



Loudoun County Equine Alliance

Serving the Loudoun County Equine Community

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Comments on the Draft Loudoun 2040 Comprehensive Plan

The Loudoun County Equine Alliance (LCEA) appreciates the opportunity to comment on the Draft Loudoun 2040 Comprehensive Plan. We recognize that the document on which we are commenting is currently a "Draft" that may change before being presented for your review and action, but we hope you will take our feedback on the Draft into account when evaluating what is submitted to you by the Planning Commission.

EXECUTIVE SUMMARY

- We present both general and specific policy concerns regarding the Draft Comprehensive Plan (Draft) and Draft Countywide Transportation Plan (CTP), and detailed recommendations for textual changes to both (shown in Appendices A, B and C).
- The first section covers "Overall Policy Concerns" as they relate to the Draft Plan, and in some cases, suggests alternative language for the Draft.
- The appendices contain specific language changes requested, where more detailed recommendations are warranted.
- In general, we feel the Draft Plan does not respect the important economic impact of the equine industry in the County, does not fully address the necessary conditions for its survival and does not reflect its critical role in the rural economy and character of Loudoun.

Overall Policy Concern 1: The Implementation Matrix

There are many strategies listed in the "**Implementation Matrix**" for the Rural Policy Area (RPA) in Chapter 7 that affect the equine industry and are designated as "long-term" (10+ years). These strategies are in the current Comprehensive Plan and have been discussed (in "The Long View" as well as other documents) for years, as essential to the health and future of the equine industry in Loudoun.

Placing them in the "long-term" time frame rather than as short-term priorities in this Draft increases the likelihood that they will not be achieved. The LCEA therefore recommends that they be labeled as "short-term" (1-5 years) in order to **encourage the growth and retention of Loudoun's \$180 million (annual economic impact) equine industry.**

See **Appendix A (page 5)** for specific examples.



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Overall Policy Concern 2: Density

1. Transition Policy Area (TPA)

The LCEA supports the efforts to preserve and protect open space (essential for the survival of the equine industry) described in the Draft Plan. However, we have VERY serious concerns about **increased density in the Transition Policy Area.**

The Draft refers to "new approaches in the TPA to accommodate some of the County's needs. These needs include accommodating high demands for housing to support the County's economic development goals." (Chapter 2, page 56.)

We contend that "accommodating high demands for housing" does **not** support Loudoun's economic development goals and has the potential for negative economic impacts. Increased density in the TPA will drive any remaining agricultural businesses from the area (including equine) and damage the rural activities in the areas of the Rural Policy Area (RPA) along the border with the TPA -- the Rt. 15 corridor south of Leesburg in particular. This is an area where horse businesses still thrive but are threatened by encroaching development, traffic, noise and the incompatibility of suburban density with rural agribusiness.

2. Rural Policy Area (RPA)

While the Draft does not call for increased residential density in the RPA, the equine industry and all agribusiness will suffer from the as-yet-unseen effects of existing by-right development.

The Equine Alliance strongly supports the recently-passed establishment of a fund to defray costs of conservation easements. We also urge the Board to adopt the proposed Transfer of Development Rights (TDR) program currently under consideration, and to **include this critical rural preservation tool in the new Comprehensive Plan**, in Chapter 2 page 80, under the heading of "Farmland Preservation and Protection."



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Overall Policy Concern 3: Rural Roads

The LCEA strongly supports the material in Chapter 4 of the Draft CTP regarding the preservation of Loudoun's unpaved roads. These roads perform essential functions for the horse industry as places to ride horses, provide natural traffic calming (also important for safely driving farm vehicles) and contribute to the important rural ambience that supports the County's rural economy. The unpaved roads can easily be shared by equestrians, cyclists and pedestrians. We urge you to maintain ***verbatim*** the language protecting these roads and discouraging paving that exists in the current Draft CTP.

We recognize that the CTP will be reviewed by VDOT. We urge you to encourage VDOT to continue its work to develop innovative road surfacing solutions for Loudoun County that will meet the need for roadways that are affordable to maintain yet rural in character.

