



*Promoting and protecting the natural resources, rural economy,
history and beauty of the Virginia Piedmont*

July 15th, 2020

Warrenton Planning Commission
Warrenton Town Hall
18 Court Street
Warrenton, VA 20186

Re: Draft Warrenton 2040 Plan

Dear Chairman Helander and Members of the Warrenton Planning Commission,

Piedmont Environmental Council is a non-profit land conservation and land use advocacy group headquartered in the Warrenton community. Our mission is to promote and protect the northern Piedmont's rural economy, natural resources, history and beauty. We have been following the Warrenton Comprehensive planning process closely and have expressed concerns to staff along the way about "by-right" zoning, ambiguous mixes of uses, and rezoning of most of the industrial and commercial areas to mixed use with residential. Now that we have reviewed the draft plan in its entirety, our questions remain unanswered and our concerns have grown.

PEC supports high quality sustainable development, especially redevelopment and infill, in our service districts and the Town. Many parts of the draft are great, including a robust plan for improving walkability and cyclist access throughout the town. However, the plan outlines a new growth trajectory for Warrenton that contains contradictions and leaves important questions unanswered. It fails to incentivize redevelopment and infill over greenfield development and does little to incentivize needed affordable housing. Also concerning is the eagerness of the Town to rush the draft forward citing developer's timelines as if this were a development application rather than a plan outlining a community vision.

There is a lot in the 513 page document first published on June 15th and then updated on July 2nd. To address it in an organized manner our comments are broken into topics rather than by chapter because several of the issues extend across several chapters. All page numbers referenced in this comment letter are referring to the July 2nd draft.

Rushed Process:

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It is an unprecedented time. Most of us have never experienced a pandemic or such a shift in the public's ability to participate in local land use decision making. Local news media have understandably been focused on Covid-19 and other prominent local and national issues and have not covered the release of the draft Comprehensive Plan. Community members have been reasonably distracted by the issues of childcare, financial hardship, employment changes and other challenges brought on by the pandemic. Times like these require the Town to actively pursue public input and encourage public participation by providing sufficient time and means to capture the community's concerns or thoughts on such an important document.

We are concerned though that rather than slowing the process down, the Town seems to be taking advantage of this crisis and rushing the plan forward. When a couple Planning Commissioners asked about the planned September 8th adoption date, staff responded that they, "have a lot of people who are waiting on this document... there will be zoning ordinance amendments that have to happen on the heels of this, depending on what's decided." Preliminary questions PEC submitted by email were not responded to. The Planning Commission had little discussion about the details of the plan during their two work sessions and abruptly canceled a third scheduled work session after PEC submitted these preliminary questions.

Before the first public hearing on July 21, the public will have had little more than a month to review the 513-page Comprehensive Plan Draft. There appears to have been little outreach or attempt to publicize the release of the draft or its contents. In fact some of the studies by RKG Associates Inc appear to have been completed February 1st 2020, yet not released until June 15th as an appendix to this draft Comprehensive Plan. In the June 15th version it said that an open house was held when the first draft of the plan update was completed. This was changed in the July 2nd version to reflect that this outreach was not done.

In light of all that is going on in the world and the number of concerns raised by PEC and others, we hope that you will consider slowing down this process and taking a bit more time to evaluate what the details of this plan mean for the future of Warrenton.

Growth Rate:

The capacity for growth under existing zoning and the projected growth of the Town under this new plan with mixed use zoning districts is unclear. In the water and wastewater section the plan assumes for analysis purposes, that the Town will grow from 10,000 to 15,000 persons during the plan period of 20 years (2.05% annual growth rate). Specifically the projected development included 2,102 residential units, a 310,000 square foot commercial area, and 480 hotel rooms. At the current household size of 2.54 person per household, this would be about 5,339 persons or an annual growth rate of 2.16%. However, on page 207 the plan states that Weldon Cooper Center for Public Service projects only 815 new persons (0.39% annually) and that even a 1.5% growth rate would be a challenge. Additionally, three development scenarios were presented at an open house in August 2019. Those scenarios were evaluated under the following assumptions:

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Scenario 1 Stronger Livable Community –

750 housing units (≈ 1,905 persons or 0.87% annually over 20 years)

Scenario 2 Livable Destination Community –

1,150 housing units (≈ 2,921 persons or 1.29% annually over 20 years)

Scenario 3 Regional Live/Work Community –

2,100 new housing units (≈ 5,334 persons or 2.16% annually over 20 years)

The 2002 Comprehensive Plan and 2009 Supplement evaluated several growth projections ranging from 1.5% to 4% and framed that growth within the limits of build-out potential (or capacity of the Town to accommodate growth under current zoning and water/sewer limitations). This draft Comprehensive Plan does not include such an analysis of current build-out potential or the potential build-out of the new plan.

