

Browntown Community Center Association
96 Browntown Road
Bentonville, VA 22610

Mr. Matt Wendling
Warren County, Planning Director
220 N. Commerce Avenue, Suite 400
Front Royal, VA 22630

November 7, 2022

Dear Mr. Wendling:

The Browntown Community Center Association (BCCA) respectfully submits to Warren County the attached recommendations for consideration when updating the Comprehensive Plan. These recommendations are the result of a series of community meetings, visioning sessions facilitated by the Alliance for the Shenandoah Valley, and surveys distributed to the BCCA membership. They confirm four main values held by the Browntown community:

- Farms, working landscapes, and the agricultural heritage of Browntown should be protected.
- Browntown citizens highly value historical and cultural preservation.
- Browntown citizens highly value the beauty of the area and the protection of natural resources.
- Browntown is a special place with a strong sense of community.

To retain and enhance these values, the BCCA proposes that a Rural Viewshed Overlay District be created and added to the Warren County Code as Subsection 180-29.2 – Rural Viewshed Overlay District (RV). The purpose of this overlay district is to:

- Protect the natural beauty of the Browntown Valley. We are surrounded on three sides by the forests of Shenandoah National Park.
- Retain our rural landscape and quality of life. Active farms are the foundation of our rural landscapes and heritage.

The BCCA proposes that the Browntown Valley becomes the first Rural Viewshed Overlay District in Warren County. This could also serve as an example for other communities to promote best practices in protecting rural character and in promoting safety.

Our specific recommendations for the Rural Viewshed Overlay District, which are directly supported by Warren County's 2018 Strategic Vision, fall into four categories:

1. **Rural Character** - What the County should encourage to protect the positive experience we all have in living in this unique place.
2. **Safety** – Things the County can do to protect the physical safety of our community.
3. **Zoning** – Specific elements of the Zoning Code that the County could review to retain our rural character and achieve our safety goals.
4. **Building Requirements** – Elements of building practice and enforcement that could be reviewed to retain our rural character and achieve safety goals.

Included in this packet of information are the following documents:

- Background Information for BCCA Visioning Process
- BCCA Specific Recommendations for the RV Overlay District
- Results of BCCA Voting

We envision these recommendations as a first step in an ongoing process. Warren County includes a scenic wonder – the Village of Browntown and its immediate valley and surrounds. It needs protection from the types of development which would spoil it. Browntowners are united in support of protecting our rural character and natural beauty.

Sincerely,

John Bell, President
Browntown Community Center Association

cc:

Cheryl L. Cullers
Board of Supervisors, South River District

Background Information for Browntown Community Center Association

The Visioning Process – How we got here.

This additional background information was assembled by the BCCA's Working Group to answer questions from the community and to support the BCCA's recommendations to Warren County. When the BCCA learned of Warren County's plans to update the Comprehensive Plan, we worked with the *Alliance for the Shenandoah Valley* to understand what our Browntown Community most valued and what our residents would most like to see in the future. The Alliance is a non-profit that works with six counties in the Shenandoah Valley, including Warren. Its mission is to ensure that "the Valley's rural character, scenic beauty, clean water and vibrant communities are protected by providing accurate and timely information to community members and decision makers."

In early August 2022, the BCCA forwarded to its email distribution list (about 200 names) three questions:

1. If you went away and came back to Browntown in 20 years, what would you hope to find when you got back?
2. What makes Browntown a great place to live?
3. Please describe any development opportunities, or development challenges, for the Browntown area in the future.

Responses were gathered, summarized, and presented to our BCCA Board at our regular monthly, public meeting. From this work, the BCCA Board chartered a Working Group to develop Comments for filing with the Warren County Planning Commission. The recommendations below represent the work of that group; all recommendations, save for one, have been approved by a strong majority of Browntown residents who both voted to support these specific recommendations and voted to file these Comments to the Warren County Planning Commission.

To determine whether the Browntown Community supported each of the following Working Group recommendations, a ballot was emailed to every person on the BCCA's membership list; and paper ballots were both advertised and made available to everyone lacking access to the internet. The recommendations below received strong community support with the majority vote from the respondents supporting each recommendation. That said, one recommendation failed to gain majority vote and therefore will not be put forward. In total, 77.7% of the Browntown Community supported filing Comments with the Planning Commission.

