

Zoning Ordinance Rewrite Comments Analysis

July 7, 2023

Executive Summary

The Loudoun County Zoning Ordinance defines and implements land use and design standards within the County. In September 2019, the Loudoun County Board of Supervisors voted to comprehensively revise and/or replace the Revised 1993 Loudoun County Zoning Ordinance. The first draft of proposed Zoning Ordinance text was published on April 18, 2022, with periodic updates leading to the most recent Draft Zoning Ordinance approved by the Planning Commission on June 8, 2023.

During the period between September 2019 and June 2023, the County has continually strived to engage the public through public comment periods, public meetings, and the facilitation of public comments through many open online portals. The public engagement effort resulted in thousands of comments relating to the draft Zoning Ordinance being provided to Loudoun County through multiple media including:

- Letters.
- Emails.
- Public meeting comments.
- Comments submitted through online channels.

This memorandum illustrates the nature of comments provided, categorized by topic, and identifies comment trends over time as well as underlying themes within each topic area identified. Comments were analyzed using a combination of data analysis procedures, Artificial Intelligence (AI), and institutional knowledge of the Zoning Ordinance and the ordinance rewrite process.

This analysis reveals that periods of high comment frequencies correspond to public meetings and comment review periods following the release of new draft chapters, demonstrating that the public was successfully engaged in the development of the draft Zoning Ordinance through intentional outreach efforts by the county. It also shows that comment topics that were present in many initial comments later fell to a small minority of overall comments, indicating that the county was successful in addressing concerns as they were brought forth by the public. Finally, this analysis demonstrated that while organizations and interest groups provided the majority of comments, individual citizens were highly engaged in the process providing 30% of all comments received.

Methodology

This section provides an overview of the methodology used to complete the Zoning Ordinance Rewrite (ZOR) Comment Review. An illustration of the comment analysis process is provided in Figure 1 below. Individual steps are detailed in the following subsections.

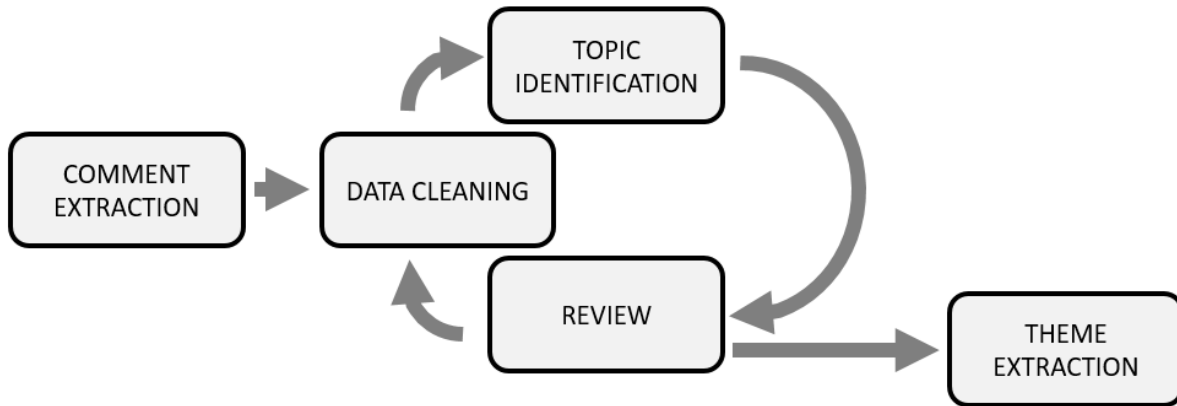


FIGURE 1. COMMENT ANALYSIS WORKFLOW

Topic versus Theme

One key detail of the comment analysis process as described in the following sections is the distinction between topic and theme. For the purpose of this analysis, topic refers to the subject of the comment, or the key term being discussed. Theme refers to what is being said about the topic. Topics were determined by examining all comments together using AI and other programmatic tools, while themes were extracted manually on a topic-by-topic basis leveraging institutional knowledge of the ZOR process.

Comment Extraction

The first step in conducting the review was to extract all comments from their native formats into a plain text format. Plain text formats provide two main benefits for the purpose of this analysis:

1. Plain text facilitates programmatic interactions with comments, allowing for application of repeatable and consistent analysis procedures across the thousands of comments.
2. Plain text is required as input into the Natural Language models leveraged to extract information from comments.

In addition to the main content of comments received, comment metadata was also extracted when provided including:

- Comment Date
- Sender
- Organization

Scripts were developed to automate extraction of comments wherever automation was feasible, such as with online portal comments provided in tabular format. For other comment formats that were too inconsistent to automate comment extraction, such as letters, text and comment metadata was extracted manually into a consistent plain text format.

Data Cleaning

Once comments had been extracted into plain text format along with any relevant metadata, various data cleaning strategies were implemented to maximize the accuracy of the analysis. Cleanup strategies include:

- Fixes to misspellings.

- Removal of Unicode text.
 - Unicode the representation of special characters such as “~”, “*”, etc., as a backslash followed by a series of alpha numeric values. These special characters can distract or confuse Natural Language models and thus are scrubbed from the comments.
- Removal of capitalization (where applicable).
- Removal of stop words.
 - Stop words are commonly used words in a given language that can distract Natural Language models and thus are scrubbed from comments for analysis.
 - Examples include “the”, “and”, “is”, “are”, etc.
- Stemming of root words (where applicable).
 - Stemming involves grouping words by their root (e.g., “ran”, “running”, “run” would all stem to “run”), thus allowing for more accurate accounting of word frequency.
- Part of speech tagging.
 - Words in each comment were tagged as nouns/verbs, etc., to better isolate the subject of each comment.

Topic Identification

As illustrated in the flow chart depicted in Figure 1, the process of topic identification was an iterative process where results of initial investigatory efforts were used to continually refine the process until results were consistent with the County's experience and expectations in addressing public comments over the past two years.

Investigatory analysis was conducted on the cleaned data in order to identify the best way to accurately categorize comments. Initial investigative steps involved word frequency analyses to gain a general understanding of which words were most frequently used among the comments. Subsequent investigative analysis focused on key terms defined in the “Definitions” chapter (Chapter 12) of the draft ordinance.

Final iterations of the topic identification process leveraged Generative AI tools to ensure that topics identified through the key term analysis are truly the topic of comments and not simply a key term that inadvertently shows up frequently in a comment whose topic is about an independent key term. For example, in the synthetic comment “While parking at my home, I've found noise levels from the neighboring winery to be too high;” even though parking, which is a key term, is included in the sentence, it is not the subject of the comment.

Once comments had been categorized based on their respective topics, individual comment summaries were developed using generative AI. These summarized comments were divided into individual documents by topic and organized in chronological order.

Theme Extraction

The final step in analyzing public comments involved a manual review process leveraging the institutional knowledge of individuals intimately familiar with the draft Zoning Ordinance document. The necessity for context related to the Zoning Ordinance to understand comment themes made the use of AI unideal for this portion of the analysis. The manual review process was facilitated by taking the previously categorized comments, reviewing each category of comments individually, and determining major themes observed for each topic. Comment themes for each major topic area were further distilled to gain insights on overall public sentiment.

Results

Results of the comment analysis are provided in the following sections. Comments are broken down by major topics, topic frequency over time, and comment frequency by sender/organization. Major topics are further broken down to assess reoccurring themes across comments by topic.