The majority of industrial and commercially zoned land is located in the Character Districts and the Broadview Overlay. These parcels are being replanned into what is described in the plan as “by-right” mixed use with a “range of housing types”. Those “by-right” mixed use zoning districts are envisioned to be developed as form-based zoning without limits on dwelling units per acre. The plan states that, “dwelling units per acre (DU/AC) is not compatible with a vision of mixed-use, walkable neighborhoods with a range of housing types.” However, many mixed use zoning districts and form-based codes include dwelling units per acre and/or limits on the percentage that can be residential. Knowing the build-out of an area, in addition to the planned form, is vital for infrastructure and fiscal planning. It is also important for ensuring that a good mix of uses is achieved and that there is a high level of connectivity/walkability between uses.

We ask that the Town include in this plan an evaluation of existing capacity under current zoning, a growth target for meeting the desired housing goals, and the maximum percentage of residential and minimum percentage of commercial in each of the Character Districts mixed use zoning.

Economic and Fiscal Resilience

The planned growth for Warrenton seems to be predicated on the information presented in the Economic and Fiscal Resilience Chapter. Much of the information in the chapter seems to be selected and presented in a way to lead the reader to one conclusion; the Town of Warrenton must grow its residential sector, by a lot, to survive. Some of the comparisons used and assumptions behind the analysis are questionable though and therefore make the conclusion questionable.

To determine the Town’s economic health the plan compares the Town of Warrenton to the City of Manassas and Counties of Culpeper, Loudoun, Prince William, and Fauquier. We find it strange that the consultant did not compare the Town of Warrenton to other nearby Towns or Towns of similar size such as the Town of Front Royal, Town of Culpeper, Town of Berryville, Town of Purcellville, and/or Town of Leesburg. Additionally the chapter states that areas west were not included in the regional analysis because, *“Warrenton’s economic future is more strongly linked to the outward expansion of Northern*

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Virginia than it is to the rural communities to the west.” We feel that this analysis would have been more accurate and helpful if it considered both the urban and rural localities around Warrenton. Many of Warrenton’s small businesses, hotels, and restaurants are directly tied to the rural and agricultural economies. Tourism was clearly identified as a major part of Warrenton’s economy and is directly tied to Fauquier’s agricultural resources and rural setting.

On Page 186, there is a graphic stating that, “Warrenton’s top occupations are among the lowest paid when compared to the surrounding region.” It shows that Warrenton Food Service and Retail Sales workers are paid less than those in Culpeper County. It’s common knowledge in this region that if you go further east, pay for the same job is higher, so some of this is not surprising. It is potentially a cause for concern though if workers in Warrenton are paid less than those in Culpeper. However, this is a comparison between Culpeper County and the Town of Warrenton. Town residents are, on average, lower income than the surrounding County. Lower income residents locate in towns because there are smaller lots, smaller houses, older housing stock, better public transportation, and more health and social services available. For reference, the Town of Culpeper’s 2018 median income was \$60,724 while Culpeper County’s was \$73,116 and the Town of Warrenton’s 2018 median income was \$72,119 while Fauquier’s was \$97,469¹. It would also be helpful to have a comparison between towns and more explanation about how limited range of housing types is causing this problem.

All Topics	Fauquier County, Virginia	Warrenton town, Virginia	Culpeper town, Virginia	Culpeper County, Virginia
Population estimates, July 1, 2019, (V2019)	71,222	10,027	18,873	52,605
Economy				
In civilian labor force, total, percent of population age 16 years+, 2014-2018	67.2%	65.6%	70.6%	65.2%
In civilian labor force, female, percent of population age 16 years+, 2014-2018	61.4%	61.1%	66.8%	63.0%
Total accommodation and food services sales, 2012 (\$1,000) (c)	108,134	57,401	43,734	59,342
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	274,753	254,964	156,326	204,330
Total manufacturers shipments, 2012 (\$1,000) (c)	137,765	17,297	301,197	563,583
Total merchant wholesaler sales, 2012 (\$1,000) (c)	159,724	36,537	D	296,847
Total retail sales, 2012 (\$1,000) (c)	920,778	500,557	278,085	550,139
Total retail sales per capita, 2012 (c)	\$13,838	\$51,062	\$16,719	\$11,483
Transportation				
Mean travel time to work (minutes), workers age 16 years+, 2014-2018	40.0	35.5	35.4	38.8
Income & Poverty				
Median household income (in 2018 dollars), 2014-2018	\$97,469	\$72,119	\$60,724	\$73,116
Per capita income in past 12 months (in 2018 dollars), 2014-2018	\$44,724	\$39,457	\$26,696	\$30,812
Persons in poverty, percent	6.1%	6.0%	12.0%	8.7%

Figure 1 Comparison of Towns vs. Counties from Census.gov QuickFacts. Accessed 7.11.2020.

