional vegetation.

COMPLIANCE WITH THE COMPREHENSIVE PLAN

The *Loudoun County 2019 General Plan* (2019 GP) calls for the conservation and preservation of the County's cultural and scenic resources. Land development applications are required to include an archaeological and historic resources survey to identify resources and, if warranted, identify measures for preservation, mitigation, and adaptive reuse (2019 GP, Chapter 3, *Historic, Archaeologic, and Scenic Resources*, Action 5.1.C). The *Loudoun County Heritage Preservation Plan* (HPP) provides additional detail regarding survey requirements (HPP, Chapter 2, *Archaeological Resources*, Policy 3). The HPP further articulates policies regarding the preservation of significant heritage resources in the context of land development (HPP, Chapter 9, *Development Review*).

In compliance with the 2019 GP, the applicant has submitted a cultural resources survey report prepared by Thunderbird Archeology, Wetland Studies and Solutions in June 2020 titled *Phase I Cultural Resources Investigation, Bles Park, Loudoun County, Virginia*.

ANALYSIS

Thunderbird's Phase I survey included background documentary research to establish environmental and historical context, pedestrian reconnaissance and visual inspection of the entire property, and systematic shovel testing at 50-foot intervals across all terrain not characterized by excessive slope, water saturation, or prior disturbance.

Subsurface Phase I survey within the Bles Park property was restricted to the limits of disturbance proposed by the current applications, an area totaling approximately 47.8 acres or 36% of the subject property. As detailed construction plans are not available, these limits must necessarily be regarded as approximate and provisional. Staff also notes that the Phase I survey included very limited subsurface testing in the vicinity of the current athletic fields and parking lot, presumably in deference to assumed disturbance associated with construction of these existing features. Staff notes that at least two of the athletic fields occupy platforms of imported fill, which may overlie intact and possibly significant archaeological deposits. Clarification of the nature and extent of both existing and proposed disturbances in this central portion of the Phase I survey's "Area A" requires additional Phase I subsurface testing combined as well as more careful consideration of development plans for this area.

Elsewhere within the property, the Phase I survey recorded three previously identified archaeological sites (44LD0157, 44LD0436, 44LD0437) and 15 newly identified archaeological sites (44LD1890 – 44LD1904, inclusive). No buildings or structures 50 or more years in age were identified within the Phase I survey area or the encompassing subject property. Four of the identified archaeological sites (44LD0157, 44LD1892, 44LD1893, 44LD1904), all located within 500 feet of the Potomac River, are recommended by the Phase I survey report as potentially eligible for listing on the National Register of Historic Places (NRHP). The remaining 14 archaeological sites recorded on the property are recommended not eligible for the NRHP and therefore warrant no further investigation. The following analysis considers each of these archaeological sites.

Site 44LD0157 is in the northcentral portion of the property along the top of a levee that parallels the south bank of the Potomac River. Initially identified in 1980 based on an avocational surface collection, Thunderbird's Phase I testing demonstrates that the site is far more extensive, extending for approximately 850 feet east-west along the riverside levee. Because Thunderbird's Phase I testing was limited to a single transect along the centerline of a proposed pedestrian path, the full north-south dimensions of the site have not been determined. Artifacts collected during Phase I shovel testing include pre-Contact era Native American lithics, pottery dating to the

Early Woodland and earlier Late Woodland periods, and fragments of calcined animal bone. More than 90% of the recovered artifacts came from a buried ground surface (Ab horizon) two to three feet below existing grade. Limited numbers of late eighteenth and nineteenth-century artifacts were also recovered from the site during Phase I testing. Because of the buried pre-Contact era ground surface and the range of Native American artifact types present, the site is recommended potentially eligible for listing on the National Register of Historic Places (NRHP) and **a Phase II significance evaluation is recommended if the deep disturbances to the site area cannot be avoided. Staff concurs with this recommendation.**

Site 44LD1892 is in the northeastern corner of the property, just upstream of the confluence of Broad Run with the Potomac River. Like 44LD0157, the site is located atop the natural riverside levee. As Phase I testing was confined to the limits of disturbance associated with the current application, the full extent of the site was not defined. Minimally, 44LD1892 covers an area of approximately 135 feet east-west by 200 feet north-south. Recovered cultural material includes Early Woodland period Native American pottery and flaked stone artifacts of uncertain age, as well as fire-cracked rock and bone. As at 44LD0157, most material was recovered from a buried ground surface some two to three feet below existing grade. Because of the presence of relatively undisturbed, stratified cultural deposits, 44LD1892 is recommended potentially eligible for NRHP inclusion and **Phase II evaluation is warranted if deep disturbances to the area cannot be avoided. Staff concurs with this recommendation.**

Site 44LD1893 is located in the northcentral portion of the property, between 44LD0157 and the northernmost of the four athletic fields. The site was identified by a series of contiguous positive shovel test pits excavated along the centerline of a proposed pedestrian path and consequently its full extent has not been determined. Minimally, the site covers an area measuring 360 feet east-west by 125 feet north-south. **A minor discrepancy exists between the site boundaries as mapped in the Phase I report and in VDHR's V-CRIS database and should be corrected.** Artifacts recovered from 44LD1893 include relatively abundant quantities of flaked stone of indeterminate age as well as Early Woodland period Native American pottery. The northern portion of the site contains a buried ground surface approximately 1.75 feet to 2.25 feet below existing grade. Because of intact stratigraphy and buried cultural deposits in at least a portion of the site, the site is considered potentially eligible for NRHP listing and should receive **a Phase II significance evaluation if impacts cannot be avoided. Staff concurs with this recommendation.**

Site 44LD1904 is in the northwestern corner of the property along an alluvial levee and terrace overlooking the Potomac River. Phase I testing was only conducted along the centerline of a proposed pedestrian path. Although the full dimensions of the site have not been determined, it stretches for approximately 600 feet east-west. While to the west, artifacts are confined to a relatively shallow (0.6-ft) plow zone overlying subsoil, the eastern portion of the site contains deep and stratified alluvial deposits,

including a buried former landscape surface that contains Pre-Contact Native American cultural materials. Artifacts recovered at this site include Native American pottery dating to the Early Woodland period as well as non-diagnostic lithic artifacts of local and imported stone. Owing to the presence of buried, culture-bearing strata, the site is recommended potentially eligible for listing on the NRHP and, if disturbance to the site cannot be avoided, **a Phase II archaeological significance evaluation is warranted. Staff concurs with this recommendation.**

Sites 44LD0436 and 44LD0437, located in the south-central portion of the property, were both previously identified in 1989 during a Phase I survey of an extension of the Potomac Interceptor sanitary sewer line. Both sites yielded sparse pre-Contact era Native American lithic artifacts. In addition to disturbances associated with installation of the sanitary sewer line, both sites were heavily impacted by construction of facilities associated with the creation of Bles Park around the onset of the twenty-first century. Neither site retains integrity, and both are recommended not eligible for NRHP listing and therefore **warrant no additional investigation. Staff concurs with this recommendation.**

Site 44LD1890, located along the western margin of the property, consists of a relatively low-density concentration of pre-Contact era Native American lithic artifacts of unknown age recovered from shovel tests located along an approximately 325-foot-long section of planned pedestrian path. All artifacts were recovered from the roughly 0.5-foot-thick plow zone. The Phase I report concludes that considering its relatively low artifact density and small area that this site is not eligible for NRHP listing; however, the limits of the site have not been fully defined and topographical considerations suggest that only the eastern margin of the site was examined by the study. In staff's opinion, **44LD1890 is potentially eligible for NRHP listing and if disturbances to the site cannot be avoided a Phase II significance evaluation is recommended.**

Site 44LD1891 is located along the central-eastern margin of the property adjacent to Broad Run. The site, containing two superimposed plow zones reaching to a depth of roughly 1.5 feet below grade, yielded pre-Contact era Native American lithic artifacts of unknown age in addition to sherds of Early Woodland period pottery. Although the presence of pottery may be indicative of longer-term occupation, the Phase I report concludes that the site is not NRHP-eligible due to its history of plowing. The potential for intact subsurface features extending into subsoil beneath the plow zone cannot be excluded and for this reason **staff does not concur with this recommendation and considers a Phase II significance evaluation appropriate prior to deep disturbances in this area.**

Site 44LD1894 is located near the center of the property in the Potomac floodplain, a short distance east of the easternmost of the park's four athletic fields and approximately 125 feet south of 44LD1893. The site was defined by two positive shovel tests located 25 feet from one another. A total of four Native American lithic

artifacts of unknown age were recovered from the plow zone. The apparent small size of the site, the low density of artifacts, and their confinement to the plow zone led the Phase I study to conclude that **the site is not NRHP eligible and no additional investigation is warranted. Staff concurs with this recommendation.**

Site 44LD1895 is in the central-eastern portion of the property, on a roughly level terrace between Bles Park Drive and Broad Run. This site is extensive, measuring approximately 450 feet by 475 feet at a minimum. Recovered artifacts are dominated by Native American lithics of unknown age occurring primarily in the plow zone. Small numbers of historic period artifacts were also recovered that probably date to the late nineteenth and twentieth centuries. A single sherd of Native American Early Woodland period pottery recovered from the site comes from redeposited fill, possibly from a source off-site. The Phase I study concludes that the site is not NRHP eligible because it has been disturbed by plowing and recommends no additional investigation is warranted. **Staff does not concur with this conclusion and recommends a Phase II significance evaluation in the western portion of the site where construction of a proposed parking lot and a park maintenance facility will result in deep disturbances to that portion of the site with the highest Phase I artifact concentrations.**

Site 44LD1896 is located immediately east of Bles Park Drive approximately 225 feet south of 44LD1895. This relatively small site measures approximately 115 feet in diameter and recovered artifacts were confined to a relatively shallow (0.5-foot-deep) plow zone. Cultural material collected from the site are limited to Native American lithic artifacts of unknown age. The assemblage is consistent with relatively ephemeral use and the potential for intact subsurface features is considered low. Consequently, the Phase I recommends the site **not eligible for NRHP listing and warranting no additional investigation. Staff concurs with this conclusion.**

Sites 44LD1897, 44LD1898, 44LD1899, 44LD1900, and 44LD1902 are similarly small, low-density scatters of Native American lithic artifacts of unknown age located on the same landform as 44LD1896 overlooking Broad Run in the southeastern portion of the property. Here also, artifacts are confined to a relatively shallow plow zone. The potential for intact subsurface features is considered low and the Phase I recommends that **the sites are not eligible for NRHP listing and no additional investigation is warranted. Staff concurs with this conclusion.**

Site 44LD1901 is in the east-central portion of the property in the Potomac River floodplain adjacent to extensive man-made wetlands. The site was defined by a single shovel test pit that yielded several Native American lithic artifacts of unknown age. The general area appears to have been heavily impacted by the construction of the adjacent wetlands and consequently the site is considered **not eligible for NRHP listing and no further work is recommended. Staff concurs with this conclusion.**

Site 44LD1903 is located on a low alluvial terrace along Broad Run in the extreme southeastern portion of the property. This very small site was defined by two positive shovel test pits within 25 feet of one another. Recovered cultural materials are limited to three Native American lithic artifacts of indeterminate age, all collected from a relatively thin plow zone. The site is considered **not eligible for NRHP listing and no further investigation is warranted. Staff concurs with this recommendation.**

COMMENTS and RECOMMENDATIONS

In general, Thunderbird's fieldwork and reporting meet the standards for Phase I archaeological investigation set forth in the County's HPP and the Virginia Department of Historic Resources' 2017 *Guidelines for Conducting Historic Resources Survey in Virginia*. The Phase I survey unambiguously demonstrates that the Bles Park property contains an extensive and rich archaeological record, particularly as regards pre-Contact periods of Native American occupation. Deeply stratified deposits exposed in multiple locations, most notably along the natural levee that parallels the south bank of the Potomac River, are especially noteworthy for their potential to contain significant archaeological contexts with high levels of integrity. Preservation of such potentially important historic and cultural resources, especially in the face of development-related disturbance and destruction, should be a priority of County planning. It is also important to stress that in a comparable floodplain setting east of Broad Run and within 4,000 feet of Bles Park, intact Native American burials have been documented just below the plow zone within the remains of a Late Woodland period riverside hamlet or small village (44LD0004). Although human burials have not been documented within Bles Park the possibility clearly exists, and the County should also exercise every effort to ensure that such highly sensitive sites are not disturbed.

Although Thunderbird's Phase I survey is sufficient to demonstrate the relative abundance of archaeological remains within the Bles Park property, the boundaries of many of the identified archaeological sites remain poorly defined because the survey, in many places, was confined to the narrow corridors of planned pedestrian paths. In such cases where archaeological resources are poorly delineated, assessing site significance and the potential for impacts to significant deposits is challenging. The difficulty of assessing potential impacts is further complicated in this case as development plans remain provisional and have yet to be finalized. The recommendations that follow are based on current understanding of the magnitude and locations of impacts as depicted on the application's SPEX Plat. As project plans are refined and possibly modified, additional archaeological research may be required to assess and mitigate more fully potential impacts to archaeological resources on the property.

As discussed in the preceding analysis, staff concurs with Thunderbird's recommendations that sites 44LD0157, 44LD1892, 44LD1893, and 44LD1904 are all

potentially eligible for NRHP listing and that Phase II archaeological significance evaluations are warranted if deep disturbances in these locations cannot be avoided. Information provided on the SPEX Plat suggests that impacts to these sites associated with approval of the current application will be minor and surficial, being limited largely to the formalization of natural-surface pedestrian paths across these site areas. Foot traffic across these sites' surfaces is not anticipated to result in significant new disturbance, especially as these locations already have a long history of plowing. **Staff therefore does not consider Phase II archaeological evaluations to be warranted at this time at 44LD0157, 44LD1892, 44LD1893, or 44LD1904; however, staff cautions that this conclusion may change at Site Plan if final development plans indicate heightened disturbance to these areas.**

Staff does not concur with Thunderbird's NRHP eligibility recommendations regarding sites 44LD1890 and 44LD1891 and considers both sites potentially eligible for NRHP listing. That said, the current CDP suggests minimal impacts to both sites and therefore Phase II significance evaluations are also not warranted in these locations at this time. **Again, staff cautions that this conclusion may change at Site Plan if final development plans indicate heightened disturbance to these areas.**

Staff does not concur with Thunderbird's NRHP eligibility recommendations regarding site 44LD1895 and considers this site potentially eligible for NRHP listing. **Given the relatively extensive disturbances proposed in the western portion of 44LD1895 where the SPEX Plat proposes construction of a new maintenance building and parking lot, staff recommends that the applicant undertake a Phase II archaeological significance evaluation and, if warranted, avoidance or Phase III data recovery excavations.** The eastern half of 44LD1895 will be impacted only by a natural surface pedestrian path and in staff's assessment Phase II archaeological testing is not warranted in this part of the site at this time.

In staff's assessment, Thunderbird's Phase I survey does not provide adequate coverage of the area surrounding the existing parking lot and athletic fields, where the current CDP proposes significant new developments, including expansion of the parking lot as well as extensive hard surface path and pavilion construction. **Staff recommends that the applicant undertake additional Phase I testing in the area highlighted in orange hatching in Figure 1, below.** The goal of this additional testing is to clarify the extent, both horizontal and vertical, of disturbances associated with the existing parking lot and athletic fields and to determine whether potentially significant archaeological deposits survive in this area that will be impacted by planned improvements.

In summary, staff recommends that the applicant undertake additional Phase I survey within the area highlighted in Figure 1 as well as Phase II evaluation testing of the western portion of 44LD1895 prior to approval of this application. Staff also recommends a condition of approval requiring additional Phase I archaeological survey and, if necessary, Phase II and Phase III investigations if the refinement of

construction plans following approval of this application imposes unforeseen impacts to previously unsurveyed areas and/or to previously identified historic resources.

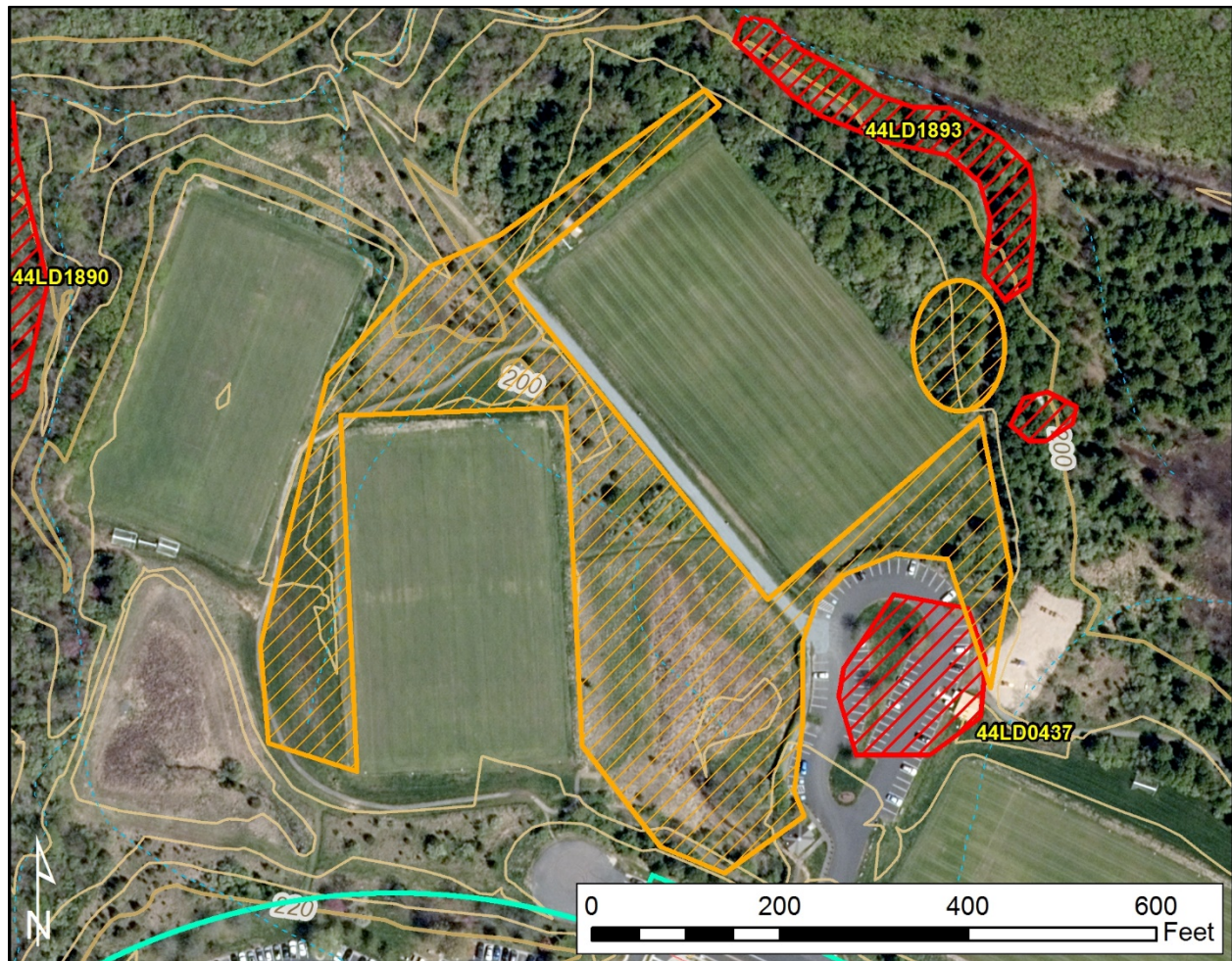


Figure 1: Map of Bles Park showing area (orange hatching) where additional Phase I archaeological survey is recommended.

cc: Alaina Ray, AICP, Director, Planning and Zoning (via e-mail)
Randall Farren, AICP, Acting Manager, Community Planning (via e-mail)

COUNTY OF LOUDOUN

DEPARTMENT OF PLANNING AND ZONING

MEMORANDUM

DATE: November 25, 2019

TO: Steve Barney, Project Manager
Land Use Review

FROM: Bradley R. Polk, Senior Planner 
Proffer Management

CC: Joseph Carter Jr., Manager
Proffer Management

CASE NUMBER AND NAME: SPEX-2019-0037 SPEX-2019-0038
SPEX-2019-0039 ZRTD-2019-0004
Bles Park

**PARCEL IDENTIFICATION
NUMBERS (PIN):** 038-26-8806

PLAN SUBMISSION: **1st Submission**
Statement of Justification, SPEX Plat, and CDP

COMMENTS:

The Proffer Management Team (“Staff”) has reviewed the Statement of Justification dated August 30, 2019, and the Special Exception (“SPEX”) Plat and Concept Development Plan dated August 2019, revised through October 7, 2019. Staff offers the following comments:

STATEMENT OF JUSTIFICATION

1. Revise the Title of the Statement of Justification to correct the Application Number to replace “SPEX-2019-035” with “SPEX-2019-0035”.
2. In the third line of the first paragraph on page 1 replace “Potomack” with “Potomac”.
3. In the description of the application request for SPEX-2019-0037 on page 1, replace “ZCOR 2015-0021” with “ZCOR-2015-0021”.
4. In the description of the application request for ZRTD-2019-0004 on page 1, replace “Loudoun County Revised 1993 Zoning Ordinance” with “Revised 1993 Loudoun County Zoning Ordinance”.
5. On page 3, under the standards for a Special Exception, replace “4-11507” with “4-1507”.

