



## Loudoun County, Virginia

---

Planning Commission

1 Harrison Street, S.E., 3<sup>rd</sup> Floor, P.O. Box 7000, MSC #62

Leesburg, Virginia 20177-7000

Telephone (703) 777-0246 • Fax (703) 777-0441 • E-mail: loudounpc@loudoun.gov

March 10, 2014

Honorable Scott K. York, Chairman  
Loudoun County Board of Supervisors  
1 Harrison St. S.E.  
Leesburg, Virginia 20175

Re: DOAM-2013- 0002, Facilities Standards Manual and Chapter 1096 Codified Ordinance Amendments, Stormwater Management

Dear Chairman York,

The Planning Commission wishes to inform the Board of Supervisors of issues and concerns raised during the Commission's review of the above-noted Facilities Standards Manual amendment. The amended Virginia Stormwater Management Plan Permit Regulations, mandated by the State, require major amendments to Chapter 5 (Water Resource Management) of the FSM, minor amendments to Chapter 1 (Authority) of the FSM, and major amendments to Chapter 1096 (Stormwater Management of the Codified Ordinance).

These amendments were heard by the Planning Commission on January 23, 2014. At a subsequent work session on February 4, 2014, the Commission voted 6-1-1 (Commissioner Scheel opposed; Dunn abstaining; and Ruedisueli absent) to recommend approval. However, during the course of discussion, there was considerable concern expressed that the new requirements would put a significant burden on landowners, including residential homeowners. A number of Commissioners expressed the concern that the process was arduous, difficult and costly.

A significant change for projects that will discharge to man-made channels or streams are new requirements to reduce the maximum amount of stormwater runoff allowed to enter the stream to levels 10 to 20 percent lower than the pre-development levels and a requirement to include the entire development site in the determination of the pollutant load (vs. the current criteria which includes only the impervious site area). Land-disturbing activities as small as one acre must meet more stringent pollutant standards. The Planning Commission was particularly concerned with the potential cost to landowners, particularly owners of small properties, to meet the new standards.

These more stringent technical criteria have the potential to require that additional stormwater management Best Management Practices be incorporated on development sites. Furthermore, to implement the new State-mandated program, County staff will have additional duties which include administering a new permit process, more complex plan reviews to include "completeness" reviews,

---

**Charles Douglas**  
Blue Ridge District

**Helena Syska, Chairman**  
Sterling District

**Jeffrey Salmon, Vice Chairman**  
Dulles District

**Eugene Scheel**  
Catocin District

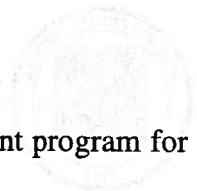
**Jack Ryan**  
Broad Run District

**Thomas Dunn**  
Leesburg District

**Robert Klancher**  
Ashburn District

**J. Kevin Ruedisueli**  
At-Large

**Mary Blackburn**  
Algonkian District



additional site inspection responsibilities, and administering the stormwater management program for all incorporated towns (other than Leesburg).

We offer these observations to provide the Board with the tenor of the Commission review and to encourage the Board to consider working with Federal and State representatives to evaluate the impact of the new standards on landowners. Please do not hesitate to contact us if we can be of further assistance.

Respectfully submitted,

Helena Syska, Chairman  
Loudoun County Planning Commission

- cc: Loudoun County Board of Supervisors
- Loudoun County Planning Commission
- Tim Hemstreet, County Administrator
- Charles Yudd, County Administration
- Kenny Young, County Administration
- Mike Seigfried, Acting Director, Building and Development
- Julie Pastor, Planning
- John Merrithew, Planning