¹ Census.gov, Median Household Income (2014-2018) in 2018 dollars. <https://www.census.gov/quickfacts/fact/table/fauquiercountyvirginia,warrentontownvirginia,culpepertownvirginia,culpepercountyvirginia/PST045219>. Accessed 7.11.2020

Although the plan emphasizes Warrenton’s economic deficiencies, the data included in this Comprehensive Plan actually seems to show that Warrenton has a strong economy. The graph on page 185 states that Warrenton generally has higher proportions of Semi-Skilled White Collar and High-Skilled White Collar jobs. Page 179 says that 25% of industries enjoy a competitive advantage in the Town of Warrenton. Page 174 shows that Warrenton has enjoyed 5% growth in employment, which does not seem bad for a small Town that has only grown by 15% over that same time. The Warrenton industry earnings even exceed the regional average by 5%, which is impressive when you consider that the “region” of comparison is western Northern Virginia. On page 89, in the housing chapter, the plan describes the high job-to-housing ratio of 2.77 as problematic because it means that, “employees must commute into the area because there is not enough housing to accommodate the workers.” However, this is arguably a good thing if viewed in context. If you zoomed out and included the suburbs around the Town, or even more dramatically all of Fauquier County, you would likely find that the high employment in Warrenton greatly helps to balance Fauquier’s job-to-housing ratio.

Fauquier County also demonstrated a strong economy with an unemployment rate lower than Prince William, Culpeper, or Manassas. Tourism and the equestrian industry are very competitive in the region although the consultant suggests monetizing them more, “a waterpark resort such as Great Wolf Lodge will generate many more visitors on a repeating basis than an historic walking tour.” Consider these type of suggestions holistically though. A Great Wolf Lodge also would generate much more expense in terms of water, sewer, traffic, police, and fire and rescue than a walking tour.

We ask that the fiscal and economic resilience of Warrenton be reevaluated fairly and without agenda. Comparisons should be made to other Towns not counties and the region used should capture both rural and urban localities. Additionally, basic information about the Town’s median income, retail sales, major employers, major employment areas, declining industries, and potential new industries would be helpful for creating a full picture of Warrenton’s economic resilience.

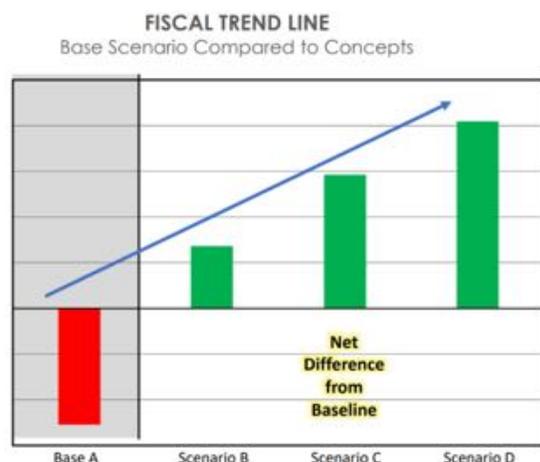


Figure 2 Graphic presented at August 2019 Open House

Growth Scenarios

The fundamental question of how much the Town should grow was decided based on a scenario exercise in which three scenarios were presented to the public. A bar graph with no label on the y-axis shown was shown at the open house with only a general explanation that it depicted fiscal health of the town. There was no background about the study or how that analysis was made. Although annual growth rates were included, there was little explanation as to what they meant in terms of real population, number of households, development of land, and infrastructure needs.

Unsurprisingly, Scenario D was selected by 18 attendees while 6 selected Scenario C and 4 chose Scenario B.

Appendix IV Fiscal Sustainability Analysis from RKG Associates explains how the model works. Based on the description incremental costs of services such as police and fire and rescue personnel associated with population increases were calculated but it does not show capital infrastructure expenses such as expanding water and wastewater capacity. It also fails to consider additional school seat impacts on the County tax base which affects Town residents because they also pay County taxes.

