



Save Rural Loudoun

Detailed Comments on Draft Comprehensive Plan – December 2018

1. General

Problem	Reference	Solution
The 2040 Vision statement and the other general policies do not address citizens' interest in preserving the quality of life in Loudoun County.	The Vision statement (1-2).	Revise the second sentence of the vision statement as follows (additions highlighted): "The County will foster economic innovation, preserve natural and historic assets, and manage growth to ensure fiscal strength and sustainability. "

2. Land Use, the Rural Policy Area:

Problem	Reference	Solution
Introduction		
The draft suggests that the County's land use policies, such as the preservation of rural land and green infrastructure, are a challenge that needs to be overcome.	"... new land use policies and approaches are needed to address a constrained land supply , the County's connection to the regional Washington Metropolitan Area Transit Authority (WMATA) Metrorail network through the Silver Line extension	Re-write this sentence as follows: "New land use policies and approaches are needed to diversify housing options, take full advantage of the County's connection to the regional Washington Metropolitan Area Transit Authority

SRL Comments on Draft Comprehensive Plan

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	in 2020, and the growing demand for new development options. " (2-2)	(WMATA) Metrorail network, and preserve open spaces for farming, tourism and improved parks, trails, and other assets that contribute to residents' quality of life."
The definition of the TPA is self-contradicting. The TPA cannot be dominated by both open spaces and by residential uses, particularly when the County's housing policy is to promote dense, affordable housing. The definition here is different from the definition provided in the Land Use chapter (see p. 2-55)	"The open spaces serve as dominant landscape and development features that provide opportunities for public recreation and facilities interwoven through a land use pattern that is predominantly residential with limited commercial and industrial uses." (2-3)	"Open spaces – with enhanced parks, trails and other features that provide opportunities for public recreation – serve as the dominant landscape. This landscape is interwoven with low density residential areas connected to adequate transportation and public utilities, with limited commercial and industrial uses."
Quality Development		
Strategy 1.2 is not accompanied by any actions to implement it.	Strategy 1.2. Encourage the submission of site development and architectural guidelines for new developments, where applicable. (2-8)	Define the conditions under which this strategy is applicable and describe how it will be implemented.
It's unclear whether the wording of Quality Development Policy 2 is intended to apply to rural subdivisions. Rural subdivisions should also be subject to appropriate QD standards.	QD Policy 2: Create compact, walkable development patterns characterized by smaller blocks , shorter distances among uses , inter-parcel connectivity, greater diversity of uses on the same street , and connected open spaces that facilitate social interaction and offer affordable and convenient lifestyles. (2-8)	Re-word the Policy as follows: "Create compact development patterns that promote inter-parcel connectivity and a diversity of uses appropriate to the relevant place type, including connected trails, parks and open spaces, in order to facilitate social interaction and affordable, high quality lifestyles."

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
Urban Policy Area		
The draft does not identify what the County will do to ensure that land uses in the UPA meet minimum density guidelines.	“Therefore, land uses that do not meet the minimum bulk and/or density guidelines envisioned in the UPA Place Types should be avoided. ” (2-19)	Incorporate specific policies, strategies and actions to implement this goal.
The draft does not identify the TDR sending or receiving areas in the UPA, or include strategies for implementing TDR there.		To incentivize desired minimum densities in the UPA while preserving desired maximum densities in the RPA, the Comp Plan should identify the UPA as a TDR receiving area and describe strategies and actions for implementing TDR, including development of zoning policies that will govern the use of purchased development rights in the designated TDR receiving areas of the UPA.
Suburban Policy Area		
The draft states that the County will enable residents of the SPA to become more involved in neighborhood planning. This policy should apply to the entire County, not just the SPA.	“Strategy 1.2. Enable residents to become more involved in their neighborhoods.” Including related actions. (2-49)	Move this strategy and its associated actions from the SPA section to the Quality Development section.
The draft does not identify the TDR sending or receiving areas in the SPA, or include strategies for implementing TDR there.		The Comp Plan should identify the TDR sending and receiving areas in the SPA and describe strategies and actions for implementing TDR, including development of zoning policies that will