Where and What is Browntown?

Let's zoom out: "The Browntown Valley" is actually a small part of the Page Valley. The Page Valley is formed by Dickey Ridge and the Fort Valley Headlands in the north and runs the length of the Massanutten Range to the south between the Massanutten Range and the Blue Ridge. The Browntown Valley and Page Valley are both in turn part of the Shenandoah Valley, which is bounded to the east by

the Blue Ridge Mountains, to the west by the eastern front of the Ridge-and-Valley Appalachians, to the north by the Potomac River, and to the south by the James River. The Browntown Valley is separated from the rest of the Shenandoah Valley by three hills that make a line from Dickey Ridge to Gimlet Ridge.

Let's zoom back in: Using a combination of watershed analysis and driveway analysis, the area called the Browntown Valley can be described as including all land where a raindrop would flow into the valley formed by these three hills and the Blue Ridge from Dickey Ridge to Mathews Arm, and also includes any property whose necessary route of access passes through that valley. In terms of Warren County government, the Browntown Valley is part of the South River District and includes the communities of Browntown, Bentonville, Limeton, Harmony Hollow, and others.

Using these definitions, which closely match the definition given in the organizing documents for the BCCA in the 1970s, we can make the following observations: The entire Browntown Valley is approximately 10,000 acres, and is around 4.2 miles E-W and 5.9 miles N-S. The fulltime population of the Browntown Valley is approximately 1335 people (US Census: 2.67 people per household, Warren County Tax Records: approximately 500 households). The South River District, which includes Browntown, has around 6000 full time residents, and Warren County (including the town of Front Royal) has a full-time population of around 41,000 people. The experience of living in the Browntown Valley cannot be considered without considering its relationship to surrounding communities that have an impact on features like light pollution, noise pollution, air pollution, traffic, and water table usage. This would include communities at least as far away as Luray and Front Royal, the Fort Valley, the Shenandoah National Park, and the counties beyond the ridges to the east and west. Since we have also long been a destination for tourism and enjoyment for our larger region, the interests of the millions of visitors we host each year should also be taken into account. The Browntown Valley is surrounded on three sides by the Shenandoah National Park and despite significant development in recent decades still has working farms, open space, and natural beauty which are worth protecting. We are an historically important area that has seen many of its historic agricultural, commercial, and industrial uses abandoned within living memory, but we have a population that has grown tremendously in the past 25 years and a community that wants to learn about the best practices in agriculture, conservation, protecting dark skies, quiet enjoyment, and how to protect and share our natural beauty – both in our valley and in our surrounding communities.

Browntown Historic Trends in Development

The population of the Browntown Valley has more than doubled in the past 25 years. According to Warren County Treasurer's Office there are approximately 500 houses in the Browntown valley. In addition, there are more than 300 already subdivided, but not yet built, parcels in the Browntown valley. There remain only 26 privately held parcels of over 50 acres in Browntown, and only 80 in the entire South River District. There are only 10 privately held parcels over 100 acres in Browntown (3 of which are already owned by house builders), and only 31 in the entire South River District. According to data from Warren County Tax Assessor's Office, the population of the Browntown valley doubled in the

period from 1995 to 2020. In that time many of the farms in our valley have been subdivided, built, and sold.

Role of the Browntown Community Center Association

The BCCA is our organizational heart, leading and supporting a wide variety of events throughout the year. Through its outreach and inclusion, the BCCA is not just the cornerstone of Browntown, but also the means by which our residents have fostered such a deep and meaningful sense of belonging.

Browntown Community Center, formerly the Browntown School, was built between 1906 and 1914, and originally housed grades 1-9. Owing to decreasing enrollment and consolidation, it closed in 1970, and the building was later sold to a newly formed Browntown Community Center Association, “BCCA”, in 1984 for one dollar. The building became a community center for the Village of Browntown and its surrounds.