The Base A “don’t change” scenario was also explained in this report. That base scenario assumes \$12 million dollars in “wish list” community improvements including things like enhanced recreational facilities, increased public parking, and a new town hall. The model shows that with this assumption, no tax increases, and with continued minimal growth in retail and residential, the Town will have a net negative fiscal impact of approximately \$509,000 by 2039.

The model shows that Scenario B, C, and D have a positive fiscal impact on the Town but there are a lot of details that go into that calculation, some of which are not explained in the report. Scenario B (the Stronger Livable Community) would bring in 750 new market rate housing units, 80,000 square feet of retail, and redevelopment of a motel into a business-class hotel. The net positive fiscal impact would be approximately \$240,682 by 2039. It is unknown how many of these new housing units would be single family detached, single family attached, or multifamily. This is important to ensure that the real-estate values used in this analysis match the vision of diversifying the housing supply of Warrenton. In other words did the consultant only include large market rate single family homes and townhouses which would produce more in tax revenue or did they include a percentage of more modestly priced homes.

Scenario C (Livable Destination Community) would bring in 1,150 market rate housing units, 100,000 square feet of retail, and growth in lodging facilities (265 new hotel rooms). The net positive fiscal impact would be \$100,000 annually at build out. Again, it is unknown what the breakdown of housing units would be and the amount of redevelopment vs. new commercial is unknown.

Finally, Scenario D (Regional Live/Work Community) would bring 2,100 new units, “redevelopment of aging shopping centers into mixed-use facilities with a substantial decrease in retail space and a substantial increase in dining facilities”, 160,000 sq ft of office, and lodging. The net positive fiscal impact would be \$335,000 annually by 2039 with the caveat that a “*concerted economic development effort from the Town*” will be needed to succeed because the current marketplace for office development is not robust enough to project such growth by 2039. The breakdown of housing is unknown, the decrease in retail is unknown, the increase in dining facilities is unknown, and the amount of lodging is unknown in this scenario.

The net positive revenue to the Town described in all of these scenarios does not appear to include water and wastewater facility expansions described as needed to accommodate the projected growth in the plan. It fails to recognize that new residents who move into Warrenton would likely have higher expectations for services and facilities which would increase the \$12 million dollar wish list in the base scenario. It also assumes that the development is phased equally over the years and the by-right zoning

doesn't get developed in large chunks that overload the services and infrastructure capacity of the Town resulting in higher taxes or rate increases for residents.

With these issues in mind, we ask that the Town reevaluate the development scenarios with the inclusion of water and wastewater facility expansions. The new analysis should also provide more detail about the projected real estate values, the breakdown of housing by type, the projected square footage and value of redevelopment, projected increases in dining facilities, and projected increase in lodging in the final scenario.

Redevelopment and Infill

Incremental redevelopment and infill is the most cost effective way for Warrenton to grow. It demands the least in services and enhances walkability and connectivity within the Town. However, this type of development is often more costly for developers because they may have to rehabilitate or demolish structures, work around or move existing utilities, integrate their development into an existing community, among other challenges. By-right mixed use zoning that allows residential can be used in these situations to incentivize this development over "greenfield" (larger vacant lots) development and provide the developer with some reassurance of approval if they meet the standards.

Our concern with this plan is that instead of using by-right mixed use zoning in targeted areas such as Broadview Avenue and the Old Town Character District it broadly applies the concept to almost all of the undeveloped industrial and commercially zoned land in the Town. We are concerned that the result of opening up this much land for by-right mixed use development will be two things:

- 1) developers will focus first on the most profitable option of building residential housing on existing greenfields which are much easier and cheaper to develop than the difficult work of recycling failed strip mall development; and
- 2) that in doing so, the residential market in Warrenton will become saturated and reduce the market demand for residential, and thus the incentive, to infill and redevelop failing areas where residents most desire that transformation.

The consultant for the Town recognized this dynamic and acknowledged it. On page 206 it states,

"Greenfield (undeveloped land) parcels were considered the most feasible from a development perspective. Greenfields were followed by development that has already been proposed and approved. Infill parcels and redevelopment of existing buildings or surface lots were considered the most complex and were evaluated based on site constraints."

Incentives must be used as a fine instrument or they are no longer incentives. By allowing the most lucrative development (residential) to be built by-right on the easiest to develop land you are delaying redevelopment and infill possibilities that much longer.

We ask that the Town reevaluate the use of by-right mixed use zoning in the Character Districts with greenfield development possibilities and target this type of zoning to better incentivize redevelopment and infill at the core of Town. Mixed use and form based zoning could still be incorporated into the Character Districts but it should not be by-right and residential should be a very limited component.