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
		govern the use of purchased development rights in the designated TDR receiving areas of the SPA.
Transition Policy Area		
There are inconsistent and potentially confusing descriptions of what is “predominant” in the TPA.	<p>“The open spaces serve as dominant landscape ...” (2-55)</p> <p>“Although the TPA is predominantly residential, there areas designated for industrial development ...” (2-55)</p>	Revise the second sentence in the preceding column to read: “Although developments in the TPA are predominantly residential ...
There is no evidence to support the assertion that the County’s economic development goals require “accommodating high demands for housing.” The chapter on housing states that growth will be focused in the SPA and UPA, where public utilities are already built, and stresses the need for additional affordable housing, for which the TPA may not be suitable. The Economic Development chapter focuses on economic diversification and sustainability rather than simple growth.	<p>“These needs include accommodating high demands for housing to support the County’s economic development goals ...” (2-55)</p> <p>“Housing Policy 1, Action 1.1.A: Update the Zoning Ordinance to incorporate density bonuses into appropriate urban, suburban, and transition zoning districts to encourage the provision of affordable housing in areas currently served by or planned for mass transit.” (4-10)</p> <p>“As described in Chapter 2, the <i>Loudoun 2040 General Plan</i> carries forward a planning approach that anticipates the majority of additional residential growth</p>	Revise the highlighted sentence as follows: “These needs include meeting current and projected demand for more affordable housing ... ”

SRL Comments on Draft Comprehensive Plan

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	<p>to occur in the Suburban Policy Area and new Urban Policy Areas.” (4-7)</p> <p>“The County will prioritize transportation funding to the Urban and Suburban Policy Areas where planned land uses and population densities warrant the expansion of roadway capacity and the implementation and expansion of transit services.” (CTP: 2-4)</p>	
<p>The draft proposes a change in zoning policy for the eastern part of the TPA that is not supported by either the public or the Board of Supervisors.</p>	<p>“This existing buffer helps deter suburban expansion westward and frames the remaining areas of the eastern TPA which allow for a mix of development intensities.” (2-56)</p>	<p>Delete the phrase highlighted in the previous column.</p>
<p>The draft is vague as to whether packing more density into the TPA will increase traffic congestion on Route 50 or other major roads. It does not take into account that there are no plans to expand existing roads in neighboring Prince William and Fairfax counties. The premise for permitting greater densities, therefore, is not demonstrated.</p>	<p>“Transportation projects in the eastern TPA, including improvements to Ryan Road and Sycolin Road, and the completion of Shreveport and Creighton Roads, will provide better connections to the east without necessarily adding to the congestion of Route 50.” (2-56)</p>	<p>The phrase highlighted in the preceding column should be deleted.</p> <p>Further, County staff should carefully examine whether increased density in any of the areas proposed for up-zoning would be likely to cause increased traffic congestion. Any areas that would increase traffic congestion should be excluded from potential up-zoning.</p>
<p>The proposal for higher intensity development in the eastern part of the TPA is inconsistent with the definition of</p>	<p>“Areas of higher intensity development interspersed with substantial open spaces that are publicly accessible can</p>	<p>Re-phrase the sentence to the left as follows:</p>

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
<p>the TPA provided earlier in the draft. “Predominant open spaces” are different from “substantial open spaces.”</p>	<p>accommodate smaller, more affordable, and more efficient residential units and neighborhoods.” (2-56)</p>	<p>“Compact areas of higher intensity development within a landscape characterized predominantly by open spaces may accommodate smaller ...”</p>
<p>The large amount of land proposed for new “Transition Small Lot” and “Transition Compact” neighborhoods is inconsistent with the policy definition of the TPA as an area that is predominantly open spaces. Up-zoning this much land would almost certainly increase traffic congestion and impose further tax burdens on Loudoun citizens to build more infrastructure.</p>	<p>Map on p. 2-58</p>	<p>Reduce the areas proposed for up-zoning to remain consistent with the policy goal of maintaining the TPA as an area that is predominantly characterized by open spaces.</p>
<p>The draft does not include policies, strategies and actions designed to maintain the TPA as it is described at the beginning of this section (“predominantly open spaces”).</p>		<p>Insert an additional policy, with accompanying strategies and actions, such as:</p> <p>TPA Policy 1: Ensure that any further development within the TPA is consistent with maintaining an area that is characterized by predominantly open spaces that preserve a buffer between the UPA, SPA and RPA, avoid increased traffic congestion, and protect critical green infrastructure.</p> <p>Strategy 1: Ensure potential new developments in the TPA are surrounded and buffered by open spaces.</p>