SPECIAL EXCEPTION PLAT

6. Sheet 1. Revise the title to list the complete application number for each special exception application (SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039).
7. Sheet 1. The Sheet Index indicates there are 11 sheets in the plan set. Sheets 10 and 11 were not included with this submission, please supply the complete plan set with the next submission.
8. Sheet 1. Revise the Sheet Index to identify Sheet 6 as the SPEX Plat.
9. Sheet 1. Revise the Sheet Index to identify Sheet 9 as the Concept Development Plan or Rezoning Plat.
10. Sheet 2. Revise General Note 1 to replace “All parcels” with “The parcel...”
11. Sheet 2. Revise General Note 22 to list all of the previously approved application numbers using the County’s adopted nomenclature for application numbers, which includes a dash after the application acronym, e.g. “ZMAP-1992-0004”, rather than ZMAP 1992-0004.
12. Sheet 2. Revise General Note 24 to indicate which sheets are identified as being subject to substantial conformance as the SPEX Plat, as the way the note is currently written the substantial conformance would be required to all 11 sheets of the plan set.
13. Sheet 2. Revise the second paragraph in the SPEX Narrative to replace “ZCOR 2015-0021” with “ZCOR-2015-0021”.
14. Sheet 6. Revise the sheet label to identify the sheet as the SPEX Plat.
15. Sheet 6. Remove the contour lines from the SPEX Plat.
16. Sheet 6. Revise note 2 to replace “flood” with “floodplain”.
17. Sheet 6. Revise the legend to identify what the green objects are identifying in the western portion of the Property.
18. Sheet 7. Remove the contour lines from the sheet.
19. Sheet 7. Revise the legend to identify what the green objects are identifying in the western portion of the Property.
20. Sheet 8. Revise the sheet to label the dark colored circles that do not include corresponding letters for existing features.

21. Sheet 8. Revise the labeling for the Loudoun Heights Apartments, Southglen at University Center, and the Eastern Loudoun Adult Day Center as they are illegible.
22. Sheet 8. Remove the contour lines from the sheet.

CONCEPT DEVELOPMENT PLAN

23. Sheet 9. Revise the sheet label to identify the sheet as the Concept Development Plan or Rezoning Plat.

OTHER COMMENTS

24. Staff recommends the Applicant use the approved proffer template language for ZRTD applications.

**VIRGINIA DEPARTMENT OF TRANSPORTATION
LOUDOUN LAND USE
PROJECT REVIEW
COMMENT AND RESOLUTION SHEET**

TIA - ACCEPTED

COMMENT CATEGORIES:
1. REQUIREMENT
2. RECOMMENDATION
3. CLARIFICATION

COUNTY PROJECT NUMBER: **SPEX-2019-0037**
SPEX-2019-0038, SPEX-2019-0039, AND
ZRTD-2019-0004

COUNTY PROJECT MANAGER: **STEVE BARNEY**

DEVELOPER/ENGINEER: **GORDON**

REVIEWER(S):
CLYDE WALLACE, P.E.

DATE: **DECEMBER 16, 2019**

PROJECT NAME: **BLES PARK**

REVIEW PHASE & TYPE:
SPECIAL EXCEPTION AND ZONING CONVERSION

DISCIPLINE: **LAND USE**

ITEM No.	DWG. No. ⁽¹⁾	COMMENTS	COMMENT CATEGORY	RESPONSE ⁽²⁾ DATE:	FINAL DISPOSITION ⁽³⁾
1.01	G	<p>We have completed our review of the referenced application and associated traffic impact study; we have no objection to approval of this application with the following caveats:</p> <ol style="list-style-type: none"> 1. It is to be noted that all site entrance/s shall meet the access management standards as defined in the VDOT Access Management Regulation and Design Standards. 2. Ensure all turn lane lengths and tapers meet VDOT's design standards. 3. Please note that detailed geometric and drainage review for the site will be provided at the site plan stage. 	1		Accepted December 16, 2019

(1) Indicate drawing no./page no. or use "G" for general comment.
(2) To be filled out by Applicant/Engineer. Date of Response is required.
(3) The VDOT reviewer is responsible for the final disposition of all comments.

Note: This form is to be used by the VDOT land use team to provide comments or concerns associated with the rezoning applications, site plans or any other plans when requested by the county or the applicants.

MEMORANDUM

To: Rob Donaldson, Project Manager
Department of Planning & Zoning (DPZ)

From: Rory L. Toth, CZA/CTM, Senior Planner 
Department of Planning & Zoning, Zoning Administration

Date: January 6, 2021

Re: SPEX-2019-0037 SPEX-2019-0038 SPEX-2019-0039 ZMOD-2019-0049
ZMOD-2020-0001 and ZRTD-2019-0004 – Bles Park – 2nd referral

PIN: 038-26-8806

Staff has reviewed the second submission of the referenced Special Exception (**SPEX**) applications, Zoning Modifications (**ZMOD**) and Rezoning within the Route 28 Tax District (**ZRTD**), to include the Statement of Justification (SOJ), revised through October 30, 2020; Applicant's Response to First Referral Comments dated October 30, 2020 and the SPEX Plat and ZRTD Plat, prepared by Gordon, revised through October 30, 2020. In general, the SPEX applications propose to 1) Expand an existing park and other amenities pursuant to Section 1-103(F)(2) of the Zoning Ordinance; 2) Allow incidental structures greater than 840 square feet in the Floodplain Overlay District per Section 4-1506(E) of the Zoning Ordinance; and 3) Increase the impervious area greater than three percent but less than ten percent in the Floodplain Overlay District pursuant to Section 4-1506(F). In addition, the application proposes a ZRTD application to rezone approximately 3.4 acres from the PD-RDP zoning district under the 1972 Loudoun County Zoning Ordinance to the PD-RDP zoning district under the Revised 1993 Loudoun County Zoning Ordinance.

Staff has reviewed the materials provided in the December 7, 2020 referral memorandum and offers the following comments:

A. ZONING ORDINANCE COMMENTS ON ZRTD

- 1. 1st Referral Comment: As the Applicant has submitted a ZRTD application for review, the Applicant needs to address the zoning map amendment criteria per Section 6-1210(E)(1-6) in their SOJ. Comment addressed as the SOJ was revised at second submission.*
- 2. 1st Referral Comment: Section 4-407(E). This Section of the PD-RDP zoning district requires a minimum floor space mix and states the following: Minimum Floor Space Mix. At build-out, a minimum of twenty (20%) percent of total floor space in the park shall be committed to research and development uses or to Educational Institutions or schools, public or private. A zoning modification of this requirement is necessary with adequate justification. After further review, a ZMOD is not necessary as the minimum floor area mix is to be accounted for as*

part of the overall PD-RDP zoning district associated with University Center and not the individual ZRTD. Comment addressed.

3. 1st Referral Comment: *Be advised that this referral applies solely to the requested ZRTD and does not imply or otherwise constitute approval of any existing uses and/or improvements, as such existing conditions are not subject to either review or approval with this application. Moreover, neither this referral nor approval of the ZRTD application constitutes a determination regarding the legality or permissibility of any potential future use and/or improvement on the Property. As such, the following note must be added to the existing conditions plan:*

EXISTING CONDITIONS NOTE: "The uses and/or improvements shown as existing conditions are for information purposes only and are not subject to review or approval with the ZRTD application. The existing conditions information is not intended to limit permitted or special exception uses on the Property or the permitted square footage of such uses and related improvements. Approval of the ZRTD application does not imply or otherwise constitute approval of the existing uses and/or improvements on the Property or any future uses and/or improvements." Comment addressed with the addition of Existing Conditions Note on Sheet 3.

4. 1st Referral Comment: *It is noted that should the ZRTD application be approved by the Board of Supervisors, an approved site plan and building/zoning permit are necessary to establish permitted uses on the property. Comment addressed.*
5. 1st Referral Comment: *Any Proffer statement submitted in connection with this application should indicate that the conversion is to the "Revised 1993 Loudoun County Zoning Ordinance, as amended," if the Applicant would like to utilize future amendments to the Zoning Ordinance. Staff may have further comments once a draft proffer statement associated with the ZRTD is submitted. No further comments.*

B. ZONING ORDINANCE COMMENTS ON SPEXS

1. 1st Referral Comment: *Section 4-1507. Zoning staff defers to the Department of Building and Development Natural Resource Team for the evaluation of the standards of Section 4-1507. In addition, correct the zoning ordinance section reference on Page 3 of the SOJ which should be Section 4-1507 as opposed to "4-11507" as currently stated. No further comments.*
2. 1st Referral Comment: *Section 5-1000. The Subject Property is located within the Scenic Creek Valley Buffer (SCVB) and is subject to the regulations listed therein regarding limitations on the location, development, parking, buildings and structures in the SCVB. Draw the Scenic Creek Valley Buffer (250-feet from channel scar line of the Potomac River and 150-feet from the channel scar line of Broad Run) on all sheets. Staff notes that there are structures*

located within the SCVB that need to be relocated outside the respective setbacks.

3. 1st Referral Comment: Section 5-1508. The Subject Property contains Moderately Steep (15 to 25 percent) and Very Steep Slopes (greater than 25 percent) and is subject to the performance regulations in Section 5-1508. The topography on the SPEX sheets appears to be shown in one-foot contour intervals. Confirm if the steep slopes drawn shown on the SPEX plat is based on one-foot topography. In addition, many notes on the plan set reference "severe slopes", which is not an accurate term used in the Zoning Ordinance. The Zoning Ordinance utilizes the terms "moderately steep" and "very steep slopes". Revise the plan set accordingly. Lastly, the Applicant needs to overlay the moderately steep slope and very steep slope areas onto the special exception plats to show the proposed uses and steep slopes data in relation to one another. Section 5-1508 contains limitations on the types of uses, development and land disturbance that can occur in moderately steep slope areas and very steep slope areas. Staff may have additional comments at next referral. Comment addressed.

C. SECTION 6-1309 SPECIAL EXCEPTION CRITERIA

1. 1st Referral Comment: Section 6-1309 (1). Staff defers comment to the Community Planning Division as to whether the proposed application is consistent with the 2019 Comprehensive Plan. No further comments.
2. 1st Referral Comment: Section 6-1309 (2). The Applicant is required by Zoning Ordinance to meet performance standards with regard to noise, light, glare, odor or other emissions generated by the proposed uses. The Applicant has stated that the existing recreation fields will not be illuminated nor will other amenities beyond what is needed/required to provide for security and maintenance. No further comments.
3. 1st Referral Comment: Section 6-1309 (3). Staff defers comment to the Community Planning Division as to whether the proposed uses are compatible with the surrounding existing and proposed uses in the neighborhood and on adjacent parcels. No further comments.
4. 1st Referral Comment: Section 6-1309 (4). Staff notes that there is an area on the SPEX plat entitled "Tree Grove." Clarify if this area is a tree conservation area or if there are new trees proposed to be planted by the Applicant and provide the quantity/species of such plantings. Such information should be included in the form of a condition. Staff would recommend that the Applicant work with the County Urban Forester to develop a special exception condition to preserve any specimen trees and to determine whether any of the existing vegetation could be preserved with a tree conservation area on the site and/or is viable to be utilized to meet the tree canopy and buffer yard

requirements of the Zoning Ordinance. Lastly, neither the SPEX plat nor the SOJ addresses how stormwater will be mitigated. Zoning Staff defers to the Department of Building and Development Natural Resource Team as to the adequacy of mitigation of the impacts to environmental and natural features on the property. Staff continues to recommend that if trees and vegetation are proposed to be planted within the "Tree Grove" area that the quantity/species of such plantings should be included in the form of a condition.

5. 1st Referral Comment: *Section 6-1309 (5). The proposed park improvements are a County project intended to provide additional recreational amenities to the citizens of Loudoun County. Zoning staff defers to the Department of Building and Development Natural Resource Team in regards to the proposed use's effect on the major floodplain and as to whether the use will promote the welfare or convenience of the public. No further comments.*
6. 1st Referral Comment: *Section 6-1309 (6). Staff defers to the Department of Transportation and Capital Infrastructure and Loudoun Water regarding adequate sewer, water, transportation and other infrastructure needed to adequately serve the proposed park uses. No further comments.*

D. SPEX PLAT AND ZRTD PLAT COMMENTS

1. 1st Referral Comment: *The Sheet Index on Sheet 1 of the plan set identifies two sheets (Sheets 10 and 11) that are missing from the plan set. The Applicant inserted Sheets 10 and 11 to the plan set at second referral and notes on the plan set sheets state that they are for illustrative purposes only. Staff recommends that these notes be revised to remove the sentence that states that uses, activities and materials will be determined at site plan as this is vague and such scope of uses, activities and materials are addressed as part of the SPEX application.*
2. 1st Referral Comment: *Clarify General Note 1 on Sheet 2 to state that Subject Property is currently split-zoned PD-RDP under the 1972 Loudoun County Zoning Ordinance and Revised 1993 Loudoun County Zoning Ordinance (Zoning Ordinance) and R-16 under the Revised 1993 Loudoun County Zoning Ordinance. In addition, clarify in the General Notes that the Subject Property is located in the Route 28 Tax District. Comment addressed.*
3. 1st Referral Comment: *Clarify General Note 21 on Sheet 2 to reference that any minor changes and/or revisions to the SPEX plat are permitted pursuant to the regulations of 6-1313 and 6-1314. Comment addressed.*
4. 1st Referral Comment: *In the bottom left-hand corner of Sheet 2, clarify the zoning district information noted on the inset Zoning Map to depict the zoning districts, Zoning Ordinances and relevant legislative applications as shown in*

Attachment 1 that was included as part of the Zoning District Map Exhibit in PRAP-2019-0035. Comment addressed.

- 5. 1st Referral Comment:** *Under the SPEX Narrative Note 2, the Note does not include all of the language stated in Section 4-1506(F) of the Zoning Ordinance. Revise the note accordingly to reference language that is missing regarding increases in base flood elevation. Comment addressed as the note was clarified as necessary.*
- 6. 1st Referral Comment:** *Regarding the Floodplain Narrative in the lower right-hand corner of Sheet 2, remove the last sentence of the first paragraph which reads "This Special Exception application shows a master plan for informational purposes only..." The information and proposed uses shown on the SPEX plat are not for informational purposes only and any changes/revisions must be in substantial conformance with the SPEX plat. In addition, Staff defers to the Department of Building & Development, Natural Resources Team, as to whether the information stated in the three paragraphs is accurate with regard to the source of floodplain waters and the impacts from the proposed improvements included with these applications. Comment addressed.*
- 7. 1st Referral Comment:** *Across multiple SPEX sheets, clarification is needed regarding the type of construction materials used, quantity of uses, height, maximum trail width, maximum square footage of each structure, proposed impervious areas and floor area. In most cases, a dot is utilized to symbolize the general location of many proposed uses on the SPEX plat sheets. However, Staff notes that there are very specific square footages of structures and impervious areas shown on the SPEX plat and there is no maximum area drawn for each proposed use. In some cases, on Sheets 6, 7 and 8, the term floor area is used for structures that may not have floor area, as defined by Article 8 of the Zoning Ordinance. Clarification of the uses listed in the Proposed Use Table and the materials, location, quantity, maximum square footage of proposed uses and maximum impervious areas shown on the SPEX plat sheet are necessary. Staff recommends that the Applicant meet with Staff to clarify these issues. Comment partially addressed. Clarification is necessary with regard to the meaning of the 10 percent contingency referenced in the floodplain tabulations table on Sheet 2 and if such contingency is accounted for in the listing of floor area and impervious area shown on Sheet 6. In addition, Staff recognizes the Applicant's desire for flexibility in materials and location of amenities, however, Sheets 10 and 11 (which are illustrative in nature) do not provide any assurance for the type of construction materials and design of amenities shown on Sheet 6 in the application. Staff recommends that the Applicant work with Staff to craft conditions that allow flexibility but also ensures a commitment to the type of design and materials for such amenities and any necessary mitigation measures as are appropriate.*

- 8. 1st Referral Comment:** *On Sheet 2, under the Floodplain Tabulations Table, clarify the meaning and square footage referenced between the "Total Estimated Structures within FOD" and "Special Exception Request with a Potential Maximum Square Footage of Structures within FOD." It is unclear what these figures and terms represent as they are different than those shown in the total on Sheets 6 and 7. Figures in the tables on Sheet 2 and 6 each reference 53,950 square feet of floor area proposed with the application. However, the Applicant stated in their response letter that they wish to allow up to 125,000 square feet of incidental structures within the major floodplain to allow flexibility in the future for the County to address any changes in the programming needs of the park to serve the greater public. Clarify the discrepancies between the two tables and the response to Comment 8.*
- 9. 1st Referral Comment:** *On Sheet 2, under the Floodplain Tabulation Within SPEX Area Table, clarify the meaning and square footage referenced between the terms "Estimated Impervious Area" and the "Special Exception Request with a Potential Maximum Square Footage of Impervious Area within FOD." It is unclear what these figures and terms represent as they are different than the totals on Sheets 6 and 7. In addition, a phrase in the third line at the top of the table reads "No Special Exception Required". Remove this phrase as one of the SPEXs requested by the Applicant is to increase the impervious area greater than 3 percent but less than 10 percent via a SPEX. See Comment 8 response above which requests clarification of the figures shown in the tables on Sheets 2 and 6.*
- 10. 1st Referral Comment:** *In some cases, it is very hard to distinguish the location of the major floodplain boundaries drawn on the SPEX plat sheets. Staff recommends that the major floodplain boundaries be more easily identified. Comment addressed as the delineated major floodplain boundaries are more clearly identified.*
- 11. 1st Referral Comment:** *The SPEX plats need to be revised to exclude the areas of the ZRTD as part of the SPEX applications. Comment addressed.*
- 12. 1st Referral Comment:** *Regarding the existing uses shown on the SPEX plat sheets, the Applicant needs to clarify if any of the existing uses are expanding or are being revised with this SPEX application. See Sheets 4 and 6. No existing uses are proposed to be expanded and the parking identified on the Existing Conditions Sheet 4 of the SPEX plat is being reconfigured as shown on Sheet 6 of the SPEX plat. No further comments.*
- 13. 1st Referral Comment:** *As the Applicant has submitted SPEX applications to add multiple uses in the FOD and increase the impervious surface in the FOD, Notes 1 and 4 on Sheet 6, Note 1 on Sheet 7 and Note 1 on Sheet 8 must be removed. Sheets 6 through 8 have been revised. However, additional clarification is needed on the "10 percent contingency" referenced on Sheet 2*

and if such contingency is accounted for in the figures shown in the table on Sheet 6.