Housing

The Comprehensive Plan Draft is clear in its intention to increase residential housing in Warrenton. The need for a diversity of housing types is mentioned throughout the plan. Nearly all areas of the Town currently zoned for industrial and commercial use are planned to be rezoned to mixed-use. Page 26 states that, “each Character District is conceived as a by-right mixed-use area with appropriate mix of land uses, in the vertical or horizontal configuration, at varying intensities.” The land use plan shows that in the New Town, Health and Wellness, and Greenway and Makers Character Districts the entire Character District (with the exclusion of public areas) would be by-right mixed use.

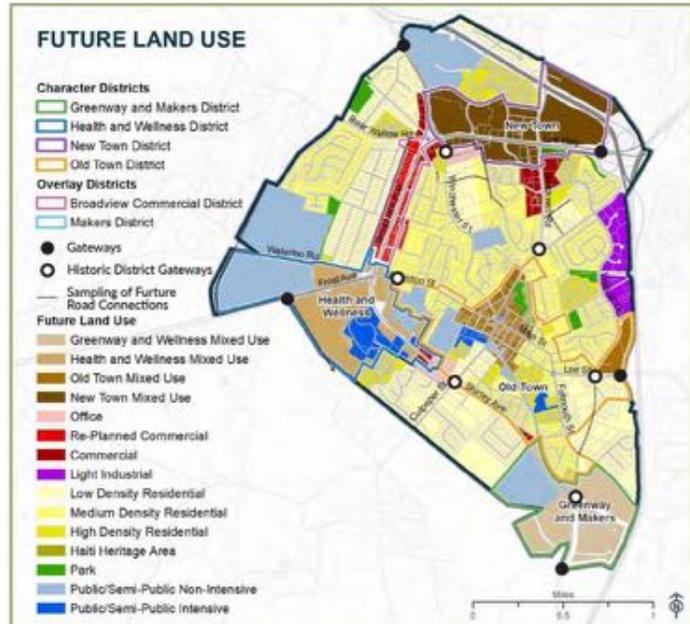


Figure 3 Future Land Use Map from Warrenton 2040 Plan

All of the character districts are described as including a “range of housing types”. The plan emphasizes a need specifically for multifamily housing and middle housing types such as townhouses, duplexes, bungalows, etc. but does not state market rate single family detached is undesirable. The density (dwelling units per acre) and the intended mix (how much of any given area is envisioned to be residential vs. commercial vs. office) is unknown.

Throughout the plan the lack of housing diversity is identified as a problem with 75% of Warrenton’s total housing stock being single family (attached and detached). On page 87 the plan states, “the lack of housing diversity is contributing to the Town’s slowing growth prospects.” Housing diversity is important, but Warrenton actually has more housing diversity than many nearby Towns. Leesburg for example has 77% single family (47% detached and 30% attached) and 23% multi-family, which they describe as diverse in their comprehensive plan. According to Culpeper’s Comprehensive Plan, their residential is 79% single family (attached and detached). It would help to have the attached and detached single family separated to better understand Warrenton’s housing diversity.

The Plan emphasizes the need for a range of housing types to be developed in the Character Districts. Many of the housing types described are single family (attached and detached) such as townhomes, row

houses, duplexes, bungalows, cottages, and clustered housing. The plan does not break down the percentage of detached and attached single family homes so it is impossible to know if there is a deficit in attached single family that some of these types would help meet. Without information that is more detailed the Town is pursuing more single family residential while at the same time saying that having too much of this product is causing economic challenges for the Town.

We ask the town to breakdown the percentage of single family housing that is attached vs. detached and consider doing further research into the home value and/or size of housing in Town. This would help Warrenton identify exactly what housing types are missing in the Town. We also ask for more information about densities and/or the percentages for the intended mix of uses in each Character District and the Broadview Overlay.

Affordable Housing

On the subject of affordable housing the plan is contradictory and vague. The plan recognizes a need for affordable housing but emphasizes a range of housing types and lacks many specifics on retaining or setting aside affordable units. The plan states on page 15 that the Town's goal is to,

“Encourage a range of housing types at different price points as appropriate in Character Districts, with an emphasis on the middle range between single-family and mixed-use or multi-family residential (bungalow, row, duplexes, and courtyard apartments).”

