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**TOWN OF PURCELLVILLE
IN
LOUDOUN COUNTY, VIRGINIA**

RESOLUTION NO. 23-03-23

**PRESENTED: MARCH 23, 2023
ADOPTED: MARCH 23, 2023**

A RESOLUTION: OF THE TOWN OF PURCELLVILLE PLANNING COMMISSION, RECOMMENDING TO THE PURCELLVILLE TOWN COUNCIL, REJECTION OF ANY SUPPORT FOR THE CONSTRUCTION OF THE RT. 7/690 INTERCHANGE UNLESS AND UNTIL THE FLOODPLAIN ISSUE IS ADDRESSED BY LOUDOUN COUNTY OFFICIALS AND IS SIGNIFICANTLY MITIGATED.

WHEREAS, the Planning Commission has carefully reviewed a substantial number of documents concerning the Rt. 7/690 Interchange Project given in Attachment 1; and

WHEREAS, the Planning Commission has adopted the conclusions pertaining to Open Space Requirements, Stream and Creek Buffer, Steep Slope, Floodplain Overlay District, Historic Overlay District, and the Three Party Easement between Loudoun County, Town of Purcellville and Catoctin Meadows HOA given in the Staff Report of February 16, 2023, with some modifications, as findings of fact as shown in Attachment 2; and

WHEREAS, the Planning Commission has determined additional findings of fact pertaining to traffic issues, fiscal issues, floodplain issues and environmental issues given in Attachment 3; and:

WHEREAS, the increase in the water flow reflected in the FEMA floodplain mapping of the South Fork of the Catoctin Creek through Purcellville is a matter of great concern; and

WHEREAS, a doubling of the floodplain flow rates from 3,617 cubic feet per second to 7,447 cubic feet per second, according to Loudoun County's hydrology consultants, is due in part to

changes in land use and roadway configurations in the creek's upstream watershed in Loudoun County; and

WHEREAS, the Planning Commission finds that: (1) the FEMA Hazard floodplain map for the South Fork of the Catoctin Creek for Purcellville, and specifically the creek floodplain located west of North Hatcher Avenue, is out of date according to the April 2018 County Floodplain Alteration (FPAL-2019-0013) for the Rt. 7/690 Interchange South Fork of the Catoctin Creek analysis; (2) further the County has not begun the FEMA-required Letter of Map Revision to update the floodplain (it has not been updated since 2013); and (3) the County Floodplain Alteration further states that 24 different and unnamed property owners are affected by this floodplain alteration analysis apart from the VDOT right of way for the Rt. 7/690 Interchange; and

WHEREAS, as stated by the Town Staff in its February 16th report to the Planning Commission: “Since the Town has received the (updated) floodplain modeling from Loudoun County, we need to take this information into consideration when considering the floodplain for the South Fork of Catoctin Creek. Neglecting to take reasonable action to ensure the safety of lives and property may subject the community to potential liability when flooding occurs. Regardless of whether the 7/690 Project is constructed or not, Town Staff recommends that the Town update the floodplain mapping, using the best available data. Communities should reasonably use this information where BFE’s [base flood elevations] increase and floodways are revised to ensure that the health, safety and property of their citizens are protected”; and

WHEREAS, it is the Planning Commission’s and the Town Council’s responsibility to ensure that the construction and operation of the interchange will have no negative higher order impacts on the floodplain flow issue in Purcellville.

NOW, THEREFORE, BE IT RESOLVED that given the gravity of this situation, the Purcellville Planning Commission strongly advises the Town Council to not agree to vacate the easement agreement with Catoctin Meadows HOA and reject any support for the construction of the Rt.7/690 interchange unless and until the floodplain flow issue is addressed by Loudoun County officials and significantly mitigated.

PASSED THIS 23rd DAY OF MARCH, 2023.

Nan Forbes, Chair
Town of Purcellville Planning Commission

ATTEST:

Jordan Andrews, Commission Clerk

ATTACHMENT 1

Route 7/690 Interchange Project Documents Reviewed by the Planning Commission

1. Deed of Dedication, Subdivision, Easement and Annexation, Catoctin Meadows L. C., The Catoctin Meadows Homeowners Association, and the Town of Purcellville, May 14, 1997.
2. Route 7/690 Interchange Build Alternative 1, Year 2040 Traffic Volume Comparison, February 10, 2015.
3. Interchange Justification Report Route 7/690 Interchange, Gorove/Slade with Dewberry Engineers, Inc., Amended May 22, 2019.
4. Revised Environmental Assessment, Route 7 and Route 690 Interchange Project, Federal Highway Administration and Virginia Department of Transportation, VDOT UPC 111666, December 26, 2019.
5. Plan Purcellville, 2030 Comprehensive Plan, June 30, 2020.
6. Draft Deed of Conveyance, Easement, and Vacation, Catoctin Meadows Homeowners Association et al, ESMT 20-06, Office of the County Attorney, Loudoun County, February 3, 2022.
7. Analysis of Western Loudoun Park and Ride Lot Bat Impact, Bruce Kimmel, October 4, 2022.
8. Floodplain Alteration, Route 7/690 Interchange, South Fork Catoctin Creek, Dewberry Engineers Inc., FPAL-2022-0020, November, 2022
9. Staff Report: Status Update on the Rt. 7/690 Interchange Project, HOA Impact and FEMA Floodplain Issue, Dale Lehnig, December 13, 2022.
10. General Observations of the Effects of the Proposed Rt7/690 Interchange Project on Levels of Service and Traffic Volumes for the Town of Purcellville's Road and Street Network Based on Loudoun County's Amended Interchange Justification Report (IJR) May 22, 2019, Ronald Rise Sr., February 2, 2023.
11. Comments on Interchange Justification Report - Level of Service Summary Results within Town of Purcellville, Dewberry Engineers Inc., February 12, 2023.
12. Update on Town of Purcellville Projects, Mark Hoffman and Nancy Boyd, Loudoun County Board of Supervisors Finance/Government Operations and Economic and Development Committee, February 14, 2023.
13. Staff Report: Review of Town Ordinance Compliance for Route 7/690 Interchange, Dale Lehnig, February 16, 2023.
14. Route 7 & 690 Interchange Tree Removal Exhibit, Dewberry Engineers, Inc., March 2023
15. Staff Report: Review of Town Ordinance Compliance for Route 7/690 Interchange, Dale Lehnig, March 2, 2023.
16. Update on Town of Purcellville Projects, Mark Hoffman and Nancy Boyd, Loudoun County Board of Supervisors Finance/Government Operations and Economic and Development Committee, March 14, 2023.
17. Staff Report: Review of Town Ordinance Compliance for Route 7/690 Interchange, Dale Lehnig, March 16, 2023.

ATTACHMENT 2

Findings of Fact Based on the February 16, 2023 Staff Report

Planning Commission modifications are shown in red text.

1. Open Space Requirements. Zoning Ordinance, Article 7. – Landscaping, Buffering, and Open Space Regulations. Conclusion: The requested right-of-way will decrease Parcel A to less than the current open space requirements for a similar sized subdivision based on today's requirements. However, since there were no open space requirements when Catoctin Meadows was platted, this is not a violation of the Town's open space requirements.
2. Stream and Creek Buffer, Zoning Ordinance, Article 14. Conclusion: The project construction encroaches into the streamside buffer in certain locations, but does not violate the permitted uses within the buffer. Possible mitigation – Stream side forested buffer should be re-established ~~if necessary~~. Article 14. Section 2. - Stream and Creek Buffer established, #4, wetlands Conclusion: Effects on wetlands will be mitigated, through stormwater management, purchase of wetland credits, or other means, prior to the initiation of construction activities. Possible mitigation – request US Army Corps of Engineers final jurisdictional determination prior to construction, **with acceptance of the March 2023 Route 7 & 690 Interchange Tree Removal Exhibit**.
3. Steep Slope. Zoning Ordinance, Article 13. Conclusion: The 7/690 Project has been reviewed and approved by the Loudoun County Building and Development Department as is required by the Town's Ordinance. It appears that the requirements for steep slope have been met.
4. Floodplain Overlay District Conclusion: The 7/690 Interchange Project is not causing an increase in the Base Flood Elevation ("no rise"), as ~~proven~~ **suggested** by the 2013 hydrologic and hydraulic analysis provided to the Town by the County and reviewed by the Town's consultant. ~~The Project has conformed with the requirements of the Town's Floodplain Ordinance. Possible mitigation — increase size of 21st Street stream culverts; stream modeling performed by Loudoun County would decrease Town costs for modeling to update the FEMA floodplain maps.~~ The Planning Commission is concerned about an apparent large increase in flow and wishes the County to undertake a study to account for current modeling and flow rate to address root causes and find mitigative solutions to avoid the overtopping of North 21st Street should a large-scale water event occur.
5. Historic Overlay District. Zoning Ordinance, Article 14A. Conclusion: Staff has reviewed the Historic Overlay District rules to determine if the potential demolition of the house at 601 N. 21st Street (lot 74) is prohibited by the zoning ordinance Article 14A. The house at 601 N. 21st Street was built in 1999, and is not a historically significant structure. A review by the Board of Architectural review is not required.
6. ESMT 20-06 Three party easement between Loudoun County, Town of Purcellville and Catoctin Meadows HOA. Conclusion: **According to the County's Land Development Application, Of** the easements noted above, permanent drainage easements for sub-areas 2B, 2C and 2D (a total of 1,677 SF or 0.038 acres) **and permanent right of way easements**

(479 square feet or 0.011 acres) are proposed to be dedicated to the Town. The remaining land (a total of 501,818 square feet or 11.520 acres) is~~are~~ dedicated to Loudoun County Board of Supervisors. The Town has reviewed the proposed dedications to the Town; legal review by the Town has not been started and is still needed. The dedications from Catoctin Meadows HOA to Loudoun County are to be negotiated privately. The County has requested vacation of the floodplain easement where the eastbound offramp is to be located.