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
		<p>Strategy 2: Ensure any potential new residential development in the TPA does not result in increased traffic congestion on the County's roads.</p> <p>Strategy 3: Ensure potential new developments in the TPA do not further compromise the County's water or other environmental resources and services.</p>
<p>The wording of draft TPA Policy 1 is inconsistent with the policy description of the TPA. "Extensive" open spaces are not the same as "predominant" open spaces.</p>	<p>"TPA Policy 1: Ensure that the Transition Policy Area retains the distinct visual character established by extensive natural open space by using compact development concepts with substantial open space requirements, and low profile construction to minimize visual intrusion into the natural environment." (2-71)</p>	<p>Re-word this policy as:</p> <p>"TPA Policy 1: Ensure that the Transition Policy Area retains the distinct visual character of predominantly natural open space by using ..."</p>
<p>The draft does not identify the TDR sending or receiving areas in the TPA, or include strategies for implementing TDR there.</p>		<p>The Comp Plan should identify the TDR sending and receiving areas in the TPA and describe strategies and actions for implementing TDR, including development of zoning policies that will govern the use of purchased development rights in the designated TDR receiving areas of the TPA.</p>

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
Rural Policy Area		
<p>The draft does not make clear that the potential and projected build out numbers cited represent <u>additional</u> residential units, <u>beyond</u> the 12,653 units <u>already built</u> in the RPA. In addition, it does not make clear the significance of these numbers by comparing them with current residential density in the RPA.</p>	<p>The data provided on pp. 2-77 and 2-78 of the draft.</p>	<p>The CP should clarify that the build out numbers cited are <u>additional</u> to current residential densities.</p> <p>The CP should compare the potential and projected build-out with the current number of residential units in the RPA. We suggest the following modification of the current language (changes highlighted in red text):</p> <p>“The build-out analysis for the RPA ... results in the potential for 11,643 additional residential units under current policy and entitlements, which would represent a 92% increase above the RPA’s current residential density.”</p>
<p>The draft does not indicate whether the potential and projected build-outs in the RPA are consistent with the County’s fundamental policy goals.</p>	<p>Ditto.</p>	<p>The CP should include a clear policy declaration that the County’s planning goal is to prevent the current potential and projected densities in the RPA from occurring. We suggest:</p> <p>“The current maximum potential build-out for the RPA, if fully realized, would drastically and permanently change the character of the RPA to a predominantly suburban environment. The County will actively pursue a range of strategies and”</p>

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
		actions, including support for conservation easements, PDRs and TDRs, to encourage landowners to voluntarily conserve rural properties for permanent rural uses.”
The CP should reflect clear, concrete planning decisions. However, the draft states only that the County “should” promote permanent conservation easements, rather than stating that as a planning commitment.	“The County should commit to supporting efforts to increase the total acreage of land held in conservation easements as part of an overall land use strategy ...” (2-80)	Revise this sentence to make this a clear policy commitment, as in: “The County will support should commit to supporting efforts to increase ...”
The draft should not leave critical decisions unresolved. A planning document should clearly indicate what the County plans to do.	“The County may consider implementation of programs such as ...” (2-80)	The CP should state unequivocally that the County will (1) actively explore the feasibility of a range of actions to permanently conserve rural areas and (2) effectively implement any such actions that are feasible.
<p>The most recent draft deletes previous references to “Transfer of Development Rights (TDR)” as an important potential conservation tool.</p> <p>The draft should be updated to reflect the BOS’ decision to implement a program to support conservation easements.</p> <p>The language in this chapter should be harmonized with the language on the same subject in other sections of the</p>	“... such as the Purchase of Development Rights (PDR) program, cost-share initiatives to assist in establishing conservation easements, and/or public/private partnerships with existing land trusts ...” (2-80)	<p>Replace the language on the left with the following:</p> <p>“The County will institute programs to incentivizes preservation of land for farming and other rural uses by providing assistance to reduce the landowner cost of establishing conservation easements, facilitating the transfer of development rights, encouraging participation in the Open Space Preservation Program, or directly purchasing development rights,</p>