Major Topics Identified

Figure 2 below illustrates the distribution of comments by topic over time. The y-axis represents the various topic areas identified, organized by highest to lowest overall comment frequency. The x-axis represents time, with vertical lines in red representing significant events including releases of new versions of the draft Zoning Ordinance and public meetings. The size of the dots indicates the number of comments submitted on a particular comment at a particular time. Figure 2 reveals that periods of high comment frequencies correspond to public meetings and comment review periods following the release of new draft chapters, demonstrating that the public was engaged in the development of the draft Zoning Ordinance through intentional outreach efforts by the county.

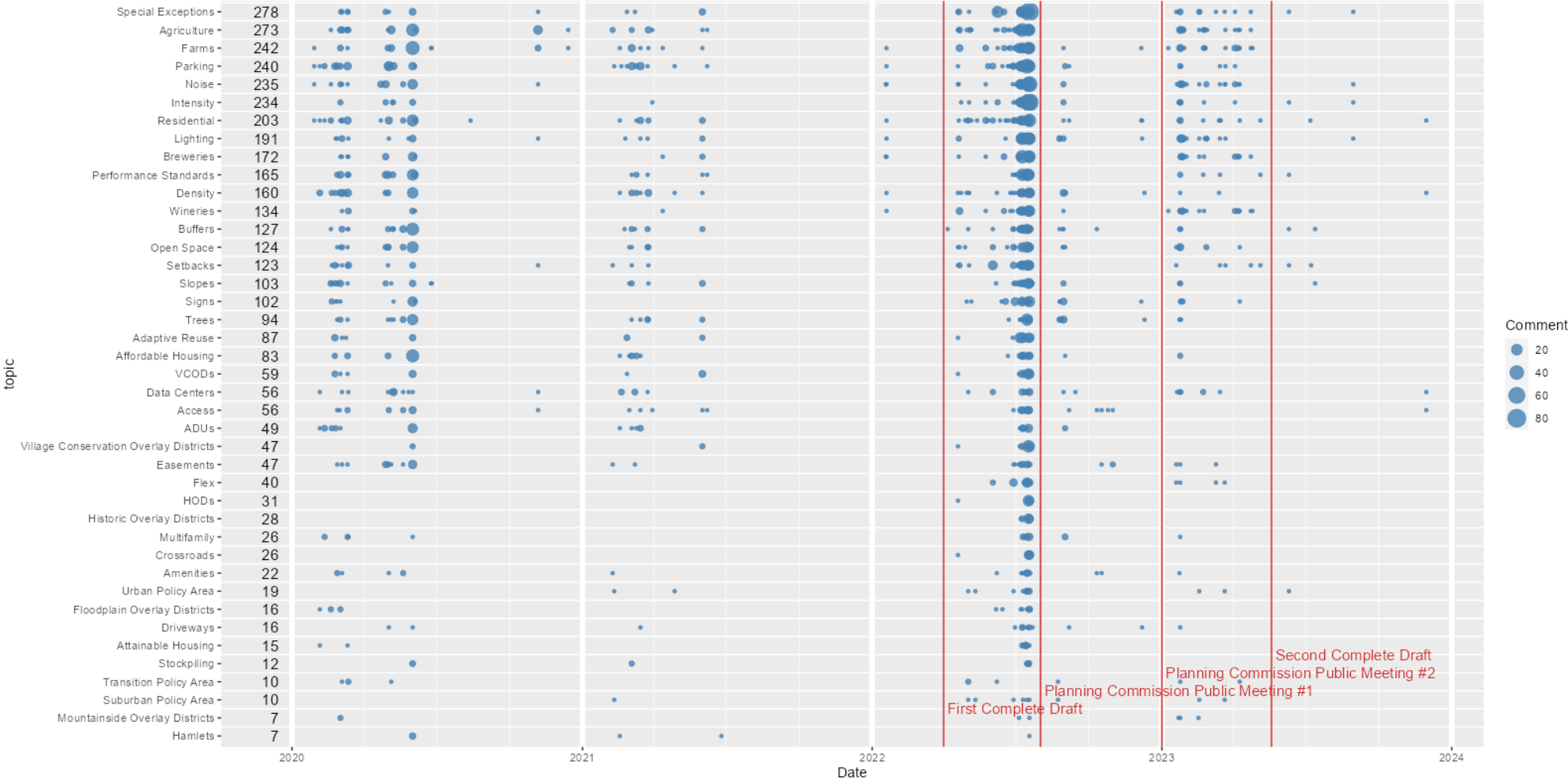


FIGURE 2. MAJOR COMMENT TOPICS

Topic Frequency Over Time

Figure 3 below illustrates comment frequency over time based on the top seven topics observed in the beginning of the public outreach effort in 2020, as well as the top six topics from the last few months of 2023 leading up to the most recent version of the Draft Zoning Ordinance. For consistency over time, values for each topic are shown as a percent of all comments provided during a given time period.¹

Figure 3 illustrates that while initially topics of parking, density, and performance standards were in the top 6 most frequent topics of 2020, those topics were reduced to much lower shares of comments submitted by 2023 whereas topic areas like lighting, noise, wineries, and breweries rose to be a much larger share of overall comments. This indicates that as public comments were addressed by updates to the draft ordinance to address parking, density, and performance standards, comments related to those topics decreased and were replaced new topics of concern to the public. Topic areas such as agriculture and farms continued to be major topic areas from 2020 to 2023, indicating that these are topics that will continue to require attention throughout the ZOR process and in any future ordinance amendments.

The overall share of comments devoted to the top 6 comment topics in 2020 (21%) is also much lower than the overall share of comment devoted to the top 6 comment topics in 2023 (126%).² This indicates that as public outreach continued over time, the overall number of topic areas of concern was reduced, likely as a result of those concerns being addressed during the ZOR process.

¹ Since only a subset of topics are illustrated in Figure 3, the total for each year will not add up to 100%.

² Single comments can have multiple topics, leading to overlaps in percentages where cumulative totals can add up to greater than 100%