ATTACHMENT 3

Findings of Fact Pertaining to Traffic Issues, Fiscal Issues, Floodplain Issues and Environmental Issues

Traffic Issues:

- Our 2030 Comprehensive Plan, under Roadway and Vehicular Recommendations, includes:
 - 4. Identify and implement congestion management techniques in key areas including Main Street.
 - 9. Limit the number of creek crossings to the minimum required to provide a safe and functional street network. Any roads or bridges constructed within the floodplain should be designed in accordance with the Town's floodplain ordinance.
 - 11. Coordinate with other relevant transportation agencies to direct Commonwealth and regional transportation improvement efforts to the advantage of the Town of Purcellville.
- Loudoun County's Amended Interchange Justification Report (IJR) May 22, 2019 shows estimates of traffic volumes and levels of service for morning and evening periods. **Finding:** For the seven significant intersections in town, assuming the Rt. 7/690 is built: (1) in the AM period, the traffic at one intersection and one lane of a three-lane intersection is improved while one intersection and one lane of a two-lane intersection get worse; and (2) in the PM period, the traffic at one lane of a two-lane intersection is improved and two intersections get worse. This is hardly a significant improvement for Purcellville's traffic.

Change in Traffic Levels of Service at Seven Principal Intersections in Purcellville Before (Actual) and After (Modeled) Building the Rt. 7/690 Interchange Notation: No-Build ➡ Build

Intersection	AM LOS Grade	PM LOS Grade
Main Street & 32nd Street	1st lane of 3: E ➡ D	1st lane of 3: F ➡ F
	2nd lane of 3: A ➡ A	2nd lane of 3: A ➡ A
	3rd lane of 3: C ➡ C	3rd lane of 3: C ➡ C
Main Street & 23rd Street	B ➡ C	C ➡ D
21st Street & 23rd Street	1st lane of 2: A ➡ A	1st lane of 2: A ➡ A
	2nd lane of 2: C ➡ D	2nd lane of 2: D ➡ C
Main Street & 21st Street	A ➡ A	B ➡ B
Main Street & 20th Street	B ➡ B	A ➡ B
Main Street & Hatcher Avenue	C ➡ C	D ➡ D
Main Street & Maple Avenue	E ➡ D	D ➡ D

