



[www.loudounwildlife.org](http://www.loudounwildlife.org)

September 25, 2026  
Board of Supervisors  
1 Harrison Street  
Leesburg, VA 20175

To WLRUS Ad Hoc Committee:

I am writing on behalf of Loudoun Wildlife Conservancy regarding the Mountainside Overlay District discussions of the Western Loudoun Rural Uses and Standards Comprehensive Plan and Zoning Ordinance Amendments. We appreciate your additional work on this important topic and thank you for the consideration of our comments.

The initial statements of the critical reasoning behind the MOD protections is noted and appreciated in establishing context and intent throughout this section of the Zoning Ordinance. The goals of these statements, all hinging on a need to protect the vulnerable and essential natural resources within the MOD, must be the leading consideration to all potential alterations of the text. As such, we at LWC have concerns regarding certain proposed standard changes.

Any additional land-disturbing activity or building within Highly Sensitive areas of the MOD could have detrimental impacts on the sanctity of wildlife habitat. Even for 600 square feet and less of land disturbance, residential driveways, and nonhabitable residential structures, additional permissions should not be given to allow for a subversion on Special Exception requirements. These standards are in place because of the fragile nature of the location, and size exclusions or accessory uses should not be given leeway that permits destruction without additional scrutiny. Comparisons to allowable land disturbance area or accessory nonhabitable residential uses elsewhere in the county are unfair: the additional steps required in the MOD were included for a reason, and decisions to increase buildout on a parcel within Highly Sensitive areas cannot be made independently of the context of their surroundings.

We do not support decreasing setbacks from sensitive environmental features in the MOD. The 300' setback for springs and ridges is needed to maximize protections, and arguments for standardization at a lower distance of 100' do not align with the statements that lead the regulations laid out at the beginning of this section: to protect mountainside areas. The argument for standardization that was used to rationalize the 100' setback does not align with similar requirements in the Limestone Overlay District. 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.

The effort to increase existing minimum forested area to 50% for non-residential covered activities is absolutely commendable and necessary. However, in order to demonstrate a commitment to the goals outlined at the conception of this section (protection of the Mountainside

**PO Box 1892, Leesburg, VA 20177**

and its features), at minimum a *majority* of forested area must be retained. Considering that is the predominant land cover for this area, this measure would work toward ensuring that the primary features of the Mountainside prevail over developed land when it comes to uses such as these.

We also support initiating a requirement for Special Exceptions or Minor Special Exceptions for all non-residential uses on the Mountainside. It has become apparent that the demand for commercial development on Loudoun County's mountains is increasing. This has already been shown to pose a significant danger to the ecosystems and individual wildlife that rely on this last refuge of wild space. Requiring a Minor Special Exception would take measures that help weed out bad actors and curb the enthusiasm for businesses which, in abundance, could prove to be the destruction of the very thing they are aiming to showcase.

The steep slope areas and ridgelines of the mountainside provide crucial habitat for wildlife in our rapidly developing county. In fact, of the areas in Loudoun County designated as Ecological Cores (areas of contiguous habitat able to sustain high biodiversity and ecological functionality due to minimal anthropogenic intrusion) by the Virginia Department of Conservation and Recreation, almost all of them are within the MOD. Thank you for your consideration of these comments, and we hope you will vote in favor of giving direction that maximizes the protection of the mountains that make Loudoun special.

Sincerely,

Trinity Mills

Conservation Advocacy Coordinator, Loudoun Wildlife Conservancy