



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

March 2, 2021

Warrenton Town Council
Warrenton Town Hall
18 Court Street
Warrenton, VA 20186

Re: Draft Warrenton 2040 Plan

Dear Mayor Nevill and Town Council Members,

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 sharing concerns and submitting comments to the Planning Commission and staff along the way. We have reviewed the version recommended for approval by the Planning Commission and, as we stated during their review, feel that the majority of our concerns have not been addressed.

PEC supports high quality sustainable development, especially redevelopment and infill, in our service districts and the Town. There are many good elements in this plan, including a robust plan for improving walkability and cyclist access throughout the town. However, the plan outlines a new trajectory for Warrenton that emphasizes residential development. We are concerned that focusing future development in Warrenton on residential will have detrimental effects on the Town's tax base and ability to meet infrastructure needs in the long term. We advocate for incentivizing redevelopment and infill over greenfield development, balanced growth of both residential and office/retail/industrial rather than a focus on residential, increased emphasis on incremental enhancements to existing communities, and incentivizing affordable housing projects rather than new market rate developments.

We feel the Town has failed to be transparent during this process. Although we raised a number of concerns in our letter submitted to the Planning Commission dated July 15, 2020, we received no response and there was little discussion about the issues we raised. During the number of work sessions the planning commission has held on this review process there has been surprisingly little discussion. The Chair of the Planning Commission has repeatedly encouraged commissioners to have one-on-one conversations about the plan with staff and herself. This is very disingenuous to the public process and has left many wondering what the reasoning was for brushing their comments aside. We hope that the Town Council will be more forthcoming and transparent in their deliberations.

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Concerning New Trajectory:

The Warrenton Comprehensive Plan for 2000-2025¹ evaluated several growth projections ranging from 1.5% to 3% annual growth rate 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 Water and Wastewater section² of the plan includes an assumption that the Town will grow from 10,000 to 15,000 persons during the plan period of 20 years. It assumes the selected high growth scenario with 2,102 new residential units, 310,000 square feet of commercial area, and 480 new hotel rooms. At the current household size of 2.54 persons per household, this would be about 5,339 new residents, which is an annual growth rate of 2.16%.

For perspective, if this rate of 2.16% were achieved and sustained this would make Warrenton one of the fastest growing places in Virginia currently. Attached is a [table](#) with data from the U.S. Census Bureau showing population estimates from 2010 to 2019 for incorporated places in Virginia. Assuming half of the growth occurred by 2030, the percent change in population would be over 25%. The Town of Leesburg has grown 24.75% since 2010 and it was the third fastest growing place in Virginia only after Purcellville and Lovettsville. The percent change in Warrenton since 2010 was around 4.5%. Warrenton would need to increase the pace of growth by more than five times to meet this rate.

Notably Warrenton has recently started growing at a faster pace achieving an annual growth rate of 0.89%. This rate is on par with many nearby localities and would bring growth at a far more sustainable pace. An annual growth rate of 2.16% is much higher and would require Warrenton to recruit substantial residential development from northern Virginia rather than accommodating natural growth.

To recruit this development, the draft plan outlines a new trajectory for Warrenton that emphasizes residential development in areas once planned for commercial and industrial. The future land use plan converts nearly all of the Town's land planned for commercial and industrial to a mixed use with residential. Illustratives in the plan show the few remaining greenfield opportunities in Town as primarily residential.

Additionally an overview of projects not yet developed or in the process of developing shows that there are currently more than 733 residential units in the pipeline.

- Walker Drive - Rezoned (unbuilt) 116 apartments and 40 condo
- Warrenton Crossing - Rezoned (unbuilt) 135 single family residential

¹ Town of Warrenton, Virginia Comprehensive Plan 2000-2025. Adopted June 11, 2002. Available at https://cms.revize.com/revize/warrenton/document_center/Planning/2002-2025%20Comprehensive%20Plan%20Full%20Comprehensive%20Plan%20PDF.pdf. Accessed on February 25, 2021.

² Water and Wastewater. Community Facilities section of Plan Warrenton 2040. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/A.2_CommunityFacilities_Water&Wastewater.pdf. Accessed on February 25, 2021.

- Warrenton Knolls - Under construction; phase 1 includes 49 single family residential and phase 2 unknown (proposal on this remaining 10 acres has not been submitted)
- Alexandria Knolls - Under review for 8 single family residential
- American Legion - Under construction 90 assisted living units
- Van Rojen (Health and Wellness Character District) - 58 acres undeveloped with a current subdivision potential of 229 single family residential
- Cobb Hill – Platted; undeveloped with 30 single family residential
- Academy Hill – Undeveloped; subdivision potential of 36 single family residential

It's unclear if the proposed population increase of 5,000 new residents or 2.16% annual growth rate included these approved but undeveloped projects.

Regardless, these numbers are targets and do not model actual buildout potential. The potential for residential growth is unclear but with so much additional land available for residential development and increased height allowances it is clearly high. The majority of industrial and commercially zoned land is located in the Character Districts and the Broadview Overlay. These parcels are being replanned into mixed use with a “range of housing types”. Those mixed use zoning districts are envisioned to be developed without limits on dwelling units per acre.

As we stated in our July letter to the planning commission we believe knowing the potential build-out of an area, in addition to the planned form, is vital for infrastructure and fiscal planning. This is easier to do if the Town takes an incremental approach that targets key areas for redevelopment rather than replanning almost all industrial and commercial land at once. The Town’s residential development target of 5,000+ new residents is much too high making the target of 310,000 square foot commercial area too low to maintain a live/work balance.

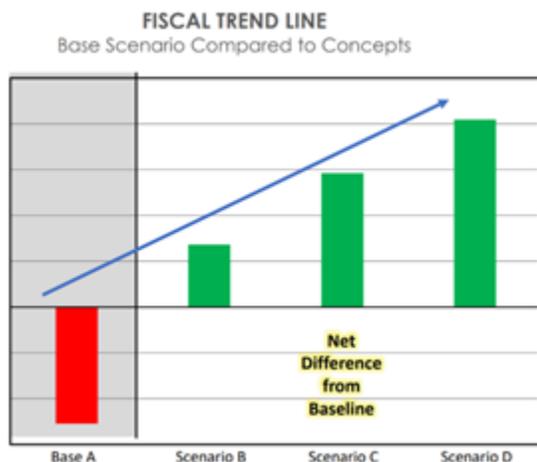


Figure 1 Graphic presented at August 2019 Open House

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 28 people in a public workshop. A bar graph with no label on the y-axis 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.

The Fiscal Sustainability Analysis from RKG Associates³ explains how the model works. Incremental costs of services such as police and fire and rescue personnel associated with population increases were calculated but it does not show most of the capital infrastructure expenses associated with new growth such as additional water and wastewater capacity, parks and recreational facilities, and transportation improvements. It also fails to consider the impact of additional school seats on the County tax base that affects Town residents who also pay County taxes.

