


Fairfax County Dept. of Land Development Services  
Site Development & Inspections Division

	<h1>Comment Writing Policy</h1>	<b>LDS-SDID Policy</b>
		Approved By: <i>Matthew Hansen</i>
		Matthew Hansen, P.E., Director
		Date Signed: 02/14/2023   09:09:20 EST

**Purpose:** This document establishes expectations for SDID reviewers and those making comments on behalf of the Director of Land Development Services regarding comment writing to ensure clarity and consistency of review comments provided to submitting engineers.

This policy is written broadly and generally even though no two situations are identical. Staff are encouraged to discuss specific situations with peers, during the QC process, and with Branch Chiefs.

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**Positions/Branches Involved in Procedure:**

- All SDID Review Staff
- Partner agencies making comments on behalf of LDS

**FORMAT AND CONTENT**

- 1) Required comment elements per [101-2-4\(d\)](#) and [112.1-8100.7.F\(2\)\(c\)](#)
  - A. **Identify deficiency**
    - i) Be as specific as possible.
  - B. **Provide reference** to code/regulation/policy, etc.
    - i) This must be specific, reference to a whole chapter is not allowed.
    - ii) Be as close to the code language as possible.
    - iii) Do not copy an entire paragraph if only a portion of the referred code section applies.
    - iv) Ensure the referred code applies to the project by reading the entire code section.
    - v) If a policy is referenced, make sure it is a published policy, such as a Letter to Industry, checklist, etc. If it is an unpublished policy, contact an Engineer IV or a Chief so publishing the policy could be evaluated.

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vi) Format for references:

- (1) County Code: When referring to County Code, use the chapter number (112.1, 101, 124, etc.) and not ZO, SO, SWM Ordinance, etc.: 112.1-8101.4.B(6) (*this format is required subsection [1104.5](#) of the Zoning Ordinance*), 101-2-2(3)(C)
- (2) Public Facilities Manual: PFM 1-0102.1A(1)(a), PFM Table 12.17, PFM Plate 4-6 (See PFM 1-0800)
- (3) LDS Technical Bulletins: Technical Bulletin 03-05, LDS Notice 2/8/18
- (4) Virginia Erosion and Sediment Control Handbook: VESCH 3.05, VESCH Table 3.05A, VESCH Plate 3.05-1
- (5) Virginia Administrative Code: 17VAC15-61-30.B.2

vii) Reference can be provided at the end of the comment in parentheses or in the comment using "As required per ...".

**C. Identify approvable modifications or corrections**

- i) Make sure the comment is actionable.
- ii) Do not design for the engineer. For example, require erosion and sediment perimeter controls but do not dictate your preferred choice of measure if multiple options are available.

**2) Issues**

Review comments in Planning and Land Use System (PLUS) Digital Plan Room (DPR) are called Issues.

- A. Discipline must be selected from the pull-down menu. For example: Site Review, Site Stormwater Review, Geotechnical Review. The program will automatically associate your name with the Issues entered.
- B. Title of each Issue should be short and refer to the content. No numbering is required. Example: Setbacks, Buildable area, Construction entrance, etc.
- C. Description must have the 3 elements as described under 1 above: Identify deficiency, identify approvable modifications or corrections, and include reference to code, etc. Issues must be actionable, stating the deficiency is not a full comment.
- D. Markups such as arrows, geometrical shapes and text are optional to clarify the location of the Issue. Markups must always be associated with a specific Issue, but not all Issues need markups. Text markup cannot be used to write a comment/Issue.
- E. Global Issues are general Issues applicable to multiple sheets or the plan in general, e.g., "provide north arrow on all applicable sheets". The checkbox "Requires modifications to be submitted" under the Issue text defaults to being checked. Uncheck this if no revision is required.

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3) Conditions and Notes in PLUS

- A. Conditions and Notes should not be used for review until further notice. Non-enforceable comments, such as suggestions to the designer that are not requirements, should be emailed or discussed, but not written where they could be confused for requirements.
- B. Internal Notes can be used. These are not published for applicants to see.