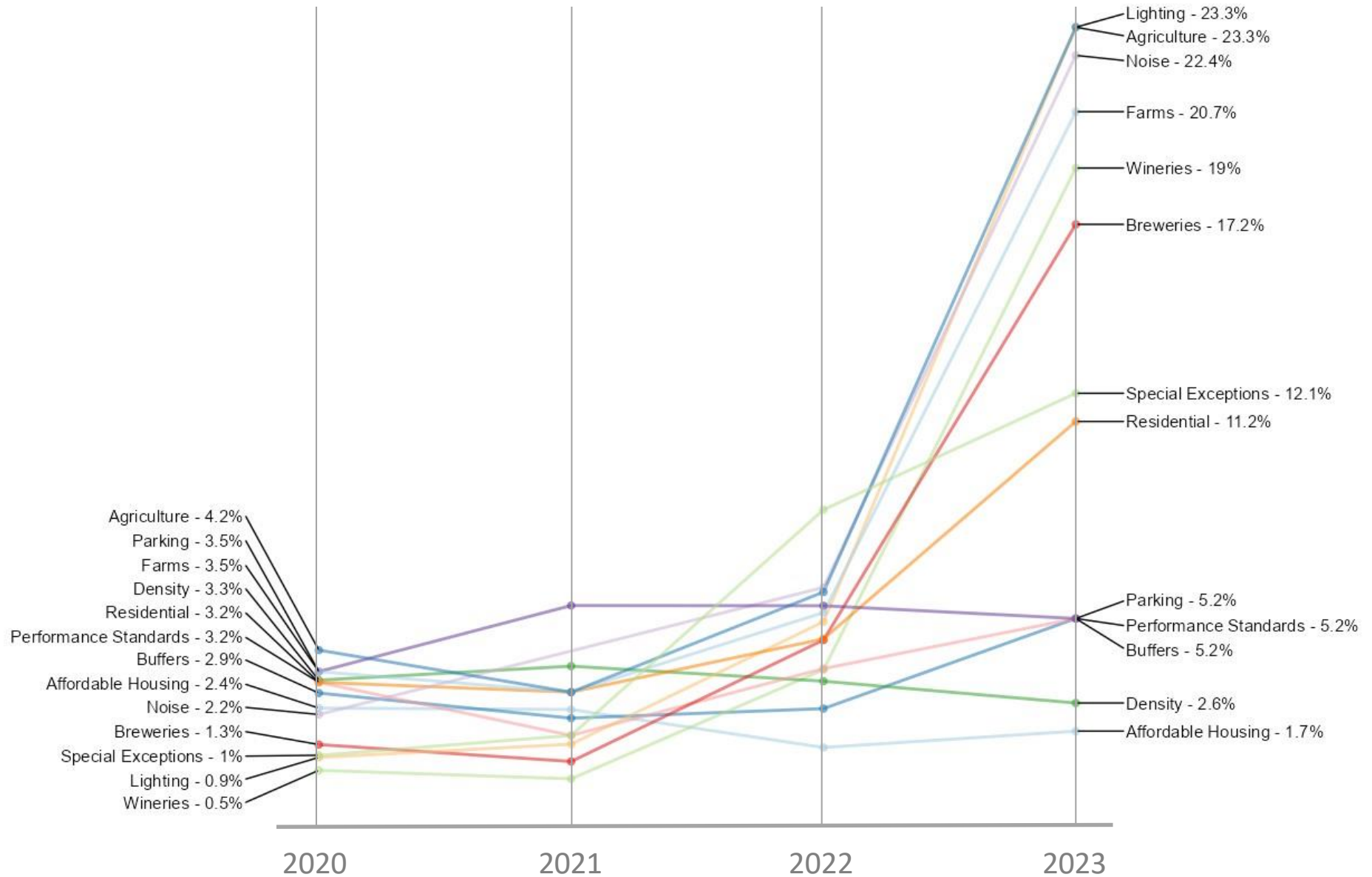


FIGURE 3. RELATIVE PERCENT SHARE OF MAJOR TOPICS OVER TIME

Comment Frequency by Sender or Organization

Figure 4 shows the overall share of comments provided by individual citizens compared to the overall share of comments associated with a specific organization or interest group. Figure 5 below illustrates the overall share of comments provided by various organizations as well as individual citizens.

Results indicate that while specific interest groups provided over two thirds of comments during the ZOR process, individual citizens were also engaged through the county's public outreach efforts accounting for 30% of all comments received.

A detailed summary of total comments by sender is included in Appendix A.

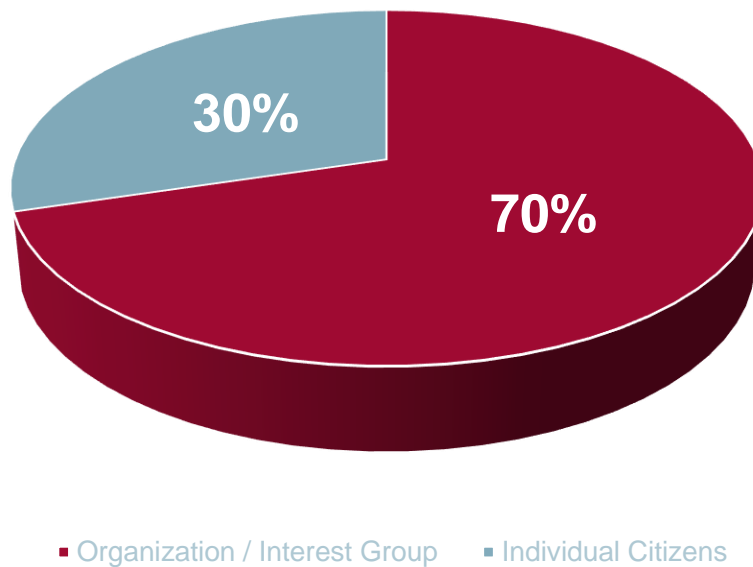


FIGURE 4. TOTAL SHARE OF COMMENTS BY INDIVIDUALS VERSUS ORGANIZATIONS / INTEREST GROUPS

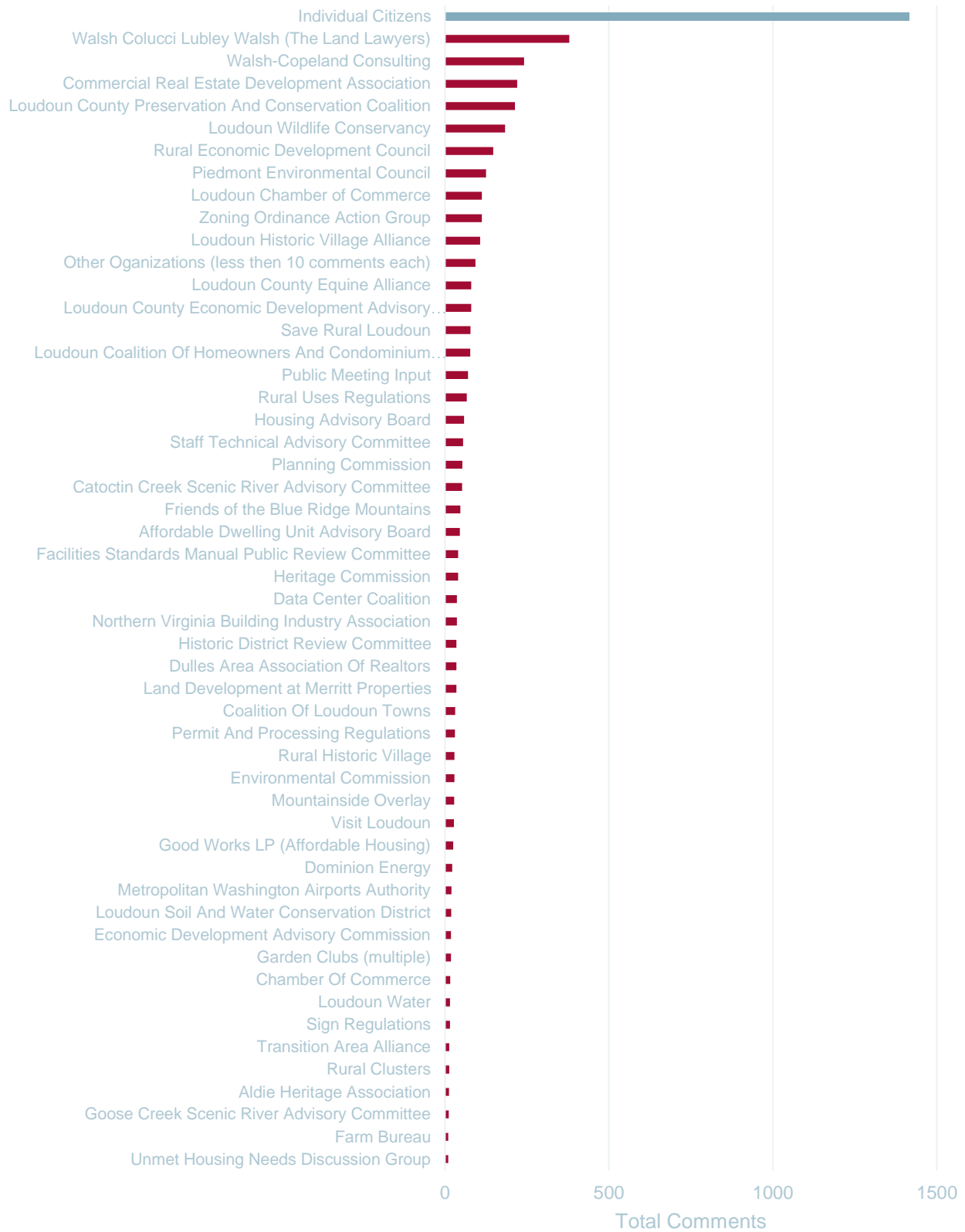


FIGURE 5. TOTAL COMMENTS BY SENDER

Comment Themes by Topic

This Section provides a summary of five key themes identified for each of the 13 major topic areas. Table 1 below enumerates the individual themes identified by examining each topic area's comment section wholistically.