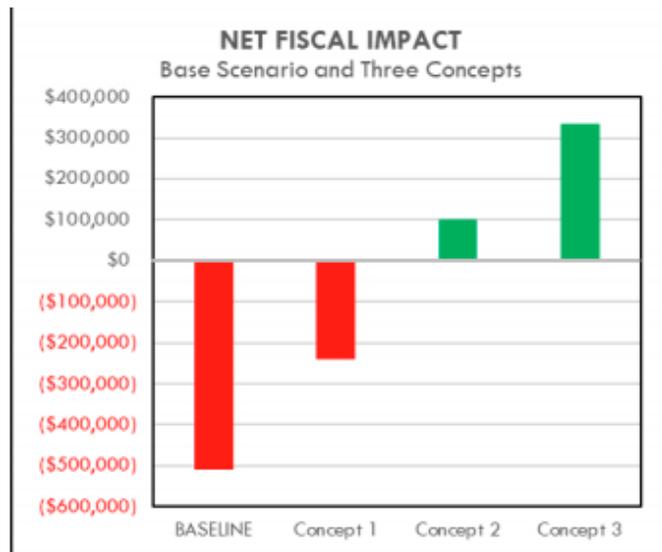
The base scenario assumes the Town will spend \$12 million dollars from a “wish list” of over \$20 million worth of community improvements that included:

- Enhanced recreational facilities (i.e. WARF improvements, active recreation venues)
- Enhanced trail development, connectivity, and maintenance
- Streetscaping and urban design enhancements
- Improved emergency service provision/response times
- Indoor and outdoor cultural venues (i.e. Amphitheatre, farmers market)
- Increased public parking capacity (i.e. Old Town)
- New public facilities (i.e. Town Hall)

\$12 million in community improvements were assumed to be spent regardless of population growth. If the Town makes \$12 million dollars worth of improvements and does not increase its tax base there will be a net negative fiscal impact of approximately \$509,000 annually by 2039. Of course in reality more people means more capital infrastructure needs. The model fails to recognize the additional cost associated with infrastructure and additional community improvements that would be desired by a growing population.

The full report shows a bar graph similar to the one presented to the public but this one shows that there is less than a million dollar difference between the fiscal impacts of the four scenarios.

- Scenario 1: 750 housing units, 80,000 square feet of retail, and redevelopment of a motel into a business-class hotel. The net fiscal impact is -\$240,682 annually by 2039.
- Scenario 2: 1,150 housing units, 100,000 square feet of retail, and



Source: RKG Associates, Inc 2019

Figure 2 Graphic from RKG Fiscal Sustainability Analysis Report

³ Fiscal Sustainability Analysis Warrenton, VA. RKG Associates Inc. February 1, 2020. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/C.6_Economic&FiscalResilience_FiscalSustainabilityAnalysis.pdf. Accessed February 23, 2021.

growth in lodging facilities (265 new hotel rooms). The net fiscal impact is \$100,000 annually by 2039.

- Scenario 3: 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 square feet of office, and new lodging. The net fiscal impact is \$335,000 annually by 2039. With the caveat that “concerted economic development effort from the Town” would be needed for Scenario 3 to succeed because the current marketplace for office development is not robust enough to project such growth by 2039.

There are a couple additional points to note about these calculations that effect infrastructure planning and the continued affordability of Warrenton for existing residents.

1. All scenarios list “0” in contribution towards the Water & Sewer Capital Project Fund even though the 2021-2026 Warrenton Capital Improvement Program⁴ includes over \$10 million toward water and sewer infrastructure expansion.
2. This model is highly dependent on increased real estate value of new development and assumes new residential development would be entirely market rate and bring in significantly increased revenue from real property taxes.
3. Finally, the consultant emphasized that, “much of the development projected in Scenario 2 and Scenario 3 will require more residences to increase spending.” It’s unclear if this means more per capita spending, if it does, this would also require attracting a more affluent population out of northern Virginia.

We are concerned about the conclusions drawn from this report. As we noted in our letter submitted to the planning commission in July, the report leaves out important information and does not factor in most capital expenditures that would be needed as population increases. Additionally, the consultant states in the conclusion, “the results of this analysis are not intended to be the sole determining factor of whether (or how) the Town defines its future land use strategy.” Yet, the fiscal trend line graphic was the primary information shared with residents to come to the conclusion that they desire significantly more residential growth and support allowing residential development on the remaining undeveloped greenfield sites currently planned for industrial and commercial development in the Town.

Economic and Fiscal Resilience

To determine the Town’s economic health an Economic Base Analysis⁵ study was done by RKG Associates. The information from this study was used as background to support residential development as a means of promoting economic development. One of the metrics for

⁴ Town of Warrenton Capital Improvement Program 2021-2026. Adopted in 2020. Available at <https://cms.revize.com/revize/warrenton/CIP%202026.pdf>. Accessed on February 25, 2021.

⁵ Economic Base Analysis for Warrenton, VA. RKG Associates Inc. February 1, 2020. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/C.6_Economic&FiscalResilience_EconomicBaseAnalysis.pdf. Accessed on February 23, 2021.

measuring progress in the Economic & Fiscal Resilience section of Plan Warrenton 2040 is, “growth in the number housing units.” One of the policies includes attracting a range of housing to meet market standards.

The study compared the Town of Warrenton to the City of Manassas and Counties of Culpeper, Loudoun, Prince William, and Fauquier instead of 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.

A simple comparison using economic data from the U.S. Census shows that the retail sales per capita are significantly higher in Warrenton than these other communities⁶. Additionally, it shows that health care receipts/revenue are very strong thanks to the presence of Fauquier Health. The Town even has higher total accommodation and food service sales than the Town of Culpeper even though Culpeper’s population is almost twice Warrenton’s population of 10,027.

Economy	Virginia	Leesburg town, Virginia	Culpeper town, Virginia	Front Royal town, Virginia	Warrenton town, Virginia
Population estimates, July 1, 2019, (V2019)	8,535,519	53,727	18,873	15,278	10,027
PEOPLE					
Economy					
In civilian labor force, total, percent of population age 16 years+, 2015-2019	64.1%	76.9%	71.7%	65.4%	65.7%
In civilian labor force, female, percent of population age 16 years+, 2015-2019	60.5%	69.3%	68.5%	59.9%	62.4%
Total accommodation and food services sales, 2012 (\$1,000) (c)	17,795,901	135,419	43,734	43,969	57,401
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	47,705,003	247,510	156,326	118,703	254,964
Total manufacturers shipments, 2012 (\$1,000) (c)	96,389,872	D	301,197	D	17,297
Total merchant wholesaler sales, 2012 (\$1,000) (c)	86,613,641	172,407	D	6,799	36,537
Total retail sales, 2012 (\$1,000) (c)	110,002,385	1,388,659	278,085	345,459	500,557
Total retail sales per capita, 2012 (c)	\$13,438	\$30,230	\$16,719	\$23,555	\$51,062

Figure 3 Comparison of Economic Census Data by Town from Census.gov Quick Facts. Accessed March 2, 2021.