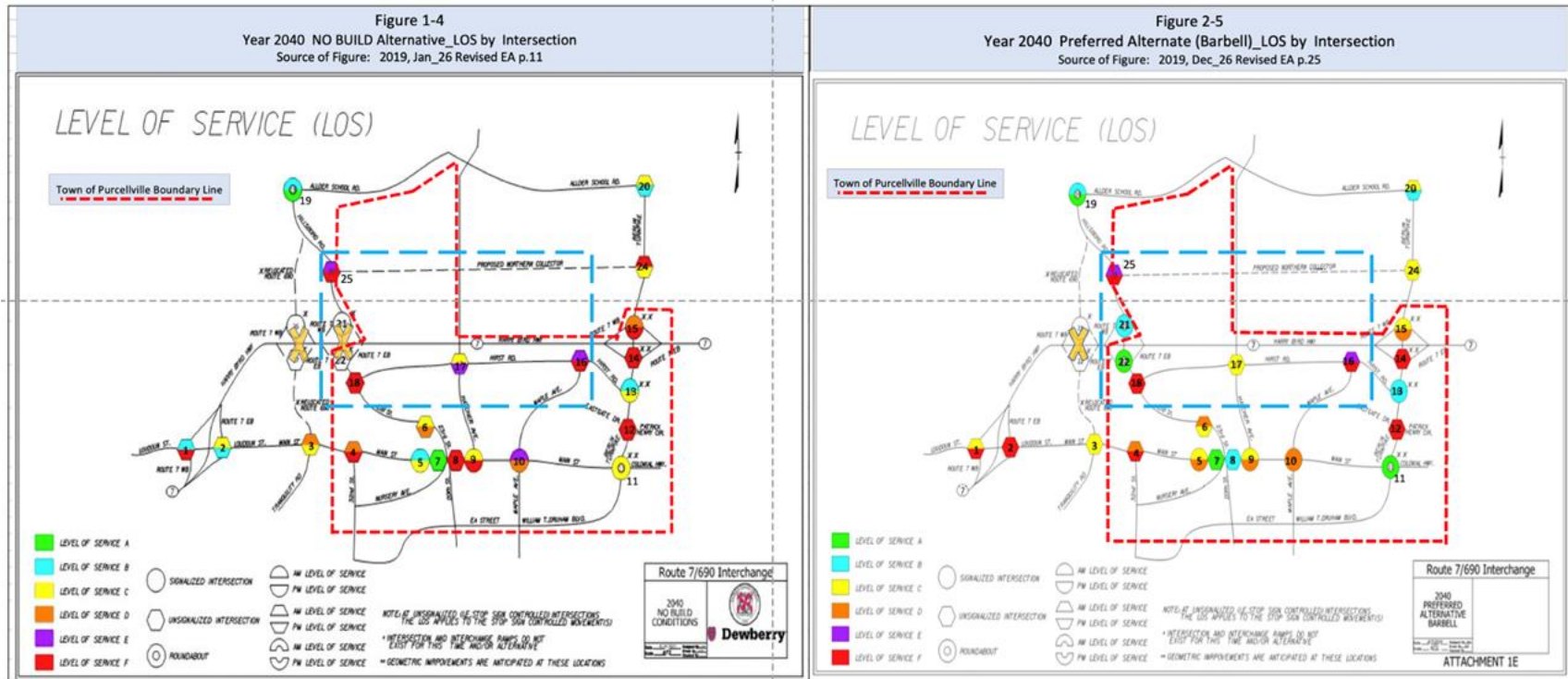
Summary

LOS Quality	AM		PM	
	Count	Percent	Count	Percent
Improved	2	20%	1	10%
Unchanged	6	60%	7	70%
Worsened	2	20%	2	20%

Rt7/690 Intersection Level of Service and Queuing Results, Year 2040 No-Build vs BUILD, Rt7/690 Preferred Alternative (Barbell)

Source: Dec 2019, Revised Environmental Assessment p. 11 and 25

The red dotted line indicates the approximate Town boundary lines for clarity



Key Points, IJR Amended – May 2019 Table 9 (p.45 IJR/ p.685 EA) Network – Wide Intersection Level of Service Summary (LOS)

Interchange Justification Report – Route 7/690 Interchange

Gorove/Slade Associates

Table 9: Network-Wide Intersection Level of Service Summary

Summary Statistic	2013	2020			2040		
	Existing	No-Build	Alt 1	Alt 2	No-Build	Alt 1	Alt 2
Signalized Intersections	5	5	6	7	5	8	8
Two-Way Stop-Controlled Intersections	13	13	14	16	15	14	17
All-Way Stop-Controlled Intersections	1	1	1	1	1	1	1
Roundabout Intersections	1	2	2	2	2	2	2
Total Number of Intersections	20	21	23	26	23	25	28
AM Peak Hour							
LOS D or Better (Overall)	6	8	9	10	8	11	9
LOS E (Overall)	0	0	0	0	1	0	0
LOS F (Overall)	1	0	0	0	0	0	1
LOS D or Better (all movements)	15	17	22	25	13	18	21
LOS E (1 or more movements)	3	1	1	0	2	3	1
LOS F (1 or more movements)	2	3	0	1	8	5	5
PM Peak Hour							
LOS D or Better (Overall)	6	8	9	10	7	11	10
LOS E (Overall)	1	0	0	0	0	0	0
LOS F (Overall)	0	0	0	0	1	0	0
LOS D or Better (all movements)	15	15	19	21	9	11	15
LOS E (1 or more movements)	1	2	3	4	2	3	4
LOS F (1 or more movements)	5	4	1	1	13	10	10

Observation:

According to the County's Feb 2015-2019 IRJ Purcellville Network – Wide LOS Traffic analysis 2040 No-Build vs Alternate-1 (Barbell) the total network sum of 25 the County analysis takes credit additional 2 new interchange intersections. Below removes this advantage to the No-Build vs Alt-1 (barbell) comparison.

AM Peak Hr,
LOS D or Better (overall) indicates +1 for Rt7/690

LOS E/F (1 or more movements) +4 Rt7/690

PM Peak Hr,
LOS D or Better (overall) indicates +2 Rt7/690

LOS E/F (1 or more movements) +2 for No-Build

IJR LOS Summary Results within Town of Purcellville ATTACHMENT 2

Observation:

- 15 Intersections of the 25 Intersection studied are located within the Town of Purcellville.
- Level of Service results are from the May 22, 2019 Amended Interchange Justification Report (IJR), Table 14 NO-BUILD (p. 51 IJR / p. 691 EA) and Table 15 Alt-1 BUILD (p.51 IJR / p.692 EA)
- 9 Intersections "Overall" Level of Service (LOS) are presented, while the remaining
- 6 Intersections Level of Service (LOS) are presented as Individual Lanes by intersection for a total of 18 lanes studied in the IJR.

Of the 10 time periods for these 5 intersections with the same build vs. no-build LOS, 8 of 10 (80%) have less delay with build compared to no-build

Observation: Overall Intersection Level of Service (LOS)
Overall Intersection Delay SEC / VEH (Wait Time)

9 Intersections were studied

Results presented

- 5 of 9 Intersections' "Overall" LOS are UNCHANGED
- 1.5 of 9 Intersections Worsen
- 2.5 of 9 Intersections Improve

IJR Findings

A composite of 1 of 9 Intersection Improves
5 of 9 "Overall" Intersections LOS are UNCHANGED with the Rt7/690 Interchange BUILD.

Of the "1.5" intersections that worsen, all drop only one letter in LOS (i.e. "B" to "C") and all intersections remain at LOS "D" or better.