4) Style

- A. Use full sentences. It is strongly preferred to word Issues to be standalone (Issues should be understandable without seeing the plan), though some site-specific circumstances will always require markup for the most effective communication.
- B. The markups associated with an Issue aid the comment clarity. Use arrows, circles, etc. as appropriate. Arrows should point to specific items and shapes (circles, squares, etc.) should be used to identify an area to be commented on and revised. Using text on drawings is discouraged and does not replace the required Issue text.
- C. Do not over-use the expression “it appears” – most of the time the item referred to is or is not on the plan. (*e.g., “it appears that there is an RPA within the subject parcel” is less clear than “RPA exists on the parcel per County maps”*)
- D. Use specific and concise language. For example, “you should provide perimeter controls...” is not concise compared to simply “provide perimeter controls...”.
- E. Do not repeat comments when avoidable. Write the comment on the first sheet the deficiency appears on, and you may refer to “all applicable sheets” or list specific sheets in that comment.
- F. Do not require duplicate information. This can result in inconsistencies on the plan. Regulatory requirements are satisfied when information is provided only once.
- G. Requiring notes referring to certain sheets is not a code requirement.
- H. Do not repeat comments already provided by other review sections/agencies (except affirming ancillary agency comments).
- I. Own the comments. Do not attribute comments to other staff (except ancillary agencies).
- J. Tone:
  - i) Make sure your comment is respectful, courteous, and professional.
  - ii) Consultation with senior staff is encouraged to ensure especially controversial or consequential comments are appropriately worded.
- K. The applicant can only see comments when review coordination task is completed.

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- 5) Proffer Compliance Matrix Review Issues
  - A. Enter these Issues on the sheet the proffered items are shown or at the applicable line in the Plan Approval Information table on the cover sheet, or as a Global Issue.
  
- 6) Comments by Inside Review Agencies
  - A. Create an Issue for each inside agency that has provided requirements and refer to that agency memo. For example: “See FCPA comments in Memo dated XX/XX/XXXX”.
  - B. Reviewers may reiterate enforceable portion of the comments as Issues in consultation with the Senior Engineer.
  - C. Forward ancillary agency comments, received as a memo, letter or e-mail, to the engineer.
  
- 7) Notes, Reminders and Recommendations
  - A. Notes and reminders
    - i) Do not be entered as Issues unless the plan approval is prevented because of non-compliance with regulations. Notes and reminders should be conveyed separately.
    - ii) Clearly state if an Issue is a reminder or repeat.
  - B. Recommendations
    - i) In the 1st submission review recommendations should be minimized and conveyed separately when needed.
    - ii) Avoid recommendations when reviewing submissions other than the first.
    - iii) Clearly state if an item is recommendation, not a requirement, and convey it in an email or call to the designer.
    - iv) Avoid recommendations that are unrelated to deficiencies.
    - v) Do not design for the engineer.
  
- 8) Submissions Other Than First
  - A. If an Issue has not been addressed, enter it as a “Repeat Issue” on the most recent sheet version.
    - i) Unresolved comments do not move to replacement sheets in PLUS.
    - ii) Leave unresolved issues open on the original sheets and create a new Issue on the current sheet version including the statement that this is a repeat issue.
    - iii) Close all prior versions of an Issue only after the Issue is resolved.
  - B. If multiple Issues have not been addressed, may add an Issue requiring addressing previous specific Issues (refer to previous Issue or sheet number).

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- C. If a portion of an Issue has not been addressed, make it a new Issue. (May also note if an Issue is a repeat or follow-up Issue).
- D. If a significant deficiency was missed and was not commented on the first submission, discuss it with senior staff if that Issue can be made on subsequent submissions.
- E. Minor Issues not impacting code compliance on subsequent submissions should be avoided. Compliance, not perfection, is our goal. For example, only comment on legibility if absolutely necessary on subsequent submissions.

9) Comment Library

- A. A [Comment Library for Record Plats](#) and a [Comment Library for Easement Plats](#) are available in the SDID Library.
- B. A [draft comment library for general reviewers](#) is available in the SDID Library to aid review of major plans. Only copy the portion of the comment that is applicable to the plan/plat.

**PROCEDURES**

- 1) Reviewers are encouraged to coordinate with the engineer prior to disapproval:
  - A. If there are major, and/or time sensitive issues. (Inform them about those issues prior to finalizing comments, so they can start to work on the resolution.)
  - B. If you need clarifications on specific items before finalizing your comment, or to help interpret if information on the plan is sufficient to demonstrate code compliance.
- 2) Follow the [SDID QA-QC Policy](#) prior to entering a decision in PLUS.

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**References:**

- 1) Subdivision Ordinance Comment Requirements: [101-2-4](#)
- 2) Zoning Ordinance Comment Requirements (for SP/MSP): [112.1-8100.7.F\(2\)\(c\)](#)
- 3) Zoning Ordinance requirements for referencing: [112.1-1104](#)
- 4) Public Facilities Manual on Encode: [Public Facilities Manual \(encodeplus.com\)](#)
- 5) [Comment Library for Record Plats](#)
- 6) [Comment Library for Easement Plats](#)
- 7) [Draft Comment Library for Site Reviews](#)
- 8) [Ancillary Agency Review Policy](#)
- 9) [SDID QA-QC Policy](#)