Overall Policy Concern 4: The Equine Industry in General

This description of the equine industry in Loudoun is significantly abbreviated from the one in the current Plan, and does not acknowledge the industry's significant economic impact, its multi-faceted nature, and Loudoun's esteemed place in the *national* culture of equestrian sports.

One key statement in the current Comprehensive Plan that is missing from the Draft is the following:

The equine industry should be afforded the same benefits and encouragement extended to other forms of local agriculture.

This important policy directive should appear in any new Comprehensive Plan.

Additionally, the current Plan contains several Rural Economy Policies that should be added into the Draft. See **Appendix B (page 6)** for details.



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Overall Policy Concern 5: Trails and Equestrian Facilities

Among the very critical Rural Economy Policies covered in Appendices are the need for equestrian trails and public spaces for riding and competition. The Rural Economic Development Council (REDC) and many other organizations have also identified the development of multi-modal trails as essential to the needs of the entire County's citizens. To make multi-modal trails useful to equestrians, trail head parking needs to incorporate areas for horse trailers.

See **Appendix C (page 7)** for specific Draft Plan textual recommendations. This includes areas in the Draft Countywide Transportation Plan (CTP) where we feel alterations/additions to the existing language regarding trails and equestrian facilities need to be made.

CONCLUSION

We reiterate the importance of the equine industry's economic significance, the centuries-old tradition of Loudoun as "horse country," and its symbiotic relationship with other rural economic businesses. We hope you do everything in your power to ensure its short- and long-term survival.

LCEA Board

Kelly Foltman, DVM, President

Michelle King, Vice President

Marion Lee, Secretary

Stephanie Jennings, Treasurer

Directors: Louise Cotulla, Emily Houston, Christina Kimberlin, Reid O'Connor,
Janet Vandervaart



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Detailed Recommendations for Textual Changes (Appendices)

Appendix A: Implementation Matrix Strategies Shown as Long-Term Vs. Short-Term Goals

The following Strategies in the Implementation Matrix (Chapter 7) in which equestrian needs have been labeled as "long term" goals. We recommend they be labeled "short term."

Strategy 3.2 (page 32)

Promote the retention and development of rural business uses that sustain the rural economy and support the County's agricultural and equine industries.

Develop County parks with trail networks, cross country courses, and equestrian riding rings or other equestrian-related features.

Develop a publicly accessible multi-use trail network (i.e., pedestrian, bicycle, and equestrian) to link private and public lands in the RPA in partnership with nonprofit entities, landowners, and developers of rural properties.

Strategies 3.3 - 3.5 and 3.7 (pages 32-35)

Promote and expand agricultural enterprises and the rural economy, and attract rural entrepreneurs to locate in Loudoun.

Strategy 3.4 (page 33)

Maintain the Land Use Assessment Program to provide property tax relief to retain and support agriculture, horticulture, forestry, and open space as critical components of the RPA.

Strategy 3.5 (page 34)

Promote and encourage the preservation, rehabilitation, and repurposing of farm buildings and structures to maintain infrastructure for future agricultural enterprises and rural economy. Where possible, rural business uses should locate in existing agricultural and historic structures.

Strategy 3.7 (page 35)

Protect farming and farmers from nuisance complaints in accordance with the provisions of the Right to Farm Act, Code of Virginia §3.2-301.



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Strategy 6.2 (page 81)

*Promote and support the establishment of public and private nature preserves throughout the County as part of the protection and enjoyment of natural and heritage resources, to include the development of natural surface, multi-modal trails.**

(*Red text indicates recommended textual change.)

Appendix B:

The Equine Industry in General, and Rural Economy Policies to Support It

While some of the information about the equine industry in the current Plan is out of date, we request that the following description of its scope be used (additional text in red):

Chapter 2, page 79.

The equine industry is a major component of the rural economy. Loudoun County leads the state in the number of horses, and the equine industry is the county's largest agricultural employer providing thousands of jobs associated with the care of these animals and the operation of barns and stables. Loudoun is home to many nationally recognized organizations and institutions. The Virginia Tech Marion DuPont Scott Equine Medical Center in Leesburg is one of the nation's leading veterinary research, teaching and treatment centers for horses. The Middleburg Agricultural Research and Extension (MARE) Center is one of 11 Virginia Tech facilities in the state, dedicated to horse pasture and breeding research. Morven Park, Glenwood Park, and Oatlands provide regional venues for horse events. In addition, Loudoun is home to the National Sporting Library & Museum, the Chronicle of the Horse, the Middleburg Training Track, the Masters of Foxhounds Association of America and the United States Eventing Association. Other smaller stables are scattered throughout the County, which provide lessons, boarding, trail rides and camps, and host a wide range of equestrian events.