The BCCA’s original by-laws state – “The objectives of the Browntown Community Center Association shall be to strengthen fellowship in the community, and to provide a place for the adults and youth in the community to use for meetings, recreation, and other functions which shall be in the interest of the community and approved by the Executive Board of the association”. The by-laws have changed some over the years, but the original intent remains. Two early leaders were Col. Anthony Perna and Joe Brogan Senior. Other early members included longtime residents as well as newcomers. This cross section of membership, open to all who live in the Browntown valley, remains the same today.

Following the BCCA’s founding, it has taken an active role in both creating a sense of community and helping local families – funds were used to help a family in need after a fire, it sponsored a “Pounding” years later to help another family whose house burned, and the BCCA took an active part in pushing the County towards better phone service. After the last fire, the BCCA built a fire-substation and signed an agreement with SWVFD to equip the building with firefighting apparatus.

While monthly Board meetings are sometimes contentious, with opinions seeming to separate our community, in the end we are a community unified and fortified by standing together as one. These Comments to the Warren County Planning Commission regarding its planned release of the 2023 Comprehensive Plan continue the BCCA’s push to improve the daily lives of our Browntown Community and to retain the natural beauty of our environment.

Our Vision of Browntown

Those of us that call Browntown home value its unique character, history, natural resources, and most of all, strong community ties. As we consider the future of Browntown, we deem it essential to preserve those qualities that make it so unique. We are surrounded on three sides by the forests of Shenandoah National Park. There are many active farms that are the foundation of our rural landscapes and heritage. Our quality of life is marked by clean water, open spaces, a rich history, and family connections. Having witnessed other similarly unique communities being overrun in the last several decades by rampant

development, we have a strong, shared commitment to manage any necessary changes thoughtfully and meaningfully.

We look to the Vision statement of Warren County to support our goals for Browntown, specifically that “the quality and character of Warren County’s natural resources should be preserved, conserved and used effectively to ensure that future citizens will enjoy the benefits...”. We will work to preserve our one-of-a-kind community through sustainable growth, conservation of natural resources, and the protection of our rural character. While it is true that some of us are open to a few modest new enterprises, such as a small cafe, bakery, antique shop, or other such endeavor and many of us want to see growing and robust services such as a fully functioning fire and rescue department and improved internet, the majority of Browntown residents want to continue to be able to appreciate the small, quiet village atmosphere that gives one a sense of going back a few steps in time. We intend to work together, as formerly stated, to preserve this one-of-a-kind home through sustainable growth, conservation of natural resources, and the protection of our rural character. We also seek to guide and to shape the scope and pace of potential change. We ask that the vision we as a community have for our own future – the collective vision of the many residents of this valley – be given the utmost consideration by Warren County who also plays a role in our future.

Supporting Warren County’s Comprehensive Plan

The BCCA’s recommendations above fit well with Warren County’s Comprehensive Plan: “The Comprehensive Plan is the County’s official policy guide for the future development related decisions. The Plan is long-range in nature, and provides a picture of how the community wishes to develop over the next 15 to 20 years.” The BCCA’s recommendations are in alignment with and support the following direct quotes from both the County’s Comprehensive Plan and the County’s Strategic Vision from 2018:

- “Preserve the County’s most valued natural and cultural resources.”
- “Preserve the quality of our clean water, air, natural resources and scenic landscape.”
- “Maintain our small-town character and rural lifestyle while providing amenities for shopping, recreation and entertainment.”
- “Deliver quality services such as fire, safety, and law enforcement and provide safe and modern roads and other infrastructure.”
- “Direct development into places ... away from sensitive environments”
- “Use County development codes to support ... rural villages with a mix of uses and a walkable form.”
- “Use design guidelines to encourage new development that is compatible with the County’s historic character.”
- “Use zoning to ensure that scenic viewsheds are preserved, particularly from the Shenandoah National Park and the Shenandoah River.”
- “Preserve farmland, open space, and forests through Agricultural and Forestal zoning districts.”