- 14.** 1st Referral Comment: *On Sheet 8, there are "solid black circle symbols" that have no corresponding number nor are listed in the Legend. Clarify this discrepancy. In addition, Staff notes that there are multiple text labels on Sheet 8 which are not legible. Revise the text labels accordingly. Comment addressed as these discrepancies were corrected.*
- 15.** 1st Referral Comment: *Remove the reference to a "ZRTD" on SPEX plat Sheets 2-9 and remove reference to a "SPEX" on the ZRTD plat Sheet 9 as the ZRTD and SPEX are separate applications. Comment addressed as the plan set was revised to clarify that the SPEXs and ZRTD are separate applications.*
- 16.** 1st Referral Comment: *The ZRTD plat Sheet 9 needs to reference the PIN number that is subject to the ZRTD application and include a note that the approximately 3.4 acre portion of PIN 038-26-8806 is proposed to be remapped from the PD-RDP zoning district under the 1972 Zoning Ordinance to the PD-RDP zoning district under the Revised 1993 Loudoun County Zoning Ordinance, as amended. Comment addressed as Sheet 9 was revised as requested.*

Cc: Chris Mohn, Deputy Zoning Administrator, DPZ
Bradley Polk, Senior Planner, DPZ
Kelly Williams, Planner, DPZ
Todd Taylor, Floodplain Engineer, B&D

County of Loudoun
Department of Planning & Zoning
MEMORANDUM

DATE: December 11, 2019

TO: Josh Peters, Project Manager
Department of Planning & Zoning (DPZ)

FROM: Rory L. Toth, CZA/CTM, Senior Planner 
Department of Planning & Zoning, Zoning Administration

SUBJECT: **SPEX-2019-0037 SPEX-2019-0038 SPEX-2019-0039 and ZRTD-2019-0004 – Bles Park – 1st referral**

PIN #: 038-26-8806 (Subject Property)

Staff has reviewed the referenced Special Exception (**SPEX**) applications and Rezoning within the Route 28 Tax District (**ZRTD**), to include the Statement of Justification (SOJ), revised through October 7, 2019 and the SPEX Plat and ZRTD Plat, prepared by Gordon, revised through October 7, 2019. The subject property is split-zoned PD-RDP under the 1972 Loudoun County Zoning Ordinance and Revised 1993 Loudoun County Zoning Ordinance (Zoning Ordinance) and R-16 under the Zoning Ordinance. The Property is located in the Route 28 Tax District. In general, the SPEX applications propose to 1) Expand an existing park and other amenities pursuant to Section 1-103(F)(2) of the Zoning Ordinance; 2) Allow incidental structures greater than 840 square feet in the Floodplain Overlay District per Section 4-1506(E) of the Zoning Ordinance; and 3) Increase the impervious area greater than three percent but less than ten percent in the Floodplain Overlay District pursuant to Section 4-1506(F). In addition, the application proposes a ZRTD application to rezone approximately 3.4 acres from the PD-RDP zoning district under the 1972 Loudoun County Zoning Ordinance to the PD-RDP zoning district under the Revised 1993 Loudoun County Zoning Ordinance.

Staff has reviewed the materials provided in the October 24, 2019 referral memorandum and offers the following comments:

A. ZONING ORDINANCE COMMENTS ON ZRTD

1. As the Applicant has submitted a ZRTD application for review, the Applicant needs to address the zoning map amendment criteria per Section 6-1210(E)(1-6) in their SOJ.

2. **Section 4-407(E).** This Section of the PD-RDP zoning district requires a minimum floor space mix and states the following: Minimum Floor Space Mix. At build-out, a minimum of twenty (20%) percent of total floor space in the park shall be committed to research and development uses or to Educational Institutions or schools, public or private. A zoning modification of this requirement is necessary with adequate justification.
3. Be advised that this referral applies solely to the requested ZRTD and does not imply or otherwise constitute approval of any existing uses and/or improvements, as such existing conditions are not subject to either review or approval with this application. Moreover, neither this referral nor approval of the ZRTD application constitutes a determination regarding the legality or permissibility of any potential future use and/or improvement on the Property. As such, the following note must be added to the existing conditions plan:

EXISTING CONDITIONS NOTE: "The uses and/or improvements shown as existing conditions are for information purposes only and are not subject to review or approval with the ZRTD application. The existing conditions information is not intended to limit permitted or special exception uses on the Property or the permitted square footage of such uses and related improvements. Approval of the ZRTD application does not imply or otherwise constitute approval of the existing uses and/or improvements on the Property or any future uses and/or improvements."

4. It is noted that should the ZRTD application be approved by the Board of Supervisors, an approved site plan and building/zoning permit are necessary to establish permitted uses on the property.
5. Any Proffer statement submitted in connection with this application should indicate that the conversion is to the "Revised 1993 Loudoun County Zoning Ordinance, as amended," if the Applicant would like to utilize future amendments to the Zoning Ordinance.

B. ZONING ORDINANCE COMMENTS ON SPEXS

1. **Section 4-1507.** Zoning staff defers to the Department of Building and Development Natural Resource Team for the evaluation of the standards of Section 4-1507. In addition, correct the zoning ordinance section reference on Page 3 of the SOJ which should be Section 4-1507 as opposed to "4-11507" as currently stated.
2. **Section 5-1000.** The Subject Property is located within the Scenic Creek Valley Buffer (SCVB) and is subject to the regulations listed therein regarding limitations on the location, development, parking, buildings and structures in the SCVB. Draw the Scenic Creek Valley Buffer (250-feet from channel scar line of the Potomac River and 150-feet from the channel scar line of Broad Run) on all sheets.

3. **Section 5-1508.** The Subject Property contains Moderately Steep (15 to 25 percent) and Very Steep Slopes (greater than 25 percent) and is subject to the performance regulations in Section 5-1508. The topography on the SPEX sheets appears to be shown in one-foot contour intervals. Confirm if the steep slopes drawn shown on the SPEX plat is based on one-foot topography. In addition, many notes on the plan set reference “severe slopes”, which is not an accurate term used in the Zoning Ordinance. The Zoning Ordinance utilizes the terms “moderately steep” and “very steep slopes”. Revise the plan set accordingly. Lastly, the Applicant needs to overlay the moderately steep slope and very steep slope areas onto the special exception plats to show the proposed uses and steep slopes data in relation to one another. Section 5-1508 contains limitations on the types of uses, development and land disturbance that can occur in moderately steep slope areas and very steep slope areas. Staff may have additional comments at next referral.

C. SECTION 6-1309 SPECIAL EXCEPTION CRITERIA

1. **Section 6-1309 (1).** Staff defers comment to the Community Planning Division as to whether the proposed application is consistent with the 2019 Comprehensive Plan.
2. **Section 6-1309 (2).** The Applicant is required by Zoning Ordinance to meet performance standards with regard to noise, light, glare, odor or other emissions generated by the proposed uses. The Applicant has stated that the existing recreation fields will not be illuminated nor will other amenities beyond what is needed/required to provide for security and maintenance.
3. **Section 6-1309 (3).** Staff defers comment to the Community Planning Division as to whether the proposed uses are compatible with the surrounding existing and proposed uses in the neighborhood and on adjacent parcels.
4. **Section 6-1309 (4).** Staff notes that there is an area on the SPEX plat entitled “Tree Grove.” Clarify if this area is a tree conservation area or if there are new trees proposed to be planted by the Applicant and provide the quantity/species of such plantings. Such information should be included in the form of a condition. Staff would recommend that the Applicant work with the County Urban Forester to develop a special exception condition to preserve any specimen trees and to determine whether any of the existing vegetation could be preserved with a tree conservation area on the site and/or is viable to be utilized to meet the tree canopy and buffer yard requirements of the Zoning Ordinance. Lastly, neither the SPEX plat nor the SOJ addresses how stormwater will be mitigated. Zoning Staff defers to the Department of Building and Development Natural Resource Team as to the adequacy of mitigation of the impacts to environmental and natural features on the property.
5. **Section 6-1309 (5).** The proposed park improvements are a County project

intended to provide additional recreational amenities to the citizens of Loudoun County. Zoning staff defers to the Department of Building and Development Natural Resource Team in regards to the proposed use's effect on the major floodplain and as to whether the use will promote the welfare or convenience of the public.

6. **Section 6-1309 (6).** Staff defers to the Department of Transportation and Capital Infrastructure and Loudoun Water regarding adequate sewer, water, transportation and other infrastructure needed to adequately serve the proposed park uses.

D. SPEX PLAT AND ZRTD PLAT COMMENTS

1. The Sheet Index on Sheet 1 of the plan set identifies two sheets (Sheets 10 and 11) that are missing from the plan set.
2. Clarify General Note 1 on Sheet 2 to state that Subject Property is currently split-zoned PD-RDP under the 1972 Loudoun County Zoning Ordinance and Revised 1993 Loudoun County Zoning Ordinance (Zoning Ordinance) and R-16 under the Revised 1993 Loudoun County Zoning Ordinance. In addition, clarify in the General Notes that the Subject Property is located in the Route 28 Tax District.
3. Clarify General Note 21 on Sheet 2 to reference that any minor changes and/or revisions to the SPEX plat are permitted pursuant to the regulations of 6-1313 and 6-1314.
4. In the bottom left-hand corner of Sheet 2, clarify the zoning district information noted on the inset Zoning Map to depict the zoning districts, Zoning Ordinances and relevant legislative applications as shown in **Attachment 1** that was included as part of the Zoning District Map Exhibit in PRAP-2019-0035.
5. Under the SPEX Narrative Note 2, the Note does not include all of the language stated in Section 4-1506(F) of the Zoning Ordinance. Revise the note accordingly to reference language that is missing regarding increases in base flood elevation.
6. Regarding the Floodplain Narrative in the lower right-hand corner of Sheet 2, remove the last sentence of the first paragraph which reads "This Special Exception application shows a master plan for informational purposes only..." The information and proposed uses shown on the SPEX plat are not for informational purposes only and any changes/revisions must be in substantial conformance with the SPEX plat. In addition, Staff defers to the Department of Building & Development, Natural Resources Team, as to whether the information stated in the three paragraphs is accurate with regard to the source of floodplain waters and the impacts from the proposed improvements included with these applications.
7. Across multiple SPEX sheets, clarification is needed regarding the type of construction materials used, quantity of uses, height, maximum trail width,

maximum square footage of each structure, proposed impervious areas and floor area. In most cases, a dot is utilized to symbolize the general location of many proposed uses on the SPEX plat sheets. However, Staff notes that there are very specific square footages of structures and impervious areas shown on the SPEX plat and there is no maximum area drawn for each proposed use. In some cases, on Sheets 6, 7 and 8, the term floor area is used for structures that may not have floor area, as defined by Article 8 of the Zoning Ordinance. Clarification of the uses listed in the Proposed Use Table and the materials, location, quantity, maximum square footage of proposed uses and maximum impervious areas shown on the SPEX plat sheet are necessary. Staff recommends that the Applicant meet with Staff to clarify these issues.

8. On Sheet 2, under the Floodplain Tabulations Table, clarify the meaning and square footage referenced between the “Total Estimated Structures within FOD” and “Special Exception Request with a Potential Maximum Square Footage of Structures within FOD.” It is unclear what these figures and terms represent as they are different than those shown in the total on Sheets 6 and 7.
9. On Sheet 2, under the Floodplain Tabulation Within SPEX Area Table, clarify the meaning and square footage referenced between the terms “Estimated Impervious Area” and the “Special Exception Request with a Potential Maximum Square Footage of Impervious Area within FOD.” It is unclear what these figures and terms represent as they are different than the totals on Sheets 6 and 7. In addition, a phrase in the third line at the top of the table reads “No Special Exception Required”. Remove this phrase as one of the SPEXs requested by the Applicant is to increase the impervious area greater than 3 percent but less than 10 percent via a SPEX.
10. In some cases, it is very hard to distinguish the location of the major floodplain boundaries drawn on the SPEX plat sheets. Staff recommends that the major floodplain boundaries be more easily identified.
11. The SPEX plats need to be revised to exclude the areas of the ZRTD as part of the SPEX applications.
12. Regarding the existing uses shown on the SPEX plat sheets, the Applicant needs to clarify if any of the existing uses are expanding or are being revised with this SPEX application.
13. As the Applicant has submitted SPEX applications to add multiple uses in the FOD and increase the impervious surface in the FOD, Notes 1 and 4 on Sheet 6, Note 1 on Sheet 7 and Note 1 on Sheet 8 must be removed.
14. On Sheet 8, there are “solid black circle symbols” that have no corresponding number nor are listed in the Legend. Clarify this discrepancy. In addition, Staff

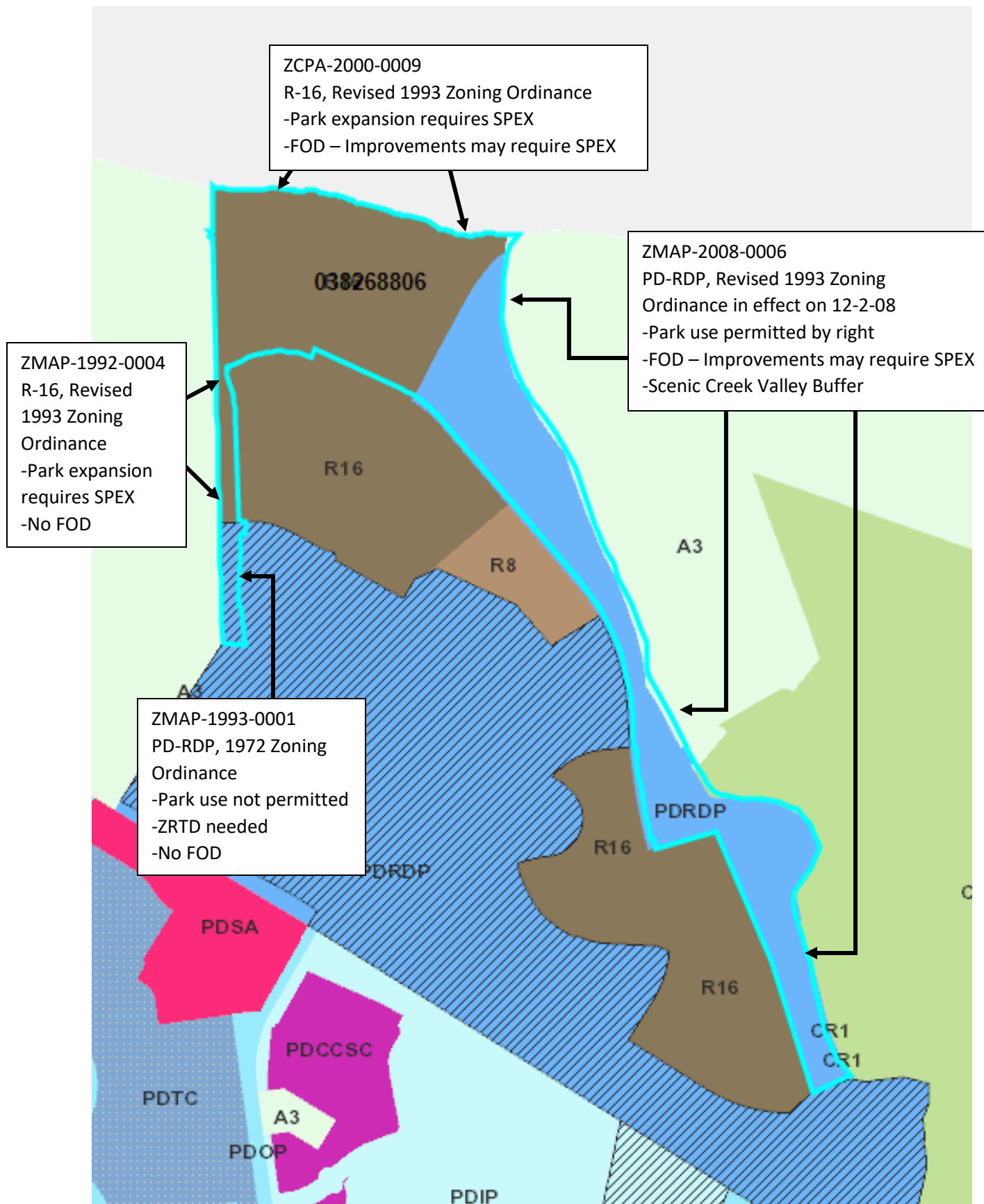
notes that there are multiple text labels on Sheet 8 which are not legible. Revise the text labels accordingly.

- 15.** Remove the reference to a “ZRTD” on SPEX plat Sheets 2-9 and remove reference to a “SPEX” on the ZRTD plat Sheet 9 as the ZRTD and SPEX are separate applications.
- 16.** The ZRTD plat Sheet 9 needs to reference the PIN number that is subject to the ZRTD application and include a note that the approximately 3.4 acre portion of PIN 038-26-8806 is proposed to be remapped from the PD-RDP zoning district under the 1972 Zoning Ordinance to the PD-RDP zoning district under the Revised 1993 Loudoun County Zoning Ordinance, as amended.

Attachment:

1. Zoning District Map Exhibit from PRAP-2019-0035.

Cc: Chris Mohn, Deputy Zoning Administrator, DPZ
Bradley Polk, Senior Planner, DPZ
Kelly Williams, Planner, DPZ
Todd Taylor, Floodplain Engineer, B&D





October 30, 2020

Mr. Rob Donaldson
Planner – Land Use Review
Department of Planning and Zoning
1 Harrison Street SE, 3rd Floor
Leesburg, VA 20175

Subject: Bles Park, SPEX 2019-0037, SPEX 2019-0038,
SPEX 2019-0039, and ZRTD 2019-0004
GORDON Project No. 3164-1001

Dear Mr. Donaldson:

The following is in response to comments from the Department of Planning and Zoning, dated November 25, 2019, the Natural Resources Team, dated November 22, 2019, DED, dated December 4, 2019, DTCL, dated November 25, 2019, Fire and Rescue, dated November 25, 2019, Fire Marshal's Office, dated November 21, 2019, Loudoun County Health Department, dated November 5, 2019, Loudoun Water, dated November 22, 2019, MWAA, dated November 25, 2019, Parks and Recreation, dated November 22, 2019, and VDOT, dated December 16, 2019, with regard to the above.