A full list of themes for each of the major topic areas is included in Appendix B.

TABLE 1. MAJOR TOPIC THEMES

Topic Area	Key Themes
Affordable Housing	<ul style="list-style-type: none"> • Affordable housing should be kept in character and quality with surrounding development and design guidelines. • Allow conversion of single family to duplex and encourage accessory dwelling units. • Ensure affordable housing in all areas, including rural areas. • Energy efficiency and sustainability of affordable housing. • Allowing reductions in unit size to increase affordability.
Agriculture	<ul style="list-style-type: none"> • Preserve land for agriculture. • Protect agricultural soil. • Preserve the rural feel of Loudoun. • Protecting and promoting the equine industry. • Fill and waste disposal.
Breweries	<ul style="list-style-type: none"> • Conflicting information, standards, regulations, and requirements. • Improvements needed in review/submission requirements for approvals. • Clearer definitions and use regulations for farms are required, including farm wineries and limited breweries. • Impacts on adjacent uses, natural and historical assets, and the community. • Concerns about the hours of operation.
Buffers	<ul style="list-style-type: none"> • Regulations, processes, and definitions related to buffers are conflicting and inconsistent. • Buffering needed to maintain rural-like identity and character. • Flexibility in buffer regulations is needed. • Conflicts and inconsistencies impede design in tandem with protection of natural resources. • Inadequate Buffers when considering light, noise, traffic access, disruption of residents.
Density	<ul style="list-style-type: none"> • Affordable housing as it relates to density. • Preserve rural Loudoun and MDOD by preventing increase density. • Incorporate sustainability into density regulations. • Water quality. • Breweries and Wineries impact on density.
Farms	<ul style="list-style-type: none"> • Preserve Loudoun right to farm and conflicts with OA regulations that impact farming. • Preserve farmland for agriculture and agricultural soils. • Improved definition of Farm. • Non-traditional farm uses.

Topic Area	Key Themes
	<ul style="list-style-type: none"> • Farm building requirements.
Lighting	<ul style="list-style-type: none"> • Regulations needed for event and high intensity use. • Dark sky lighting compliance. • Lighting and safety. • Light pollution in rural Loudoun. • Site-specific complaints (athletic field, Airbnb, data centers).
Noise	<ul style="list-style-type: none"> • Concerns about increase in noise/traffic for event venues, temp events and weddings at breweries, and wineries. • Appropriate regulation required to mitigate various factors noise, light, traffic, and impacts to nearby property values. • Noise ordinance is confusing, and enforcement is not effective – absence of a clear process. • Mitigating noise impacts of data centers. • Aircraft noise and its impact on development around the airport.
Open Space	<ul style="list-style-type: none"> • Improve Open Space definition and create stricter trail and open space and buffer requirements. • Septic fields and open space (Cluster Subdivision, on-site vs off-site location). • Rural economy lots and uses. • Maintenance and protection of new and existing open spaces. • Incentives to increase trail and open space development.
Parking	<ul style="list-style-type: none"> • Parking standards needed for breweries and wineries. • Events that create high intensity parking. • Parking ratio changes. • Environmental impact (impervious surfaces). • Flexible and multi-use parking.
Performance Standards	<ul style="list-style-type: none"> • Wineries and breweries. • Uses in MDOD and SPEX process. • Buffering, screening, and setbacks. • Loopholes and proper enforcement. • Events.
Residential	<ul style="list-style-type: none"> • Enforcing regulation, resolution of complaints. • Residential flexibility in zoning to meet future demand. • Concerns about noise, light, traffic safety and parking regulations. • Landscaping, setbacks, open space, and buffering and screening requirements. • Water, water use and septic/sewer management concerns.
Special Exceptions	<ul style="list-style-type: none"> • Increase uses by right – excessive use of special exceptions – reduce number of special exceptions. • Reduce by right uses – increase number of special exceptions. • Consistent application of standards, adequate opportunity for public review and comment. • Follow-up inspections of approved special exceptions to ensure compliance. • More stringent regulations and requirements such as landscaping, screening, and noise and light control.

Topic Area	Key Themes
Wineries	<ul style="list-style-type: none"> • Impact on local residents, increased traffic, noise, light pollution. • Reduce the number of restriction and limitations to promote business. • Increase performance standards, requirements, and regulations to operate a winery. • Better defining key terms, farm winery, farm, agricultural processing. • Regulating the noise and light pollution from wineries.

Appendix A

APPENDIX TABLE A. TOTAL COMMENTS BY SENDER

Comments submitted by the organizations and individuals listed below are available for review on the Loudoun County website at loudoun.gov/ZoningOrdinanceRewrite.

Sender	Organization / Interest Group	Comments
Maura Walsh-Copeland	Walsh-Copeland Consulting	241
Commercial Real Estate Development Association	Commercial Real Estate Development Association	220
Michael Romeo	Walsh Colucci Lubley Walsh (The Land Lawyers)	206
Rural Economic Development Council	Rural Economic Development Council	147
Piedmont Environmental Council	Piedmont Environmental Council	125
Loudoun County Preservation and Conservation Coalition	Loudoun County Preservation and Conservation Coalition	117
Theo Stamatis	Loudoun Chamber of Commerce	112
Zoning Ordinance Action Group	Zoning Ordinance Action Group	112
Loudoun Historic Village Alliance	Loudoun Historic Village Alliance	107
Environmental, Historic Resources and Sustainability	Loudoun County Preservation and Conservation Coalition	96
Matthew Leslie	Walsh Colucci Lubley Walsh (The Land Lawyers)	95
Loudoun County Equine Alliance	Loudoun County Equine Alliance	80
Loudoun Coalition of Homeowners and Condominium Associations	Loudoun Coalition of Homeowners and Condominium Associations	77
Save Rural Loudoun	Save Rural Loudoun	71
Public Input Round One	Public Meeting Input	70
Michael Myers	Loudoun Wildlife Conservancy	67
Rural Uses Regulations	Rural Uses Regulations	66
Trinity Mills	Loudoun Wildlife Conservancy	65
Housing Advisory Board	Housing Advisory Board	58
Staff Technical Advisory Committee	Staff Technical Advisory Committee	55
Planning Commission	Planning Commission	53
Catoctin Creek Scenic River Advisory Committee	Catoctin Creek Scenic River Advisory Committee	52
Brian Magurn	Loudoun Wildlife Conservancy	51
Sashenka Brauer	Walsh Colucci Lubley Walsh (The Land Lawyers)	48