The Economic Base Analysis shows that Warrenton has a strong economy. It states that Warrenton generally has higher proportions of Semi-Skilled White Collar and High-Skilled White Collar jobs. It shows that 25% of industries enjoy a competitive advantage in the Town of Warrenton. The Warrenton industry earnings even exceed the regional average by 5%, which is especially impressive when you consider that the “region” of comparison was western Northern Virginia. Fauquier County also demonstrated a strong economy with an unemployment rate lower than Prince William, Culpeper, or Manassas. The report also mentions that the tourism and the equestrian industries are very competitive in the region, which likely helps to support the strong retail, food service, and accommodation industries of the Town.

Warrenton has a strong economy with a mix of both high-skilled and low-skill labor that benefits from its position as the County Seat of Fauquier, a crossroads for three major highways, and home to Fauquier Health. Rural residents from the surrounding County depend on Warrenton

⁶ QuickFacts. U.S. Census Bureau. Available at www.census.gov/quickfacts. Accessed on February 23, 2021.

for many of their daily needs and visitors enjoy the opportunities available for accommodation, dining, and shopping.

Rather than trying to recruit residential development from Northern Virginia we urge the Town to focus the plan on making incremental improvements for the existing residents such as connecting sidewalks/trails, improving the Broadview corridor, and improving sewer and water infrastructure in existing neighborhoods.

Jobs-to-Housing Ratio:

The Existing Conditions & Background⁷ section of the Housing chapter explains that Warrenton’s high job-to-housing ratio of 2.77 is problematic because “employees must commute into the area because there is not enough housing to accommodate the workers.” Simply put this means there are too many employment opportunities and not enough homes for workers. However, we feel this figure is taken out of context and inappropriately applied to Warrenton. Unlike major cities or the District of Columbia, Warrenton is the county seat of a rural community and provides nearby employment opportunities for Fauquier residents in addition to Warrenton residents.

Using Longitudinal Employer-Household Dynamics data available from the U.S. Census Bureau you can see that over twice as many employees come into Warrenton to work as leave the Town to work. The percentage of residents that live and work in Warrenton could be increased but efforts need to focus more on affordable housing rather than market rate. Low-income

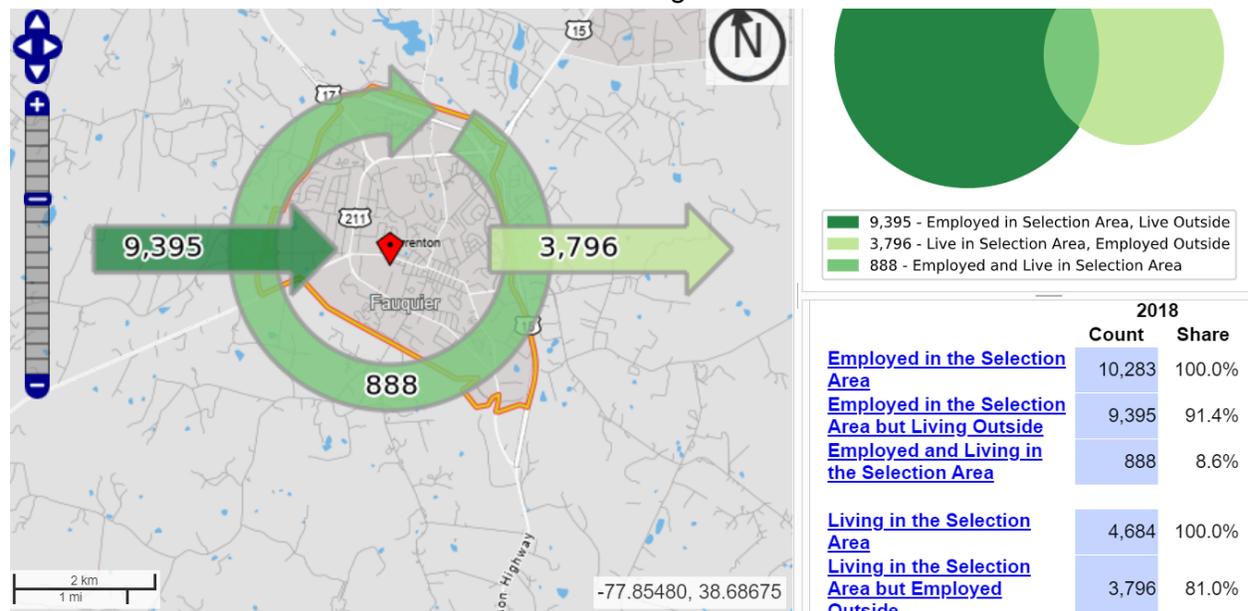


Figure 4 Inflow/Outflow for Warrenton, VA from On the Map Census.gov accessed March 2, 2021.

⁷ Existing Conditions & Background. Housing section of the Plan Warrenton 2040. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/A.3_Housing_Background.pdf. Accessed on February 26, 2021.

workers would benefit the most from housing in close proximity to employment and are the most likely to choose to live near their employment if affordable housing options were available.

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 County’s very low job-to-housing ratio. In Fauquier County only 22.5% of workers’ primary place of work is in the County, a little over half of those (13%) work in the Town of Warrenton⁸. According to the data presented in the plan, nearly 4 out of 10 Warrenton residents work in the Town of Warrenton. We believe Warrenton is currently a live-work community that also provides nearby employment for County residents and we need a plan that builds on that success.

For comparison sake, the Town of Leesburg has less employees coming into the Town to work than leave the Town to work. This means more expenditures on residential infrastructure and services and less revenue. Leesburg’s tax rate is \$0.184 and their primary revenue source is real estate taxes⁹. Moving towards more residential development and less economic development would be a fundamental shift for Warrenton. Warrenton’s tax rate is \$0.05 and the primary revenue sources are other local taxes, primarily Meals Taxes and BPOL¹⁰.