Planning and Zoning – Proffer Management

STATEMENT OF JUSTIFICATION

Comment 1: Revise the Title of the Statement of Justification to correct the Application Number to replace "SPEX-2019-035" with "SPEX-2019-0035".

Response: This comment is not applicable and applies to another application.

Comment 2: In the third line of the first paragraph on page 1 replace "Potomack" with "Potomac".

Response: The spelling of Potomac has been updated.

Comment 3: In the description of the application request for SPEX-2019-0037 on page 1, replace "ZCOR 2015-0021" with "ZCOR-2015-0021".

Response: The missing dash has been added to the ZCOR application number as requested.

Comment 4: In the description of the application request for ZRTD-2019-0004 on page 1, replace "Loudoun County Revised 1993 Zoning Ordinance" with "Revised 1993 Loudoun County Zoning Ordinance".

Response: The correct reference to the Revised 1993 Loudoun County Zoning Ordinance has been updated.

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Comment 5: On page 3, under the standards for a Special Exception, replace “4-11507” with “4-1507”.

Response: The typo has been fixed and the corrected Zoning Section has been referenced.

SPECIAL EXCEPTION PLAT

Comment 6: Sheet 1. Revise the title to list the complete application number for each special exception application (SPEX-2019-0037, SPEX-2019-0038, SPEX-2019-0039).

Response: Sheet 1 has been revised accordingly to include the correct application numbers.

Comment 7: Sheet 1. The Sheet Index indicates there are 11 sheets in the plan set. Sheets 10 and 11 were not included with this submission, please supply the complete plan set with the next submission.

Response: Sheets 10 & 11 have been included with this submission.

Comment 8: Sheet 1. Revise the Sheet Index to identify Sheet 6 as the SPEX Plat.

Response: The Sheet Index has been revised to reference Sheet 6 as the SPEX Plat as requested.

Comment 9: Sheet 1. Revise the Sheet Index to identify Sheet 9 as the Concept Development Plan or Rezoning Plat.

Response: The Sheet Index has been revised to reference Sheet 9 as the Concept Development Plan as requested.

Comment 10: Sheet 2. Revise General Note 1 to replace “All parcels” with “The parcel...”

Response: General Note #1 on Sheet #2 has been revised.

Comment 11: Sheet 2. Revise General Note 22 to list all of the previously approved application numbers using the County’s adopted nomenclature for application numbers, which includes a dash after the application acronym, e.g. “ZMAP-1992-0004”, rather than ZMAP 1992-0004.

Response: Note 22 has been revised accordingly to include the correct application numbers as suggested.

Comment 12: Sheet 2. Revise General Note 24 to indicate which sheets are identified as being subject to substantial conformance as the SPEX Plat, as the way the note is currently written the substantial conformance would be required to all 11 sheets of the plan set.

Response: General Note #24 on Sheet #2 has been revised to reference SPEX Plat (Sheet 6-8) as being subject to substantial conformance.

Comment 13: Sheet 2. Revise the second paragraph in the SPEX Narrative to replace "ZCOR 2015-0021" with "ZCOR-2015-0021".

Response: The application number has been revised accordingly.

Comment 14: Sheet 6. Revise the sheet label to identify the sheet as the SPEX Plat.

Response: Sheet 6 has revised as the SPEX Plat as suggested.

Comment 15: Sheet 6. Remove the contour lines from the SPEX Plat.

Response: The contour lines have been removed from Sheet 6 as requested.

Comment 16: Sheet 6. Revise note 2 to replace "flood" with "floodplain".

Response: The Notes on Sheet 6 has been revised and Note 2 is now Note #1 has been revised as suggested.

Comment 17: Sheet 6. Revise the legend to identify what the green objects are identifying in the western portion of the Property.

Response: The legend has been revised to identify the green objects as the different wetland categories.

Comment 18: Sheet 7. Remove the contour lines from the sheet.

Response: The contour lines have been removed from Sheet 7.

Comment 19: Sheet 7. Revise the legend to identify what the green objects are identifying in the western portion of the Property.

Response: The legend has been revised to identify the green objects as the different wetland categories.

Comment 20: Sheet 8. Revise the sheet to label the dark colored circles that do not include corresponding letters for existing features.

Response: Acknowledged, corresponding letters have been added to colored circles.

Comment 21: Sheet 8. Revise the labeling for the Loudoun Heights Apartments, Southglen at University Center, and the Eastern Loudoun Adult Day Center as they are illegible.

Response: Acknowledged, labels have been revised to improve the legibility.

Comment 22: Sheet 8. Remove the contour lines from the sheet.

Response: The contour lines have been removed from Sheet 8.

CONCEPT DEVELOPMENT PLAN

Comment 23: Sheet 9. Revise the sheet label to identify the sheet as the Concept Development Plan or Rezoning Plat.

Response: The sheet title has been revised to the Concept Development Plan.

OTHER COMMENTS

Comment 24: Staff recommends the Applicant use the approved proffer template language for ZRTD applications.

Response: Comment acknowledged, and the approved proffer template language will be utilized.

ZONING ORDINANCE COMMENTS ON ZRTD

Comment 1: As the Applicant has submitted a ZRTD application for review, the Applicant needs to address the zoning map amendment criteria per Section 6-1210(E)(1-6) in their SOJ.

Response: Section 6-1210 (E) Pertains to Zoning Map Amendments. The proposed application seeking a ZRDT for a zoning conversion to convert the portion of the property that is current zoned PD-RDP under the 1972 Loudoun County Zoning Ordinance. The SOJ has been updated address the conversion to the Revised 1993 Loudoun County Zoning Ordinance.

Comment 2: **Section 4-407(E).** This Section of the PD-RDP zoning district requires a minimum floor space mix and states the following: Minimum Floor Space Mix. At build-out, a minimum of twenty (20%) percent of total floor space in the park shall be committed to research and development uses or to Educational Institutions or schools, public or private. A zoning modification of this requirement is necessary with adequate justification.

Response: The subject area for this application is a part of the greater PD-RDP Zoning District within University Center (ZMAP 1993-0001), (ZCPA 2000-0009) and (ZMAP 2008-0006). ZCPA 2000-0009 specifically identified the subject area with this application as "Public Use Site" and was excluded from the area

available for PD-RDP density therefore not being subject to the Minimum Floor Space Mix. ZMAP 2008-0006 brought this area into the Revised 1993 Loudoun County Zoning Ordinance specifically so the Adult Day Center could be a permitted use for the County. Furthermore, Section 4-407(E) refers to the total floor area of the PD-RDP Park (University Center) shall be committed to research and development uses or to education institutions or schools, public or private which ZCPA 2000-0009 clearly demonstrates and denotes the specific areas of University Center to be used FAR density and specifically excluded the Public Use Site (This application area) from the FAR density.

Comment 3: Be advised that this referral applies solely to the requested ZRTD and does not imply or otherwise constitute approval of any existing uses and/or improvements, as such existing conditions are not subject to either review or approval with this application. Moreover, neither this referral nor approval of the ZRTD application constitutes a determination regarding the legality or permissibility of any potential future use and/or improvement on the Property. As such, the following note must be added to the existing conditions plan:

EXISTING CONDITIONS NOTE: "The uses and/or improvements shown as existing conditions are for information purposes only and are not subject to review or approval with the ZRTD application. The existing conditions information is not intended to limit permitted or special exception uses on the Property or the permitted square footage of such uses and related improvements. Approval of the ZRTD application does not imply or otherwise constitute approval of the existing uses and/or improvements on the Property or any future uses and/or improvements."

Response: Acknowledged, the existing conditions note above has been added to Sheet 3.

Comment 4: It is noted that should the ZRTD application be approved by the Board of Supervisors, an approved site plan and building/zoning permit are necessary to establish permitted uses on the property.

Response: Comment acknowledged.

Comment 5: Any Proffer statement submitted in connection with this application should indicate that the conversion is to the "Revised 1993 Loudoun County Zoning Ordinance, as amended," if the Applicant would like to utilize future amendments to the Zoning Ordinance.

Response: Comment acknowledged.

ZONING ORDINANCE COMMENTS ON SPEXS

Comment 1: **Section 4-1507.** Zoning staff defers to the Department of Building and Development Natural Resource Team for the evaluation of the standards of Section 4-1507. In addition, correct the zoning ordinance section reference on Page 3 of the SOJ which should be Section 4-1507 as opposed to “4-11507” as currently stated.

Response: **Comment acknowledged and the SOJ has been revised to reference the correct Zoning Ordinance Section of 4-1507.**

Comment 2: **Section 5-1000.** The Subject Property is located within the Scenic Creek Valley Buffer (SCVB) and is subject to the regulations listed therein regarding limitations on the location, development, parking, buildings and structures in the SCVB. Draw the Scenic Creek Valley Buffer (250-feet from channel scar line of the Potomac River and 150-feet from the channel scar line of Broad Run) on all sheets.

Response: **Acknowledged and the SCVB has been added to the plans.**

Comment 3: **Section 5-1508.** The Subject Property contains Moderately Steep (15 to 25 percent) and Very Steep Slopes (greater than 25 percent) and is subject to the performance regulations in Section 5-1508. The topography on the SPEX sheets appears to be shown in one-foot contour intervals. Confirm if the steep slopes drawn shown on the SPEX plat is based on one-foot topography. In addition, many notes on the plan set reference “severe slopes”, which is not an accurate term used in the Zoning Ordinance. The Zoning Ordinance utilizes the terms “moderately steep” and “very steep slopes”. Revise the plan set accordingly. Lastly, the Applicant needs to overlay the moderately steep slope and very steep slope areas onto the special exception plats to show the proposed uses and steep slopes data in relation to one another. Section 5-1508 contains limitations on the types of uses, development and land disturbance that can occur in moderately steep slope areas and very steep slope areas. Staff may have additional comments at next referral.

Response: **Acknowledged, the slope terms have been revised. Slopes have been added to the SPEX sheets to show that there are no conflicts with the proposed uses. Per previous comments, the contours have been removed from the SPEX sheets. The slope information was obtained from the Loudoun County G.I.S. data and a new note 27 has been added to the general notes on Sheet 2 for clarity.**

SECTION 6-1309 SPECIAL EXCEPTION CRITERIA

Comment 1: **Section 6-1309 (1).** Staff defers comment to the Community Planning Division as to whether the proposed application is consistent with the 2019 Comprehensive Plan.

Response: Comment acknowledged.

Comment 2: **Section 6-1309 (2).** The Applicant is required by Zoning Ordinance to meet performance standards with regard to noise, light, glare, odor or other emissions generated by the proposed uses. The Applicant has stated that the existing recreation fields will not be illuminated nor will other amenities beyond what is needed/required to provide for security and maintenance.

Response: Comment is acknowledged and at time of site plan compliance with Zoning Ordinance performance standards will be provided.

Comment 3: **Section 6-1309 (3).** Staff defers comment to the Community Planning Division as to whether the proposed uses are compatible with the surrounding existing and proposed uses in the neighborhood and on adjacent parcels.

Response: Comment is acknowledged.

Comment 4: **Section 6-1309 (4).** Staff notes that there is an area on the SPEX plat entitled "Tree Grove." Clarify if this area is a tree conservation area or if there are new trees proposed to be planted by the Applicant and provide the quantity/species of such plantings. Such information should be included in the form of a condition. Staff would recommend that the Applicant work with the County Urban Forester to develop a special exception condition to preserve any specimen trees and to determine whether any of the existing vegetation could be preserved with a tree conservation area on the site and/or is viable to be utilized to meet the tree canopy and buffer yard requirements of the Zoning Ordinance. Lastly, neither the SPEX plat nor the SOJ addresses how stormwater will be mitigated. Zoning Staff defers to the Department of Building and Development Natural Resource Team as to the adequacy of mitigation of the impacts to environmental and natural features on the property.

Response: The Tree Grove is a proposed amenity area along the trail system to provide a calming experience. At time of site plan this area will be designed and will determine the specific quantities and species of any proposed plantings. This area does not contain any tree conservation.

Comment 5: **Section 6-1309 (5).** The proposed park improvements are a County project intended to provide additional recreational amenities to the citizens of Loudoun County. Zoning staff defers to the Department of Building and Development Natural Resource Team in regards to the proposed use's effect on the major floodplain and as to whether the use will promote the welfare or convenience of the public.

Response: Comment acknowledged.

Comment 6: **Section 6-1309 (6).** Staff defers to the Department of Transportation and Capital Infrastructure and Loudoun Water regarding adequate sewer, water, transportation and other infrastructure needed to adequately serve the proposed park uses.

Response: Comment acknowledged.

SPEX PLAT AND ZRTD COMMENTS

Comment 1: The Sheet Index on Sheet 1 of the plan set identifies two sheets (Sheets 10 and 11) that are missing from the plan set.

Response: Acknowledged, sheets 10 and 11 have been added.

Comment 2: Clarify General Note 1 on Sheet 2 to state that Subject Property is currently split-zoned PD-RDP under the 1972 Loudoun County Zoning Ordinance and Revised 1993 Loudoun County Zoning Ordinance (Zoning Ordinance) and R-16 under the Revised 1993 Loudoun County Zoning Ordinance. In addition, clarify in the General Notes that the Subject Property is located in the Route 28 Tax District.

Response: Acknowledged, the general notes have been revised on Sheet 2.

Comment 3: Clarify General Note 21 on Sheet 2 to reference that any minor changes and/or revisions to the SPEX plat are permitted pursuant to the regulations of 6-1313 and 6-1314.

Response: Acknowledged, general note 21 has been revised on Sheet 2.

Comment 4: In the bottom left-hand corner of Sheet 2, clarify the zoning district information noted on the inset Zoning Map to depict the zoning districts, Zoning Ordinances and relevant legislative applications as shown in **Attachment 1** that was included as part of the Zoning District Map Exhibit in PRAP-2019-0035.

Response: The Zoning Map on Sheet #2 has been amended to add the relevant legislative applications as requested.

Comment 5: Under the SPEX Narrative Note 2, the Note does not include all of the language stated in Section 4-1506(F) of the Zoning Ordinance. Revise the note accordingly to reference language that is missing regarding increases in base flood elevation.

Response: Acknowledged, the SPEX Narrative note 2 has been revised on Sheet 2.

Comment 6: Regarding the Floodplain Narrative in the lower right-hand corner of Sheet 2, remove the last sentence of the first paragraph which reads “This Special Exception application shows a master plan for informational purposes only...” The information and proposed uses shown on the SPEX plat are not for informational purposes only and any changes/revisions must be in substantial conformance with the SPEX plat. In addition, Staff defers to the Department of Building & Development, Natural Resources Team, as to whether the information stated in the three paragraphs is accurate with regard to the source of floodplain waters and the impacts from the proposed improvements included with these applications.

Response: **Acknowledged, the Floodplain Narrative has been revised on Sheet 2.**

Comment 7: Across multiple SPEX sheets, clarification is needed regarding the type of construction materials used, quantity of uses, height, maximum trail width, maximum square footage of each structure, proposed impervious areas and floor area. In most cases, a dot is utilized to symbolize the general location of many proposed uses on the SPEX plat sheets. However, Staff notes that there are very specific square footages of structures and impervious areas shown on the SPEX plat and there is no maximum area drawn for each proposed use. In some cases, on Sheets 6, 7 and 8, the term floor area is used for structures that may not have floor area, as defined by Article 8 of the Zoning Ordinance. Clarification of the uses listed in the Proposed Use Table and the materials, location, quantity, maximum square footage of proposed uses and maximum impervious areas shown on the SPEX plat sheet are necessary. Staff recommends that the Applicant meet with Staff to clarify these issues.

Response: **Acknowledged, a detailed list of square footages (impervious and floor area of structures within the FOD) for each feature has been added to Sheet 6 for clarity. On meeting with staff was held on 1/21/20 to help address issues.**

Comment 8: On Sheet 2, under the Floodplain Tabulations Table, clarify the meaning and square footage referenced between the “Total Estimated Structures within FOD” and “Special Exception Request with a Potential Maximum Square Footage of Structures within FOD.” It is unclear what these figures and terms represent as they are different than those shown in the total on Sheets 6 and 7.

Response: **The current program of the park includes existing and proposed improvements totaling approximately 53,950 SF of estimated incidental structures within the major floodplain. The SPEX application would like to request an allowance of up to 125,000 SF of incidental structures within the major floodplain to allow for flexibility in the future for the County address any changes in the programming needs of the park to serve the greater public. This is a request of less than 3% of encroachments into the 108 AC of the major floodplain.**

Comment 9: On Sheet 2, under the Floodplain Tabulation Within SPEX Area Table, clarify the meaning and square footage referenced between the terms “Estimated Impervious Area” and the “Special Exception Request with a Potential Maximum Square Footage of Impervious Area within FOD.” It is unclear what these figures and terms represent as they are different than the totals on Sheets 6 and 7. In addition, a phrase in the third line at the top of the table reads “No Special Exception Required”. Remove this phrase as one of the SPEXs requested by the Applicant is to increase the impervious area greater than 3 percent but less than 10 percent via a SPEX.

Response: The current program of the park includes existing and proposed improvements totaling approximately 371,150 SF of estimated impervious area within the major floodplain. This is a request of less than 8% of the 108 AC of the major floodplain.

Comment 10: In some cases, it is very hard to distinguish the location of the major floodplain boundaries drawn on the SPEX plat sheets. Staff recommends that the major floodplain boundaries be more easily identified.

Response: Acknowledged, and the SPEX plan sheets have revised to improve the legibility and the major floodplain boundary is now easier to identify.

Comment 11: The SPEX plats need to be revised to exclude the areas of the ZRTD as part of the SPEX applications.

Response: Acknowledged, ZRTD has been removed from Sheets 6-8.

Comment 12: Regarding the existing uses shown on the SPEX plat sheets, the Applicant needs to clarify if any of the existing uses are expanding or are being revised with this SPEX application.

Response: The existing uses are identified in the table on Sheet 6. The recreational fields are to remain in their same locations and the existing parking area will be reconfigured as shown. The existing Adult Day Care facility will remain and is subject to ZMAP 2008-0006.

Comment 13: As the Applicant has submitted SPEX applications to add multiple uses in the FOD and increase the impervious surface in the FOD, Notes 1 and 4 on Sheet 6, Note 1 on Sheet 7 and Note 1 on Sheet 8 must be removed.

Response: The notes have been revised on Sheets 6-8 as suggested, however the client would like to maintain flexibility to allow for minor program changes in response public / community needs without having to go back through SPEX process in the future. It is acknowledged that a substantial deviation from the master plan, such as complete rearrangement of amenities could require an amendment to this application.

Comment 14: On Sheet 8, there are “solid black circle symbols” that have no corresponding number nor are listed in the Legend. Clarify this discrepancy. In addition, Staff notes that there are multiple text labels on Sheet 8 which are not legible. Revise the text labels accordingly.