Sender	Organization / Interest Group	Comments
Peter Weeks	Friends of the Blue Ridge Mountains	47
Matt Holbrook	Loudoun County Economic Development Advisory Commission	46
Facilities Standards Manual Public Review Committee	Facilities Standards Manual Public Review Committee	40
Heritage Commission	Heritage Commission	40
Data Center Coalition	Data Center Coalition	36
Northern Virginia Building Industry Association	Northern Virginia Building Industry Association	36
Britney Dow	Land Development at Merritt Properties	35
Dulles Area Association of Realtors	Dulles Area Association of Realtors	35
Historic District Review Committee	Historic District Review Committee	35
Loudoun County Economic Development Advisory Commission	Loudoun County Economic Development Advisory Commission	34
Coalition Of Loudoun Towns	Coalition Of Loudoun Towns	31
Affordable Dwelling Unit Advisory Board	Affordable Dwelling Unit Advisory Board	30
Erin Swisshelm	Walsh Colucci Lubley Walsh (The Land Lawyers)	30
Permit And Processing Regulations	Permit And Processing Regulations	30
Environmental Commission (Keara Moore, Staff Liaison)	Environmental Commission	29
Rural Historic Village	Rural Historic Village	29
John Hunter	Individual Citizens	28
Mountainside Overlay	Mountainside Overlay	28
Visit Loudoun	Visit Loudoun	27
Heather Green	Individual Citizens	25
Kim Hart	Good Works LP (Affordable Housing)	25
Cody Francis	Individual Citizens	24
John Mossgrave	Individual Citizens	24
Dominion Energy	Dominion Energy	22
Beth M Erickson	Individual Citizens	20
Metropolitan Washington Airports Authority	Metropolitan Washington Airports Authority	20
Loudoun Soil and Water Conservation District	Loudoun Soil and Water Conservation District	19
Bill	Individual Citizens	18

Sender	Organization / Interest Group	Comments
Economic Development Advisory Commission	Economic Development Advisory Commission	18
Gladys Lewis Representing the Leesburg Garden Club and The Purcellville, Fauquier-Loudoun, Middleburg, Upperville, And Catoctin Garden Clubs	Garden Clubs (multiple)	18
Adam Stevenson	Individual Citizens	17
Gem Bingol	Individual Citizens	17
Justin Wisch	Individual Citizens	17
Chamber Of Commerce	Chamber Of Commerce	16
Jennifer Don	Individual Citizens	16
Judith Meany	Individual Citizens	16
Tim Shinbara	Individual Citizens	16
Devin Laney	Individual Citizens	15
Doug Wagner - Aduab Chair on Behalf of Aduab	Affordable Dwelling Unit Advisory Board	15
Kelly Foltman	Individual Citizens	15
Loudoun Water	Loudoun Water	15
Patti Psaris	Individual Citizens	15
Philip Foltman	Individual Citizens	15
Scott Reynolds	Individual Citizens	15
Sign Regulations	Sign Regulations	15
To: Subject: Date	Individual Citizens	15
Andrew Beatty	Individual Citizens	14
John Ebersole	Individual Citizens	14
Madeline Fayle Skinner	Individual Citizens	14
Margaret Kieran Good	Individual Citizens	14
Michael Perham	Individual Citizens	14
Michelle Dunne	Individual Citizens	14
Roy Barnett	Individual Citizens	14
W. Joseph Coleman	Individual Citizens	14
Beckwith Bolle	Individual Citizens	13

Sender	Organization / Interest Group	Comments
Rural Clusters - Fbrm	Rural Clusters	13
Transition Area Alliance	Transition Area Alliance	13
Andrew Marusich	Individual Citizens	12
Katie Johnson (Aldie Heritage Association)	Aldie Heritage Association	12
Al Van Huyck	Individual Citizens	11
Christie Giuliani	Individual Citizens	11
Eric Sibley	Individual Citizens	11
Goose Creek Scenic River Advisory Committee	Goose Creek Scenic River Advisory Committee	11
Mary Sue Collins	Individual Citizens	11
Norm Myers	Individual Citizens	11
Amanda Brewer	Individual Citizens	10
Ben Giuliani	Individual Citizens	10
Cynthia Morris	Individual Citizens	10
Farm Bureau	Farm Bureau	10
Louis Canonico	Individual Citizens	10
Phil Daley	Individual Citizens	10
Susan Manch	Individual Citizens	10
Susan Sutter	Individual Citizens	10
Unmet Housing Needs Discussion Group	Unmet Housing Needs Discussion Group	10
(Anonymous)	Individual Citizens	9
Anne Dull	Individual Citizens	9
Anne Reynolds	Individual Citizens	9
Bob Barnett	Individual Citizens	9
Brian Night	Individual Citizens	9
Buffington, Tony	Individual Citizens	9
Chris Van Vlack	Individual Citizens	9
Dave Ogden	Individual Citizens	9
Gillian Sims	Individual Citizens	9

Sender	Organization / Interest Group	Comments
Jennifer Moore	Individual Citizens	9
Kirsten Langhorne	Individual Citizens	9
Landfills/Stockpiling	Landfills/Stockpiling	9
Meghan Miller	Individual Citizens	9
Mike Kelly	Individual Citizens	9
Ryan Gibbons	Individual Citizens	9
Ward Melhuish	Individual Citizens	9
Wendy Gerlich	Individual Citizens	9
Avis A Renshaw	Individual Citizens	8
Bj Lecrone	Individual Citizens	8
Garrett Reynolds	Individual Citizens	8
Lori Dehart	Individual Citizens	8
Marcella M Marcey	Individual Citizens	8
Richard Rasmus	Individual Citizens	8
Ronald Benschoter	Individual Citizens	8
Russell Wall	Individual Citizens	8
A	Individual Citizens	7
Albemarle County	Albemarle County	7
Cate Magennis Wyatt	Individual Citizens	7
Fauquier County	Fauquier County	7
Jane Williams	Individual Citizens	7
John Ellis (Save Rural Loudoun)	Save Rural Loudoun	7
John Marshall Soil and Water Conservation District	John Marshall Soil and Water Conservation District	7
K	Individual Citizens	7
Leslie Sinn	Individual Citizens	7
Lisa Seeberger	Individual Citizens	7
Mary O'Connor	Individual Citizens	7
Other Organizations (Non-Work Group Members)	Other Organizations (Non-Work Group Members)	7

Sender	Organization / Interest Group	Comments
Patric E Copeland	Individual Citizens	7
Sharyn Franck	Individual Citizens	7
Stephen E Bozzo/Bozzo Family Vineyards	Bozzo Family Vinyards	7
Virginia Farm Bureau Federation	Virginia Farm Bureau Federation	7
Bradley D. Keister	Individual Citizens	6
Britain, Allison	Individual Citizens	6
David S Ward	Individual Citizens	6
Jim Russell	Individual Citizens	6
John L Fuog	Individual Citizens	6
Linear Parks and Trails Subcommittee	Linear Parks and Trails Subcommittee	6
Mark Rutyna	Individual Citizens	6
Robin Bartok	Individual Citizens	6
Robin-Eve Jasper	Individual Citizens	6
To	Individual Citizens	6
Virginia Chapter of The American Planning Association	Virginia Chapter of The American Planning Association	6
Aubrey Hall	Individual Citizens	5
Cleanth B Toledano	Individual Citizens	5
Culpeper Soil and Water Conservation District	Culpeper Soil and Water Conservation District	5
Derrick Sutter	Individual Citizens	5
George Rambo	Individual Citizens	5
Holly Hall Nichols	Individual Citizens	5
James Cameron	Individual Citizens	5
Jefferson A van Allen	Individual Citizens	5
Jerry Krumwiede	Individual Citizens	5
Kay Chewning	Individual Citizens	5
Kwasi Fraser	Individual Citizens	5
Mark Nelis, Nelis Law	Individual Citizens	5
Richard Dale Bright	Individual Citizens	5