- “Encourage protected farmland and open space through voluntary measures including conservation easements, scenic easements, purchase of development rights, or transfer of development rights.”
- “Preserve forests through zoning code provisions that prohibit clear cutting.”
- “Reduce the number of private access points along major highways and gateways to maintain highway capacity and support a walkable environment with accessible infrastructure.”
- “Manage the aesthetics of development ... through zoning overlays.”
- “Use zoning tools to protect historic sites, viewsheds, and buffers to ... Shenandoah National Park, ... and the Appalachian Trail.”
- “Invest in recreational facilities that provide access to natural features, such as ... hiking and biking paths ...”
- “Support agritourism enterprises.”
- “Develop a wayfinding signage program to promote the community’s destinations.”

BCCA Specific Recommendations for the Rural Viewshed Overlay District

1. Rural Character – Protecting the experience of residents and visitors

- A. Browntown Road, Bentonville Road, and Gooney Manor Loop should be designated as Virginia Scenic Byways.
- B. To help protect working landscapes and the rural beauty and natural resources of our valley, the County could encourage the creation of voluntary Habitat Corridors and Rewilding Areas, which include native, non-invasive species and work to increase accessibility and feasibility of Agricultural-Forestal Districts.
- C. Shenandoah National Park Trailheads – Warren County should support keeping open all historic access points to the Shenandoah National Park (e.g., the Smith Run Trailhead, the Lands Run Trailhead, the Gravel Springs Gap Trailhead). Warren County should work with adjacent voluntary landowners to create basic parking lots (unlit, unpaved, but accessible from the public roadway for safety).
- D. To protect dark skies from light pollution, the County should promote all exterior lighting on **NEW** structures to conform to code for shielded, down-facing, full cut off and motion sensing lights.
- E. Create an incentive program and/or grant program in conjunction with Rappahannock Electric Cooperative and International Dark-Sky Association to encourage existing structures to change out old lighting systems for more energy efficient and non-intrusive systems.
- F. Work toward having Browntown Valley designated as an “International Dark Sky Place”.
- G. Create an Agricultural Advisory Group to explore financial incentives, economic development initiatives, and technical support for these community goals.

2. Safety – Protecting the physical safety of our community

- A. Reduce Default Speed Limit - Currently all rural roads with unposted speed limits (e.g., sections of Gooney Manor Loop, Smith Run Road, Lands Run, Fetchett Road, etc.) default to having a 55 MPH speed limit, making enforcement of safety rules difficult. The County should ask VDOT to post a 25 MPH speed limit for the Agricultural District unless otherwise posted.
- B. Increase presence and visibility of Fire and Emergency Services – Though the population of the Browntown Valley has doubled in the past 25 years, it feels as if we have fewer and less visible services available now. The County should prioritize having full time Fire and EMS staff at the Browntown Substation and should make their efforts more visible to residents through public outreach and education of the sort demonstrated by the BCCA and its BEARR group.

