MEMORANDUM

To:       Loudoun County Planning Commission
From:     Rob Donaldson, Project Manager, Planning and Zoning
          Marchant Schneider, Program Manager, Planning and Zoning
Date:     October 7, 2021
Re:       October 14, 2021, Planning Commission Work Session
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 three Special Exceptions (SPEX) 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 impervious area greater than three percent but no more than ten percent within the FOD.

STAFF RECOMMENDATION

Staff supports a Planning Commission (Commission) recommendation of approval to the Board of Supervisors (Board) subject to the Proffer Statement (Attachment 1) and Conditions of Approval (Conditions) (Attachment 2) and based on the Findings for Approval (Attachment 3). Staff has concluded that the applications advance 2019 General Plan policies addressing parks and recreational uses, particularly in eastern Loudoun County. There are no outstanding issues identified by Staff. The applications are ready for Commission action.

PROPOSAL

As a part of an overall Master Plan for Bles Park, several legislative applications are proposed:
1. **ZRTD-2019-0004** - To rezone 3.4 acres from the PD-RDP zoning district under the 1972 Zoning Ordinance to the PD-RDP zoning district under the Revised 1993 Zoning Ordinance consistent with the balance of the property.

2. **SPEX-2019-0037** – To permit the expansion of the existing park area with various program amenities that include pavilions, canoe / kayak launch, multi-generation playgrounds, skate spots, off-leash dog area, tennis & pickleball courts, overlook areas, and unprogrammed open lawn.

3. **SPEX-2019-0038** – To allow incidental structures, such as benches and pavilions, with a total area greater than 840 SF in the FOD.

4. **SPEX-2019-0039** – To allow impervious area greater than three percent but no more than ten percent within the FOD.

**Figure 1. Vicinity Map**

Figure 1: The 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).

**BACKGROUND**

The existing park sits on 132 acres and was built in the late 1990s and early 2000s. Bles Park includes four soccer fields, a parking lot, and a playground and restroom facility which were approved through the by right site plan process with STPL-1998-0075, Riverside Park, and University Center. Additionally, the park contains walking trails and the Eastern Loudoun Adult Day Center. 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.

The Commission held a Public Hearing on June 22, 2021.¹ 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 the Commission 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 voted 8-0-1 (Miller absent) to send the applications to a future work session.

Staff has received 1 comment on the Loudoun Online Land Applications System (LOLA). The commenter recommended that the skate spots be moved closer to the main park to be more accessible, easier to maintain and have less impact on the environment. The staff reports and associated attachments can be viewed online at www.loudoun.gov/lola; search “SPEX-2019-0037.”

**UPDATES**

On August 20, 2021, the applicant provided an updated CDP (Attachment 4) that made various changes to the CDP. The changes are summarized as follows:

1. 12 percent decrease in total impervious surface area.
2. 19 percent decrease to incidental structures.
3. 10 percent decrease in total proposed parking areas.
4. 57 percent decrease to proposed open lawn area.
5. One acre increase to the Tree Conservation Area.
6. Maintenance facility removed.
7. Five pavilions removed.
8. Multi-purpose courts relocated closer to existing active recreational uses and parking areas.

On September 30, 2021, the applicant provided responses to questions submitted by Commissioner Kirchner following the Public Hearing. Those questions are summarized below and further addressed in Topics for Discussion and in Attachment 5.

1. Summary of field facility usage.

¹ View the June 22, 2021 Public Hearing Staff Report [here](#).
2. Alternative canoe / kayak launch sites versus use of existing easement.

3. Alternate overflow parking areas.

4. Alternative locations for planting enhancements within existing ponds in consultation with County staff.

5. Boardwalk design / construction information.

6. Information regarding other boardwalks in the NOVA area.


9. Reforestation opportunities to mitigate impacts of proposed parking reconfiguration and expansion.

Additionally, the applicant (PRCS) requested flexibility performing archaeological studies due to the final locations of new park structures being unknown at this time. In response to this request, staff updated the Conditions to give the County Archaeologist the right to have the applicant perform additional archaeological studies as necessary at the time of site plan. These updated archaeological conditions are also supported by the Heritage Commission, who provided a letter in support of protecting the potentially historically significant sites on the subject property.

**TOPICS FOR DISCUSSION**

*From June 22, 2021, Planning Commission Public Hearing:*

1. **Reduction of impervious surface and incidental structures.** The applicant provided an updated CDP that decreases the impervious surface impact by 12 percent and the incidental structure impact by 19 percent (see Attachment 4). This is achieved through three major changes:

   a. The proposed maintenance facility has been removed, reducing the amount of impervious area by 18,000 SF and the incidental structure area by 6,000 SF.

   b. The number of proposed pavilions has been reduced by five from 13 to eight.

   c. The proposed parking has been reduced by approximately thirty spaces (10 percent).