Sender	Organization / Interest Group	Comments
Stephen Bradford	Individual Citizens	5
Sujith Maram	Individual Citizens	5
Swana	Individual Citizens	5
Allison G	Individual Citizens	4
Birkitt, Judi	Individual Citizens	4
David Moore	Individual Citizens	4
Dept-Pz-Planning Commission	Dept-Pz-Planning Commission	4
Don Richards	Individual Citizens	4
Jane Covington	Individual Citizens	4
John C. Woulfe Iii	Individual Citizens	4
John Doe	Individual Citizens	4
Judith Whitehouse	Individual Citizens	4
Karen Denale	Individual Citizens	4
Kathryn Kirtsis	Individual Citizens	4
L	Individual Citizens	4
Libby Devlin	Individual Citizens	4
Luke Russert	Individual Citizens	4
Margit Royal	Individual Citizens	4
Meredith.Witte	Individual Citizens	4
Nicholas Torrance	Individual Citizens	4
Nick Weeks	Individual Citizens	4
Pqweeks	Individual Citizens	4
Robert Ellis	Individual Citizens	4
Route 28 Landowners Advisory Board	Route 28 Landowners Advisory Board	4
Ruth Brooks	Individual Citizens	4
Sarah Huntington	Individual Citizens	4
Virginia Agribusiness Council	Virginia Agribusiness Council	4
Virginia Transportation Construction Alliance	Virginia Transportation Construction Alliance	4

Sender	Organization / Interest Group	Comments
Alexander Nance	Individual Citizens	3
Anne Kelly	Individual Citizens	3
Annette M Hala	Individual Citizens	3
Brenda Sargent	Individual Citizens	3
Clyde Grotophorst	Individual Citizens	3
Donnie Walker Jr	Individual Citizens	3
Dulany Morison	Individual Citizens	3
Home Builders Association of Virginia	Home Builders Association of Virginia	3
Jack Vega	Individual Citizens	3
Jim Edmondson	Individual Citizens	3
Joel L Burrows	Individual Citizens	3
John P Kirwan	Individual Citizens	3
Judith Anne Whitehouse	Individual Citizens	3
Julia Metzger-Traber	Individual Citizens	3
Lindsey Aline Holman	Individual Citizens	3
Lowell Smith	Individual Citizens	3
Madeline Skinner	Individual Citizens	3
Matt Donnelly	Individual Citizens	3
Maureen Arnold	Individual Citizens	3
Michael Cohen	Individual Citizens	3
Michael Leahy	Individual Citizens	3
Mick Newman	Individual Citizens	3
Natalie Pien	Individual Citizens	3
Paula Kerger	Individual Citizens	3
Paz Andrae	Individual Citizens	3
Robin Frank	Individual Citizens	3
Scott E. Pedowitz, Aoba	Individual Citizens	3
Steffen H Warfield	Individual Citizens	3

Sender	Organization / Interest Group	Comments
Travis Hare	Individual Citizens	3
Andrew Tull	Individual Citizens	2
Bruce Isaachsen	Individual Citizens	2
Carol Weare	Individual Citizens	2
Colleen Steedly	Individual Citizens	2
Community Planning, Historic Preservation Team	Community Planning, Historic Preservation Team	2
Deborah Zungoli	Individual Citizens	2
Dennis Oneill	Individual Citizens	2
Douglas Smith	Individual Citizens	2
Elliott Hamilton	Individual Citizens	2
Eric Combs	Individual Citizens	2
Eric Kramer	Individual Citizens	2
Erica Ehrhardt	Individual Citizens	2
Grace-Marie Turner	Individual Citizens	2
J. Marvin Watts	Individual Citizens	2
Jennie Thompson	Individual Citizens	2
Joan Dutchess Freidson	Individual Citizens	2
Katherine Barker	Individual Citizens	2
Kathryn B. Keister	Individual Citizens	2
Keith Simpson	Individual Citizens	2
Kim Larson	Individual Citizens	2
Kim Rapp	Individual Citizens	2
Larry Malone	Individual Citizens	2
Lynne Kaye	Individual Citizens	2
Marsha Barg Karp	Individual Citizens	2
Mary Ann Good	Individual Citizens	2
Mary Sheehan	Individual Citizens	2
Matthew J Frost	Individual Citizens	2

Sender	Organization / Interest Group	Comments
Michael Lipsky	Individual Citizens	2
Nelis Law	Individual Citizens	2
Nigel Ogilvie	Individual Citizens	2
Paul Clausen	Individual Citizens	2
Peggy Wall	Individual Citizens	2
Rob Martin	Individual Citizens	2
Robert Brown	Individual Citizens	2
Sara Brown	Individual Citizens	2
Scott Pedowitz	Individual Citizens	2
Sharon Conner	Individual Citizens	2
Sunil Vundela	Individual Citizens	2
Susan Planck	Individual Citizens	2
Teresia Scott	Individual Citizens	2
To: Subject	Individual Citizens	2
Virginia Baxter	Individual Citizens	2
Virginia Trucking Association	Virginia Trucking Association	2
Wegener, Brian	Individual Citizens	2
Wendy Kirwan	Individual Citizens	2
Zach	Individual Citizens	2
"Supervisor Caleb Kershner"	Individual Citizens	1
Adrianne Roy	Individual Citizens	1
Akemi Tinder	Individual Citizens	1
Alan Karp	Individual Citizens	1
Alex Paris	Individual Citizens	1
Alika Middleton	Individual Citizens	1
Amy Owen	Individual Citizens	1
Andrew McCoy	Individual Citizens	1
Anthony Venafo	Individual Citizens	1

Sender	Organization / Interest Group	Comments
Barbara M. Lamborne	Individual Citizens	1
Ben Keethler	Individual Citizens	1
Ben Sedlins	Individual Citizens	1
Benjamin Winn	Individual Citizens	1
Bishop Doyle	Individual Citizens	1
Blanca C Spencer	Individual Citizens	1
Bradley Gable	Individual Citizens	1
Britain Allison	Individual Citizens	1
Cadence Musick	Individual Citizens	1
Carole Napolitano	Individual Citizens	1
Carole S Napolitano	Individual Citizens	1
Caroline Nash	Individual Citizens	1
Charles R Planck	Individual Citizens	1
Cheryl Wright	Individual Citizens	1
Chip Planck	Individual Citizens	1
Christina Berry	Individual Citizens	1
Christine Porter	Individual Citizens	1
Christopher Whitfield	Individual Citizens	1
Cierra Prencipe	Individual Citizens	1
Clarke Lunara	Individual Citizens	1
Cleo Gewirz	Individual Citizens	1
Clifford Sweatte	Individual Citizens	1
Constance Chatfield-Taylor	Individual Citizens	1
David Berish	Individual Citizens	1
David Macduffee	Individual Citizens	1
David Ward	Individual Citizens	1
David, James	Individual Citizens	1
Debbie Halla	Individual Citizens	1

Sender	Organization / Interest Group	Comments
Deja Burt	Individual Citizens	1
Eileen Broderick	Individual Citizens	1
Elaine Meilahn	Individual Citizens	1
Eleanor M Adams	Individual Citizens	1
Elizabeth L	Individual Citizens	1
Emily Chiappinelli	Individual Citizens	1
Emily Southgate	Individual Citizens	1
Equusmtn	Individual Citizens	1
Eric Fryer E	Individual Citizens	1
Erin Becker Gulick	Individual Citizens	1
Eva Bunney	Individual Citizens	1
Fh	Individual Citizens	1
Gail Itschner	Individual Citizens	1
George Tauser	Individual Citizens	1
Georjan D. Overman	Individual Citizens	1
Greg Baka	Individual Citizens	1
Gregory Prelewicz	Individual Citizens	1
Hana Newcomb	Individual Citizens	1
Harris, Arlee	Individual Citizens	1
Harrybigley	Individual Citizens	1
Holly Geary	Individual Citizens	1
Howard Lewis	Individual Citizens	1
Isabel Hulkwer	Individual Citizens	1
Ivan Blumberg	Individual Citizens	1
J Harris	Individual Citizens	1
J. Randall Minchew	Individual Citizens	1
Janice Tauser	Individual Citizens	1
Janna Leepson	Individual Citizens	1