This vision is very broad and the result will likely be that Warrenton will get whatever market demand dictates. The plan seems to support this market driven approach by seeking a range of housing types including market rate housing. In fact one of the Objectives in the Economic and Fiscal Resilience Chapter is to, *“allow for market-rate and a range of housing types...”*. The Plan describes on page 90 the breakdown of housing need in the County as

- *“Local area workers with annual incomes below \$75,000 and homes worth less than \$300,000 for 30 percent of future demand.*
- *Northern Virginia commuters (at least one worker who commutes per household) with incomes greater than \$75,000 and homes worth \$300,000 to \$500,000 account for 60 percent of future demand.*
- *Seniors and retirees with homes worth less than \$250,000 to \$400,000 account for 10 percent of future demand.”*

Affordable units are not as profitable to build as market-rate units and therefore must be required through inclusionary zoning or incentivized. Form can also help dictate affordability, by requiring inclusion of smaller units or units with shared common areas. The only definitive incentive this plan gives for the inclusion of affordable housing is bonus densities. This density bonus is unlikely to result in much affordable housing though due to the alternative options for those bonuses (ie public art, public

parking, employment uses, and park space) and the lack of need (the new mixed use districts are described as having no density limits besides height so there will likely be little demand for bonuses).

Although the background report done by RKG Associates describes Warrenton's rental market as relatively affordable, it also described a need for multifamily units that cater to younger cohorts who, "may not desire or are not ready to purchase a home". According to that report, almost all of the multifamily in Town is age restricted. We are concerned that without inclusionary zoning condominiums and luxury apartments will be built without any affordable units for younger residents of more modest incomes.

We support the goal of maintaining and improving existing housing stock identified in the Housing section of the plan, however, we're concerned that there seems to be contradictory language about this in the plan. Starting on page 235, the Low Density Residential and Medium Density Residential sections include this language,

"This Plan seeks to preserve the integrity of existing residential neighborhoods; limit and discourage incompatible uses into established residential neighborhoods; and maintain and improve neighborhood qualities by eliminating substandard housing and improving its physical features."

This is likely an oversight or poor phrasing but should be corrected to make it clear that the goal is not elimination but rehabilitation and repair assistance to help existing families stay in their homes.

The Haiti Heritage Area is briefly mentioned on page 237 with little to no explanation. The text says, "the flexibility provided is to recognize its historical development patterns that function as a small-scale neighborhood village." What flexibility is planned here exactly? This is not enough information, we suggest this area be better explained and that the history and significance of the area be included in the historic resources chapter.

More information about affordable housing goals is needed in the plan. It would be helpful to have explicit affordable housing goals and know the price range and number of rental units and the price range and number of owner occupied units the Town would need to meet those goals.

We support the objective of working with non-profit partners to acquire at-risk properties to protect, rehabilitate, and retain permanently affordable housing stock, however, we feel that this plan puts too much of the burden on the non-profit sector and fails to leverage private investment through the development process. We ask that the Town consider requirements for affordable housing and adding more information regarding affordable housing goals and the Haiti Heritage Area.

New Western Bypass:

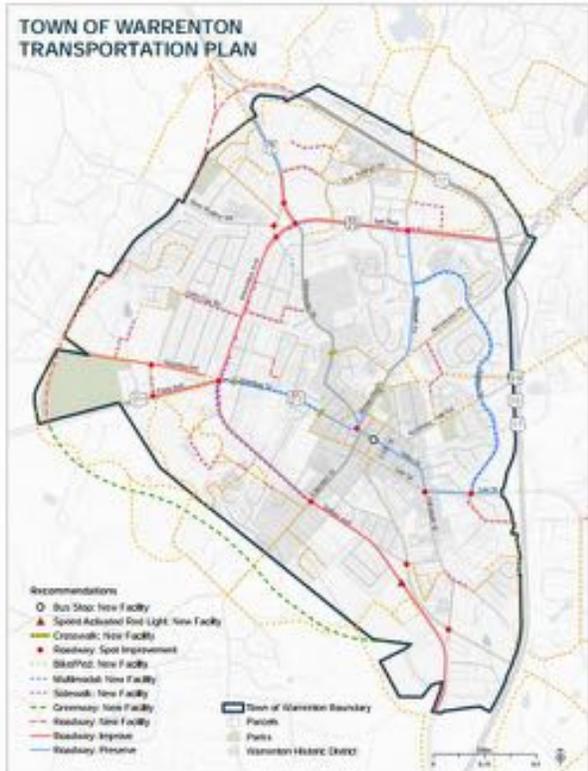


Figure 4 The Timberfence Parkway is the dark orange dashed line labeled Roadway: New Facility. The Southern Parkway is the green dash line labeled Greenway: New Facility

We are concerned that the Transportation Plan appears to be proposing a full western bypass by combining the old Timberfence Parkway plan and the new Southern Parkway plan. Regarding the Southern Parkway the Plan states,

“The immediate intent of the parkway concept is for the development of a multi-use trail to provide recreation and mobility for bicycle, pedestrian, and equestrian transportation while serving to preserve the opportunity and right-of-way for a continuous parkway around eastern/southern Warrenton if needed in the long term future.”