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
draft Plan, including p. 6-7 of the Fiscal and Capital chapter.		subject to the feasibility and efficiency of each of these policy tools.”
The draft does not identify TDR sending or receiving areas in the RPA, or include strategies for implementing TDR there.		The Comp Plan should identify the TDR sending and receiving areas in the RPA and describe strategies and actions for implementing TDR.
Simple monitoring of the ongoing loss of rural land will not be sufficient to achieve the County’s rural preservation policy goals.	“... development pressures and the incremental loss of productive agricultural land to residential development will require continued monitoring by the County to maintain the RPA’s unique character.” (2-81)	This sentence should be modified to recognize that the County will need to make hard decisions and take decisive actions to preserve the RPA. We suggest the following: “... will require continued monitoring and decisive actions by the County to maintain ...”
Open spaces on some approved cluster subdivisions are not made available for agriculture, outdoor recreation, or other rural economy uses. The CP should include specific actions to implement this aspect of the place type description.	“This category also includes low-density, large-lot residential subdivisions that are compatible with the surrounding pastoral character, and subdivisions that cluster smaller residential lots while retaining large lots for open space, agricultural production and/or rural economy uses.” (2-83)	Under Strategy 1.1 of RPA Policy 1 (2-89), insert the following Action. (This is a modification of draft Action 2.1.B, on page 2-89): “Establish regulations and design standards to ensure that approved subdivision plats include rural economy lots and open spaces that are appropriate and reserved for farming (by the landowners or their lessees) and parks, trails or other outdoor recreation.”
Large lot residential subdivisions do not necessarily retain land for agricultural production, particularly when Homeowners’ Associations restrict	“This category also includes low-density, large-lot residential subdivisions that are compatible with the surrounding pastoral character, and subdivisions that cluster	Revise the sentence to the left as follows: “... and subdivisions that cluster smaller residential lots with the intention of

SRL Comments on Draft Comprehensive Plan

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<p>agriculture and other rural economy uses. The draft should not suggest that the land will be retained for rural economy uses automatically.</p>	<p>smaller residential lots while retaining large lots for open space, agricultural production and/or rural economy uses.” (2-83)</p>	<p>retaining large lots for open space, agricultural production and/or rural economy uses.”</p> <p>Revise Strategy 3.7.A (p. 2-92) as follows:</p> <p>“Develop zoning regulations and design standards that protect the right to farm, including on subdivision plots designated for rural economy uses.”</p>
<p>Some approved cluster subdivisions have not blended with existing topography. Tree clearing high on the ridges have failed to buffer and screen views from adjoining properties. The CP should include specific actions to implement this aspect of the place type description.</p>	<p>“Locate buildings and structures to blend with the existing topography and natural features. Preserve and incorporate existing trees and vegetation on the property and its perimeter to buffer and screen views for adjoining properties.” (2-84)</p>	
<p>In the draft CP, the RPA actions are not organized under the logical strategies. RPA Policy 1.1 focuses on ensuring that future development remains consistent with the rural place types, but actions listed below it relate to the avoidance of rural development. RPA Policy 1.2 focuses on avoiding future development, but actions A and B relate to the consistency of development with the CP place types.</p>	<p>RPA policies, strategies and actions described on p. 2-89.</p>	<p>Re-organize the proposed actions under the appropriate strategies. Actions A and B that are under Strategy 1.1 in the draft should be moved to Strategy 2.1. Actions A and B that are under Strategy 2.1 in the draft should be moved under Strategy 1.1 (with the modifications suggested below).</p>

SRL Comments on Draft Comprehensive Plan

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As currently worded, strategies 1.1 and 2.1 both appear to relate to RPA Policy 1, not RPA Policy 2.	Ditto	Add a new Strategy under RPA Policy 2: Strategy 2.1: Encourage the preservation of rural land at average densities lower than those permitted by the zoning regulations.
The draft does not commit the County to use all the potential tools available for rural preservation, mentioning only conservation easements. Specifically, it does not mention the Land Use Assessment program, Open Spaces Preservation program, AFD, TDR or PDR.	"Action 1.1.B. Use public funds to create public and private conservation easements, in order to reduce the land that is available for residential development and to provide landowners with financial options to support working farms, rural economy uses, and/or stewardship of the land." (2-89)	Two additional action items should be included: Action C: Implement a Transfer of Development Rights (TDR) program. Action D: Allocate funds to the County's PDR program, as needed to preserve land that is critical to the rural economy, preservation of water or other natural resources, or citizen's quality of life. Action E: Continue to implement the County's Land Use Assessment program, Open Spaces Preservation program, and Agricultural and Forestal Districts program.
The draft does not include strategies and actions for preserving a critical mass of "prime agricultural soils" and "secondary cropland."	Strategy 3.3 on p. 2-90.	Insert the following strategy, with appropriate actions that are also addressed in the Implementation matrix: Strategy X. Review all proposed rural development plats to ensure that prime agricultural soils and secondary croplands are preserved for farming.

