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Darby Creek Association

April 23, 2019

To: Far West Area Commission, Columbus Development Commission
Re: Sugar Farms proposal

Dear Commission members;

The Darby Creek Association continues to oppose the proposed Sugar Farms development in its current form. Since our last letter submitted 3/7/19 we have been following ongoing discussions and testimony about this proposal involving the Far West Area Commission, city officials, and the applicants. In the last month a number of minor changes have been proposed by the applicant, but none of them address the main problems with this project.

The primary problems are twofold: 1) First, the project does not achieve LEED certification, or in lieu of that, present a compelling alternative strategy that would achieve the goals of the Special Pilot Site as outlined in the Accord Plan, and 2) the plan still does not achieve the minimum requirement of 50% open space, although regrettably the applicants and city officials continue to claim that it does by ignoring the rules governing what constitutes open space.

Discussion of these two concerns follow.

1. LEED certification and the Special Pilot area.

As you likely know, the Sugar Farms site was identified as a Special Pilot area in the Darby Accord Plan. Both the applicant and city officials have unfortunately mischaracterized the intent of this designation, suggesting that LEED certification was simply "encouraged" but not required. We would like to set the record straight on this issue and provide evidence of what exactly the Accord Plan intended for the Special Pilot site.

The Accord Plan writers went out of their way to create the Special Pilot site, and for a specific reason. The Plan states clearly: "Due to the sensitive nature of this location and gateway into the watershed, this area should serve as a model development for sustainable design through application of LEED principles (p. 3-18)." They envisioned

this site as an experimental demonstration site which could serve as an example for development techniques that could be utilized in the rest of the planning area: "Application of LEED principles should be encouraged throughout the entire planning area (3-18)." In fact, LEED is one of the "Key Recommendations" of the entire plan (p. 3-1). A special land use category was created in the Plan for this site--Special Pilot LEED Residential--with a unique density cap of 3 units per acre. This land use type was only assigned to the Sugar Farms site, illustrating the uniqueness of the Pilot in the minds of the Accord planners.

At the time the Plan was written LEED standards for building design were well established, but a new set of standards was in the process of being created for something called LEED Neighborhood Design, or LEED ND. These standards offered the promise of a new certification option that would assess projects on a landscape level as opposed to just a building-specific level. The Plan writers specifically talked about a site needing to meet all the prerequisites and certain levels of credits to achieve certification (p.3-20). Inclusion of discussion about how to get certified makes it crystal clear that certification was a goal for the Pilot site.

An important aspect of the Pilot Site is that it offers a developer higher density than surrounding areas (p. 3-20). In fact, the Plan specifically ties this higher density to achieving LEED ND: "If a development meets or exceeds identified LEED™ targets the jurisdiction should consider providing some type of financial incentive to the developer (p. 4-1)." The financial incentive in the case of Sugar Farms is clearly the extra density (3 units per acre vs. the standard 1 unit). Greater density is thus explicitly and directly tied to LEED ND certification in the Plan text.

The vision of the Special Pilot Site is thus clear: the site was to obtain LEED ND certification and serve as a demonstration site that offered greater density to the developer in return for following sustainable practices over and above what was being required in other conservation areas in the Accord. There is no indication that LEED ND was optional.

In an effort to avoid having to get LEED certification, the applicant, and unfortunately city officials, have argued that the Sugar Farms site could not *under any circumstances* achieve LEED ND certification, and therefore should not be required to try. This claim is based on their contention that no property currently in agriculture can become LEED ND certified. To the best of our knowledge this claim has not been verified by any official LEED certification authority, and it doesn't appear to be true. Our reading of LEED ND site requirements is that although *in general* LEED ND discourages conversion of agriculture to housing, such a project could be appropriate in some circumstances, particularly circumstances in which a site is part of a greater planning effort and instrumental in achieving an overall reduction in urban sprawl. In the Darby Accord Plan some agricultural land is sacrificed in exchange for requiring that large areas not be developed, resulting in a net retention of agriculture compared to a scenario in which no land use planning existed. Because of this direct link to larger conservation goals we think it highly likely that Sugar Farms could get LEED ND certification.

That said, DCA is not opposed in principle to the applicant and city officials forgoing LEED ND certification *if an innovative alternative project were proposed that could credibly claim to be more protective of the creek than standard conservation development and thus justify triple the density of surrounding areas.* This is a high bar.