Sender	Organization / Interest Group	Comments
Javier Zablah	Individual Citizens	1
Jay Bradshaw	Individual Citizens	1
Jeanee Layman	Individual Citizens	1
Jennifer Gannaway	Individual Citizens	1
Jennifer James	Individual Citizens	1
Jmw	Individual Citizens	1
Joan Gardiner	Individual Citizens	1
John Adams	Individual Citizens	1
John B. Adams	Individual Citizens	1
John Benedict	Individual Citizens	1
John Edgemond	Individual Citizens	1
John Gardiner	Individual Citizens	1
John McClintic	Individual Citizens	1
John R Cox	Individual Citizens	1
John Wylie	Individual Citizens	1
Jordan Lunara	Individual Citizens	1
Judy Mazzucchelli	Individual Citizens	1
K And K Boi	Individual Citizens	1
Kaki Pearson	Individual Citizens	1
Karen Belle	Individual Citizens	1
Katherine Collins	Individual Citizens	1
Kelly Williams	Individual Citizens	1
Kerry Dukinfield	Individual Citizens	1
Kershner, Caleb	Individual Citizens	1
Kevin Goeller	Individual Citizens	1
Kim Roszel	Individual Citizens	1
Kirsten Langhornr	Individual Citizens	1
Kristin Stewart	Individual Citizens	1

Sender	Organization / Interest Group	Comments
L. Beerman	Individual Citizens	1
Land Trust of Virginia	Individual Citizens	1
Laura Jacobson	Individual Citizens	1
Laura Lieberman	Individual Citizens	1
Lauragreenlea	Individual Citizens	1
Lauragreenleaf	Individual Citizens	1
Lauren Woolcott	Individual Citizens	1
Lawrence Malone	Individual Citizens	1
Linda Bohane	Individual Citizens	1
Linda Coffees	Individual Citizens	1
Linda Colucci	Individual Citizens	1
Linda Maclean	Individual Citizens	1
Maggie Hirschberg	Individual Citizens	1
Maria Eldredge	Individual Citizens	1
Matthew Donnelly	Individual Citizens	1
Matthew Lawrence	Individual Citizens	1
Mavis Taintor	Individual Citizens	1
Melanie Voght	Individual Citizens	1
Melissa Pankas	Individual Citizens	1
Michael Marsh	Individual Citizens	1
Michael Wright	Individual Citizens	1
Mike Aaron	Individual Citizens	1
Mike Rhodes	Individual Citizens	1
Miriam Westervelt	Individual Citizens	1
Nat White	Individual Citizens	1
Nedim Ogelman	Individual Citizens	1
Neil Gormley	Individual Citizens	1
Nicole Gervais	Individual Citizens	1

Sender	Organization / Interest Group	Comments
Norman Myers	Individual Citizens	1
Owen Snyder	Individual Citizens	1
Pamela Donehower	Individual Citizens	1
Patric Copeland	Individual Citizens	1
Paul Claused	Individual Citizens	1
Pauline Clark	Individual Citizens	1
Pavla Teie	Individual Citizens	1
Peggy Bednarik	Individual Citizens	1
Peggy Coleman	Individual Citizens	1
Pete Jobse	Individual Citizens	1
Protect Loudoun []	Individual Citizens	1
Rae Basile	Individual Citizens	1
Rick Stout	Individual Citizens	1
Rob Jakubik	Individual Citizens	1
Robert Cissel	Individual Citizens	1
Robin Short	Individual Citizens	1
Roger K	Individual Citizens	1
Roger La Rouche	Individual Citizens	1
Roger Lataille	Individual Citizens	1
Rsmith	Individual Citizens	1
Ruthann Carson	Individual Citizens	1
Sabina Puppo	Individual Citizens	1
Samuel Flemer	Individual Citizens	1
Scott Dueweke	Individual Citizens	1
Sent: Subject	Individual Citizens	1
Shafi Devlanva	Individual Citizens	1
Sharon Wright	Individual Citizens	1
Shelley Horneck	Individual Citizens	1

Sender	Organization / Interest Group	Comments
Shelley Tamres	Individual Citizens	1
Sophia Maravell	Individual Citizens	1
St	Individual Citizens	1
Steadly	Individual Citizens	1
Stephen Bradford Rose	Individual Citizens	1
Steve	Individual Citizens	1
Steven Chase	Individual Citizens	1
Tadeusz Lewis	Individual Citizens	1
Tammi Elisa	Individual Citizens	1
Ted Lewis	Individual Citizens	1
Teresia Scott J	Individual Citizens	1
Tiffany	Individual Citizens	1
Torrible, Christina	Individual Citizens	1
Torye Hurst	Individual Citizens	1
Tracy Naber	Individual Citizens	1
Virginia Association of Counties	Virginia Association of Counties	1
Virginia Association of Soil and Water Conservation	Virginia Association of Soil and Water Conservation	1
Wallyg	Individual Citizens	1
Wendy Bebie	Individual Citizens	1
Will Nisbet	Individual Citizens	1
William Grant	Individual Citizens	1
William Steedly	Individual Citizens	1
Witte, Meredith	Individual Citizens	1

Appendix B

APPENDIX TABLE B. THEMES BY MAJOR TOPIC AREA

Topic Area	Key Themes
Affordable Housing	<ul style="list-style-type: none"> • Affordable housing should be kept in character and quality with surrounding development, design guidelines • Allow conversion of single family to duplex, and encourage accessory dwelling units • Ensure affordable housing in all areas, including in rural areas • Affordable housing and connectivity for bicycles and pedestrians, and connectivity to transit • Incentives to create more affordable housing • Complexity of Affordable Housing provisions in the ordinance, permitting, reporting, and approvals for AHUs • Resources for rental programs, housing assistance, programs for public employees • Energy efficiency and sustainability of affordable housing • Funding, Future funding, Partnerships, and effectiveness of Affordable Housing Program • Achievability of affordable housing targets, increases in flexibility of regulations • Density increases to achieve affordability and parking and infrastructure impacts • Affordability over time for existing residents of Loudoun • Engaging HOAs in finding solutions for affordable housing • Allowing reductions in unit size to increase affordability • Concerns about increase in corporate owned SFD, and short-term rentals.
Agriculture	<ul style="list-style-type: none"> • Preserving land for agriculture • Protecting agricultural soils • Preserving the rural feel of Loudoun • Preservation and conservation of the environment and rural lands • Protecting and promoting the equine industry • Balancing agricultural land/soil use within cluster subdivisions • Fill and waste disposal • Promoting agricultural industry • Properly defining 'farm' • Regulating breweries and wineries • Properly defining agricultural processing • Increased oversight • Ensuring safety through more robust code • Organization of large events • Proper use and approval of buildings
Breweries	<ul style="list-style-type: none"> • Conflicting information, standards, regulations, and requirements • Improve review and submission requirements for approvals

