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September 29, 2025

Transportation and Land Use Committee of The Board of Supervisors
1 Harrison Street
Leesburg, VA 20175

To Transportation and Land Use Committee Members:

I am writing on behalf of Loudoun Wildlife Conservancy regarding the Mountainside Overlay District discussion as part of the Western Loudoun Rural Uses CPAM/ZOAM. We at Loudoun Wildlife reemphasize comments on the MOD that we gave during the original Zoning Ordinance Rewrite Process. We remain in concurrence with county staff on the importance of protecting the sensitive environmental features that make up the MOD, including dark skies.

Regarding Regulatory Standards, Flexibility, and Development Costs, we do not believe that the standards in place are overly restrictive. Even for most minor developments, the restrictions and study requirements in place are still necessary to protect the sensitive features of the MOD. Enforcement inconsistencies should be a driver to improve methods for zoning enforcement, not a reasoning for relaxing protections.

We do not support the expansion of uses within the Mountainside Feature Protection area. Ridgelines provide a crucial habitat for wildlife in developing areas, and expanding uses will invite development to the detriment of the ecosystems that are currently protected in ridgeline areas. Not only could this change have a negative footprint on the mountainside itself, it also has the potential to negatively impact natural resources outside of the MOD. In this way, the sourcewater protection standards that require a 300' setback from mountain springs should in no way be decreased. To prevent further contamination of Loudoun's streams and groundwater, this setback must be increased or maintained.

Permitting tree clearing offsetting is at odds with the subsequently stated goal to ensure ecological integrity and public safety. On steep slope areas and across the MOD, mature trees are absolutely critical. Only the extensive and stable root network of late successional forests can provide sufficient habitat, soil protection, and ecological health. This means also that permitting the clearing of these types of trees increases the likelihood of public safety hazards presented by natural disasters such as mudslides or landslides. Allowing offsetting that replaces mature forests with young trees that do not have an established root system could have disastrous consequences.

We'd like to reiterate sentiments that were set out in initial Zoning Ordinance Rewrite comments about the purpose of the Mountainside Overlay District. Regarding signage, we maintain our position that dark skies must be a priority, and standards should minimize lighting and prohibit uplighting. Additionally, we recognize that the process of surveys and permits required for any kind of development or alteration on property on the Mountainside may be considered onerous by some pursuing small-scale projects. However, it is important to emphasize that these requirements are in place because the MOD is considered to be sensitive land-procedures that ensure impacts to it will not be harmful to the environment or people are crucial in all cases.

Sincerely,

Trinity Mills

Conservation Advocacy Specialist, Loudoun Wildlife Conservancy

PO Box 1892, Leesburg, VA 20177