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
		<p>Action: Ensure that subdivision lots set aside for “rural economy uses” contain a minimum of 80% Class I and Class II agricultural soils.</p> <p>Action: Ensure that residential drainfields are not sited on subdivision lots designated for open spaces or rural economy uses.</p>
<p>The draft does not include efforts to promote long-term farm leases to incentive investments in farm productivity.</p>	<p>See Strategy 3.3 on p. 2-90.</p>	<p>Under Strategy 3.3, add an Action:</p> <p>Provide incentives to landowners to offer longer-term leases to local farmers. Those incentives will include tax deferral for start-up small farms on lot sizes from 5 to 50 acres.</p>
<p>The draft does not include efforts to promote investment in new farm infrastructure.</p>	<p>See Strategy 3.3 on p. 2-90.</p>	<p>Under Strategy 3.3, add an Action:</p> <p>Enhance the AFD program to provide incentives to landowners and farmers to invest in water systems, soil testing, nutrient application, barns, and handling and processing facilities.</p>
<p>The draft does not include efforts to preserve older farm structures that are used for the growing of crops and raising of livestock for food production.</p>	<p>See Strategy 3.3 on p. 2-90.</p>	<p>Under Strategy 3.3, add an Action:</p> <p>Provide tax incentives for farmers to maintain older farm structures that are directly used for the growing of crops and raising of livestock for food production.</p>
<p>The draft does not include efforts to promote investment in and sustain the</p>	<p>See Strategy 3.3 on p. 2-90.</p>	<p>Under Strategy 3.3, add an Action:</p>

SRL Comments on Draft Comprehensive Plan

Problem	Reference	Solution
commercial viability of agricultural support businesses.		Provide property tax and other incentives to businesses that directly serve and support Loudoun farms, including equipment and parts suppliers, large animal veterinary practices, and processing operations.
The draft does not address the fact that Loudoun farmers are disadvantaged by the lack of access to consolidation, processing, and packing facilities.	See Strategy 3.3, p. 2-91.	Under Strategy 3.3, add an Action: Support local and regional efforts to attract investment in nearby agricultural consolidation, processing and packing facilities.
The Plan should be consistent in its references to potential land preservation tools.	“Proactive preservation of farmland in the RPA through private permanent conservation easements and full utilization of the County’s Purchase of Development Rights (PDR) program is essential.” (2-114)	Revise the sentence to the left as follows: “Proactive preservation of farmland in the RPA is essential, using all appropriate policy tools, such as public-private partnerships, conservation easements, the Use Value Assessment program, the Open Spaces Preservation Program, AFDs, PDR, and TDR.”
The Plan does not include a map of TDR sending and receiving areas, which is required by state law in order to implement a TDR program.	See p. 2-130	Insert a TDR map in the Reference Maps section.

SRL Comments on Draft Comprehensive Plan

3. Natural and Heritage Resources

<p>The Plan should be consistent in its references to available land preservation tools.</p>	<p>“Identify those properties that are not conducive to development due to sensitive environmental, cultural, and historical characteristics, and promote their preservation through various public and private programs (such as the PDR program, Open Space Preservation Program, conservation easements, etc.).” (3-14)</p>	<p>Revise the language to the left as follows: “... and promote their preservation through available programs, such as public-private partnerships, conservation easements, the Use Value Assessment program, the Open Spaces Preservation Program, AFDs, PDR, and TDR.”</p>
<p>The Plan should reflect positive policy decisions, not possibilities that may be ignored.</p>	<p>“E. Consider establishing a PDR program that protects agricultural, natural, historic, and scenic resources.” (3-14)</p>	<p>Revise the language of the Action to the left as follows: “E. Provide funding for the County’s PDR program that is sufficient to protect critical agricultural, natural, historic and scenic resources.”</p>
<p>The Plan should be consistent in its references to available land preservation tools.</p>	<p>“F. Use the Conservation Design process, Use Value Assessment Program, AFDs, the PDR program, public-private partnerships, and other regulatory and incentive-based efforts for the preservation, conservation, restoration, and management of the County’s natural and heritage resources.” (3-14)</p>	<p>Revise the language to the left as follows: “F. Use all available policy tools, such as public-private partnerships, conservation easements, the Use Value Assessment program, the Open Spaces Preservation Program, AFDs, PDR, and TDR to ensure the preservation, conservation, restoration and management ...”</p>
<p>The Plan should commit to implementing a TDR program.</p>		<p>Under NHR Strategy 1.1, add the following action: “X. Establish a County TDR program.”</p>