Response: Acknowledged, the labels have been revised accordingly on Sheet 8.

Comment 15: Remove the reference to a “ZRTD” on SPEX plat Sheets 2-9 and remove reference to a SPEX” on the ZRTD plat Sheet 9 as the ZRTD and SPEX are separate applications.

Response: The Plans Sheets have been revised accordingly.

Comment 16: The ZRTD plat Sheet 9 needs to reference the PIN number that is subject to the ZRTD application and include a note that the approximately 3.4 acre portion of PIN 038-26-8806 is proposed to be remapped from the PD-RDP zoning district under the 1972 Zoning Ordinance to the PD-RDP zoning district under the Revised 1993 Loudoun County Zoning Ordinance, as amended.

Response: Acknowledged, the ZRTD note has been added to Sheet 9.

Department of Building and Development (Natural Resources Team)

Comment 1: To demonstrate compliance with the Steep Slope Standards in Revised 1993 Loudoun County Zoning Ordinance (R93ZO) Section 5-1508, please depict very steep slopes (greater than 25 percent) and moderately steep slopes (15 to 25 percent) on sheets 3-8 based on the 1-foot topography provided on the special exception plat (i.e. topographical analysis). (R93ZO 5-1508 and 6-407)

Response: The Steep slopes have been added to Sheets 3-8 based on the County GIS mapping of the Steep Slopes overlay district permitted. The plan doesn't propose any activities that not allowed within steeps and at time of site plan a detailed slope analysis will be provided and the requirements of the Steep slopes standards will be addressed.

Comment 2: Depict the Scenic Creek Valley Buffer (SCVB) on sheets 3-8. The SCVB prohibits the construction of buildings, structures, parking lots, or other impermeable surfaces. The buffer is measured 250 feet and 150 feet from the channel scar line of the Potomac River and Broad Run, respectively. (R93ZO 5-1000)

Response: Acknowledged, Scenic Creek Valley Buffer (SCVB) has been depicted.

Comment 3: General Note 7 on Sheet 2 references a 12/21/18 wetland delineation performed by WSSI. Please verify that all jurisdictional waters and wetlands are clearly depicted on sheets 3-8. (R93ZO 6-1309(4))

Response: Acknowledged, wetland delineations have been added to Sheets 3-8.

Recommendations

Comment 4: While trails are permitted in very steep slope areas, staff requests additional information regarding how the natural surface trails will be installed to minimize impacts, especially in the southern portion of the property, where very steep slopes extend from the property line to Broad Run. As part of the topographical analysis, please also identify slopes greater than 50 percent, if applicable, to demonstrate the trail alignment avoids these sensitive areas.

Response: The existing foot paths in the areas of concern were walked during site visit. As result the maintaining the natural surface was chosen as opposed to providing a hard surface trail in these specific areas. The trails follow the existing contours and will not traverse areas where slopes area greater than 50%. At time of Site Plan the trail alignment will be refined and a slope analysis showing avoidance and addressing any necessary steep slopes standards will be provided.

Comment 5: The proposed canoe/kayak launch is located at the Broad Run/Potomac River confluence. Please provide information describing the proposed facility, including the access trail and measures to prevent root compaction of mature tree cover. A mulch chip trail should be considered at this location.

Response: The proposed canoe launch is generally described in the form of a precedent image on Sheet 11 using a wooden, low impact structure.

Comment 6: Portions of the property drains directly to Broad Run, which has been listed by the Virginia Department of Environmental Quality (DEQ) as impaired for aquatic life (aquatic insects and other small organisms that live on the stream bottom). In addition, the County's 2009 Stream Assessment Project found Broad Run, adjacent to the property, to be "suboptimal to marginal" for habitat. Impacts to water quality is a matter for consideration as part of a special exception application. Based on the close proximity of proposed improvements to *the* streams, please provide information describing the measures that will be incorporated to protect water quality. (R93ZO 6-1309(4))

Response: This master plan will follow all required County and State regulations and will be demonstrated at the of site plan.

Comment 7: Staff recommends depicting the River and Stream Corridor 50-foot Management Buffer around the major floodplain and adjacent very steep slopes on the special exception plat. (2019 General Plan (2019 GP) River and Stream Corridor Resources Strategy 2.2)

Response: Comment is noted however the entire site is virtually entirely within the RSCR and depicting a 50' management buffer will offer little to protect the natural resources. The plan is being designed in coordination with County PRCS to address the needs of the community and has taken sensitivity with the placement and programming of into consideration with the natural features.

Comment 8: Active recreation uses are proposed within the River and Stream Corridor 50-foot Management Buffer, which is not a permitted use per River and Stream Corridor Resources policies in the 2019 GP. Consistent with River and Stream Corridor Resources Strategy 2.2 Action B, staff recommends incorporating mitigation measures to help offset the impacts of the encroachments. Examples of mitigation measures include reforestation, increasing tree conservation areas, buffering streams and wetlands outside of the management buffer, enhanced stormwater and erosion and sediment control measures, and invasive species control. (R93ZO 4-1507(F) and 6-1309(4))

Response: Comment is noted, and the site is being designed with environmental features taken into consideration. This is an existing park that the County has deemed the proposed improvements necessary for the community's greater well-fare. The passive recreation amenities are placed closer to the RSCR elements while the active recreation amenities have been placed further away where possible.

Floodplain Management

Recommendations

Comment 9: Staff request information regarding the proposed improvements identified in the legend/table on Sheet 6 to confirm that the square footage areas are listed under the appropriate column (impervious surface vs. floor area of incidental structures). Specifically, please provide details for the multi-gen playground, off-leash dog area, skate spots, boardwalks, and pedestrian bridges (i.e. type of surface, materials being used, brief description of the improvement).

Response: See Sheet 11 for general vision of proposed improvements. Further details will be provided at site plan.

Comment 10: Please review and verify that the floor area for the pedestrian bridges in the legend/table on Sheet 6 is correct and accounts for the site terrain in the area of the proposed crossings.

Response: Comment is acknowledged, and our best estimate has been provided at this time to allow for final design consideration. Site plan stage will detail the proposed improvements and assure the proper precautions have been provided.

Comment 11: Update General Note 8 (Source of Floodplain Note) on Sheet 2 to reflect the correct Flood Insurance Rate Map (FIRM) of Loudoun County Community Panel Numbers: 51107C0255E, 51107C0265E, and 51107C0266E. (FSM 8.101.A.20)

Response: General Note 8 has been updated.

Comment 12: For clarity, as minor floodplain is not present on the subject property and the Source of Floodplain Note is provided, please remove the first sentence in General Note 8 on Sheet 2. (FSM 8.101.A.20)

Response: Acknowledged, Floodplain note has been revised.

Comment 13: Staff recommends updating the first sentence in the last paragraph of the Floodplain Narrative on Sheet 2 as follows: "It is the opinion of Gordon that the proposed..."

Response: Acknowledged, Floodplain Narrative has been revised.

Comment 14: Staff recommends updating the last two sentences in the last paragraph of the Floodplain Narrative on Sheet 2 as follows: "If there is no change to the base floodplain elevation, then a CLMOR submission to FEMA is not anticipated. A LOMR submission to FEMA will be processed with the development as-built condition should the floodplain boundary or base flood elevation change."

Response: Acknowledged, Floodplain Narrative has been revised.

Comment 15: Update the floodplain boundary (i.e. thicken the line work) on Sheet 6-8 (Special Exception Plat) so that the limits are clearly discernable. (R93ZO 4-1504(B))

Response: The floodplain boundary has been revised to improve legibility.

Comment 16: Provide the total floodplain acreage/square footage on the property to demonstrate that the total area of imperviousness provided in the table on Sheet 6 does not exceed the 10 percent maximum specified in R93ZO 4-1506(F).

Response: Sheet 2 has a table that denotes the floodplain area in acreage and square footage and demonstrates the allowable and proposed percentages of maximum impervious areas.

Comment 17: Provide information regarding the activities and types of storage (fertilizers, herbicides, pesticides?) anticipated for the proposed maintenance facility. Also, include a note on the special exception plat indicating that bulk storage of gasoline, chemicals, fuels, or similar substances are prohibited at the maintenance facility. (R93ZO 4-1506(E))

Response: General Note #28 on Sheet 2 has been added to address activities and the prohibition of the bulk storage of gasoline, chemical and etc.

Comment 18: Staff recommends clarifying or removing the last sentence in the section of the statement of justification pertaining to R93ZO 4-1507(B), which references open space and recreational fields between the Potomac River and the application area. (R93ZO 4-1507(B))

Response: The SOJ has been revised to clarify the statement in question.

Comment 19: Update the section of the statement of justification pertaining to R93ZO 4-1507(F) to address harmony with the 2019 GP related to allowable uses within the River and Stream Corridor Resources buffer, including any proposed mitigation measures. (R93ZO 4-1507(F))

Response: The SOJ has been updated to better address the harmony with the 2019 GP pertaining to the RSCR buffer.

Comment 20: Please clarify the section of the statement of justification that pertains to R93ZO 4-1507(G). Is “proximity to the project size in comparison to the Potomac River” intended to highlight that the majority of the improvements are located on the fringe of the floodplain? (R93ZO 4-1507(G))

Response: The SOJ has been amended to clarify the statement in question.

Urban Forestry

Recommendations

Comment 21: Staff recommends that stabilization of trails and the canoe/kayak launch for recreational uses are done with as minimal impact as possible to tree roots. Wood chips are recommended for stabilization.

Response: Comment acknowledged and will be taken into consideration during site plan.

Comment 22: Staff recommends that invasive species control should be implemented to protect the biodiversity of the area.

Response: Comment acknowledged and will be taken into consideration.

Comment 23: Sheet 6- Existing Exhibit G depicts a champion tree. Provide the species and context to champion status.

Response: Sheet 3A has been added to show the Tree Stand Evaluation Overlay. See Sheet 6 of the Tree Stand Evaluation Map prepared by WSSI for details of specimen trees. The Champion Tree (denoted Exhibit G) on the Sheet 6 is labeled as (ID# T2363) is a 50" American Sycamore in critical condition with broken limbs and displays Basal, Trunk and Branch decay.

Planning and Zoning

River and Stream Corridor Resources

Comment 1: The application to expand Bles Park is not consistent with Plan policy, as it would locate active recreational uses within the RSCR; therefore, Community Planning Staff cannot support the application as proposed. Should the application be considered further, Community Planning Staff recommends the application include measures to help mitigate the impacts to the RSCR, such as reforestation of open areas adjacent to the Potomac River, the Broad Run, and floodplain; increasing Tree Conservation Areas (TCA) adjacent to the floodplain; and enhanced stormwater and erosion and sediment control measures (2019 GP, Chapter 3, RSCR Strategy 2.2, Mitigation Examples call-out box). Staff also recommends the use of pervious paving in the parking areas.

Response: The expansion of active recreational uses in the RSCR has been limited to the fringes and placed further away from the RSCR amenity. Passive recreational have been designed to be in harmony with the RSCR. Areas of the existing tree canopy not affected by the improvements will be placed into Tree Conservation. The suggestion of pervious paving will be taken into consideration.

Application Materials

Comment 2: In order to fully analyze the proposal, Community Planning Staff recommends that subsequent application materials:

- Clarify the amount of impervious surface proposed in the chart and on the labels.
- Clarify if the existing grass soccer fields, natural surface trail, tree grove, and unprogrammed lawn are impervious as labelled. The labels on the drawing do not match the information in the chart.
- Provide a breakdown of the uses that are located in multiple areas throughout the site such as the pavilions, parking etc. in the chart.

- Depict the limits of disturbance proposed for the site to determine the extent of the impacts to the RSCR.

Response: The plans have been updated to provide greater clarity of the proposed elements to address impervious areas, reconcile the labels and charts along with providing details of uses that are in multiple locations. The limits of disturbance will be provided at time of site plan, however the site almost entirely within the RSCR and encroachments are unavoidable but have been limited where practical to already disturbed areas.

Sustainability

Comment 3: Community Planning Staff recommends the applicant incorporate and commit to sustainability practices such as green building design, water conservation, and sustainable site design.

Response: Recommendation is acknowledged and will be taken into consideration.

Wetlands

Comment 4: Community Planning Staff recommends that the limits of clearing and grading be depicted on the SPEX plat in order to clarify the areas of wetlands that may be impacted. If impacts cannot be avoided mitigation measures should be provided to meet the County's goal to improve water quality in Loudoun.

Response: Design of the of proposed improvements have taken into consideration avoidance of the wetlands to the greatest extent possible.

Forests, Trees and Vegetation

Comment 5: Although the Tree Survey requirement was waived at checklist, one must be submitted in order to evaluate the site for compliance with the Forest, Trees and Vegetation policies.

Community Planning Staff recommends that TCAs be established to mitigate impacts to the RSCR as discussed above.

Response: A Tree Survey has been submitted with this application and Tree Conservation will be consistent wetlands and archeological as depicted on the plans.

Natural Heritage Resources

Comment 6: Although the Endangered Species Habitat Assessment was waived at checklist, one must be submitted in order to evaluate the site for compliance with the Natural Heritage Resource policies.

Response: A copy of the Endangered and Threatened Species review has been included with this application.

Stormwater Management

Comment 7: Community Planning Staff requests information regarding stormwater quality measures for the proposed application. Community Planning Staff recommends the applicant commit to providing LID onsite.

Response: To satisfy the water quality requirements, the intension is to purchase nutrient credits and utilized VRRM conserved/open space easements. LID practices will be considered during site planning.

Historic, Archeologic, and Scenic Resources

Comment 8: Although the Phase I Archeological Survey was waived at checklist, this survey is required in order to evaluate the site for compliance with the Historic, Archeologic, and Scenic Resources policies.

Response: A Phase 1 Archeological Survey has been submitted with this application.

Recommendation

Comment 9: The application materials be revised to clarify the limit of disturbance and amount of impervious surface being proposed.

Response: An exhibit has been prepared to depict the amount of impervious area being requested.

Comment 10: A Tree Survey, Phase I Archeological Survey and Endangered Species Habitat Assessment be submitted for review.

Response: The requested reports have been included with this submission

Comment 11: Mitigation measures be provided to reduce the impact to the RSCR.

Response: As form of mitigation the design of the park improvements have limited the expansion of active recreational uses in the RSCR and kept them to the fringes and placed further away from the RSCR amenity. Passive

recreational have been designed to be in harmony with the RSCR by blending into the existing condition with minimal impacts. Areas of the existing tree canopy not affected by the improvements will be placed into Tree Conservation at time of site plan.

Department of Economic Development

Comment 1: No Comments

Response: Acknowledged

Transportation and Capital Infrastructure

Traffic Impact Study

Comment 1: DTCI has reviewed the Applicant's Traffic Impact Study and finds it to be an acceptable evaluation of the proposal.

Response: Acknowledged and appreciated.

Roadway Network and Site Access

Comment 2: The proposed expansion of the existing County park to include up to 125, 000 SF of incidental structures, impervious playground area and walking trails, 271 additional onsite parking spaces and associated amenities, does not conflict with any existing or planned roadways shown on the Loudoun County 2019 Countywide Transportation Plan (2019 CTP).

Response: Acknowledged and appreciated

Comment 3: Approval of the applications as proposed would not adversely affect the public roadway network in the vicinity of the site. No additional roadway improvements on Bles Park Drive are warranted or proposed with these applications.

Response: Acknowledged and appreciated

Fire and Rescue

Comment 1: No Comments

Response: Acknowledged

Fire and Rescue Planning Staff

Comment 2: The fire and Rescue Planning Staff is not opposed at the proposed applications. However, the submitted materials do not provide enough detail to evaluate access and circulation of emergency vehicles. Staff respectfully requests that the Applicant demonstrates adequate access and circulation of emergency vehicles to all areas of the proposed development. Staff understands that this concern may be best addressed at the time of site plan. If you have any questions or need additional information, please contact 703-777-0333.

Response: Comment is acknowledged and agree that site plan would be the best time to fully evaluate adequacy of emergency vehicular circulation.

Health Department

Comment 1: Both GIS and the attached plans identify one well and one septic system on the subject property.

WWIR-2004-0146 – Irrigation well, PSSD 1969-0051 – Individual onsite septic system. No abandonment records exist for the well or septic system. If they are no longer in use or if construction activities are to impact one or both of these systems, an abandonment permit will be required by the Health Department.

Response: Comment acknowledged.

Loudoun Water

Comment 1: No comments.

Response: Acknowledged.

MWAA

Comment 1: If the pavilions, skate spots or tennis courts are approved for development by the County, the Airports Authority does not object to the development provided that any associated lighting does not project light upward into the night sky. Because the height of the proposed infrastructure is not specified, filing of a Notice of Proposed Construction (form 7460) with the Federal Aviation Administration (FAA) under Title 14 of the Code of Federal Regulations CFR Part 77 may be required. The referred website has a tool the applicant can use to identify if a 7460 form is required (<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>). As an added precaution, the Airports Authority recommends that the applicant submit a 7460 form regardless of the results of the tool.

Mr. Rob Donaldson
Department of Planning and Zoning
Bles Park
October 30, 2020
Page 21

Response: Acknowledged and at time of site plan a 7460 form will be prepared and submitted with the FAA.

Parks and Recreation

Comment 1: No comments.

Response: Acknowledged

VDOT

Comment 1: It is to be noted that all site entrance/s shall meet the access management standards as defined in the VDOT Access Management Regulation and Design Standards.

Response: Understood and at time of site plan all VDOT access management standards will be fulfilled.

Comment 2: Ensure all turn lane lengths and tapers meet VDOT's design standards.

Response: Understood and at time of site plan all turn lanes lengths and tapers will be designed to meet VDOT standards.

Comment 3: Please note that detailed geometric and drainage review for the site will be provided at the site plan stage.

Response: Understood and acknowledged.

If you have any further comments, I can be reached at (703) 889-2350 or by email at cstephenson@gordon.us.com.

Sincerely,

William H. Gordon Associates, Inc.

Christopher D. Stephenson, PLA
Director of Planning

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April 9, 2021

Mr. Rob Donaldson
Planner, Land Use Review
Department of Planning and Zoning
1 Harrison Street, SE
Leesburg, Virginia 20177

Re: Bles Park Second Referral
SPEX-2019-0037
GORDON Project: 3164-1001

Dear Mr. Donaldson:

The following is in response to your letter dated January 7, 2021 along with the following:

Department of Transportation and Capital Infrastructure dated January 6, 2021
Department of Fire and Rescue dated January 6, 2021
Loudoun County Health Department dated December 22, 2020
Department of Building and Development dated January 7, 2021
Loudoun County Planning and Zoning dated January 6, 2021
Loudoun County Archaeologist, dated February 18, 2021

River and Stream Corridor Resources (RCSR)

Comment 1: As stated in the first referral, the application is not consistent with Plan policy, as it would locate active recreational uses within the RSCR. Therefore, Community Planning Staff recommended that should the application move forward it include measures to help mitigate the impacts to the RSCR, such as reforestation of open areas adjacent to the Potomac River, the Broad Run, and floodplain; increasing Tree Conservation Areas (TCA) adjacent to the floodplain; and enhanced stormwater and erosion and sediment control measures (2019 GP, Chapter 3, RSCR Strategy 2.2, Mitigation Examples call-out box). Staff also recommended the use of pervious paving in the parking areas.