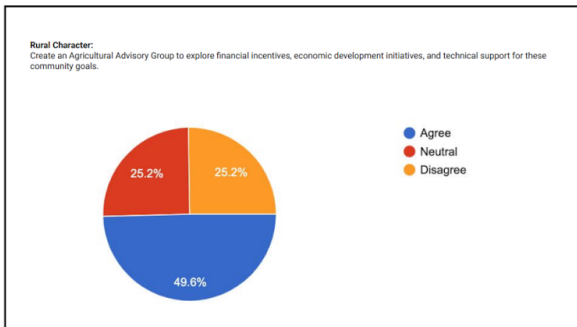
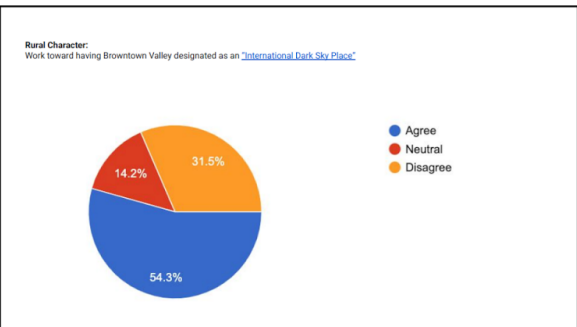
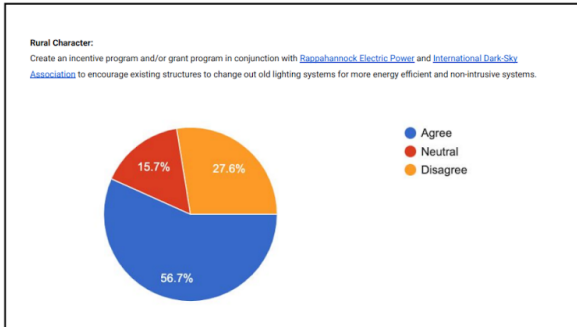
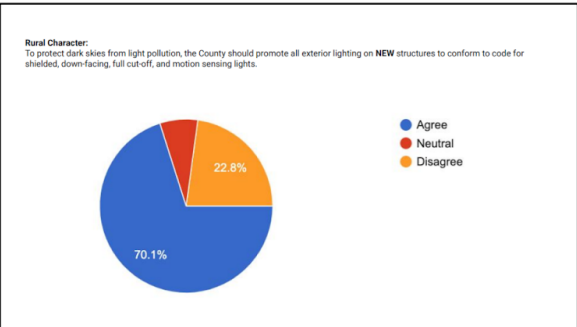
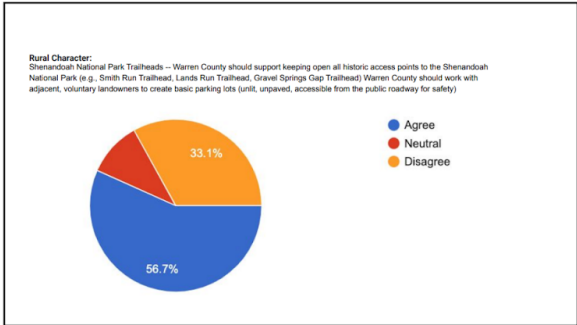
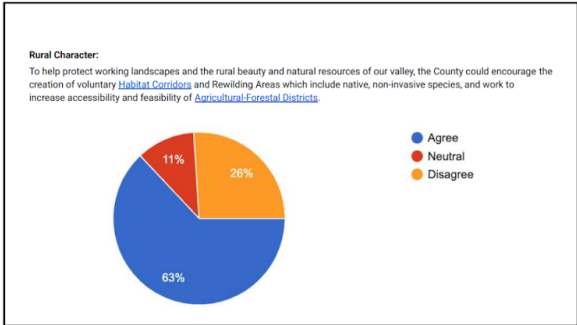
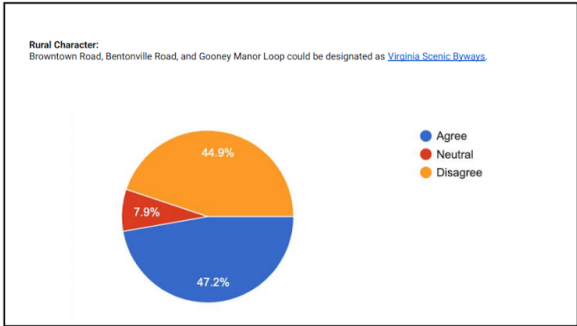
3. Zoning – Parts of the Code that should be changed to achieve Rural Character and Safety Goals

- A. Eliminate Cluster Subdivision in areas zoned Agricultural ([§ 180-40.5](#) Cluster Housing Developments per Warren County <https://ecode360.com/11767222>).
- B. Review zoning and subdivision regulations with the goal of maintaining the rural character of Browntown, specifically its landscape of farm, forest, and native meadow.
- C. Consider any provisions needed to result in an overall density that is primarily rural, not residential.
- D. Consider any provisions needed to encourage retention of parcels large enough to farm (e.g., land use taxation requires effective minimums of 6 acres for farming and 21 acres for forestry if house on parcel).
- E. Allow for flexibility in location and size of residential lots to retain rural uses and views (e.g., reduce number of driveways by allowing smaller lots away from public road frontage, minimize visibility of houses from roadway and neighboring houses by changing setback and buffer requirements).