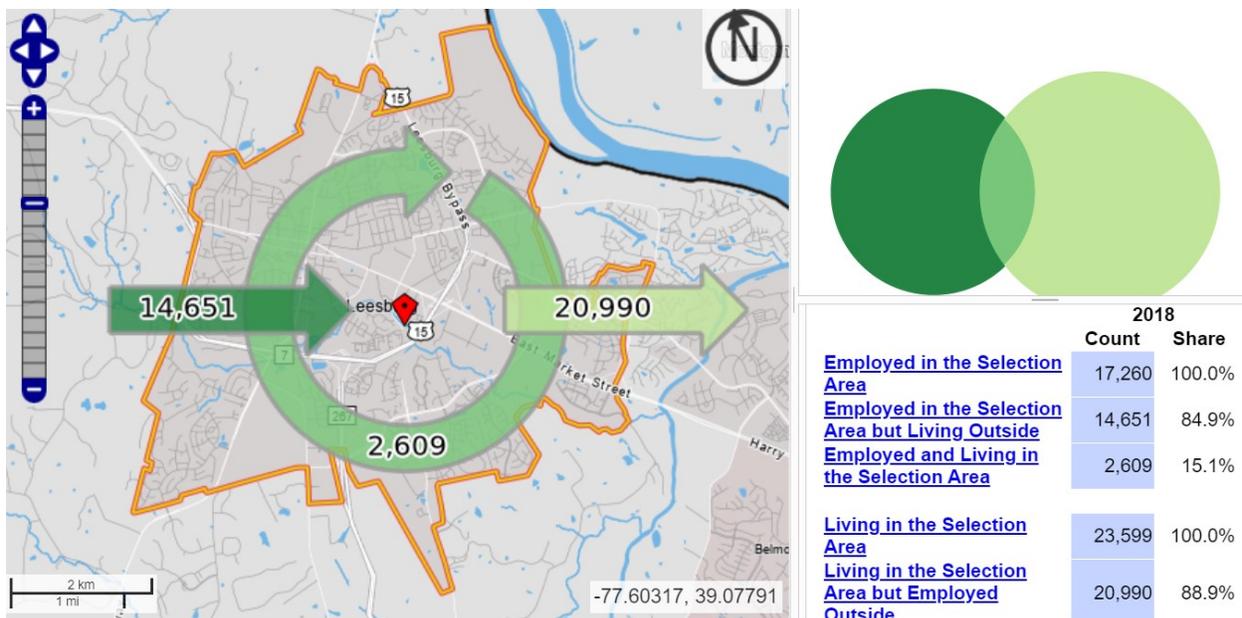


Figure 5 Inflow/Outflow for Leesburg, VA from On the Map Census.gov accessed March 2, 2021.

⁸ 2018 Work Destination Analysis. U.S.Census Bureau, Center for Economic Studies, LEHD. Available at <https://onthemap.ces.census.gov/>. Accessed on February 18, 2021.

⁹ Adopted Fiscal Year 2021 Budget & Capital Improvement Plan. Town of Leesburg Virginia. Available at <https://www.leesburgva.gov/home/showpublisheddocument?id=34685>. Accessed on February 26, 2021.

¹⁰ Fiscal Year 2020-2021 Adopted Budget. Town of Warrenton Virginia. Available at https://cms.revize.com/revize/warrenton/document_center/Budget/2020-10-09_FINAL%20FY21%20Budget.pdf. Accessed on February 26, 2021.

The high jobs-to-housing ratio in Warrenton is only problematic in that it demonstrates the disconnect between low-wage employment and home prices in Warrenton. To address this issue the town needs to focus on affordable housing rather than market rate housing. Additional market rate housing will only exasperate this problem.

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. Mixed use zoning that allows residential can be used in these situations to incentivize this development over greenfield development.

Our concern with this plan is that instead of using 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 mixed-use development will be two things:

1. Developers will focus first on the most profitable option of building residential housing on existing greenfields that are much easier and cheaper to develop than the difficult work of recycling failed strip mall development.
2. 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 stating,

“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.”¹¹

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

We ask that the Town reevaluate future land use designations that broadly apply mixed use to almost all the areas planned for industrial and commercial development. Specifically, greenfield

¹¹ Page 206 of Draft Plan Warrenton 2040. Warrenton, VA. July 2, 2020 version. https://warrentonplan.com/wp-content/uploads/2020/07/2020_07_02_Town_of_Warrenton_Draft_Comprehensive_Plan_smaller.pdf. Accessed March 2, 2021.

development possibilities should not be replanned for residential. Instead, redevelopment on Broadview Ave and infill around the Old Town District should be prioritized. Mixed use and form based zoning could still be incorporated into the Character Districts but it should require rezoning and residential should be a very limited component. The illustratives shown in the Character Districts Design Guide Book¹² include too much residential and should be reassessed.

Housing

In the Warrenton 2040 future land use plan all character districts have been replanned from industrial and commercial to mixed use to include a “*range of housing types*.”¹³ The description explains this will provide future renters and buyers more options and investors and lenders more flexibility in their future projects. RKG Associates state in the Demographic and Housing Analysis¹⁴ that Warrenton has, “proven to be a highly desirable location for seniors and affluent households.” They argue that an increase in diversity in both housing type and price is needed to attract additional economic development.

However, the diversity of housing type appears to be on par with nearby Towns:

- Warrenton - 53.5% SF (single-family) detached, 24.5% SF attached, and 22% multifamily¹⁵
- Leesburg - 47% SF detached, 30% SF attached, and 23% multifamily¹⁶
- Town of Culpeper - 58.6% SF detached, 19.7% SF attached, and 21.7% multifamily¹⁵

Interestingly, RKG Associate’s assessment³ of existing vs. new development demonstrates that new single-family attached units (e.g. townhouses, duplexes) trend higher value than even existing single-family detached homes. This indicates that the Town’s particular focus on the strategy of attracting home types in the “missing middle”, those between the single-family and multi-family, will increase median home prices in the Town and make Warrenton less affordable for existing residents.

¹² Character Districts Design Guide Book. Plan Warrenton 2040. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/C.7_LandUse&Character_CharacterDistrictGuideBook.pdf. Accessed February 26, 2021.

¹³ Range of Housing Types. Housing section of Plan Warrenton 2040. https://cms.revize.com/revize/warrenton/Comp%20Plan/A.3_Housing_RangeofHousingTypes.pdf. Accessed on February 26, 2021.

¹⁴ Demographic and Housing Analysis. RKG Associates Inc., February 1, 2020. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/A.3_Housing_DemographicandHousingAnalysis.pdf. Accessed February 27, 2021.

¹⁵ Regional Housing Study – Local Summary Profiles. Rappahannock-Rapidan Regional Commission. December 2020. https://www.rregion.org/program_areas/housing/regional_housing_study.php. Accessed March 2, 2021.

¹⁶ Page 7-1 of Town Plan. Leesburg, Virginia. Adopted June 26, 2012. <https://www.leesburgva.gov/home/showpublisheddocument?id=12822>. Accessed March 2, 2021.