In response, the applicant has designed the site to expand the active recreational uses in the RSCR farther away from waterways and locate the more passive amenities in closer proximity to the Potomac River. The applicant states that the areas of existing tree canopy not affected by the improvements will be placed into TCAs and that providing pervious paving will be taken into consideration. Additionally, the applicant states that the entire site is almost entirely within the RSCR and that depicting a 50' management buffer will offer little to no protection to the natural resources. While most of the site is within the major floodplain, there are areas where a 50' management buffer could be accommodated on the site.

While the applicant has revised the proposal to reduce impacts to the RSCR through design and placement of the proposed uses, no

commitments to mitigation measures have been provided to offset the impacts. Therefore, Community Planning Staff recommends the following:

- Clarify the total area of incidental structures to be located within the major floodplain;
- ***Commit to the location, type of construction materials, and design of the recreational amenities proposed;***
- ***Provide the 50' management buffer along the floodplain and adjacent steep slopes consistent with Plan policy;***
- ***Commit to mitigation measures for the impacts to the RSCR, such as reforestation of open areas, increasing TCAs within and/or adjacent to the floodplain, and/or providing enhanced stormwater and erosion and sediment control measures; and,***
- ***Commit to the use of pervious paving in the parking areas.***

Response: Flexibility is still being requested as the final design and program needs of the facility has not been finalized. However, the anticipated total area of incidental structures has been clearly denoted on the plans. The application will be further subject to substantial conformance requirement of Section 6-1209(E) of the Zoning Ordinance to help reassure the project does not deviate from proposed concept. The 50' Management Buffer has been added to plan where possible and to offset the impacts, TCAs have been clearly denoted on the plans. Commitments to enhanced erosion and sediment control measure will also be provided as part of the conditions of approval. Given the existing conditions, pervious paving for the parking areas is not ideal for this project and we are unable to commit to this request.

Sustainability

Comment 2: In the first referral, Community Planning Staff recommended the applicant incorporate and commit to sustainability practices such as green building design, water conservation, and sustainable site design. In response the applicant has indicated that sustainability measures will be considered for the development.

Community Planning Staff continues to recommend that commitments be made to address the sustainability policies of the 2019 GP.

Response: Part of Sustainable development also utilized practices that are cost-effective, enhance human health and well-being, and protect and restore the environment. The County has taken all those aspects into consideration with the development of these plans. The more intensive aspects of the project are being redeveloping on top of already developed areas. The park will provide the greater community with an amenity that will appeal to the active and passive recreational needs to that address human mental and physical health by connection with the natural environment. Cost efficient development practices will be taken

into consideration to provide the best experiences possible for the community without adding unnecessary expenses to development cost. The overall development has been designed to consider the natural environment through tree conservation and design intent of program activities that harmoniously address the needs of the users and impacts on the natural environment.

Forests, Trees, and Vegetation

Comment 3: The applicant has provided a Tree Survey in response to Community Planning's first referral comments and has indicated the desire to establish TCAs on land that will not be disturbed by the development. However, to date no TCAs have been identified on the plats.

Community Planning Staff continues to recommend that TCAs be identified to mitigate impacts to the RSCR as discussed above.

Response: TCAs have been incorporated where possible to the greatest extent possible with the resubmission of this application.

Stormwater Management

Comment 4: In the first referral, Community Planning Staff recommended the applicant address stormwater management for the proposed application and commit to providing LID measures onsite. Given most of the site is located within the RSCR, water quality is of utmost importance. The applicant responded that water quality requirements will be addressed by the purchase of nutrient credits and utilized Virginia Runoff Reductions Method (VVRM) conserved/open space easements. They state that LID practices will be considered during site planning.

Community Planning Staff continues to recommend commitments to LID measures and defers to the Natural Resource Team (NRT) for evaluation of the stormwater management measures proposed by the applicant.

Response: Comment acknowledged.

Historic, Archeologic, and Scenic Resources

Comment 5: A Phase I Archeological Survey has been provided as requested in the first referral to evaluate the site for compliance with the Historic, Archeologic, and Scenic Resources policies. A review of the survey will be provided under separate cover from the County Archaeologist.

Response: Comment acknowledged and the comments from the County's Archaeologist received 2/22/21 have been included as the end of this response letter.

Department of Transportation and Capital Infrastructure:

Traffic Impact Study

Comment 1: Initial Staff Comment (November 25, 2019): DTCl has reviewed the Applicant's Traffic Impact Study and finds it to be an acceptable evaluation of the proposal.

Applicant's Response (October 30, 2020): Acknowledged and appreciated.

Comment Status: No further comments.

Response: Acknowledge and appreciated.

Roadway Network and Site Access

Comment 2: Initial Staff Comment (November 25, 2019): The proposed expansion of the existing County park to include up to 125,000 SF of incidental structures, impervious playground area and walking trails, 271 additional onsite parking spaces and associated amenities, does not conflict with any existing or planned roadways shown on the *Loudoun County 2019 Countywide Transportation Plan (2019 CTP)*.

Applicant's Response (October 30, 2020): Acknowledged and appreciated.

Comment Status: No further comments.

Response: Acknowledge and appreciated.

Comment 3: Initial Staff Comment (November 25, 2019): Approval of the applications as proposed would not adversely affect the public roadway network in the vicinity of the site. No additional roadway improvements on Bles Park Drive are warranted or proposed with these applications.

Applicant's Response (October 30, 2020): Acknowledged and appreciated.

Comment Status: No further comments.

Response: Acknowledge and appreciated.

Department of Fire and Rescue:

Comment 1: **I. Requirements: From the current Loudoun County Facilities Standards Manual (FSM) and the current Loudoun County Fire Prevention Code (LCFPC)**
1. None.
II. Concern:
1. None.
III. Recommendations:
1. None.

Response: Acknowledge and appreciated.

Requirements for fire apparatus access roads:

Comment 1: Fire Apparatus Access Road is designed and maintained to a minimum of 20 feet of unobstructed width, 13.5 feet of unobstructed vertical clearance, support H-20 loading, be surfaced so as to provide all-weather driving capabilities, located within an "Emergency Access" easement, and identified as a fire lane in accordance with the FSM Chapter 4.

Response: Comment acknowledged and will be address with final design at site plan.

Information for requesting modifications to the LCFPC:

Comment 1: 106.5 Modifications. The fire official may grant modifications to any provision of the SFPC upon application by the owner or the owner's agent provided the spirit and intent of the SFPC are observed and public health, welfare, and safety are assured. Note: The current editions of many nationally recognized model codes and standards are referenced by the SFPC. Future amendments to such codes and standards do not automatically become part of the SFPC; however, the fire official should consider such amendments in deciding whether a modification request should be granted.

Response: Acknowledge.

Comment 2: 106.5.1 Supporting data. The fire official shall require that sufficient technical data be submitted to substantiate the proposed use of any alternative. If it is determined that the evidence presented is satisfactory proof of performance for the use intended, the fire official shall approve the use of such alternative subject to the requirements of this code. The fire official may require and consider a statement from a professional engineer, architect or other competent person as to the equivalency of the proposed modification.

Response: Acknowledge.

Loudoun County Health Department:

Comment 1: Both GIS and the attached plans identify one well and one septic system on the subject property.

WWIR-2004-0146 - Irrigation well
PSSD-1969-0051 -Individual onsite septic system

No abandonment records exist for the well or septic system. If they are no longer in use or if construction activities are to impact one or both of these systems, abandonment permits will be required by the Health Department.

Response: Acknowledge and appreciated.

Department of Building and Development:

Natural Resources:

Comment 1: To more accurately identify steep slope areas and evaluate compliance with the Steep Slope Standards, please depict moderately steep slopes (15 to 25 percent), very steep slopes (greater than 25 percent), and steep slopes greater than 50 percent, as applicable, based on the 1-foot topography provided on the plan set (i.e. topographical analysis). (R93ZO 5-1508 and 6-407)

Response: Slopes greater than 50% are denoted on the plans will not be impacted.

Comment 2: Please remove the pavilion area and overlook of natural clearing (near the Eastern Loudoun Adult Day Center) from the Scenic Creek Valley Buffer (SCVB) buffer or pursue a reduction in accordance with R93ZO 5-1002(D). Note that if the overlook is constructed as a raised boardwalk, as pictured on Sheet 11, it would be considered pervious and be permitted within the buffer. (R93ZO 5-1003)

Response: Overlook is intended to be elevated as suggested and if determined not feasible / cost prohibited it will be removed to assure compliance with the SCVB.

Recommendations

Comment 3: Impacts to wildlife habitat, vegetation, wetlands, and water quality are issues for consideration as part of a special exception application. Based on the location of the park and proposed improvements in proximity of the streams, please expand on the statement of justification to provide additional information and specific measures that will be incorporated to provide protection and/or mitigation. For example, the Endangered and Threatened Species Review, dated December 3, 2018, identifies the potential for the white trout lily (state-rare species) and wood turtle (state-threatened) to occur on the park site and references an inventory/searches as part of the wetland permitting process. Please provide information regarding the status of the inventory/searches. (R93ZO 6-1309(4))

Response: As stated in the Endangered and Threatened Species report, the inventory of the white trout lily and wood turtle will likely be conditions of the wetland permit process which will not begin until time of site plan.

Comment 4: Consistent with the applicant's responses, staff recommends adding a note to Sheet 2 stating that the natural surface trails will follow the existing contours, will not traverse areas where slopes are greater than 50 percent, and the trail alignment will be refined based on a slope analysis to comply with the Steep Slope Standards at the time of site plan.

Response: See Note 29 which has been added to Sheet 2 as suggested.

Comment 5: Staff continues to recommend depicting the River and Stream Corridor 50-foot Management Buffer around the major floodplain and adjacent very steep slopes on the special exception plat. (2019 General Plan (2019 GP) River and Stream Corridor Resources Strategy 2.2)

Response: The RSCR and 50' management has been added to the plans as requested.

Comment 6: Consistent with River and Stream Corridor Resources Strategy 2.2 Action B, staff continues to recommend incorporating mitigation measures to help offset the impacts of the River and Stream Corridor 50-foot Management Buffer encroachments. (R93ZO 4-1507(F) and 6-1309(4))

Response: As previously noted and suggested tree conservation areas and additional erosion and sediment control measure are being committed to offset the encroachments into the 50' management buffer.

Comment 7: Sheets 7 and 8 identifies a conservation easement. Please provide information describing the intent of this area, specifically the activities allowed.

Response: The areas within the conservation easement will not have any proposed development activities.

Floodplain Management:

Recommendations

Comment 8: The last paragraph of the SPEX narrative on Sheet 2 states that this application seeks the ability to allow for a potential of 9.5% imperviousness and up to 125,000 square feet of incidental structures in the major floodplain. The tabulations on sheets 2 and 6 references the special exception request for a maximum of 371,150 square feet of impervious surfaces (7.89% impervious) and 53,950 square feet of incidental structures in the floodplain. Please review and correct this discrepancy. (R93ZO 4-1506)

Response: The narrative and tables have been reconciled.

Comment 9: Please clarify why the adult day center is included in the SPEX Breakdown of FOD Areas tabulation on Sheet 6 as the facility is not located in the floodplain. (R93ZO 4-1506)

Response: The adult day care was inadvertently included in the tables and has been removed.

Comment 10: Please review and verify that the floodplain tabulations provided on Sheet 2 are consistent with the SPEX Breakdown of FOD Areas tabulation on Sheet 6. For example, it appears that the square footage of existing and proposed incidental structures is reversed in the table on Sheet 2. (R93ZO 4-1506)

Response: The floodplain tabulations have been reconciled.

Comment 11: Please clarify the need for the 10 percent contingency in the structures and impervious surfaces tables on Sheet 2. The existing square foot of existing structures is a known value and the proposed square footage should be a maximum that accounts for minor adjustments. (R93ZO 4-1506(E) and 4-1506(F))

Response: The contingency has been removed from the tabulations and the tables accordingly.

Comment 12: As previously stated, as minor floodplain is not present on the subject property, please remove the first sentence in General Note 8 on Sheet 2. (FSM 8.101.A.20)

Response: Note 8 on sheet 2 has been updated to remove the first sentence as requested.

Comment 13: Staff was unable to locate the note referenced in the applicant's responses regarding the proposed maintenance facility. Please provide information regarding the activities and types of storage (fertilizers, herbicides, pesticides?) anticipated for the proposed maintenance facility. Also, include a note on the

special exception plat indicating that bulk storage of gasoline, chemicals, fuels, or similar substances are prohibited at the maintenance facility. (R93ZO 4-1506(E))

Response: See note #30 on Sheet #2 which provides reference that there will be no bulk storage of fuels, chemicals, fertilizers, within the maintenance facility.

Urban Forestry:

Recommendations

Comment 14: Staff recommends that stabilization of trails and the canoe/kayak launch for recreational uses are done with as minimal impact as possible to tree roots. Wood chips are recommended for stabilization.

Response: Recommendation acknowledged, and a condition will be added to provide additional coordination with the County Arborist at site plan to address concerns for stabilization and minimizing impacts.

Comment 15: Staff recommends that invasive species control should be implemented to protect the biodiversity of the area.

Response: Recommendation acknowledged, and a condition will be added to provide additional coordination with the County Arborist at site plan to address concerns regarding invasive species control.

Comment 16: Staff suggests a time of site plan 80% of all landscaping to include all plant classifications of chapter 7 in the FSM be species native to Virginia. Additionally, any grasses used for landscaping purposes should be 100% native to Virginia.

Response: Recommendation acknowledged, and a condition will be added that at time of site plan 80% of all landscaping to include all plant classifications of chapter 7 in the FSM be species native to Virginia. Additionally, any grasses used for landscaping purposes should be 100% native to Virginia

Loudoun County Planning and Zoning:

A. ZONING ORDINANCE COMMENTS ON ZRTD

Comment 1: *1st Referral Comment: As the Applicant has submitted a ZRTD application for review, the Applicant needs to address the zoning map amendment criteria per Section 6-1210(E)(1-6) in their SOJ.* Comment addressed as the SOJ was revised at second submission.

Response: Acknowledge and appreciated.

Comment 2: 1st Referral Comment: Section 4-407(E). This Section of the PD-RDP zoning district requires a minimum floor space mix and states the following: Minimum Floor Space Mix. At build-out, a minimum of twenty (20%) percent of total floor space in the park shall be committed to research and development uses or to Educational Institutions or schools, public or private. A zoning modification of this requirement is necessary with adequate justification. After further review, a ZMOD is not necessary as the minimum floor area mix is to be accounted for as part of the overall PD-RDP zoning district associated with University Center and not the individual ZRTD. Comment addressed.

Response: Acknowledge and appreciated.

Comment 3: 1st Referral Comment: Be advised that this referral applies solely to the requested ZRTD and does not imply or otherwise constitute approval of any existing uses and/or improvements, as such existing conditions are not subject to either review or approval with this application. Moreover, neither this referral nor approval of the ZRTD application constitutes a determination regarding the legality or permissibility of any potential future use and/or improvement on the Property. As such, the following note must be added to the existing conditions plan:

EXISTING CONDITIONS NOTE: "The uses and/or improvements shown as existing conditions are for information purposes only and are not subject to review or approval with the ZRTD application. The existing conditions information is not intended to limit permitted or special exception uses on the Property or the permitted square footage of such uses and related improvements. Approval of the ZRTD application does not imply or otherwise constitute approval of the existing uses and/or improvements on the Property or any future uses and/or improvements." Comment addressed with the addition of Existing Conditions Note on Sheet 3.

Response: Acknowledge and the note has been added to Sheet 3 as requested.

Comment 4: 1st Referral Comment: It is noted that should the ZRTD application be approved by the Board of Supervisors, an approved site plan and building/zoning permit are necessary to establish permitted uses on the property. Comment addressed.

Response: Acknowledge and appreciated.

Comment 5: 1st Referral Comment: Any Proffer statement submitted in connection with this application should indicate that the conversion is to the "Revised 1993 Loudoun County Zoning Ordinance, as amended," if the Applicant would like to utilize future amendments to the Zoning Ordinance. Staff may have further comments once a draft proffer statement associated with the ZRTD is submitted. No further comments.

Response: Acknowledge and appreciated.

B. ZONING ORDINANCE COMMENTS ON SPEXs

Comment 1: *1st Referral Comment: Section 4-1507. Zoning staff defers to the Department of Building and Development Natural Resource Team for the evaluation of the standards of Section 4-1507. In addition, correct the zoning ordinance section reference on Page 3 of the SOJ which should be Section 4-1507 as opposed to "4-11507" as currently stated. No further comments.*

Response: Acknowledge and appreciated.

Comment 2: *1st Referral Comment: Section 5-1000. The Subject Property is located within the Scenic Creek Valley Buffer (SCVB) and is subject to the regulations listed therein regarding limitations on the location, development, parking, buildings and structures in the SCVB. Draw the Scenic Creek Valley Buffer (250-feet from channel scar line of the Potomac River and 150-feet from the channel scar line of Broad Run) on all sheets. Staff notes that there are structures located within the SCVB that need to be relocated outside the respective setbacks.*

Response: The structures have been located outside the SCVB as required.

Comment 3: *1st Referral Comment: Section 5-1508. The Subject Property contains Moderately Steep (15 to 25 percent) and Very Steep Slopes (greater than 25 percent) and is subject to the performance regulations in Section 5-1508. The topography on the SPEX sheets appears to be shown in one-foot contour intervals. Confirm if the steep slopes drawn shown on the SPEX plat is based on one-foot topography. In addition, many notes on the plan set reference "severe slopes", which is not an accurate term used in the Zoning Ordinance. The Zoning Ordinance utilizes the terms "moderately steep" and "very steep slopes". Revise the plan set accordingly. Lastly, the Applicant needs to overlay the moderately steep slope and very steep slope areas onto the special exception plats to show the proposed uses and steep slopes data in relation to one another. Section 5-1508 contains limitations on the types of uses, development and land disturbance that can occur in moderately steep slope areas and very steep slope areas. Staff may have additional comments at next referral.*

Response:

C. SECTION 6-1309 SPECIAL EXCEPTION CRITERIA

Comment 1: *1st Referral Comment: Section 6-1309 (1). Staff defers comment to the Community Planning Division as to whether the proposed application is consistent with the 2019 Comprehensive Plan.*

Response: Comment acknowledge.

Comment 2: *1st Referral Comment: Section 6-1309 (2). The Applicant is required by Zoning Ordinance to meet performance standards with regard to noise, light, glare, odor or other emissions generated by the proposed uses. The Applicant has stated that the existing recreation fields will not be illuminated nor will other amenities beyond what is needed/required to provide for security and maintenance.*

Response: Comment acknowledged.

Comment 3: *1st Referral Comment: Section 6-1309 (3). Staff defers comment to the Community Planning Division as to whether the proposed uses are compatible with the surrounding existing and proposed uses in the neighborhood and on adjacent parcels.*

Response: Comment acknowledged.