The Town should be clear about its intention in this plan and should not use misleading graphics that show the future parkway as a trail. Using a desirable multiuse trail as a placeholder for a possible roadway is disingenuous and will inevitably lead to significant conflict and controversy when the time comes to build the road.

In regards to the Timberfence Parkway it would be helpful to know how the community, high school, WARF, and County feel about this proposal before putting it in the Transportation Plan for the Town. If the road is pursued the multi-use pathway adjacent to the roadway should be contained in an easement to ensure it cannot be converted to widened to road beyond the two lanes described in this plan.

Regarding the Southern Parkway, it is shocking to see such a potentially impactful road included in the Comprehensive Plan when there has been no mention of it in any of the open houses. There is no study included in this plan showing a compelling need for a connection between Rt. 211 and



Figure 5 Rough approximation of Southern Parkway on County map with easements, buildings, streams, floodplains, and cemeteries.

James Madison Highway. On page 164 one of the Objectives is to, “*identify opportunities to improve traffic flow between U.S. 211 and U.S. 29 through the evaluation of the Southern Parkway concept.*” Under the Actions it states, “*Form a Southern Parkway task force consisting of local, regional, and State officials and incorporate developers and business leaders.*” None of the Actions include conducting outreach in the community to get feedback about this proposal. This proposed roadway has the potential to cross through existing communities, VOF Open Space and Fauquier County easements, and have a significant impact on historic, environmental, and cultural resources including a cemetery. All stakeholders need to be involved in this important conversation.

Although external traffic growth is cited as the need for this bypass, there is no evaluation of the traffic implications of the proposed development in this plan. Without densities or even percentages for mix of uses within the Character Districts and the Broadview Overlay, it is challenging to estimate traffic. However, it is safe to say that there would be additional traffic on Broadview Avenue under the envisioned Land Use Plan. The Transportation Plan map does not show any other additional road connections within the Town to mitigate that transportation impact which may be why this Western Bypass is being proposed.

There are a number of bike and pedestrian facilities shown on the map and described in the plan, which we fully support. Although these will help reduce traffic and enhance quality of life for residents, they will not eliminate additional traffic that will accompany the new development.

We ask that the Town engage stakeholders in conversations about the Timberfence Parkway and remove the Southern Parkway from the plan. Additionally evaluate the traffic implications of the proposed growth and the costs associated with needed improvements. Ensure that these improvements are paid by development, not by existing taxpayers.

Water and Wastewater:

The growth envisioned in this plan is dependent on expansions of the existing water and wastewater systems. A new capacity and demand analysis was done for the Warrenton 2040 Plan which determined that several upgrades would be needed to meet a projected build-out of 2,102 residential units, 310,000 square feet of commercial space and 480 hotel rooms.

The maximum safe yield from surface water and groundwater sources is 2.34 million gallons per day (MGD). The water treatment facility will require upgrades when it reaches 2.72 MGD. The analysis determined that average total demand for water would be 2.198 MGD, which is well within the limits. However, peak demand would require 3.29 MGD, well above the current maximum safe yield and above the treatment capacity of the water treatment facility. Well #4 which will provide, “*additional flows due to change in land uses and zoning*” is described as only yielding an additional 75,000 gpd which will do little to help meet peak demand. This raises significant concerns about the cost of treatment plant upgrades and potentially reservoir expansions in the long term.

The wastewater treatment capacity of the Town is 2.375 MGD because beyond this the Town will need to undertake a wastewater capacity extension. The analysis shows that sewage flow is projected to be 2.56 MGD. To meet this projection the Town will need to increase the capacity of the wastewater facility and obtain a new permit to operate a 3 MGD plant (with 2.85 MGD capacity). However, there is a possibility that this permit will be denied in which case the plan states,

“if a new permit for 3 MGD plant operations cannot be obtained for the WWTP, then the Town should take steps to work with the adjoining landowners to obtain additional land for expanding the treatment plant and work out a framework with the County Water and Sanitation Authority to provide facilities for out of Town customers.”

The cost of these facility expansions should be paid by development and not subsidized by the existing taxpayers. We ask that Town provide a cost estimate for how much these expansions will cost and how they will be paid for.