**Average Assessed Values for Development by Subarea
Town of Warrenton, VA**

	Lee Highway	Broadview	East Shirley	Inside the Bypass	Old Town	Town-wide
NEW DEVELOPMENT VALUES (PROPERTIES BUILT SINCE 2009)						
Per Unit Values						
Single Family Detached	\$376,858	\$542,850	\$384,325	\$359,495	\$344,900	\$376,858
Single Family Attached	\$362,087	\$362,087	\$362,087	\$362,087	\$362,087	\$362,087
Multifamily	\$189,693	\$189,693	\$189,693	\$189,693	\$189,693	\$189,693
Per Square Foot Values						
Retail	\$227.44	\$190.82	\$193.61	\$161.76	\$195.21	\$195.21
Restaurant	\$227.44	\$190.82	\$193.61	\$161.76	\$195.21	\$195.21
Office/Service	\$149.38	\$119.86	\$119.86	\$123.76	\$63.03	\$119.86
Bank	\$321.78	\$321.78	\$321.78	\$321.78	\$321.78	\$321.78
Hotel	\$149.38	\$119.86	\$119.86	\$123.76	\$63.03	\$119.86
Industrial	\$35.01	\$35.01	\$35.01	\$35.01	\$35.01	\$35.01
EXISTING DEVELOPMENT VALUES (PROPERTIES BUILT PRIOR TO 1989)						
Per Unit Values						
Single Family Detached	\$270,543	\$288,183	\$269,305	\$243,835	\$280,278	\$259,436
Single Family Attached	\$230,098	\$209,901	\$153,948	\$217,359	\$179,043	\$206,482
Multifamily	\$107,136	\$104,430	\$116,563	\$78,750	\$84,917	\$107,136
Per Square Foot Values						
Retail	\$26.78	\$22.50	\$24.27	\$34.09	\$39.32	\$26.78
Restaurant	\$26.78	\$22.50	\$24.27	\$34.09	\$39.32	\$26.78
Bank	\$90.56	\$74.99	\$96.31	\$96.31	\$114.80	\$96.31
Office/Service	\$59.70	\$55.75	\$72.86	\$38.37	\$57.25	\$55.75
Hotel	\$59.70	\$55.75	\$72.86	\$38.37	\$57.25	\$55.75
Industrial	\$19.72	\$4.22	\$31.01	\$15.08	\$19.11	\$19.72

Source: Fauquier County and RKG Associates, Inc. 2019

[NB] Subareas with insufficient data use the Town-wide average as a proxy value

Figure 6 Table Comparing Existing and New Development Values from RKG Fiscal Sustainability Analysis Report

The Housing section of the plan is vague when it comes to affordable housing. Affordable units are not as profitable to build as market-rate units and therefore must be encouraged, incentivized, and/or required. The Housing chapter includes a section on Attainable Housing¹⁷ but it does not provide important information about the housing needs of the lowest income households or vital information about substandard housing and vulnerable neighborhoods in the Town. This information is needed as a baseline to combat gentrification and displacement.

Rather than focusing on diversity of housing type, the Town should focus on a continuum of housing that meets the spectrum of need. The RRRC's Regional Housing Study¹⁵ showed that 804 households below 50% AMI (area median income) in Warrenton are cost burdened, meaning that they are paying more than 30% of their income on housing. Over half of these are renters. The highest

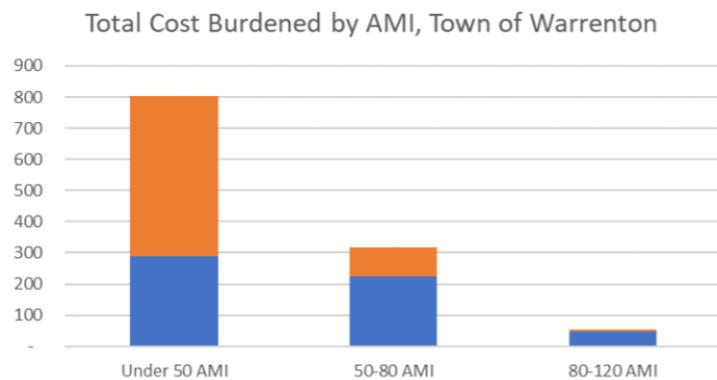


Figure 7 Graph from Rappahannock-Rapidan Regional Commission Regional Housing Study - Town of Warrenton Locality Profile

¹⁷ Attainable Housing. Housing section of Plan Warrenton 2040. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/A.3_Housing_AttainableHousing.pdf. Accessed on February 26, 2021.

demand for new units is also under 50% AMI (75 units needed over the next 5 years) followed by 50%-80% AMI (61 units needed over the next 5 years).

Affordable housing is a critical component of a live/work community. According to the Economic Base Analysis, the majority of the top 15 occupations in the Town are very low-income jobs. Understanding that part of this issue is disparity of income that is beyond the Town's ability to address; the other half is equity in land use decisions. Employees of these very low-income jobs are the most likely to need to live in close proximity to their employment due to transportation limitations and they are often more likely to choose to live in close proximity to save money on transportation and be in closer proximity to other assistance and services.

Recommendations for new zoning ordinances should include inclusionary zoning where affordable housing is required rather than simply being an option for increased density. The Density Bonus Recommendations¹⁸ in the plan are unlikely to result in much affordable housing due to the alternative options for those bonuses (ie public art, public parking, employment uses, and park space). 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 to meet this need without any affordable units for residents of more modest incomes.

However, just as importantly the Town needs to maintain the existing affordable housing by investing in neighborhood level improvements and working with non-profit organizations to offer low-interest loan programs for critical repair and renovation of substandard housing. The Town should also incentivize and provide clear guidance for potential small-scale developers, a concept described as "Unleashing the Swarm" in a recent Strong Towns article.¹⁹ The plan should outline initiatives and zoning ordinances recommendations to encourage more small-scale development in the form of accessory dwelling units, duplex or fourplex conversions, historic building renovations, vacant lot infill, etc.

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 develop a clear action plan for creating and maintaining affordable housing, which includes information about need and a baseline inventory of all substandard housing. Goals or metrics for monitoring success could include new affordable dwelling units, creation of accessory dwelling units and duplex

¹⁸ Density Bonus Recommendations. Plan Warrenton 2040. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/C.7_LandUse&Character_BonusDensityRecommendations.pdf. Accessed on February 27, 2021.

¹⁹ Herriges, Daniel. *Unleash the Swarm*. StrongTowns.org. Available at <https://www.strongtowns.org/journal/2021/2/3/unleash-the-swarm>. Accessed February 27, 2021.

conversions, renovation and repair of substandard housing, and monitoring of racial and socioeconomic trends related to housing.

Historic Neighborhoods:

The Historic Neighborhoods²⁰ section of the plan is rather confusing. We are glad to see detailed information about the history of Haiti now included but it is unclear what the purpose of this section is and what the metric for inclusion was. Our hope is that the information in this section would be used to help ensure that new development is compatible with historic communities but as drafted, it seems to fall short of that purpose.

It is unclear why the Foxcroft Neighborhood, which appears to have homes dating from 1960's and later, was included in this section while other historic neighborhoods were left out. One glaring omission is the early African-American community of Madisontown, which includes a Rosenwald School that remains intact as a part of the Warrenton Auto Service.