Comment 4: *1st Referral Comment: Section 6-1309 (4). Staff notes that there is an area on the SPEX plat entitled "Tree Grove." Clarify if this area is a tree conservation area or if there are new trees proposed to be planted by the Applicant and provide the quantity/species of such plantings. Such information should be included in the form of a condition. Staff would recommend that the Applicant work with the County Urban Forester to develop a special exception condition to preserve any specimen trees and to determine whether any of the existing vegetation could be preserved with a tree conservation area on the site and/or is viable to be utilized to meet the tree canopy and buffer yard requirements of the Zoning Ordinance. Lastly, neither the SPEX plat nor the SOJ addresses how stormwater will be mitigated. Zoning Staff defers to the Department of Building and Development Natural Resource Team as to the adequacy of mitigation of the impacts to environmental and natural features on the property.*

Response: Recommendation acknowledged, and a condition will be added to provide additional coordination with the County Arborist at site plan to address the proposed planting of the "Tree Grove" if incorporated at time of final site plan.

Comment 5: *1st Referral Comment: Section 6-1309 (5). The proposed park improvements are a County project intended to provide additional recreational amenities to the citizens of Loudoun County. Zoning staff defers to the Department of Building and Development Natural Resource Team in regards to the proposed use's effect on the major floodplain and as to whether the use will promote the welfare or convenience of the public.*

Response: Comment acknowledged.

Comment 6: *1st Referral Comment: Section 6-1309 (6). Staff defers to the Department of Transportation and Capital Infrastructure and Loudoun Water regarding*

adequate sewer, water, transportation and other infrastructure needed to adequately serve the proposed park uses. No further comments.

Response: Comment acknowledge.

D. SPEX PLAT AND ZRTD PLAT COMMENTS

Comment 1: *1st Referral Comment: The Sheet Index on Sheet 1 of the plan set identifies two sheets (Sheets 10 and 11) that are missing from the plan set. The Applicant inserted Sheets 10 and 11 to the plan set at second referral and notes on the plan set sheets state that they are for illustrative purposes only. Staff recommends that these notes be revised to remove the sentence that states that uses, activities and materials will be determined at site plan as this is vague and such scope of uses, activities and materials are addressed as part of the SPEX application.*

Response: Comment acknowledge.

Comment 2: *1st Referral Comment: Clarify General Note 1 on Sheet 2 to state that Subject Property is currently split-zoned PD-RDP under the 1972 Loudoun County Zoning Ordinance and Revised 1993 Loudoun County Zoning Ordinance (Zoning Ordinance) and R-16 under the Revised 1993 Loudoun County Zoning Ordinance. In addition, clarify in the General Notes that the Subject Property is located in the Route 28 Tax District. Comment addressed.*

Response: Comment acknowledge.

Comment 3: *1st Referral Comment: Clarify General Note 21 on Sheet 2 to reference that any minor changes and/or revisions to the SPEX plat are permitted pursuant to the regulations of 6-1313 and 6-1314. Comment addressed.*

Response: Comment acknowledge.

Comment 4: *1st Referral Comment: In the bottom left-hand corner of Sheet 2, clarify the zoning district information noted on the inset Zoning Map to depict the zoning districts, Zoning Ordinances and relevant legislative applications as shown in Attachment 1 that was included as part of the Zoning District Map Exhibit in PRAP-2019-0035. Comment addressed.*

Response: Comment acknowledge.

Comment 5: *1st Referral Comment: Under the SPEX Narrative Note 2, the Note does not include all of the language stated in Section 4-1506(F) of the Zoning Ordinance. Revise the note accordingly to reference language that is missing*

regarding increases in base flood elevation. Comment addressed as the note was clarified as necessary.

Response: Comment acknowledge.

Comment 6: *1st Referral Comment: Regarding the Floodplain Narrative in the lower right-hand corner of Sheet 2, remove the last sentence of the first paragraph which reads “This Special Exception application shows a master plan for informational purposes only...” The information and proposed uses shown on the SPEX plat are not for informational purposes only and any changes/revisions must be in substantial conformance with the SPEX plat. In addition, Staff defers to the Department of Building & Development, Natural Resources Team, as to whether the information stated in the three paragraphs is accurate with regard to the source of floodplain waters and the impacts from the proposed improvements included with these applications. Comment addressed.*

Response: Comment acknowledge.

Comment 7: *1st Referral Comment: Across multiple SPEX sheets, clarification is needed regarding the type of construction materials used, quantity of uses, height, maximum trail width, maximum square footage of each structure, proposed impervious areas and floor area. In most cases, a dot is utilized to symbolize the general location of many proposed uses on the SPEX plat sheets. However, Staff notes that there are very specific square footages of structures and impervious areas shown on the SPEX plat and there is no maximum area drawn for each proposed use. In some cases, on Sheets 6, 7 and 8, the term floor area is used for structures that may not have floor area, as defined by Article 8 of the Zoning Ordinance. Clarification of the uses listed in the Proposed Use Table and the materials, location, quantity, maximum square footage of proposed uses and maximum impervious areas shown on the SPEX plat sheet are necessary. Staff recommends that the Applicant meet with Staff to clarify these issues. Comment partially addressed. Clarification is necessary with regard to the meaning of the 10 percent contingency referenced in the floodplain tabulations table on Sheet 2 and if such contingency is accounted for in the listing of floor area and impervious area shown on Sheet 6. In addition, Staff recognizes the Applicant's desire for flexibility in materials and location of amenities, however, Sheets 10 and 11 (which are illustrative in nature) do not provide any assurance for the type of construction materials and design of amenities shown on Sheet 6 in the application. Staff recommends that the Applicant work with Staff to craft conditions that allow flexibility but also ensures a commitment to the type of design and materials for such amenities and any necessary mitigation measures as are appropriate.*

Response: The contingency factor was removed, and a condition will be provided to address substantial conformance and while providing the county with a surety of the type development design and materials while

allowing for the desired flexibility while the project goes into final design.

Comment 8: *1st Referral Comment: On Sheet 2, under the Floodplain Tabulations Table, clarify the meaning and square footage referenced between the “Total Estimated Structures within FOD” and “Special Exception Request with a Potential Maximum Square Footage of Structures within FOD.” It is unclear what these figures and terms represent as they are different than those shown in the total on Sheets 6 and 7. Figures in the tables on Sheet 2 and 6 each reference 53,950 square feet of floor area proposed with the application. However, the Applicant stated in their response letter that they wish to allow up to 125,000 square feet of incidental structures within the major floodplain to allow flexibility in the future for the County to address any changes in the programming needs of the park to serve the greater public. Clarify the discrepancies between the two tables and the response to Comment 8.*

Response: The tables have been reconciled and the square footages requests have been clarified as requested.

Comment 9: *1st Referral Comment: On Sheet 2, under the Floodplain Tabulation Within SPEX Area Table, clarify the meaning and square footage referenced between the terms “Estimated Impervious Area” and the “Special Exception Request with a Potential Maximum Square Footage of Impervious Area within FOD.” It is unclear what these figures and terms represent as they are different than the totals on Sheets 6 and 7. In addition, a phrase in the third line at the top of the table reads “No Special Exception Required”. Remove this phrase as one of the SPEXs requested by the Applicant is to increase the impervious area greater than 3 percent but less than 10 percent via a SPEX. See Comment 8 response above which requests clarification of the figures shown in the tables on Sheets 2 and 6.*

Response: The tables have been reconciled and the square footages requests have been clarified as requested.

Comment 10: *1st Referral Comment: In some cases, it is very hard to distinguish the location of the major floodplain boundaries drawn on the SPEX plat sheets. Staff recommends that the major floodplain boundaries be more easily identified. Comment addressed as the delineated major floodplain boundaries are more clearly identified.*

Response: The floodplain delineation has been revised on the plans for better clarity.

Comment 11: *1st Referral Comment: The SPEX plats need to be revised to exclude the areas of the ZRTD as part of the SPEX applications. Comment addressed.*

Response: Comment acknowledge.

Comment 12: 1st Referral Comment: *Regarding the existing uses shown on the SPEX plat sheets, the Applicant needs to clarify if any of the existing uses are expanding or are being revised with this SPEX application. See Sheets 4 and 6. No existing uses are proposed to be expanded and the parking identified on the Existing Conditions Sheet 4 of the SPEX plat is being reconfigured as shown on Sheet 6 of the SPEX plat. No further comments.*

Response: Comment acknowledge.

Comment 13: 1st Referral Comment: *As the Applicant has submitted SPEX applications to add multiple uses in the FOD and increase the impervious surface in the FOD, Notes 1 and 4 on Sheet 6, Note 1 on Sheet 7 and Note 1 on Sheet 8 must be removed. Sheets 6 through 8 have been revised. However, additional clarification is needed on the “10 percent contingency” referenced on Sheet 2 and if such contingency is accounted for in the figures shown in the table on Sheet 6.*

Response: The contingency reference has been removed from the application.

Comment 14: 1st Referral Comment: *On Sheet 8, there are “solid black circle symbols” that have no corresponding number nor are listed in the Legend. Clarify this discrepancy. In addition, Staff notes that there are multiple text labels on Sheet 8 which are not legible. Revise the text labels accordingly. Comment addressed as these discrepancies were corrected.*

Response: Comment acknowledge.

Comment 15: 1st Referral Comment: *Remove the reference to a “ZRTD” on SPEX plat Sheets 2-9 and remove reference to a “SPEX” on the ZRTD plat Sheet 9 as the ZRTD and SPEX are separate applications. Comment addressed as the plan set was revised to clarify that the SPEXs and ZRTD are separate applications.*

Response: Comment acknowledge.

Comment 16: 1st Referral Comment: *The ZRTD plat Sheet 9 needs to reference the PIN number that is subject to the ZRTD application and include a note that the approximately 3.4 acre portion of PIN 038-26-8806 is proposed to be remapped from the PD-RDP zoning district under the 1972 Zoning Ordinance to the PD-RDP zoning district under the Revised 1993 Loudoun County Zoning Ordinance, as amended. Comment addressed as Sheet 9 was revised as requested.*

Response: Comment acknowledge.

County Archaeologist

Comment 1: In general, Thunderbird's fieldwork and reporting meet the standards for Phase I archaeological investigation set forth in the County's HPP and the Virginia Department of Historic Resources' 2017 Guidelines for Conducting Historic Resources Survey in Virginia. The Phase I survey unambiguously demonstrates that the Bles Park property contains an extensive and rich archaeological record, particularly as regards pre-Contact periods of Native American occupation. Deeply stratified deposits exposed in multiple locations, most notably along the natural levee that parallels the south bank of the Potomac River, are especially noteworthy for their potential to contain significant archaeological contexts with high levels of integrity. Preservation of such potentially important historic and cultural resources, especially in the face of development-related disturbance and destruction, should be a priority of County planning. It is also important to stress that in a comparable floodplain setting east of Broad Run and within 4,000 feet of Bles Park, intact Native American burials have been documented just below the plow zone within the remains of a Late Woodland period riverside hamlet or small village (44LD0004). Although human burials have not been documented within Bles Park the possibility clearly exists, and the County should also exercise every effort to ensure that such highly sensitive sites are not disturbed.

Response: Comment acknowledge and per coordination meeting with staff on 2/26/21 it was determined the plan will reflect avoidance where possible at time of site plan. A condition of approval requiring additional Phase I archaeological survey and, if necessary, Phase II and Phase III investigations if the refinement of construction plans following approval of this application imposes unforeseen impacts to previously un-surveyed areas and/or to previously identified historic resources.

Comment 2: Although Thunderbird's Phase I survey is sufficient to demonstrate the relative abundance of archaeological remains within the Bles Park property, the boundaries of many of the identified archaeological sites remain poorly defined because the survey, in many places, was confined to the narrow corridors of planned pedestrian paths. In such cases where archaeological resources are poorly delineated, assessing site significance and the potential for impacts to significant deposits is challenging. The difficulty of assessing potential impacts is further complicated in this case as development plans remain provisional and have yet to be finalized. The recommendations that follow are based on current understanding of the magnitude and locations of impacts as depicted on the application's SPEX Plat. As project plans are refined and possibly modified, additional archaeological research may be required to assess and mitigate more fully potential impacts to archaeological resources on the property.

Response: Comment acknowledge and will be incorporated in the conditions of approval as noted in comment response #1.

Comment 3: As discussed in the preceding analysis, staff concurs with Thunderbird's recommendations that sites 44LD0157, 44LD1892, 44LD1893, and 44LD1904 are all potentially eligible for NRHP listing and that Phase II archaeological significance evaluations are warranted if deep disturbances in these locations cannot be avoided. Information provided on the SPEX Plat suggests that impacts to these sites associated with approval of the current application will be minor and surficial, being limited largely to the formalization of natural-surface pedestrian paths across these site areas. Foot traffic across these sites' surfaces is not anticipated to result in significant new disturbance, especially as these locations already have a long history of plowing. Staff therefore does not consider Phase II archaeological evaluations to be warranted at this time at 44LD0157, 44LD1892, 44LD1893, or 44LD1904; however, staff cautions that this conclusion may change at Site Plan if final development plans indicate heightened disturbance to these areas.

Response: **Comment acknowledge and will be incorporated in the conditions of approval as noted in comment response #1.**

Comment 4: Staff does not concur with Thunderbird's NRHP eligibility recommendations regarding sites 44LD1890 and 44LD1891 and considers both sites potentially eligible for NRHP listing. That said, the current CDP suggests minimal impacts to both sites and therefore Phase II significance evaluations are also not warranted in these locations at this time. Again, staff cautions that this conclusion may change at Site Plan if final development plans indicate heightened disturbance to these areas.

Response: **Comment acknowledge and will be incorporated in the conditions of approval as noted in comment response #1.**

Comment 5: Staff does not concur with Thunderbird's NRHP eligibility recommendations regarding site 44LD1895 and considers this site potentially eligible for NRHP listing. Given the relatively extensive disturbances proposed in the western portion of 44LD1895 where the SPEX Plat proposes construction of a new maintenance building and parking lot, staff recommends that the applicant undertake a Phase II archaeological significance evaluation and, if warranted, avoidance or Phase III data recovery excavations. The eastern half of 44LD1895 will be impacted only by a natural surface pedestrian path and in staff's assessment Phase II archaeological testing is not warranted in this part of the site at this time.

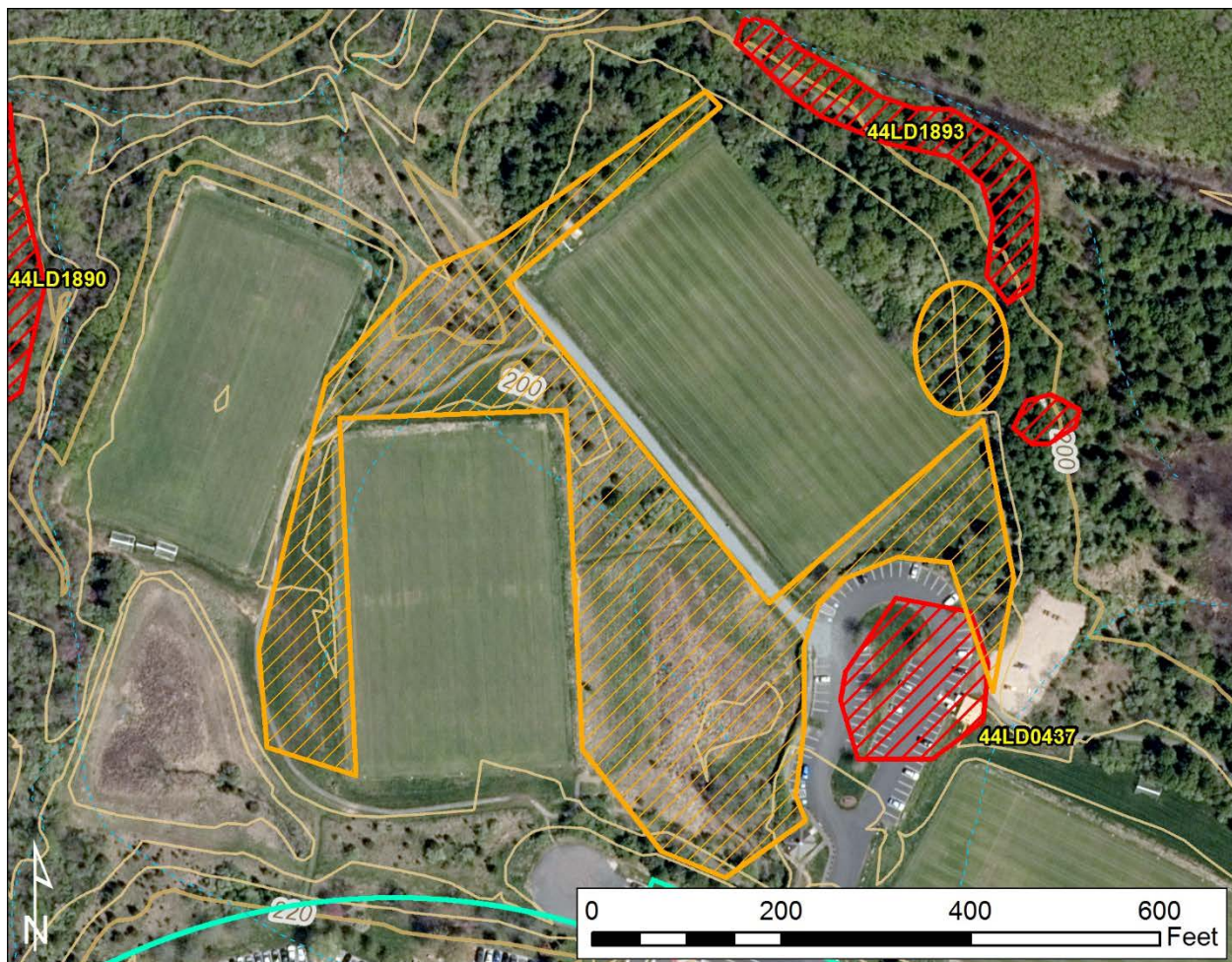
Response: **Comment acknowledge and will be incorporated in the conditions of approval as noted in comment response #1.**

Comment 6: In staff's assessment, Thunderbird's Phase I survey does not provide adequate coverage of the area surrounding the existing parking lot and athletic fields, where the current CDP proposes significant new developments, including expansion of the parking lot as well as extensive hard surface path and pavilion

construction. Staff recommends that the applicant undertake additional Phase I testing in the area highlighted in orange hatching in Figure 1, below. The goal of this additional testing is to clarify the extent, both horizontal and vertical, of disturbances associated with the existing parking lot and athletic fields and to determine whether potentially significant archaeological deposits survive in this area that will be impacted by planned improvements.

Response: Comment acknowledge and will be incorporated in the conditions of approval as noted in comment response #1.

Comment 7: In summary, staff recommends that the applicant undertake additional Phase I survey within the area highlighted in Figure 1 as well as Phase II evaluation testing of the western portion of 44LD1895 prior to approval of this application. Staff also recommends a condition of approval requiring additional Phase I archaeological survey and, if necessary, Phase II and Phase III investigations if the refinement of construction plans following approval of this application imposes unforeseen impacts to previously unsurveyed areas and/or to previously identified historic resources.



Mr. Rob Donaldson
Department of Planning and Zoning
Bles Park Second Referral
April 9th, 2021
Page 20

Figure 1: Map of Bles Park showing area (orange hatching) where additional Phase I archaeological survey is recommended.

Response: Comment acknowledge and will be incorporated in the conditions of approval as noted in comment response #1.