Observation: Intersection Lanes Level of Service (LOS)
Lane Delay SEC / VEH (Wait Time)

6 Intersection with 18 Lanes were studied

Results presented

- 15 of 18 Lanes' LOS are UNCHANGED
- 1.5 Intersections Worsen
- 1.5 Intersections Improve

IJR Findings

1.5 Lanes Worsen and 1.5 Lanes Improve (net 0)
15 of 18 Lanes LOS are UNCHANGED with Rt/760 Interchange BUILD

Build condition eliminates two LOS "E" and "F" conditions, and does not introduce any deteriorations to LOS E or F

Of the "2.5" intersections that improve, one improves multiple letters in LOS ("F" to "D") and all no-build LOS "E" and LOS "F" conditions eliminated

2/12/23

10

Observation Summary, EAST – WEST MAIN Transportation Intersections Rt. 7/690 IJR, Traffic LOS and Traffic Volume Results, YR204 NO-BUILD vs. BUILD

	IJR #	Intersection Discription	Type	Status	Table 14, p. 51 IJR/p.691 EA Year 2040		Table 15, p. 52 IJR/p.692 EA Year 2040		UR Traffic Volume Results Fig 16 p35/Fig 17p.36 AM	UR Traffic Volume Results Fig 16 p35/Fig 17p.36 PM
					NO-BUILD		BUILD-Rt7/690-Barbell		NO-BUILD vs BUILD-Barbell	NO-BUILD vs BUILD-Barbell
					AM	PM	AM	PM		
PLAN PURCELLVILLE 2030 Comprehensive Plan Adopted June 30, 2020 Focus on Transportation Observations: EAST / WEST MAIN STREET Intersection LOS / Vol Results Rt7/690 Proposed Interchange Amended IJR, May 22, 2019	4	Main Street and 32nd Street	Stop	Town Network Existing	LOS by Lane "A" 9.7 s/v "E" 41.7 s/v "C" 24.1 s/v	LOS by Lane "A" 9.3 s/v "F" 245 s/v "C" 15.2 s/v	LOS by Lane "A" 9.1 s/v "D" 27.9 s/v "C" 18.3 s/v	LOS by Lane "A" 19.1 s/v "F" 132.5 s/v "C" 14.4 s/v	1380 vs 1142 -238 VEH -17% decrease	1795 vs 1645 -150 VEH -13% decrease
	*5	Main Street and 23rd Street <i>- Mitigation coordinated signal</i>	Signal- Mod	Future Mod	Overall LOS B 15.0 s/v	Overall LOS C 31.5 s/v	Overall LOS C 20.1 s/v	Overall LOS D 53.0 s/v	1541 vs 1529 -12 VEH -0.8% decrease	2076 vs 2128 +52 VEH +2.5% increase
	6	21st Street and 23rd Street	Stop	Town Network Existing	LOS by lane "A" 8.0 s/v	LOS by lane "D" 34.1 s/v "A" 7.9 v/s	LOS by Lane "D" 33.6 s/v "A" 0.2 v/s	LOS by Lane "C" 23.8 s/v "A" 0.3 s/v	1022 vs 1341 +319 VEH +31% increase	1261 vs 1549 +388 VEH +22.8% Increase
	*7	Main Street and 21st Street <i>- Mitigation includes addition of a short eastbound left turn lane.</i>	Stop/ Lane-Mod	Future Mod	Overall LOS A 9.2 s/v	Overall LOS B 12.6 s/v	Overall LOS A 9.5 s/v	Overall LOS B 12.2 s/v	1463 vs 1534 +71 VEH +4.9% increase	2040 vs 2102 +62 VEH +3.0% Increase
	*8	Main Street and 20th Street <i>- Mitigation includes addition of a traffic signal and addition of a westbound left turn pocket.</i>	Stop/ Signal&La ne Mod	Future Mod	Overall LOS B 18.5 s/v	Overall LOS A 9.1 s/v	Overall LOS B 15.6 s/v	Overall LOS B 12.2 s / v	1649 vs 1571 -78 VEH 4.7% decrease	2256 vs 2123 -133 VEH 5.9% decrease
	*9	Main Street and Hatcher Avenue <i>-Mitigation includes coordinated signal</i>	Signal- Cord Mod	Future Mod	Overall LOS C 24.8 s/v	Overall LOS D 52.6 s/v	Overall LOS C 20.8 s/v	Overall LOS D 39.2 s/v	1696 vs 1428 -268 VEH 15.8% decrease	2127 vs 1821 -306 VEH -14.4% decrease
	*10	Main Street and Maple St <i>- Mitigation includes coordinated signal</i>	Signal- Cord Mod	Future Mod	Overall LOS E 57.5 s/v	Overall LOS D 50.7 s/v	Overall LOS D 53.4 s/v	Overall LOS D 42.0 s/v	2175 vs 2009 -166 VEH 7.6% decrease	2559 vs 2360 -199 VEH 7.8% decrease
* IJR stated mitigations required prior to Year 2040										

Fiscal Issues:

- Loudoun County's February 14, 2023 Update on Town of Purcellville Projects states: "The Route 7 and Route 690 interchange is a project of regional importance and a critical part of the planned transportation network in western Loudoun County. If construction of the Route 7 and Route 690 Interchange is delayed, access to the Western Loudoun Park and Ride lot will be compromised ..."
- Finding:** However, the interchange is not designed or intended to be of service to the Town of Purcellville. The information in the aforementioned report makes it clear there is more negative impact than positive impact to the Town's traffic intersections levels of service.