Figure 8 Estimated Area Containing the Early African-American Community of Madisontown

²⁰ Historic Neighborhoods. Plan Warrenton 2040. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/A.1_HistoricResources_HistoricNeighborhoods.pdf. Accessed February 27, 2021.

Other roads appear to have a number of homes from a similar time period as Foxcroft, including Jefferson St., Monroe St., Cleveland St., Wilson St., Piedmont St., Blueridge St. Rappahannock St., Dover Rd., and Norfolk among others.

There is not a clear framework for the Historic Neighborhood section and therefore the purpose is unclear. One section described clear actions to enhance the neighborhood overall, another only provided actions in regard to ensuring that new development is compatible with the historic community, and another only described the history of the community. The Foxcroft Neighborhood section includes the goal of preserving and maintaining the large lot residential appearance of the residential neighborhood and a number of recommendations for accomplishing that goal and next steps including completing an inventory of housing stock, incorporating traffic-calming measures, and increasing connectivity to the park and the neighborhood. The Oliver City Neighborhood section includes a history of the community and a couple vague recommendations about historical markers, public water and sewer, and developing urban design guidelines. The Haiti Street Neighborhood section includes a detailed history of the neighborhood but no recommendations.

Incremental neighborhood improvements such as expanding sidewalk connections and lighting, implementing traffic-calming measures, improving stormwater management, and facilitating hook up to public water and sewer for existing residents should be a focus of the Town regardless of the historical significance of the neighborhood. In these historic neighborhoods this is all that much more important. Without public investment there will be only limited private investment from homeowners, and without either these communities fall into disrepair and are lost. There also needs to be clear guidance for how new development, enhancements, and rehabilitation should be done so that it is compatible with the history of the communities.

The Historic Neighborhood section has a lot of potential to be a document that guides public investment and future development but it needs more attention to be effective.

Western Bypass:

The Transportation & Circulation chapter of the plan includes a full western bypass by combining the Timberfence Parkway plan and the old Southern Parkway plan. There is no explanation of need or how this new bypass would benefit Warrenton residents. The reason cited by staff has been that it was in the old plan, which makes little sense when the purpose of this endeavor is to update the plan. Additionally, the 2009 Supplement²¹ or update to the 2000-

²¹ Town of Warrenton Comprehensive Plan Update: 2000-2025, 2009 Supplement. February 12, 2013. https://cms.revize.com/revize/warrenton/document_center/Planning/Comprehensive%20Plan%20Update%20Town%20of%20Warrenton-CPU%202009%20Supplement.pdf. Accessed February 28, 2021.

2025 Warrenton Comprehensive Plan does not include the Southern Parkway portion. So even that reasoning does not hold up for the Southern Parkway.

Although marketing of the Warrenton 2040 Plan has emphasized the community input into the plan, the Timberfence Parkway and Southern Parkway were not discussed at community presentations or even shown on the maps during open houses. The Western Bypass is a major part of the plan and conducting outreach in the community to share information about the justification and get feedback is vital before including it in the vision for the community's future.

External traffic growth is cited as the need for this bypass while there is no evaluation of the traffic implications of the additional residential development proposed in this plan. Without densities or even percentages for the mix of uses within the Character Districts and the Broadview Overlay, it is challenging to estimate additional traffic volumes. However, it is safe to say that there would be additional traffic on Broadview Avenue under the envisioned future land use plan. We are concerned that the Western Bypass may be intended to mitigate this additional traffic.

Interestingly, VDOT traffic data²² over the past 15 years shows that although traffic has increased on the Eastern Bypass and US 17, traffic on Lee Highway, Broadview Avenue, Frost Avenue, Shirley Avenue, and James Madison Highway have remained steady or have declined.

Route Number	Route Alias	Link Length	Start Label	End Label	AADT (2006)	AADT (2010)	AADT (2015)	AADT (2016)	AADT (2017)	AADT (2018)	AADT (2019)
00029	Eastern Bypass	0.26	SCL Warrenton	NCL Warrenton	30000	47000	47000	49000	49000	50000	49000
00017	US 17	1.52	SCL Warrenton	NCL Warrenton	12000	14000	12000	13000	14000	14000	14000
00015	Lee Highway	0.59	US 29 Bus US 211; Blackwell Rd	NCL Warrenton	33000	32000	33000	31000	31000	32000	32000
00029	Lee Highway	0.55	Bus US 17 Broadview Ave	Bus US 15 Blackwell Rd	31000	29000	29000	28000	28000	28000	26000
00017	Broadview Ave	0.86	Bus US 211 Waterloo St	Bus US 29 Lee Hwy	40000	35000	33000	32000	33000	33000	32000
00211	Frost Ave	0.48	WCL Warrenton	Bus US 17; Bus US 29	25000	22000	22000	22000	22000	22000	23000
00017	West Shirley Ave	0.80	Culpeper St	Bus US 211 Waterloo St	20000	19000	18000	18000	18000	19000	17000
00017	East Shirley Ave	0.96	Bus US 15 Falmouth St	Culpeper St	14000	14000	12000	12000	12000	12000	12000
00015	James Madison Hwy	0.34	SCL Warrenton	US 17 Bus; Shirley Ave	11000	11000	11000	11000	11000	11000	11000

Figure 9 Table created using VDOT Traffic Data from 2006-2019

This indicates that external traffic volumes may not be as significant of an issue as once feared. In fact, the Town may see more reduced traffic volumes due to long-term shifts in telecommuting triggered by the COVID-19 pandemic.

Development of Clevenger's Village, 784 residential units and 354,000 square feet of commercial, is emphasized in the Main Arterials²³ section of the plan as a development with major potential to increase traffic volumes significantly through the Town of Warrenton. However, it is unclear why this residential development, only a percentage of which would travel

²² Traffic Data. Virginia Department of Transportation. Available at <https://www.virginiadot.org/info/ct-TrafficCounts.asp>. Accessed March 1, 2021.

²³ Main Arterials. Plan Warrenton 2040. Available at https://cms.revize.com/revize/warrenton/Comp%20Plan/B.5_Transpo.&Circulation_MainArterials.pdf. Accessed March 1, 2021.

through Warrenton, would significantly increase traffic while the traffic implications of 2,100 new residential units along the impacted corridor is not being evaluated.

The Broadview Safety Improvement Project is scheduled to begin construction in 2022 and will help elevate some of the existing traffic problems. Although the project does not add capacity, it will help move traffic through town more efficiently, thereby reducing congestion. According to VDOT's description of benefits this project will, "improve safety and lessen traffic congestion along Route 17/29 Business/211 (Broadview Avenue) in the town of Warrenton." The Town should consider these declining traffic counts and the expected benefit from the Broadview Safety Improvement Project before including the Western Bypass in Plan Warrenton 2040.