SRL Comments on Draft Comprehensive Plan

<p>The Plan should be consistent in its references to available land preservation tools.</p>	<p>“Purchase of Development Rights (PDR) and Conservation Easements are tools that are available to the County and public and private entities to protect and preserve open space, farms, and natural and heritage resources in perpetuity, allowing landowners to retain ownership of their property, while maximizing the economic value of the land.” (3-15, box)</p>	<p>Revise the language in this box as follows: “The County can use a wide range of tools to protect and preserve open space, farms, and natural and heritage resources in perpetuity, allow landowners to retain ownership of their property, and maximize the value of the land, including conservation easements, the Use Value Assessment program, the Open Spaces Preservation Program, AFDs, PDR, and TDR.”</p>
<p>TDR is not mentioned as a useful tool for establishing a green belt.</p>	<p>“A. ... The greenbelt will be created through various mechanisms such as land donations, conservation easements, PDR, and other land conservation mechanisms.” (3-20)</p>	<p>Revise Action 2.5.A as follows: “The greenbelt will be created through various mechanisms such as land donations, conservation easements, PDR, TDR, and other land conservation mechanisms.”</p>
<p>TDR is not mentioned as a useful tool for preserving historic, cultural and scenic resources.</p>	<p>“K. Preserve and protect significant cultural and scenic resources from development impacts by promoting private or public acquisition and/or conservation easements, and the use of a PDR program.” (3-25)</p>	<p>Revise Action 5.1.K as follows: “Preserve and protect significant historic, cultural and scenic resources from development impacts by promoting private or public acquisition and conservation easements, by providing necessary funding to the County’s PDR program, and by implementing a TDR program.” (3-25)</p>

SRL Comments on Draft Comprehensive Plan

4. Housing

5. Economic Development

6. Fiscal Management and Public Infrastructure

<p>The Plan should be consistent in its references to available land preservation tools.</p>	<p>“The County and individual property owners manage these elements through the regulation of protective buffers, donation of open space easements, Purchase of Development Rights (PDR), and performance standards.” (6-6)</p>	<p>Revise the language to the left as follows: “The County and individual property owners manage these elements through a range of public programs and private actions, including the regulation of protective buffers, regulation of subdivisions, development performance standards, donation of open space easements, conservation easements, the Open Spaces Preservation Program, AFDs, PDR, and TDR.”</p>
<p>Action 3.1.1 should be updated to reflect the Board of Supervisor’s decision to establish a program to support conservation easements with small grants. The language should also be expanded to include the potential use of other conservation tools, including TDR and PDR.</p>	<p>“Institute a program whereby the County facilitates acquisition of conservation easements by others by providing assistance such as a revolving loan program to reduce or defer the landowner cost of establishing conservation easements. The program should emphasize protecting the priority open space areas that are identified in</p>	<p>Re-word the language to the left as follows: “Institute programs whereby the County incentivizes preservation of land with key scenic, historical, cultural, economic, recreational, or environmental assets, by providing assistance to reduce the landowner cost of establishing conservation easements, facilitating the transfer of development rights,</p>

SRL Comments on Draft Comprehensive Plan

	this Plan that are not otherwise protected.” (6-17)	encouraging participation in the Open Space Preservation Program, or directly purchasing development rights, subject to the feasibility and efficiency of each of these policy tools.”
The draft describes the County’s PDR program. It should also describe a TDR program.	See page 6-17.	Insert the following paragraph: <p>“A TDR program also facilitates the voluntary the sale of development rights in designated sending areas, and the transfer of those rights to purchasers’ properties in designated receiving areas. Permanent open-space easements are placed on any sending properties from which development rights are sold and these easements therefore add to the County’s open space assets.”</p>

7. Implementation

Quality Development		
The policy of enabling residents to become more involved in their neighborhoods should apply to the entire county, not just the SPA.	Strategy 1.2 on p. 7-20	Move this strategy to the Quality Development section of the Implementation matrix.
The matrix assigns no responsibility for implementing QD Strategy 1.2.	See pp. 2-8 and 7-5.	Insert appropriate actions and implementation responsibilities.

