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Department of Transportation and Capital Infrastructure
Loudoun County
PO Box 7000
Leesburg, VA 20177

To Department of Transportation and Capital Infrastructure:

Loudoun Wildlife Conservancy is very excited that the Westpark golf course property is being turned into a passive park. This property has already been placed under a conservation easement, and protecting its conservation values should be the top priority of this park. This is an opportunity to enhance habitat for wildlife and protect water quality while supporting passive recreation uses.

There were several elements that we are glad to learn will be included as this project develops. These proposed elements enhance wildlife habitat, increase functional wildlife corridors, and improve water quality. In addition to comments on the concept plan, we are including other recommendations for specific written commitments that we believe will strengthen this future park as the park planning process progresses from concept to an approved design.

- Commitment to the use of native plants for all new vegetation. We recommend utilizing 100% native plants for any future vegetation. We also recommend creating a site-specific natural resources management plan to include a habitat management plan to not only maintain open space and create buffers, but to also enhance habitat throughout the park through native plantings, and to strategically manage invasive species.
- Minimal mowing to protect meadow habitat for grassland nesting birds. While mowing in late-July and October are suitable times to accommodate grassland nesting birds, one alternative would be to mow once in late winter-early spring to also allow for overwintering habitat for birds and insects.
- Wetlands creation projects.
- Riparian buffers. However, buffers surrounding the wetlands and streams on the property should be wider to have greater protection of water quality and wildlife corridors.

It is important to ensure these wetland creation and habitat enhancement projects are given proper protections. This includes ensuring that passive recreation amenities including trail systems are located in areas that will not impair these efforts.

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We have concerns about the following are elements of the design that have the potential to negatively impact wildlife, water quality, and the conservation values of the property. We have enclosed a map to illustrate specific areas of concern.

- Trails and recreation areas should be located away from the wetlands, creeks, proposed established buffers, and outside of the floodplain as much as possible. Where it is not possible to avoid the floodplain, only natural surface trails should be allowed. The current proposed Concept Plan illustrative has excessive trails located within the floodplain and buffers.
- Boardwalks depicted on the current proposed Concept Plan illustrative should be removed. Bisecting wetlands of these small sizes could have significant negative impacts on wildlife and water quality. Interpretive panels and strategic viewpoints along the wetlands and creeks can provide context and education about the projects without harming the ecological value of the projects.
- Disc golf holes should not traverse the floodplain. Wayward discs and increased foot traffic could harm the sensitive habitat. Additionally, disc golf fairways should be as narrow as necessary to increase the amount of habitat restoration potential.
- The off-leash dog park located directly adjacent to the floodplain could lead to pet waste run-off during heavy rain events that would impair water quality. This amenity should be removed since there is a nearby off-leash dog park at Olde Izaak Walton Park.

Below are additional points for consideration as part of the overall park planning process.

- It would be helpful for future maps to include more details on currently existing or proposed amenities or natural resources, such as:
 - Delineating existing trails on the property.
 - How many acres of wetlands are estimated to be created? And existing wetland acreage.
 - Delineating the acreage and proposed width of buffers and upland buffers.
- A statement of justification of the community need for an 18-hole disc golf course.
- What is being done to enforce park boundaries to ensure adequate riparian buffers between the streams and houses? Fertilizer run-off from adjacent residences is a major water-quality concern.
- Are there ways to have engaging, interactive passive activity elements? Perhaps in coordination with the interpretive panels?
- Will volunteers and/or students be utilized or engaged to enhance habitat, create interpretive signage/activities, or build a sense of community and ownership over the park?
- How will neighboring residents be engaged to help be stewards of this park?
- Statements made by the contractor to diminish specific concerns due to the use of “artistic license” during the concept plan phase are misleading as many specific elements, such as trail alignments, often end up in the exact or approximate location detailed on conceptual maps that eventually get approved. More care should be taken during the concept phase to avoid



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illustrating potential impacts to natural resources, especially given the water quality goals of this project.

Many of the proposed passive recreation elements have the potential to hinder the conservation values of the property. Some of the proposed passive recreation elements are more susceptible to irresponsible recreation and could compromise the ecological integrity of the land and habitat. This park is a tremendous opportunity for Loudoun County to be good stewards of natural resources, and a lighter touch should be used in regards to proposed passive recreation elements to ensure the conservation values of this property can thrive for generations to come.

Sincerely,

Michael Myers
Executive Director

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