A Western Bypass would have significant impacts on the community that have not been evaluated and considered in this plan. For it to effectively act as a bypass and accommodate through traffic, especially freight traffic, the roadway could not be designed as two-lane with at-grade intersections as described in the plan. In light of the fact that most traffic from Rt. 211 is moving east, this sort of "bypass" would likely not be used because Broadview/Lee Highway to Rt. 29 would continue to be the quicker route.

The Southern Parkway is shockingly impactful. As shown on the Transportation Plan map it would cross through existing communities, VOF Open Space easements, and impact historic, environmental, and cultural resources including a cemetery. We encourage the Town to remove all language about the Southern Bypass/Parkway from the plan. Again, most traffic from Rt. 211

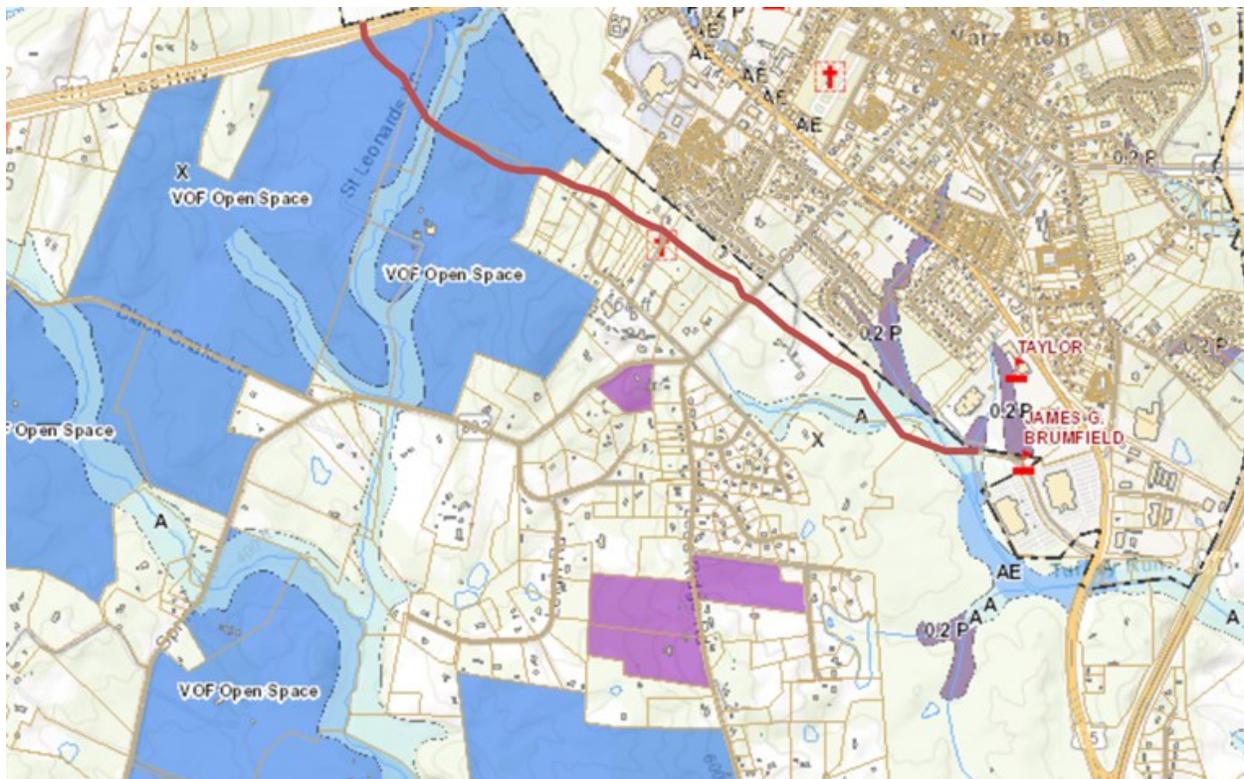


Figure 10 Rough approximation of Southern Parkway/Bypass on County Interactive GIS System with easement, building, streams, floodplains, and cemetery layers on

is moving east and this circuitous of a bypass would likely not be used because Broadview/Lee Highway to Rt. 29 would remain the quicker route.

We support efforts in the plan to encourage and invest in bike and pedestrian facilities that promote walkability and recreational opportunities. Although they will only reduce traffic associated with new development by a small percentage, they will enhance quality of life for residents and provide safe alternative transportation options for those without a vehicle.

To this purpose, the Transportation Plan map shows a new “Greenway”, typically defined as a shared-use path along a strip of undeveloped land, connecting the south end of Town to the WARF. This proposed new facility fits well with the County’s Warrenton Service District Plan²⁴ for greenway linear parks and trails around the Town:

“The Plan would create a hard edge at the perimeter of the Service District by means of linking open space, parks and a linear park encircling both the Town of Warrenton and the ancillary –