- **Finding:** The Rt. 7/690 interchange was planned before the County purchased 143 acres of land immediately west of the Town for the Western Loudoun recreational facility and pool complex.
- Regarding fiscal impact, the County's February 14, 2023 Update on Town of Purcellville Projects states the Rt. 7/690 and Rt. 7/287 interchanges “are partially funded using SMART SCALE funds.” The report goes on to say: “Future SMART SCALE fund allocations are dependent on a jurisdiction’s past performance. If delays continue, County staff will recommend to either delay these projects or replace the SMART SCALE funding with other sources to ensure that the County’s ability to obtain future SMART SCALE awards is not jeopardized.”

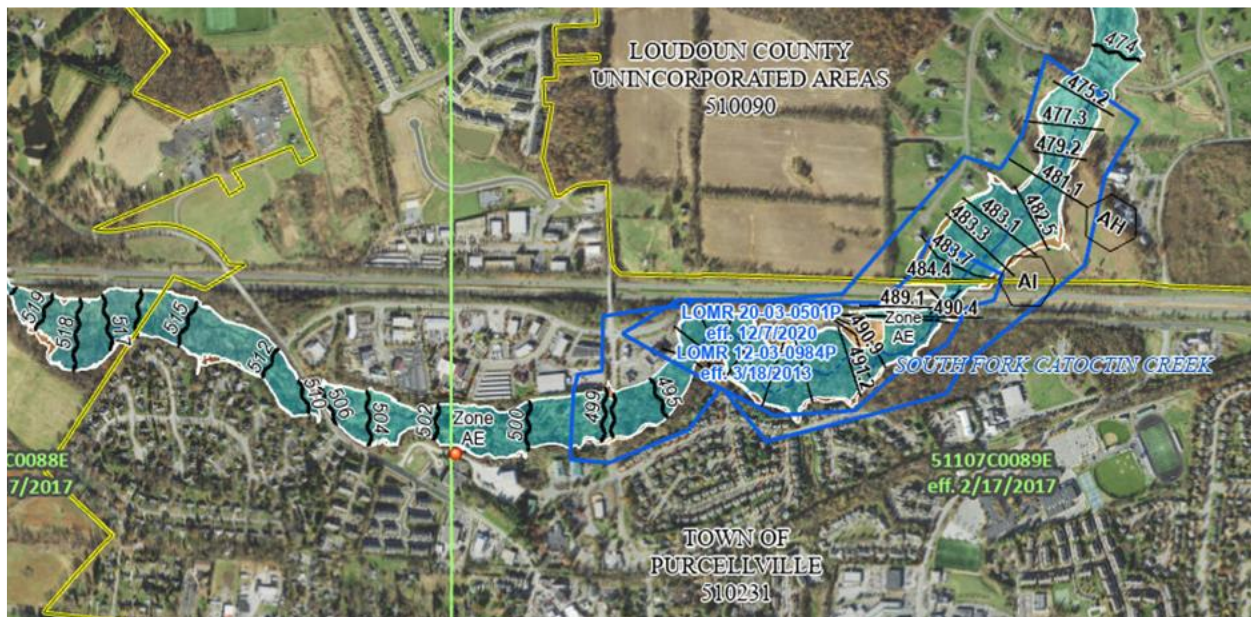
Finding: It may be in the interest of the County to use this project to ensure a future stream of funds, but it is not in the interest of Purcellville to permit a project that does nothing to help our town - and in fact, may be harmful.

Floodplain Issues:

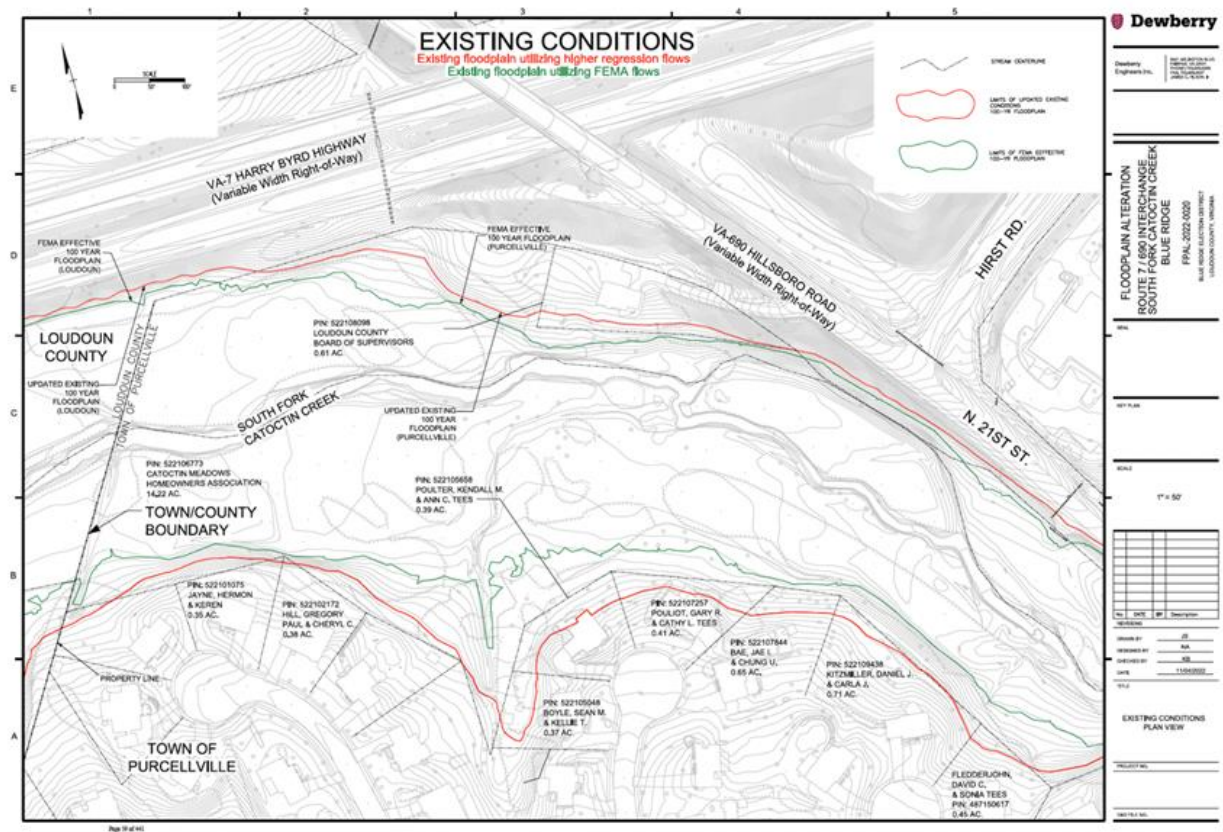
- On May 14, 1997, Catoctin Meadows L. C., The Catoctin Meadows Homeowners Association, and the Town of Purcellville entered into a Deed of Dedication, Subdivision, Easement and Annexation.
Finding: The Town agreed to maintain the floodplain on the HOA property adjacent to the proposed Rt. 7/690 interchange. For the Rt. 7/690 interchange to be built as proposed, a portion of the floodplain easement in the proposed right of way needs to be vacated by the Town.
- Analyses of the floodplain by the County’s consultant and the Town’s consultant used different methodologies and came to different conclusions.
Finding: In a meeting on January 3, 2023 between County staff and the County’s consultant (engineer of record), “the County’s consultant declined to utilize the floodplain analysis method suggested by the Town for technical and liability reasons.”
- **Finding:** The Town’s hydrology consultant says there may be a doubling of the floodplain flow from 3,617 cubic feet per second to 7,447 cubic feet per second. This may be due to upstream changes in land use in future years and not directly as a result of the Rt. 7/690 interchange construction. Note that a flow rate of 7,447 cubic feet per second is equal to 232 tons of water per second - or four freight train locomotives.
- **Finding:** The February 14, 2023 Update on Town of Purcellville Projects asserts: “the Route 7 and Route 690 interchange does not increase the water surface elevation of the existing floodplain.”
- **Finding:** The Rt. 7690 Revised Environmental Assessment, December 26 2018, Section 3.0, Table 3.1 states: “The project is within the floodplain of South Fork Catoctin Creek, a mapped 100-year floodplain.”
- **Finding:** The County used their Floodplain Alteration analysis to claim that the Rt. 7/690 project would not cause any increase in the Base Flood Elevation (“no-rise”),
- **Finding:** The County did not use the Floodplain Alteration FPAL-2019-0013 but rather used the outdated and lower FEMA floodplain flow rates of 3,617 in their ESMT-20-06 PLAT RPA-987-LC to determine the requested floodplain vacation area from the Town.
- **Finding:** The County stated at the March 16, 2023 Planning Commission meeting they have been aware of the flowrate and changes to the floodplain from these rates since 2013. The

County Floodplain Alteration states that there are 24 different property owners affected by their Floodplain Alteration. To date, neither the County nor the Town has taken action to alert these property owners or FEMA of the floodplain flow, elevation, and horizontal changes in the floodplain west of North Hatcher Avenue. These floodplain flows were described by Town Staff as a “dramatic”.