   **Status:** Commission comment addressed. Staff acknowledges that the reduction of impervious surface and incidental structures in the floodplain better implement
the Loudoun County 2019 General Plan (2019 GP) policies to protect the floodplain.

Figure 2: Conceptual Design Plan / Redline Changes

Figure 2: The highlighted areas in red show items that were changed by the applicant and further explained in Table 1 below.
Table 1: Impervious and Floor Area within the FOD Changes

<table>
<thead>
<tr>
<th>Amenity</th>
<th>Approximate Area of Impervious within FOD (SF)</th>
<th>SF Change</th>
<th>Approximate Floor Area of Structures Within FOD</th>
<th>SF Change</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(Public Hearing Submission)</td>
<td>(Work Session Submission)</td>
<td>(Public Hearing Submission)</td>
<td>(Work Session Submission)</td>
</tr>
<tr>
<td>Parking</td>
<td>135,000</td>
<td>113,000</td>
<td>-22,000</td>
<td>N/A</td>
</tr>
<tr>
<td>Pavilion Area</td>
<td>12,000</td>
<td>8,875</td>
<td>-3,125</td>
<td>12,000</td>
</tr>
<tr>
<td>Maintenance Facility</td>
<td>18,000</td>
<td>Removed</td>
<td>-18,000</td>
<td>6,000</td>
</tr>
<tr>
<td>Total</td>
<td>347,150</td>
<td>304,025</td>
<td>-43,125</td>
<td>47,950</td>
</tr>
</tbody>
</table>

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).
2. **Relocation of Multi-Purpose Courts.** The applicant has relocated the proposed multi-purpose courts to be by the parking lot and existing soccer fields (Figure 3). Staff believes 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.

*Status: Commission comment addressed.*
3. **Tree Conservation Area.** The Commission asked the applicant to investigate whether it was possible to add more tree conservation area to the site. The applicant was able to provide an additional acre of tree conservation area by removing the proposed maintenance facility, reducing the size of the proposed open lawn area by 57 percent, and relocating the multi-purpose courts.

**Status:** Commission comment addressed.

**Follow-On Requests For Information / Recommendations**

4. **Response to Follow-On Commission Questions and Recommendations.** At the Public Hearing, the Planning Commission directed the applicant to work with staff and Commissioner Kirchner to address the Commission discussion. Since the Public Hearing, the applicant has met with both staff and the Commissioner several times and provided a number of responses to questions. A summary of those questions and responses are found below and in Attachment 5:

   a. **Summary of Field Usage.** The applicant provided this information directly to Commissioner Kirchner.

   b. **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.
c. Evaluation of Alternative Overflow Parking Area. The applicant was asked to evaluate the use of an existing grassy area (Figure 7 – circled in red) for overflow parking. It was 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](image)

d. 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 SWM/BMP will need to be impacted. The proposes to offset this impact through fifty acres of tree conservation and a 2:1 mitigation of impacts with reforestation and invasive species removal.

e. Boardwalk Information. 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 5.

f. 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.

g. Additional information. The applicant submitted additional information related wildlife impacts, easements, and nutrient credits in their comment response letter (Attachment 5).
DRAFT MOTIONS


OR

2. I move an alternate motion.

ATTACHMENTS

1. Proffer Statement (June 14, 2021)
2. Conditions of Approval (October 7, 2021)
3. Findings of Approval
4. Revised Concept Development Plan (August 20, 2021)
5. Comment Response Letter
The LOUDOUN COUNTY BOARD OF SUPERVISORS, the owner ("Owner") of the property described as Loudoun County Tax Map /63/E16/////A/ (PIN 038-26-8806) ("Property"), 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 above referenced Property is rezoned by the Board of Supervisors of Loudoun County, Virginia (hereinafter referred to as "the County"), 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.

1. CONCEPT DEVELOPMENT PLAN

The development of the Property shall be in substantial conformance with Sheet 09 of the eleven (11) sheet plan set titled "BLES PARK”, dated August 30, 2019, with revisions through April 9, 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-IP 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 ________________
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 (SPEX 2019-0037, SPEX-2019-0038, & SPEX-2019-0039)” dated August 30, 2019 and revised through April 9, 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 APPLICATION” on 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 Sheet 5of 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 STPL, including any SPAM, or CPAP approval 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.

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Attachment 2
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 STPL, including any SPAM, or CPAP, the Applicant shall conduct Phase II significance evaluations for archaeological sites 44LD0157, 44LD1895, 44LD1892, 44LD1893, and 44LD1904. 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 Owner will provide historic preservation staff with a copy of the findings of the Phase II archaeological study prior to approval of such STPL, SPAM, or CPAP, 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 Owner 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 Expanded 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 Owner shall consult with the County’s Urban Forest to identify appropriate open areas for reforestation adjacent to the major floodplain in an amount equal to the area of the that impacts of the proposed parking shown on the CDP 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. Planting and removal of invasive species a rate of two square feet for every one square foot of disturbed for approximately 2 acres.