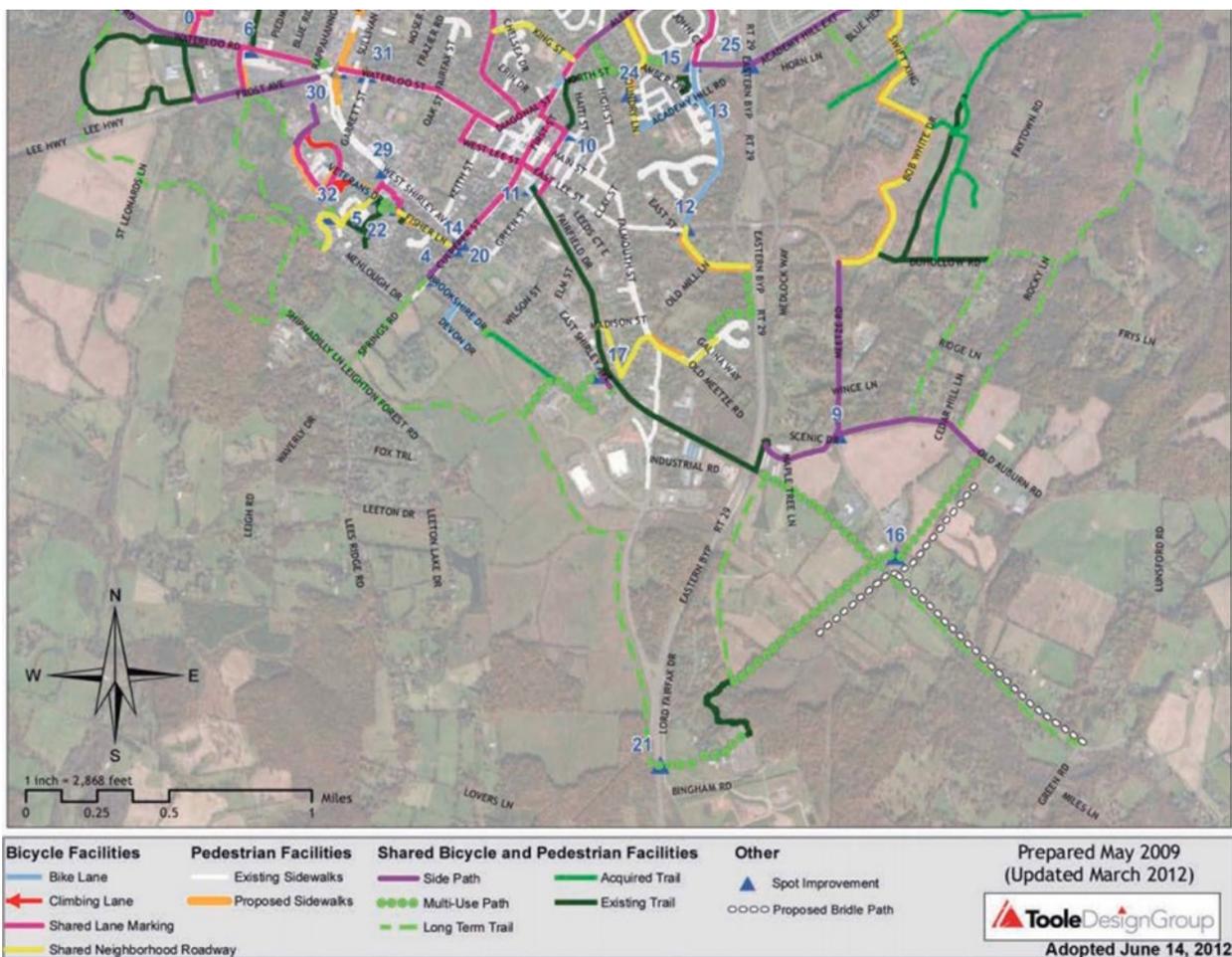


Figure 11 Map of Greenway Linear Park Plan from Fauquier County Warrenton Service District Plan

²⁴ Warrenton Service District Plan. Fauquier County Board of Supervisors. Adopted October 13, 2005 and revised November 12, 2015. <https://www.fauquiercounty.gov/home/showpublisheddocument?id=7214>. Accessed March 1, 2021.

infill development noted above. This system, sometimes just a multi-user path threaded through eased open space, or sometimes a series of connecting floodplains and upland parks, would be connected to schools, public parks and the center of Town by means of radial paths and sidewalks.”

However, in the Plan Warrenton 2040 this “Greenway” is a placeholder for the Southern Parkway, the southern portion of the Western Bypass that would connect up to the Timber Fence Parkway. In the Main Arterials section the description says:

“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.”

This is disingenuous of the Town and would inevitably lead to significant conflict and controversy in the future. The County voted not to adopt the Western Bypass concept in 2005 but it is concerning that these two seemingly consistent but conflicting plans could push through right-of-way for a road that the County has otherwise opposed.

We ask that the Town provide updated data demonstrating need for the proposed portions of the Western Bypass and engage stakeholders in conversations about these proposals. Additionally, the Town should evaluate the traffic implications of the proposed residential development and the costs associated with needed improvements. The Town should ensure that these improvements are paid by development, not by existing taxpayers who will receive little benefit as any traffic congestion diverted will likely be replaced with additional traffic from new residential development.

Water and Wastewater:

The projected build-out of this plan would equate to approximately 2,102 residential units, 310,000 square feet of commercial space and 480 hotel rooms. The plan states that, “the Town has the capacity for future water and sewer needs with prudent planning over the next twenty years.” However, this statement is confusing in light of the figures in the Water & Wastewater² section of the plan and projects included in the Warrenton Capital Improvement Program 2021-2026.⁴ It appears that the growth envisioned in this plan is dependent on an expansion in water storage capacity and water treatment capacity to meet peak water demand and an expansion in wastewater treatment capacity.

The Capital Improvement Program for 2021-2026 includes several capacity-increasing projects over the next 5 years that indicate that this capacity does not currently exist:

- Secondary Digester/Solids Holding Tanks (\$2,625,834) - New holding tank so that the existing tank can be upgraded with mixing, heating and other necessary retrofits to fully function as a digester. Digester No. 2 along with a new sludge holding tank is necessary for the plant to be permitted for 3.0 mgd.

- Warrenton Reservoir Dam Expansion (\$4,850,000) - Increases the height of the dam from 3-5 feet to add an additional 250,000 to 400,000 gallons per day reserve for the Town to preclude restrictions on consumers as the community approaches future buildout.
- Additional Storage Tank/Clearwell at WTP (\$1,095,000) - Additional storage within the distribution network of an estimated 500,000 gallons. This will allow greater storage capacity for fire reserve and to supplement peak demand times.
- Additional Gravity Sludge Thickener (\$1,750,000) - As further plant flows approach 3.0 mgd level, the sludge treatment projects of FY20 and FY21 (UD-21-003) may not be able to support a permit beyond 3.0 mgd. This project will satisfy sludge/solids handling to the 3.5 mgd level.

According to the Water and Wastewater section², the maximum safe yield from surface water and groundwater sources is 2.34 million gallons per day (MGD) and 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 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 is only estimated to yield 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 reservoir expansions in the long term.

The Town's wastewater treatment plant operational capacity is currently limited to 2.375 MGD but the analysis shows that sewage flow is projected to be 2.56 MGD. The Town is currently pursuing a capacity upgrade to the Wastewater Treatment Plant that would be able to treat up to 2.85 MGD before further upgrades were needed. It is unclear what infrastructure improvements are needed to upgrade the capacity or how much they would cost in total.

The cost of these facility expansions should be paid by development and not subsidized by the existing taxpayers. We ask that the 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 in the plan such as creation of a town-wide tree plan, development of a master park plan, and streetscape planning. 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 the new mixed-use zoning districts the Town is contemplating.

We ask that the Town take the time to create the Master Park Plan, streetscape guidance, and Town-Wide Tree Plan prior to adopting new mixed use zoning for the Character Districts and the Broadview Overlay. Form-based codes are blank checks for developers if the Town has not

taken the time to establish the form you are trying to obtain and integrated it into the zoning ordinance.

There is much in this plan that we support but there are fundamental problems with the vision put forward that needs to be addressed. We encourage the Town to redraft the future land use plan, transportation plan, and housing chapter and rethink broad brush changes to zoning that encourage greenfield development over redevelopment and infill. We encourage the Town to adopt a plan that enhances the quality of life for Warrenton residents by prioritizing investments in existing neighborhoods, redevelopment of struggling commercial areas, affordable housing, and recreational amenities.

Many of our members and our staff live in Warrenton and we have invested in expanding and enhancing the landscaping around our main headquarters in downtown. 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 lengthy comments and please feel free to contact me with any questions or concerns.

Sincerely,

Julie Bolthouse
Fauquier Field Representative
Piedmont Environmental Council