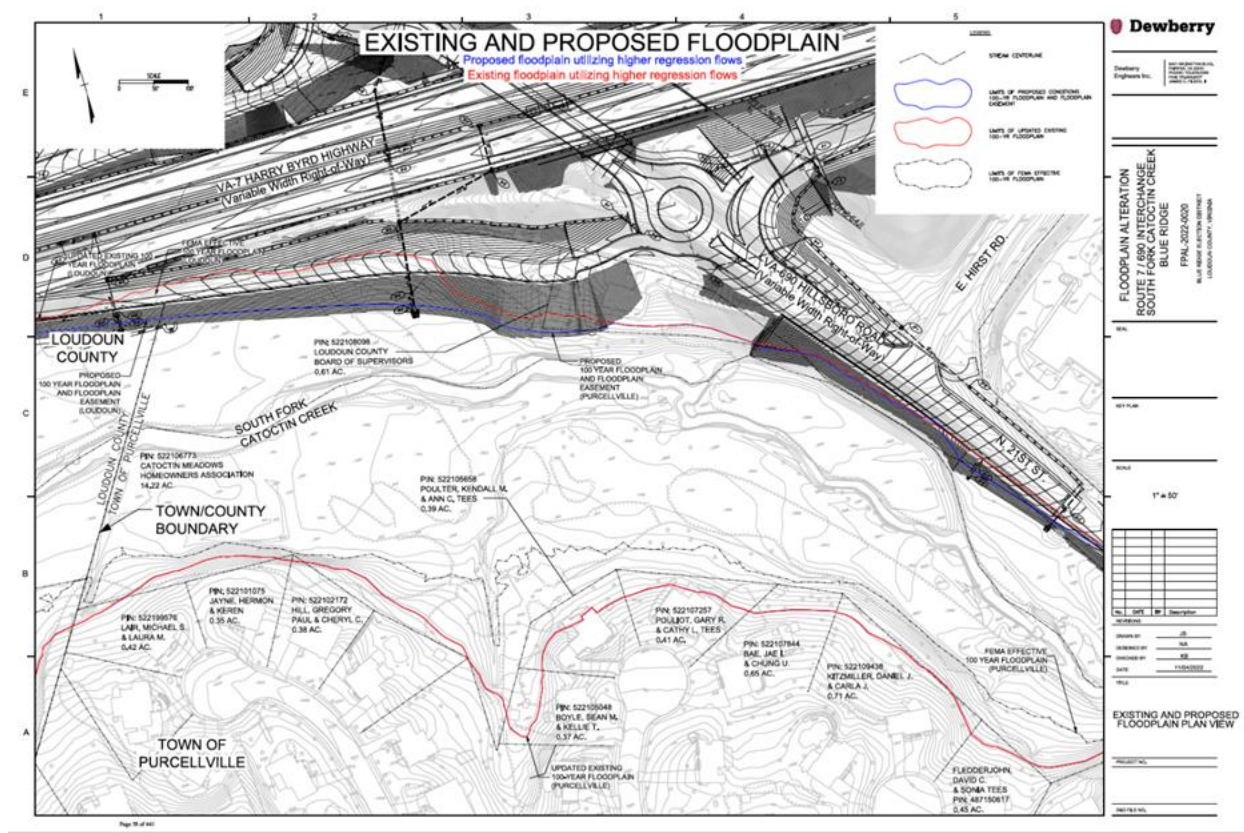
- **Finding:** The County’s application appears to be in conflict with their accepted Floodplain Alteration analysis resulting in a larger floodplain area to be vacated by the Town



Ref: FEMA Hazard Map, Catoclin Creek, Purcellville Virginia, January 2023.



Ref: County Rt. 7/690 Flood Alteration FPAL-2022-0022 Existing Floodplain Conditions (pg.59), March 16, 2022.



Ref: County Rt. 7/690 Flood Alteration FPAL-2022-0022 Existing and Proposed Floodplain Conditions (pg.61), March 16, 2022.

Environmental Issues:

- **Finding:** The Revised Rt. 7/690 Environmental Assessment, Section 3.12 Indirect and Cumulative Effects Table 3.3 states that the prominent environmental resources in the study area for this project of water and wetlands will reasonably foresee increase the degradation of streams and wetlands from stormwater runoff and loss of habitat and forested areas. Additionally, the Cumulative Effects Table 3.3 also suggested 35 residential units will be impacted from this project and reasonable action to widen Route 7 is foreseeable.
- **Finding:** The proposed Rt. 7/690 interchange is directly over and beside the South Fork of the Catoclin Creek.
- **Finding:** There will be construction debris, silt, etc. during construction. After construction, oil, salt and road debris will flow off the road and downhill into the creek. There is no place for it to go except into the water.
- **Finding:** The area around the creek is habitat for endangered long-eared bats. This has not been found to be critical habitat.
- **Finding:** About 12 to 15 acres of trees would be cleared.
- **Finding:** The County provided an update to the Environmental Assessment's expected 15.5 acres of tree removal to the Planning Commission on March 16, 2023. However, the expected land disturbance is still that about 12 to 15 acres of trees would be cleared. The County Deed of Conveyance, if approved, allows the County the right to trim, cut and

remove trees in or near the easements conveyed, deemed by the County to interfere with the proper and efficient construction, operation and maintenance of said easements. The Deed also provides the Town the same authority for the permanent drainage easements to be conveyed to the Town for this project.



Ref: Dewberry Updated Project Tree Clearing and Limits of Disturbance Estimates, March 16, 2022.