Reforestation plantings shall consist of plant species native to Northern Virginia. The Owner 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”) in effect as of the date of approval of this Application for the reforestation area(s) prior to the approval of the first site plan, including any site plan amendment, 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. 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 (SPEX 2019-0037, SPEX-2019-0038, & SPEX-2019-0039)” dated August 30, 2019 and revised through April 9, 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 APPLICATION” on 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 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.

8. **Archaeological Sensitive Sites.** Prior to the approval of the first STPL, including any SPAM, or CPAP approval 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.
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 STPL, including any SPAM, or CPAP, the Applicant shall conduct Phase II significance evaluations for archaeological sites 44LD0157, 44LD1895, 44LD1892, 44LD1893, and 44LD1904. 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 Owner will provide historic preservation staff with a copy of the findings of the Phase II archaeological study prior to approval of such STPL, SPAM, or CPAP, 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 Owner 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.

9. **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 Expanded 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.

10. **Reforestation and Invasive Species Control.** The Owner shall consult with the County’s Urban Forest to identify appropriate open areas for reforestation adjacent to the major floodplain in an amount equal to the area of the that impacts of the proposed parking shown on the CDP 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. Planting and removal of invasive species a rate of two square feet for every one square foot of disturbed for approximately 2 acres.

Reforestation plantings shall consist of plant species native to Northern Virginia. The Owner 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”) in effect as of the date of approval of this Application for the reforestation area(s) prior to the approval of the first site plan, including any site plan amendment, 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. 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 (SPEX 2019-0037, SPEX-2019-0038, & SPEX-2019-0039)” dated August 30, 2019 and revised through April 9, 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 APPLICATION” on 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 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.

11. **Archaeological Sensitive Sites.** Prior to the approval of the first STPL, including any SPAM, or CPAP approval 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.
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6. **Reforestation and Invasive Species Control.** The Owner shall consult with the County’s Urban Forest to identify appropriate open areas for reforestation adjacent to the major floodplain in an amount equal to the area of the impacts of the proposed parking shown on the CDP over the existing 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. Planting and removal of invasive species a rate of two square feet for every one square foot of disturbed for approximately 2 acres.

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FINDINGS FOR APPROVAL
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.
BLES PARK

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 BILINGER
LOUDOUN COUNTY DEPARTMENT OF
TRANSPORTATION AND CAPITAL INFRASTRUCTURE
101 BLUE SEAL DRIVE, SE, SUITE 102
PO BOX 7500
LEESBURG, VA 20177-7500
EMAIL: ROBERT.BILINGER@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 #: 038-20-8805
TAX MAP #: 83E/10/5/1/0/1/A
AUGUST 30, 2019
SEPTEMBER 23, 2019
AUGUST 7, 2020
OCTOBER 30, 2020
DECEMBER 4, 2020
AUGUST 13, 2021

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

BLES PARK
ALGONKIAN ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA
SPEX NARRATIVE

This special exception application is to address 20CPA-200200 which stated: PER SECTION 1972-306Z, AN EXPANSION OF AN EXISTING SPEX APPLICATION REQUIRES A NEW SPEX.

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

1. Section 4-1032 (b) for incidental structures greater than 100 SF if within the major floodplain.

2. Section 4-1003.3.1.4 for presence of impervious area greater than 15% but no more than 20% and when master and access recreation uses cause the boundaries of major floodplain to change above that cause an increase in flood elevation.

3. THERE IS APPROXIMATELY 108 AC OF MAJOR FLOODPLAIN USES CAUSE THE BOUNDARY OF MAJOR FLOODPLAIN TO CHANGE AND/OR THAT CAUSE AN INCREASE IN FLOOD ELEVATION.

4. NO CHANGE TO THE BASE FLOOD ELEVATION, THEN A CLOMR SUBMISSION TO INCIDENTAL STRUCTURES AND MINIMAL GRADING WITHIN THE MAJOR FLOODPLAIN IS REQUIRED.

5. IT IS THE OPINION OF GORDON THAT THE PROPOSED CHANGES WITHIN THE MAJOR FLOODPLAIN WILL NOT IMPACT THE CONFIGURATION OF THE NATURAL ACTIVE CHANNEL OF THE POTOMAC RIVER.

6. MODERATELY STEEP AND VERY STEEP SLOPES SHOWN IS OBTAINED FROM LOUDOUN COUNTY GIS DATA.

7. SECURITY ACTIONS OR STRUCTURE MARKING A PLACE OF BURIAL ON THIS PROPERTY.

8. THERE IS FLOODPLAIN ON THE PROPERTY THAT IS THE SUBJECT OF THIS APPLICATION. THE CURRENT ZONING, AND LAND DEVELOPMENT REGULATIONS.

9. TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY ENHANCED SPECIES HABITAT ON THIS PROPERTY.

10. TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY ENDANGERED SPECIES HABITAT ON THIS PROPERTY.

11. TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY ARCHAEOLOGICAL SURVEY AND L. ENVIRONMENTAL FEATURES.

12. TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY HAZARDOUS OR TOXIC SUBSTANCES ON THIS PROPERTY.

13. TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THERE IS NO EVIDENCE OF ANY HAZARDOUS OR TOXIC SUBSTANCES ON THIS PROPERTY.

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24. DEVELOPMENT OF THIS PROPERTY SHALL BE IN SUBSTANTIAL CONFORMANCE WITH THIS SPECIAL EXCEPTION PLAT (SHEETS 6-8). LAYOUT AND CONFIGURATION OF THE BUILDING ELEVATIONS, FOOTPRINT, AND CROSS-SECTIONS OF THE MAJOR FLOODPLAIN IS IN A BACKWATER CONDITION FROM THE POTOMAC RIVER ON THE PROPERTY.

25. THE BUFFERING AND SCREENING AND PARKING LOT LANDSCAPING REQUIRED PURSUANT TO THE REGULATIONS OF 6-1313 AND 6-1314.

26. DEVELOPMENT OF THIS PROPERTY SHALL BE IN SUBSTANTIAL CONFORMANCE WITH THIS SPECIAL EXCEPTION PLAT (SHEETS 6-8). LAYOUT AND CONFIGURATION OF THE BUILDING ELEVATIONS, FOOTPRINT, AND CROSS-SECTIONS OF THE MAJOR FLOODPLAIN IS IN A BACKWATER CONDITION FROM THE POTOMAC RIVER ON THE PROPERTY.

27. MODERATELY STEEP AND VERY STEEP SLOPES SHOWN IS OBTAINED FROM LOUDOUN COUNTY GIS DATA.

28. A TREE COVER INFORMATION SHEET MUST BE PROVIDED AT SITE PLAN.

29. THE NATURAL SURFACE TRAILS WILL FOLLOW THE EXISTING CONTOURS, WILL NOT TRAVEL AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT, AND THE TRAIL TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT, AND THE TRAIL TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT, AND THE TRAIL TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT.

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32. THE NATURAL SURFACE TRAILS WILL FOLLOW THE EXISTING CONTOURS, WILL NOT TRAVEL AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT, AND THE TRAIL TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 25 PERCENT.

33. THE NATURAL SURFACE TRAILS WILL FOLLOW THE EXISTING CONTOURS, WILL NOT TRAVEL AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT, AND THE TRAIL TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 25 PERCENT.

34. THE NATURAL SURFACE TRAILS WILL FOLLOW THE EXISTING CONTOURS, WILL NOT TRAVEL AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT, AND THE TRAIL TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 25 PERCENT.

35. THE NATURAL SURFACE TRAILS WILL FOLLOW THE EXISTING CONTOURS, WILL NOT TRAVEL AREAS WHERE SLOPES ARE GREATER THAN 50 PERCENT, AND THE TRAIL TRAVERSE AREAS WHERE SLOPES ARE GREATER THAN 25 PERCENT.
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 ALONG THE RECREATIONAL FIELDS FOR PICNICS

SMALL PAVILION
FOR DISCRETE LOCATIONS ALONG THE NATURE TRAILS

SHADE STRUCTURE
FOR LOCATIONS ALONG THE RECREATIONAL FIELDS FOR VIEWING

OPEN LAWN
FOR UNPROGRAMMED ACTIVITIES

BOARDWALK
FOR ICONIC VIEWS OF THE EXISTING WETLANDS

TREE GROVE
ALONG THE TRAILS FOR A CALMING EXPERIENCE

OVERLOOK AT NATURAL CLEARING
FOR ICONIC 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
Welcome to Bark Park
The place for happy dogs

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.
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 DTCI 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 DTCI  
- Email coordination 7/29  
- Email coordination 8/13  
- Phone coordination / virtual meeting 8/25 meeting with Commissioner Kirchner, PRCS and DTCI  
- Pulled from September 9th work session  
- Email coordination 9/7 with Commissioner Kirchner  
- September 17th virtual meeting with Commissioner Kirchner, PRCS and DTCI  
- Email coordination 9/26 with Commissioner Kirchner  
- Email and phone coordination 10/4 with Commissioner Kirchner
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 DTCI)
- 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 DTCI 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/](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/)

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.
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.

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.

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.

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.

Response: The area within proximity of the playground improvement and expansion will be subject to removal invasive species as suggested.

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 Abraham 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