Please feel free to contact me at 703-263-1900 or by email at cstephenson@gordon.us.com if you should have any further questions.

Sincerely,
WILLIAM H. GORDON ASSOCIATES, INC.

Christopher D. Stephenson, PLA
Director of Planning

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Date: October 6, 2021

Mr. Rob Donaldson
Planner, Land Use Review
Department of Planning and Zoning
1 Harrison Street, SE
Leesburg, Virginia 20177

Re: Bles Park – Resubmission for Planning Commission Work Session 10/14/21
SPEX-2019-0037
GORDON Project: 3164-1001

Dear Mr. Donaldson,

The following is in response to your request to provide a formal resubmission of the Bles Park application. The comments and responses provided in this letter are a culmination of the various meetings, emails and phone conversations that have occurred between Commissioner Kirchner, PRCS and DTCL since the Planning Commission Public Hearing held back on June 22nd. We feel there have been significant improvements made to the Bles Park Application as result of the on-going coordination over the past 3 months. We believe the revised application provides a fair compromise to balance the needs of the active recreation portion of the facility (which is approximately is only 30 AC of the entire 132 Park.) while the rest of the park remains for passive recreation usage and enjoyment.

We would like to make note that back in June of 2018, the Board of Supervisors initiated the proposed park improvements which included items such as 250 additional parking spaces, safety netting throughout the park, an updated of the exiting playground, picnic pavilions, and a canoe/kayak launch. Those improvements have been incorporated into the plans and are current funded through the Capital Improvement Program.

The following is a summary of coordination efforts and SPEX Applications improvements:

Summary of Events:

- June 22nd Planning Commission – Action sent to future work session
- Site meeting on 7/28 meeting with Commissioner Kirchner, PRCS and DTCL
- Email coordination 7/29
- Email coordination 8/13
- Phone coordination / virtual meeting 8/25 meeting with Commissioner Kirchner, PRCS and DTCL
- Pulled from September 9th work session
- Email coordination 9/7 with Commissioner Kirchner
- September 17th virtual meeting with Commissioner Kirchner, PRCS and DTCL
- Email coordination 9/26 with Commissioner Kirchner
- Email and phone coordination 10/4 with Commissioner Kirchner

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Summary of Plan project updates:

- Reduced the amount of proposed impervious surface by 12% (Less 43,125 SF)
- Reduced the number of incidental structures by 19% (Less 9,125 SF)
- Removed the Maintenance Facility
- Reduced proposed parking by 10% (approx. 30 spaces)
- Reduced the number of proposed pavilions (5 pavilions removed)
- Relocated the multi-purpose courts closer to the active recreational uses
- Reduced the open lawn area by 57% (From 1.75 AC down to .75 AC)
- Increase the amount of Tree Conservation by 1 AC
- Commitments to mitigate impacts of the existing SWM / BMP facility with a 2:1 replacement of reforestation and invasive species removal. (Approximately 2 AC)

Additional information provided:

- Provided summary of field facility usage – (PRCS Rectrec)
- Provided boardwalk construction information
- Provided information of other boardwalks in the NOVA area
- Provided summary of initial public input session (4/19/19)
- Summary of original board initiative (6/21/18) (provided by DTCL)
- Provided documentation of existing site easements
- Provided deed language of proposed VRRM Conservation Easements
- Provided information on the Nutrient Credits program

The following are the specific comments and responses provided to Commissioner Kirchner dating back to the Planning Commission public hearing in June:

Concerns from Public Hearing Dated 6/22/21:

Comment 1: Concerns regarding impacts from potential boardwalk amenity and does it create fragmentation of habitat and impacts on wildlife?

Response: *The following was provided by the environmental consultant WSSI; **Habitat fragmentation is where there are species that require large, continuous tracts (think 100-acres or greater) of a particular ecotype (field, forest, etc.) in order to complete their life-cycle. A great example is forest interior dwelling birds (FIDs). FIDs need large forests and will typically only live in the core area, staying well away from the edges. This type of habitat is NOT currently present at Bles Park – there is already a lot of edge habitat and zero large areas of continuous habitat type. Furthermore, boardwalks are unique in that they allow for passage of species under them – they are far less impact than an asphalt trail, while still being ADA compliant. The Corps of Engineers and the Virginia DEQ do not consider boardwalks in wetlands to be an impact to wetlands (i.e., no permit would be required) so long as trees are not removed (DEQ requirement).***

Comment 2: Noise impacts on wildlife.

Response: *The following was provided by the environmental consultant WSSI; Given how there are already (4) existing sports fields there and there is no proposed increase nor existing or proposed site lighting, we don't see the proposed condition being markedly different from the current condition.*

Comment 3: Commitments to providing all native vegetation plantings.

Response: **We are committing to all proposed plantings will be Northern Virginia native.**

Comment 4: Compatibility of having active and passive recreation opportunities on a naturalized areas for plants and wildlife.

Response: **The fields have been existing since the mid 1990's and proposed improvement related to the active recreation portion of the park comprises approximately 22% of the 132 AC Park. Those areas are generally located in a relatively compact 30 AC portion of the site and are located as far as possible from the Potomac River and close to the Bles Park Drive within already developed areas. To further help with the concern of impacts to the wildlife, we believe there may be opportunities for some educational signs posted for visitors alerting to their proximity to naturalized areas for the plants and wildlife.**

Comment 4: Consideration for Invasive Species Management programs

Response: **We are committing to providing a 2:1 mitigation for impacts to the existing SWM/BMP facility which includes reforestation and invasive species removal of approximately 2 AC.**

Site Meeting on 7/28:

Comment 1: Concerns regarding boardwalk impacts

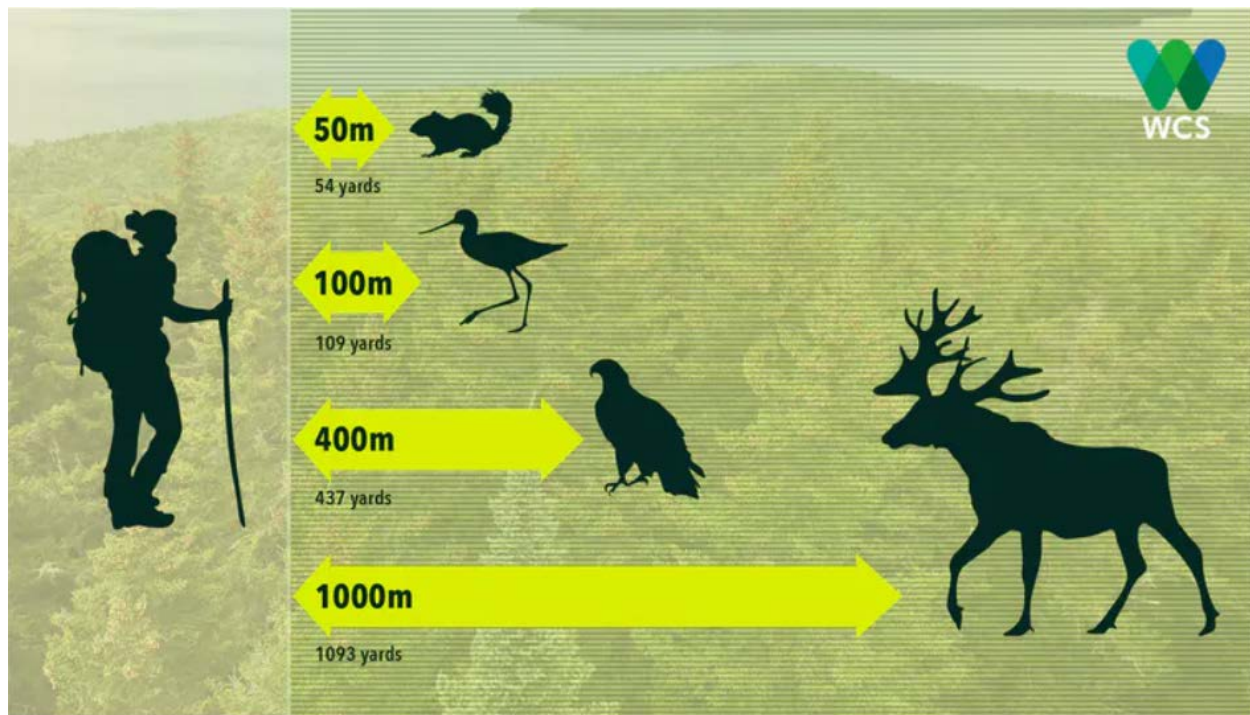
Response: **At our meeting, we discussed opportunities to adjust alignment of boardwalk and the preference by PRCS and DTCL is to keep the proposed amenity for the park. We feel this will provide a unique experience for the visitors of park with minimal impacts. The proposed alignment generally avoids the wetland and primarily located along the fringe of made-made wetland mitigation area.**

Comment 2: Is it possible for reconfiguration of the existing parking lot?

Response: **The reconfiguration of the existing parking without impacting the existing SWM/BMP facility would not be practical and/or efficient. The amount of site work necessary would need only result in a slight increase in the number of parking spaces and would be still significantly below the PRCS standards of 60 spaces per field.**

7/29 Email from Commissioner Kirchner

Comment 1: I will forward more info as discussed on some topics, but here is an academic overview article on wildlife behavior and proximity to human activity - authored by Jeremy Dertien, PhD Candidate in Forestry and Environmental Conservation/Clemson University; Courtney Larson, Adjunct Assistant Professor/University of Wyoming, and Sarah Reed, Affiliate Faculty in Fish, Wildlife and Conservation Biology/Colorado State University. https://www.salon.com/2021/07/20/dont-hike-so-close-to-me-how-the-presence-of-humans-can-disturb-wildlife-up-to-half-a-mileaway_partner/



Human recreation starts to affect wild creatures' behavior and physical state at different distances. Small mammals and birds tolerate closer recreation than do

larger birds of prey and large mammals. Sarah Mackay. CC BY ND

Response: Comment is noted that wildlife is affected by the proximity of human activity. It should also be noted the history of the park was originally a sod farm prior to the construction of the ballfields in the 90's. The current condition of the park is a combination of naturalized regeneration of vegetation and the construction of man-made wetlands. The resubmission of the plans has reduced the number of proposed impacts of impervious surface by 12% and the number of incidental structures by 19% from the initial submission of the plans.

8/13 Email from Commissioner Kirchner

Comment 1: Keep the current footprint of the existing parking lot and reconfigure to add more parking spaces rather than expand the parking lot. Pursue temporary off-site parking options for the weekends/days when additional parking may be needed.

Response: We've evaluated alternative layouts during the initial planning and program of the park design. In order to avoid impacting the existing SWM/BMP facility, the footprint of the active recreation area would have had to expand significantly beyond what is currently proposed. Temporary off-site only existing in the form of on-street parking. Bles Park Drive is a public road and enforcement of parking restriction would be very challenging and is typically not a viable option for PRCS.

Comment 2: Do not add fencing/netting, pavilions, shade structures or additional hard surface trails in the western part of the park around the fields or near the wetlands and both stormwater pond areas. Instead, add benches, NoVA native trees for additional shade and possibly picnic tables where appropriate.

Response: We have reduced the number of proposed shelters and have committed to NOVA native tree plantings on site. Please note, the fencing and netting was specified in the Board of Supervisors initiative for the site improvements.

Comment 2: Do not remove/pave over the stormwater management pond nearest the fields but restore natural habitat and ecosystem functions in the pond so it provides a "close-up" observation/viewing area of wetland plants, wildlife and habitat for park visitors.

Response: In order to maximize the parking potential without significantly expanding the development footprint, the existing SWM/BMP will need to be impacted. It is noted that the existing SWM/BMP facility is an existing non-conforming use that meet current standards of the today's stormwater regulations. The proposed improvements will offset the impacts by placing nearly 50 AC of the park into a conservation easement and will provide 2:1 mitigation of impacts with a replace of reforestation and invasive species removal.

Comment 3: Modestly expand and upgrade the children's playground in conjunction with removing invasives such as Autumn olive, Princess tree, Bradford pear and Johnson grass in that area near the playground and fields.

Response: The area within proximity of the playground improvement and expansion will be subject to removal invasive species as suggested.

Comment 4: Keep the pavilion in the overlook at the natural clearing with a trail connection near the Eastern Loudoun Adult Day Center.

Response: Comments is noted and that was the intent of the design.

Comment 5: Upgrade the existing bathroom, esp. look at an upgraded stone exterior for the added bathroom, similar to what the original bathroom building has.

Response: Comment is noted and will be taken into consideration if additional funding available, however the existing restroom facility is based on the current PRCS standards.

Comment 6: Do not construct a boardwalk or observation platforms through the wetland area

Response: As previously noted, we are continually evaluating the opportunities and value of the boardwalk experience. We have provided materials on the how boardwalk could be constructed while minimizing impacts to the wetlands. The proposed alignment generally avoids the wetland and is primarily located along the fringe of made-made wetland mitigation area. PRCS and DTCI would like to keep the proposed amenity for the park and will provide a unique experience for the visitors of park with minimal impacts.

Here is a blog that references other boardwalks in NoVA:

<https://www.funinfairfaxva.com/boardwalk-hikes-northern-virginia/>

Here is another resource that talks about reducing impacts to vegetation and wildlife under boardwalks.

<https://www.americantrails.org/resources/faq-vegetation-under-boardwalks>

Here is an excerpt from the FFX County website regarding Huntley Meadows Park's Heron Trail: "The boardwalk is an immersive nature experience. You will walk through the heart of the wetland and be close to wildlife."

Comment 7: Look to relocate the proposed kayak launch, gravel drive and parking to the existing roadcut and sewer line access drive that is across from Bishop Terrace and Abrahm Terrace. I walked this drive down to the Broad Run; it is shorter which I feel is better and kayak access to the Broad Run there looks good. Also, possibly a few gravel parking spots could be added nearer the road. It gets the kayak drive and launch further away from the sensitive wetland area.



Response: After further site evaluation, this area is subject to a Loudoun Water sanitary sewer easement. It would likely require additional impervious surface to be added and improving the access to a commercial entrance standard since its accessed by the public road. Furthermore, there is no on-street parking in this vicinity of the Bles Park Drive which and ingress /egress could have potential safety concern unless and parking area is provided. The current location on the plans utilizes an existing commercial access, and gravel road with a proposed off-street parking that would have minimal new disturbance.

Comment 8: Remove tennis and pickle ball courts, off-leash dog area these from the plan for now or, see if one or two could be placed adjacent to the Eastern Loudoun Adult Day Center. We are looking to find a different location nearby/not on the current Bles Park site to locate these.

Response The overall parking provided was reduced by 10% and thereby created an opportunity to relocate the tennis / multipurpose courts closer to the rest of the active recreational uses. The off-leash area has remained unchanged as it continues to keep the proposed improvements centrally located and minimize the development footprint.

Comment 9: maintenance facility- I believe this was removed, thank you!

Response: Acknowledged

Comment 10: cleared areas for unprogrammed lawn activities Do not create a cleared area for unprogrammed lawn activities with pavilions near the existing stormwater detention pond as shown now but create the overlook with a pavilion at the natural clearing near the Eastern Loudoun Adult Day Center. Add one or two benches near the stormwater detention pond off the existing trail. (I can show you on a map).

Response: The unprogrammed lawn area was reduced an acre and the balance added into conservation.

Comment 11: hard surface trails and skateboarding areas- Eliminate the additional hard surface trail sections near the sensitive wetlands area.- We haven't really discussed the trail and skateboarding areas near Potomac Farms.

Response: The proposed hard surface trails are within the request threshold of the amount of impervious within the floodplain and the skate spots are located in an area of the park that is outside an environmentally sensitive areas and far away from the passive recreational areas of the park.

Comment 12: Climate and other - You may have seen the recent [IPCC climate report](#) which elevates the importance of protecting and restoring natural climate solutions, including mature stands of trees for carbon sequestration.
I would like to see a way for the county to pursue some sort of invasive plant removal program for the park.

Response We are providing over 50 AC of Tree Conservation on site and are committing to providing NoVA native plantings along reforestation and invasive species removal to mitigate the impacts to the existing SWM/BMP facility that is currently non-conforming to today's stormwater regulations

8/25 Phone coordination meeting:

Comment 1: Requested information regarding the field usage and the initial public input session.

Response: Copy of the meeting notes from the public input meeting along with photos of the event were provided. In addition, PRCS provide their Rec-Trac summary for the upcoming month of field usage and contact information from the Loudoun Soccer facility coordinator.

9/7 Email from Commissioner Kirchner

Comment 1: Hi Chris -- I have a few thoughts on Huntley Meadows and some of the other information you sent that I can share next time we meet. Relative to providing an area for overflow parking when needed that could also be used as unprogrammed lawn area at other times - I suggest looking at what appears to be a water or sewer line grassed easement road running between the fields and the apartments, just west of the Bles Park Drive cul-de-sac. It looks like the grassed area could be widened a bit to accommodate parking and unprogrammed lawn area - a gate could be used to access from the cul-de-sac, opened when needed for overflow parking and then closed so the grassy area is usable for unprogrammed activities.



Response: Alternative parking area suggestion doesn't work for PRCS. This area is difficult to control access, grass parking not ideal and would expand the development footprint with additional impervious area.

9/17-10/6 email coordination

Comment 1: Does the proposal change the alignment of the Potomac Heritage Trail? When I compare the May 2019 site analysis map (existing) with the May 2019 Final Master Plan, the alignment looks like it's changed starting at about the first bend in the Broad Run (page 1, past the wetlands) and the rest of the way eastward to the end of the park (page 2).

Response: There are no plans to change the existing alignment of the Potomac Heritage Trail. The discrepancy was purely a graphically translation that between the images from the illustrative and the site analysis. On the pending SPEX requests, we've noted the portions of the existing trail the needed to be factored into the floodplain impacts. (Such as the existing pedestrian bridge)

Comment 2: Please explain the nutrient credits that will be purchased, quantity and what they will be for and also the Virginia Runoff Reduction Method (VVRM) conserved/open space easements - referred to in page 9 of Rob Donaldson's 6/22 report for the public hearing. Why are these necessary?

Response: Attached is a copy of the typical deed language associated with the VRRM easement. As you will see it's designed to preserve the land as undisturbed forested/open space.

Nutrient credits are purchased from eligible banks. During site Plan, we would run through a nutrient credit analysis to determine specifically which banks this project is now eligible for.

How the nutrient credits are implemented depends on the bank. Some banks achieve credits by land cover conversion, some by land cover conservation.

All banks are regulated through DEQ, who reviews the methodology for nutrient credit generation and the ledger for retiring of nutrient credits as they are sold on the market. Typically, we don't get into the details on how each bank gets their credits. Here are the regulations for more information: <https://law.lis.virginia.gov/admincode/title9/agency25/chapter900/>

We have purchased nutrient credits on number of projects in Loudoun County and the most recent one was for the Potomack Lakes Sportsplex project by Loudoun County.

Please feel free to contact me at 703-889-2350 or by email at cstephenson@gordon.us.com if you should have any further questions.

Sincerely,
Gordon

Christopher Stephenson, PLA
Planning Director

CC: Ms. Jane Kirchner, Planning Commissioner Algonkian District
Mr. Rob Balinger, DTCI
Mr. Mark Novak, PRCS

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