SRL Comments on Draft Comprehensive Plan

Urban Policy Area		
The matrix does not identify how the County will implement its policy of avoiding “land uses that do not meet the minimum bulk and/or density guidelines envisioned in the UPA.”	See p. 2-19	Insert in the UPA section of the matrix specific actions to implement this policy, together with staff responsibilities.
The matrix doesn’t include actions and responsibilities for implementing a TDR program.		Insert in the UPA section of the matrix specific actions and responsibilities for developing the zoning policies that will govern the use of purchased development rights in the designated TDR receiving areas of the UPA.
Suburban Policy Area		
The matrix doesn’t include actions and responsibilities for implementing a TDR program.		Insert in the SPA section of the matrix specific actions and responsibilities for developing the zoning policies that will govern the use of purchased development rights in the designated TDR receiving areas of the SPA.
Suburban Policy Area		
The matrix doesn’t include actions and responsibilities for implementing a TDR program.		Insert in the SPA section of the matrix specific actions and responsibilities for developing the zoning policies that will govern the use of purchased development rights in the designated TDR receiving areas of the SPA.

SRL Comments on Draft Comprehensive Plan

Transition Policy Area		
The matrix doesn't include actions needed to ensure that the TPA continues to be characterized by predominant open spaces.		To implement the strategies suggested on page 7, above, insert related actions and responsibilities in the matrix.
The matrix doesn't include actions and responsibilities for implementing a TDR program.		Insert in the TPA section of the matrix specific actions and responsibilities for developing the zoning policies that will govern the use of purchased development rights in designated TDR receiving areas of the TPA, if any.
Rural Policy Area		
The strategies and actions for RPA policies 1.1 and 1.2 are mixed up.	See p. 2-89 and comments on page 12, above.	Re-organize the actions in the matrix to align with the relevant strategies.
The matrix does not include any actions to implement RPA Policy 2 ("limit residential development") other than consolidation of small plots and support for conservation easements. It does not assign responsibilities for implementing all the other tools that are available to support this policy.	See p. 7-28 and our comments on page 12, above.	Insert actions and related responsibilities for implementing: <ul style="list-style-type: none"> • Use Value Assessment • AFD • TDR • PDR • OSPP
The matrix doesn't include specific action or assigned responsibility to ensure that cluster subdivision plots reserved for "rural economy uses" are made available for farming.	See pp. 2-83 and 2-89, and our comments on page 12, above.	Insert the action proposed on p. 12, above, and related responsibilities.

SRL Comments on Draft Comprehensive Plan

The matrix does not assign responsibility for preserving prime agricultural soils and secondary croplands.	See Strategy 3.3 on p. 2-90 and our comments on page 12, above.	Insert actions and responsibilities to implement the strategy we propose on page 12, above.
The matrix does not assign responsibility for promoting longer-term farm leases.	See Strategy 3.3 on p. 2-90 and our comments on page 13, above.	Insert the action proposed on page 13, above, with relevant implementation responsibilities.
The matrix does not include actions or assign responsibility to provide incentives for the maintenance of older farm structures used for the growing of crops and raising of livestock for food production.	See Strategy 3.3 on p. 2-90 and our comments on page 13, above.	Insert the action proposed on page 13, above, with relevant implementation responsibilities.
The matrix does not assign responsibility for incentivizing investment in local farm infrastructure.	See Strategy 3.3 on p. 2-90 and our comments on page 13, above.	Insert the action proposed on page 13, above, with relevant implementation responsibilities.
The matrix does not include specific actions and responsibilities to sustain farm-support businesses.	See Strategy 3.3 on p. 2-90 and our comments on page 13, above.	Insert the action proposed on page 13, above, with relevant implementation responsibilities.
The matrix does not assign responsibility for promoting and supporting local or regional agricultural consolidation, processing and packing facilities.	See p. 2-91 and our comments on page 13, above.	Under Strategy 3.3, insert the action proposed on p. 13, above, and related responsibilities.

8. Glossary

The glossary doesn't include a definition of TDR.		Insert the following definition: "Transfer of Development Rights (TDR): A land conservation tool used to limit
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SRL Comments on Draft Comprehensive Plan

		<p>development on natural and/or agricultural lands and preserve natural and heritage resource elements in perpetuity. Under this program, sellers of development rights in designated sending areas place open-space easements on their sending properties and the owners of receiving properties in designated receiving areas are permitted to develop their properties with additional densities where additional density of development is desirable based upon the Place Types concept and other goals of this Plan.”</p>
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