4. Building Requirements – Parts of building practices that should be used to achieve Rural Character and Safety Goals

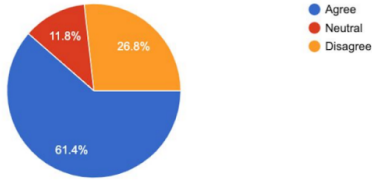
- A. Initiate an Aquifer Carrying Capacity Study & Well Monitoring Program.
- B. ~~Require Periodic Inspection of Well and Septic (especially alternative systems): (Did not Pass)~~
- C. Require Septic Field to be located on the parcel that it serves.
- D. To protect our soils, water quality, natural beauty, accessibility, and rural character, Warren County should create and promote incentives for Vegetative Buffers (new or existing native, non-invasive to Virginia, dense vegetation to slow water runoff, trap sediment, and beautify the community) and Viewshed Protection (minimize the visibility of new physical development from public roads, hiking trails, and park lands) in conjunction with all or some of the following: Shenandoah National Park, USGS, NRCS.

Results of BCCA Voting



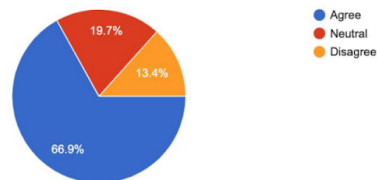
Safety:

Reduce Default Speed Limit- Currently all rural roads with unposted speed limits (e.g., sections of Gooney Manor Loop, Smith Run Road, Lands Run Road, Fetchett Road, etc.) default to having a 55 MPH speed limit, making enforcement of safety rules difficult. The County should ask VDOT to post a 25 MPH speed limit for the Agricultural District unless otherwise posted.



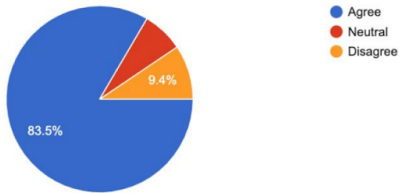
Safety:

Increase presence and visibility of Fire and Emergency Services – Though the population of the Browntown Valley has doubled in the past 25 years, it feels as if we have fewer and less visible services available now. The County should prioritize having full time Fire and EMS staff at the Browntown Substation, and should make their efforts more visible to residents through public outreach and education of the sort demonstrated by the [BCCA](#) and its [Facebook](#) group.



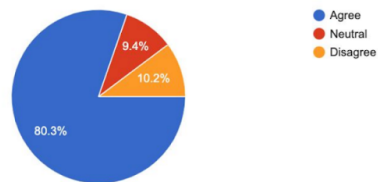
Zoning:

Eliminate Cluster Subdivision in areas zoned Agricultural. ([G-180-40-1](#) Cluster Housing Developments per Warren County <https://code360.com/11767222>)



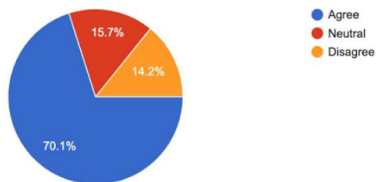
Zoning:

Review zoning and subdivision regulations with the goal of maintaining the rural character of Browntown, specifically its landscape of farm, forest and native meadow.



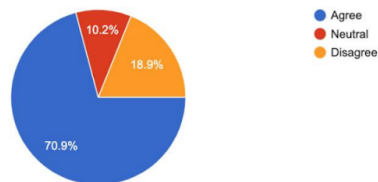
Zoning:

Consider any provisions needed to result in an overall density that is primarily rural, not residential.



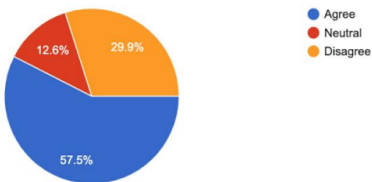
Zoning:

Consider any provisions needed to encourage retention of parcels large enough to farm (e.g., land use taxation requires effective minimums of 6 acres for farming and 21 acres for forestry if a house is on the parcel)