Parks and Recreation:

We support many of the goals described such as enhanced green infrastructure and creation of a town-wide tree plan, a Master Park Plan, and Town Streetscape Manual. However, these need to be in place prior to encouraging new development so that they can be used to maximize private investment and insure that trees are preserved, parks are established in the right places, and streetscapes are developed as part of new developments. These aspects are vital to integrate into any form-based code especially in the Character Districts and the Broadview Overlay where mixed-use development would potentially be allowed “by right”.

Although there is little language about parks in the plan, what is included encourages parks in floodplains. On page 15, the plan states that the Town should, *“promote opportunities to develop new parks and green areas on private development site where floodplains are located, and development cannot be sited.”* Floodplain areas can be good for unpaved trails or wildlife areas but these areas are not ideal for play areas, paved trails, picnic tables, benches etc. Generally, these are the first areas developers offer to meet open-space requirements because there is little they can do with these areas so there is no need to promote this. It would make more sense to promote tree preservation within the floodplain and discourage things like stormwater management facilities in these areas so that they are left available for passive recreation.

The goal on page 24 of establishing a park or trail within a 10-minute walk (half mile) from all residents is admirable and we fully support it. The inclusion of “green space” though is a bit confusing. It would be helpful to have an explanation of what “green space” is to ensure it is not just a grassy mowed strip along the road.

As a side note, to more accurately reflect and address barriers to pedestrian access the Town should model half mile walksheds not just half mile radius from facilities. A GIS intern could conduct this

analysis using sidewalk and trails data and create a “barriers” layer for the Town. This would help the Town identify possible barriers to access and how they affect different residential neighborhoods. This data could provide the foundation for future grants or VDOT Transportation Alternatives funds to reduce/remove those “barriers”.

We ask that the Town take the time to create the Master Park Plan, Town Streetscape Manual, and Town-Wide Tree Plan prior to adopting by-right mixed use zoning for the Character Districts and the Broadview Overlay. Form-based codes are blank checks for developers if you have not taken the time to establish the form you are trying to obtain and integrated it into the zoning ordinance.

In conclusion, the primary thing we are asking the Town to do is slow down this process and address the concerns raised by PEC and others. Our additional asks summarized and reiterated from above are:

- **Growth Rate** - Include in this plan an evaluation of existing capacity under current zoning, a growth target for meeting the desired housing goals, and the maximum percentage of residential and minimum percentage of commercial in each of the Character Districts mixed use zoning.
- **Economic and Fiscal Resilience** - The fiscal and economic resilience of Warrenton should be reevaluated fairly and without agenda. Comparisons should be made to other Towns not counties and the region used should capture both rural and urban localities.
- **Growth Scenarios** - Reevaluate the development scenarios with the inclusion of water and wastewater facility expansions and more detail about projected real estate values and housing type, square footage of redevelopment, and increases in dining facilities.
- **Redevelopment and Infill** - Reevaluate the broad application of by-right mixed use zoning in the Character Districts and target incentives such as residential allowances and by-right approval to priority redevelopment and infill sites.
- **Housing** - Provide more information about densities and/or the percentages for the intended mix of uses in each Character District and the Broadview Overlay.
- **Affordable Housing** - Consider requirements for affordable housing and provide more information regarding affordable housing goals and the Haiti Heritage Area.
- **New Western Bypass** - Engage stakeholders in conversations about the Timberfence Parkway and remove the Southern Parkway from the plan. Evaluate the traffic implications of the proposed growth and the costs associated with needed improvements. Ensure that these improvements are paid by development, not by existing taxpayers.
- **Water and Wastewater** - Provide a cost estimates for how much water and wastewater expansions need to meet projected growth needs will cost and how they will be paid for.
- **Parks and Recreation** - Take the time to create the Master Park Plan, Town Streetscape Manual, and Town-Wide Tree Plan prior to adopting by-right mixed use zoning for the Character Districts and the Broadview Overlay.

These comments are extensive and thorough because we care about how the Town develops and want to support a strong Comprehensive Plan that enhances the quality of life for Warrenton residents and keeps taxes low, traffic manageable, and level of service high. Many of our members and our staff live in Warrenton. We have invested in expanding and enhancing the landscaping around our main headquarters in downtown Warrenton. We care about the Town's future and hope that these comments can be used to help strengthen the plan.

Thank you for taking the time to read these comments and feel free to contact me with any questions or concerns.

Sincerely,

Julie Bolthouse
Fauquier Field Representative
Piedmont Environmental Council