The following "Rural Economy Policies" are in the current Draft Plan, and we request that they be added into the Draft:

The County will encourage an environment supportive of the ownership and boarding of horses, for both commercial and recreational use, by promoting land development practices that preserve large tracts of land appropriate for grazing, growing hay, and riding horses. The County will also provide tax incentives such as expanding the Land Use Tax Program to include all sectors of the equine industry.



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The County will seek to expand Agricultural and Forestal District eligibility to include acreage used for equine-related activities, such as stables, training and racing facilities, and breeding farms.

Appendix C: Trails and Equestrian Facilities

Glossary

Definitions: There is no definition of trail in the glossary and trails are variably referred to as trails, paths, or lanes throughout the Draft Plan. LCEA agrees with the REDC recommended definitions as follows, and feels that consistency of terminology is absolutely necessary to avoid misrepresentation or exclusion of a user group:

- a. **Multi-modal Trail** (i.e. pedestrian, bicycle, **equestrian**) natural surface used for passive recreation.
- b. **Paved path** - multi-modal byway, paved for pedestrian and non-motorized recreation and transportation, ADA compliant.

The following are changes and additions in specific chapters and pages in the Draft Plan where language regarding multi-modal trails should include equestrian use and needs, and address the definition of trail multi-modal:

Chapter 3, page 15 and Matrix page 57 (Strategy 1.1)

*Define “link” as **a multi-modal trail**.*

Chapter 3, page 23 (Strategy 3.3 Action G)

*Seek the expansion of passive recreational opportunities in mountainside areas, including the development of public park sites **including creation of multi-modal trails**, and improving access to existing recreational facilities such as the Appalachian Trail.*

Chapter 3, page 28, Action E and Matrix page 81 (Strategy 6.2)

*Promote and support the establishment of public and private nature preserves throughout the County as part of the protection and enjoyment of natural and heritage resources, **to include the development of multi-modal trails**.*

Chapter 6, page 7, item b

*Linear linkages within and among communities that offer potential for walking, bicycling, **and equestrian use**, and connecting neighborhoods to parks, school, and other community destinations.*

Chapter 7 (Matrix), page 6 (Strategy 4.1)

*Create guidelines and regulations that ensure bike lanes, shared spaces, and paths of travel **to include multi-modal trails suitable for equestrian use**.*



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Draft Transportation Plan

Chapter 2, page 9, Countywide Bicycle and Pedestrian Policies, item 2-2.13

Connectivity *The County shall actively seek to establish connections to local and regional trail networks including but not limited to, the Appalachian National Scenic Trail, Chesapeake and Ohio Canal Towpath, Potomac Heritage Trail, and Washington & Old Dominion Trail. Connections to natural surface trails (multi-modal) need to be suitable for equestrians, and parking areas must also accommodate horse trailers.*

Chapter 2, page 28-29 Off-Road Bicycle, Pedestrian and Equestrian Facility Guidelines
Add the following to the "overview of guidelines" listed on page 29:

Where design and location can accommodate equestrians, trails should be of natural surface and sufficiently wide with buffers to accommodate all users, and parking areas to accommodate horse trailers.

Chapter 3, page 25 Transition Bicycle, Pedestrian and Equestrian Policies, item 3-3.12

Off-Road Trails *Provision of publicly-accessible off-road trail networks is highly encouraged in the transition area, and should include the potential for equestrian use (natural surface, multi modal) wherever practical. Such networks will provide for greater utilization and access to natural amenities.*

Chapter 3, page 29 Rural Policy Area Bicycle, Pedestrian and Equestrian Policies

This plan supports growth of a cycling and horseback riding network in the Rural Policy Area while promoting safety for riders of both types. The plan also indicates the need for pedestrian facilities along primary roads and in the villages, where pedestrian activity is anticipated to occur.