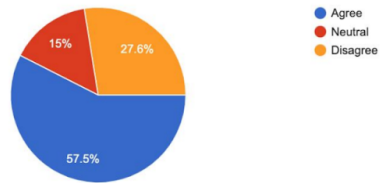
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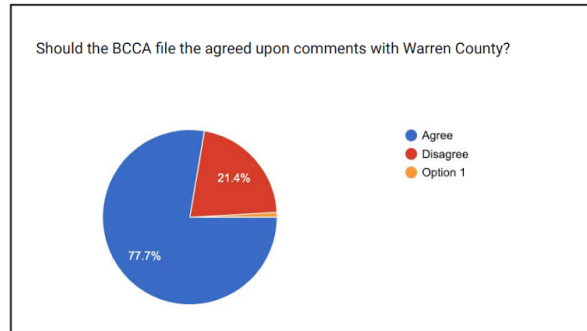
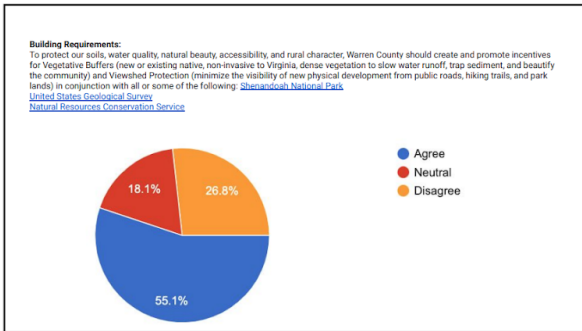
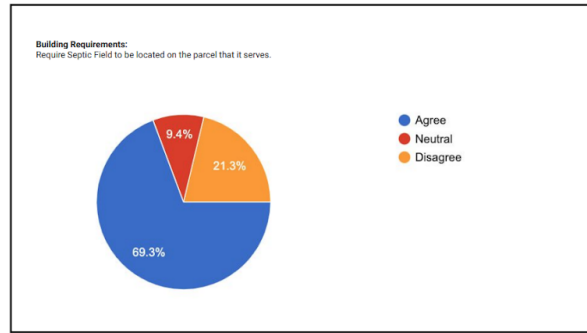
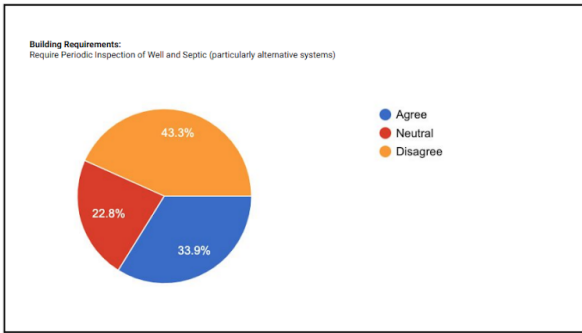
Allow for flexibility in location and size of residential lots to maintain rural uses and views (e.g., reduce number of driveways by allowing smaller lots away from public road frontage, minimize visibility of houses from roadway and neighboring houses by changing setback and buffer requirements).



Building Requirements:

Initiate an Aquifer Carrying Capacity Study & Well Monitoring Program.





Summary

Browntowners, our community, and our way of life are under tremendous pressure. At the current pace of growth, the local, full-time population is expected to increase 50 to 100% in the next 20 years. The Village of Browntown and its immediate valley and surrounds need protection from the types of development which would spoil it. Browntowners are united in support of protecting our rural character and natural beauty.

The Warren County Tax Assessor’s Office data notes that the population of Browntown has doubled between 1995 and 2020. Data from the County’s Treasurer’s Office shows that the Browntown Valley has approximately 500 houses and there are more than 300 already subdivided, but not yet built, parcels in the Browntown valley. Recent history illustrates that Browntown and the preservation vision of its inhabitants are under growing pressure; our agricultural way of life is threatened. We’re asking for the County’s help in preserving Browntown.

While the Comprehensive Plan already supports some of the elements which Browntown area citizenry wish to preserve, we believe our recommendations, if implemented by Warren County, would better ensure maintaining the rural nature of the Browntown area and to preserve it into the future. Filing these comments is essential to making our views understood and to influence the outcome of the County’s process. This information represents many months of hard work on the part of the community, and we appreciate Warren County help in achieving these goals.