	<ul style="list-style-type: none"> • Clearer definitions and use regulations for farms, including farm wineries and limited breweries • Zoning enforcement to protect agricultural uses and existing residential • Zoning enforcement for health, safety, and welfare • Concerns about noise, light, traffic, and parking • Performance standards needed for Limited Farm Breweries • Reduce higher intensity/commercial uses in MDOD • Impacts on adjacent uses, natural and historical assets, and the community • Water, water use and septic/sewer management concerns • Landscaping, setbacks, buffering and screening • Minimum lot area requirements for a Limited ("Farm") Brewery • Include public input earlier in the review process • Concerns about the hours of operation • Special exception requirements for certain uses
Buffers	<ul style="list-style-type: none"> • Regulations, processes, and definitions related to Buffers are conflicting and inconsistent • Buffering needed to maintain rural-like identity and character • Maintaining flexibility in buffer regulations • Buffer regulations are too general and should be stricter and more specific • implementing additional overlay districts and increase buffers to protect streams, landscapes, and habitat • Conflicts and inconsistencies impede design in tandem with protection of natural resources • Include "buffering" in site design/development standards • Balance between buffer and setback requirements and impacts on development • Buffers and protection of adjacent properties, natural assets and, and property values • Buffer requirements for a substation and a data center development • Development regulations allow for the use of non-native plants, plant species permitted • Improve parking, buffer, lighting, fencing, signage and other requirements for event venues, breweries, wineries • Inadequate Buffers when considering light, noise, traffic access, disruption of residents • Greater community input during the design process and legislative changes • Utility easements and buffering requirements
Density	<ul style="list-style-type: none"> • Affordable housing • Preserving rural Loudoun and MDOD from increased density • Incorporating sustainability into density regulations • Bonus density and incentives • Preserving agricultural land and soil from increased density • Water quality • Preserving rural villages and historic Loudoun areas from increased density

	<ul style="list-style-type: none"> • FAR (floor area ratio) • Meeting the General Plan goals • Breweries and Wineries impact on density • Increasing density west of Evergreen Mills Road at Red Hill Road • Regulation and design requirements • Lot sizes • Density language and categories in the ZO • Urban development
Farms	<ul style="list-style-type: none"> • Keeping Loudoun right to farm and stopping HOA prevention • Preserving farming land and land for agriculture • Preserving agricultural soils • Housing on farms • Dumping and fill • Supporting local farm businesses and farm markets • Definition of a farm and corresponding performance standards • Preserving the natural environment, i.e., MDOD, waterways • Limited Breweries and Virginia Farm Wineries • Sizing and Specific Code Changes • Farm building requirements • Agricultural definitions (i.e., agricultural processing) • Farm use and commercial operation regulations • Non-traditional farm uses • Management of small-scale agricultural uses • Preserving rural villages
Lighting	<ul style="list-style-type: none"> • Event and high intensity use lighting regulation • Dark Sky Lighting Compliance • Lighting Safety • Acceptable hours for lighting • Adding lighting definitions, standards, and graphics to ordinance • Lighting restrictions on MDOD and ridge lines • Lighting regulation strategies • Regulating lighting from breweries and wineries • Light pollution in rural Loudoun • Lighting for large signs • Residential light pollution • Site-specific complaints (athletic field, Airbnb, data centers) • Environmental impacts
Noise	<ul style="list-style-type: none"> • Concerns about Increase in traffic and noise for event venues, temp events, weddings, breweries, wineries • Appropriate regulations to mitigate various factors including noise, light, traffic, and impacts nearby property values. • Noise ordinance is confusing, and enforcement is not effective - absence of a clear process. • Aircraft noise and its impact on development around the airport. • Concern is about noise standards not achieving intended goal • Mitigating noise impacts of data centers

	<ul style="list-style-type: none"> • Increase community access and input on noise studies and other data during development process • Differences between Zoning Noise ordinance and Codified ordinance - address inconsistencies • Noise and adjusting Hours of Operation • Provide consistent, clear standards and processes across all uses for noise • Specific standards should be applied to high intensity uses • Development in MDOD and associated traffic, parking, noise, lighting, and waste product • Potential noise and number of animals related to dog day care
Open Space	<ul style="list-style-type: none"> • Improve Open Space definitions and create stricter trail and open space and buffer standards • Septic fields and Open Space • Rural Economy Lots and Uses • Preservation and Protection of Open Space, Historic landscapes, Rural and Agricultural lands • Excessive open space requirements • Impacts of Cluster subdivisions on open space, land preservation and surrounding development and uses. • Maintenance and protection of new and existing open spaces • Material Standards and sustainability • Conflicts between Open space requirements and allowable uses • Protection of wildlife, habitat, and use of non-native plantings • Developers changing plans to avoid open space requirements • Closing loopholes in regulations and requirements • Contiguous open spaces - Physical linkages between open spaces • Incentives to increase trail and open space development • Unusable land counted as open space • Removal of allowable uses by right in zoning Districts
Parking	<ul style="list-style-type: none"> • Parking standards for breweries and wineries • Event and high intensity parking • Parking ratios • On-street parking • Environmental impact (impervious surfaces) • Villages and historic buildings • Setback requirements • Parking lot design • Planning process for parking • Preserving MDOD • Parking requirements (minimum requirements) • Flexible and multi-use parking • Specific site parking questions • Improving definitions, references, and figures in ZO for parking • Amount of parking in the county (too much/too little)
Performance Standards	<ul style="list-style-type: none"> • Wineries and Breweries • Uses in MDOD and SPEX process • Buffering, screening, and setbacks

	<ul style="list-style-type: none"> • Loopholes and proper enforcement • Traffic, Parking, Noise, and Lighting • Tree coverage and Tree conservation • Protection of natural and historical assets and resources • Events
Residential	<ul style="list-style-type: none"> • Enforcing regulations, Resolution of complaints • Residential flexibility in zoning to meet future demand • Concerns about noise, light, traffic safety and parking regulations • Conflicting information, unclear standards, regulations, and requirements • Preservation of rural, agricultural lands, mountain views, and quality of life of existing residents. • Impacts on adjacent uses, natural and historical assets, and the community • Requirements for a Special Exception, SPEX process • Landscaping, setbacks, open space, and buffering and screening requirements • Data centers adjacent to residential • Breweries, wineries, and high intensity uses allowed in residential areas • Changes in allowable uses in the Airport Overlay District • Unmet Housing needs and affordable housing options • Water, water use and septic/sewer management concerns • Allowable uses and development on MDOD lands and other residential areas • Residential cluster subdivisions requirements, regulations, and prime soils
Special Exceptions	<ul style="list-style-type: none"> • Increase uses by right - Excessive use of special exception - reduce number of Special Exceptions • Reduce by right uses - Increase number of special exceptions • Consistent application of standards, adequate opportunity for public review and comment • Make Ordinance more user-friendly, improve and expand definitions of permitted uses, reduce loopholes • Stricter enforcement of zoning regulations • Follow-up inspections of approved special exceptions to ensure compliance. • Special Exception and dumping of fill material • Development standards for rural economy uses allowed by special exception. • More stringent regulations and requirements such as landscaping, screening, and noise and light control • Special Exceptions - impacts on landscape/forestation, habitat, historic resources, and water supply • Regulations on farm wineries, limited breweries, and limited distilleries - banquet/event facilities • Special Exceptions and requirement for traffic studies • Negative Impacts of larger footprint, high intensity uses

Wineries	<ul style="list-style-type: none"> • Impact on local residents, increased traffic, noise, light pollution • Reducing the number of restrictions and limitations to promote business • Increasing performance standards, requirements, and regulations to operate a winery • Preserving MDOD • Expanding definition of agriculture (include retail sales and warehouses and limited distillery) • Better defining key terms, farm winery, farm, agricultural processing • Promoting equal standards across breweries, wineries, and equine spaces • Clarifying use-specific standards for wineries • Impact of wineries on HOD, VCOD, and the rural landscape • Regulating the noise and light pollution from wineries • Regulating events hosted by wineries • Preserving land and overdevelopment • Promoting safety • Changing technical requirements
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