City officials and the applicant have attempted to make a case that LEED ND principles are being achieved in the current proposal even though certification is not being required. Their argument is not compelling. For one thing, the applicant has not used a LEED ND certified consultant to assess their plan or make recommendations, nor is Columbus using one. Instead their method has simply been to go through a LEED ND checklist and decide that the proposal is "good enough." If that was all it took to achieve LEED ND goals then LEED ND status would be a much more common thing.

In reality, our assessment is that the current proposal does not meet several critical LEED ND "prerequisites," meaning it would not achieve some of the core aspects of LEED ND. These prerequisites include:

- Protect Imperiled Species and Ecological Communities
- Compact Development
- Wetland and Water Body Conservation

Protect Imperiled Species and Ecological Communities. The Accord Plan used modeling to determine the level of developed area the planning area could sustain before degradation of the stream would occur, factoring in the positive effects of the proposed level of open space. The Plan thus amounts to a grand equation in which a specific level of open space is needed to offset a specific level of development, hopefully resulting in little to no impact on the Big Darby ecology. Because Sugar Farms has only 25% natural open space (see Open Space section below), i.e. less than what was envisioned in the Plan, it is not sufficiently protective of either imperiled species or aquatic ecological communities downstream of the site. We would also note that neither the applicant nor the city provided have supplied any specific evidence that they have analyzed the impact of the additional impervious surface in this project or explained how they would compensate for these impacts on the site.

Compact Development. A quick scan of the site drawing of this plan makes it clear that the development proposed is laid out in standard neighborhood design, i.e. it sprawls out over the great majority of the land. Compact Development, on the other hand, would entail clustering housing in one or a few parts of the land and surrounding it with large areas of open space. Because of the small amount of open space, the proposed project does not achieve this prerequisite.

Wetland and Water Body Conservation. In a similar way that this proposal does achieve protection of Imperiled Species and Ecological Communities, it does not protect water bodies, specifically the creek downstream of the site. As mentioned above, the Darby Accord used modeling to balance developed areas and open space. Because

this site has less open space than was modeled, it will not provide the stormwater benefits that were anticipated in the Accord modeling equation. Insufficient control of stormwater is one of the major problems that lead to water body degradation, and thus the project would not sufficiently meet this prerequisite.

These are just some of the gaps we see in this project, but a LEED ND qualified consultant might find more. The bottom line is that this proposal cannot credibly claim to be "as protective as" LEED ND certification. In fact, as it is proposed it is demonstrably inferior to nearby projects. For example, the Alton Place project to the north of Sugar Farms (in Hilliard) uses large areas of open space, clustered development, and innovative stormwater management techniques such as backflow retention basins.

2. Insufficient open space.

As we have mentioned many times, the second major problem with the Sugar Farms proposal is its inadequate open space. From our last letter:

The applicant continues to claim that they have over 50 percent open space, when by our calculation it is more in the range of 25%, because they are counting mowed grass, retention ponds, and a 27 acre parcel that is not within the LEED special project zoning area. To reiterate, in 2010 the Big Darby Accord Open Space Advisory Council clarified an ambiguous part of the Accord Plan, which as originally written was unclear on the issue of what could be counted as open space. That committee defined open space as being natural areas in native vegetation, i.e. forest, meadows, or natural wetlands (not constructed ponds), meaning that mowed grass and retention ponds are not permitted as open space. This definition brought the Accord in closer alignment with the OEPA's Water Quality Management plan for the area.

We understand that the applicant has stated that it has changed some of the mowed lawns to "meadows" in its latest proposal. If by meadows they mean natural prairie grasses and plants then this would count as open space. However, their written document entitled "Changes to Sugar Farms/Renner South Plan to Date Based on Public Meetings, Updated April 14, 2019" still lists only 117.6 acres of natural open space, which translates to 31% open space.

In addition, even the 31% figure is high, based on the applicant's inclusion of the 27 acre parcel west of Alton Darby Road that isn't even in the Special Pilot Site. If that is removed from the calculation, as it must be, it still appears to us that the total amount of actual open space is around 25%.

On the matter of the 27-acre off-site parcel, the applicant and city officials argue that other projects in the Accord area have been allowed to "import" non-adjacent land to count as open space, as long as that land is permanently protected. This is true. But those sites were not in a Special Pilot site with a Special Pilot LEED Residential land use. The whole idea of a Special Pilot Site, as discussed above, is to demonstrate what can be

done to build a sustainable green project on a particular site. In this case importing the extra land essentially would allow the applicant to have a density of 3.24 units per acre, not to mention enabling them to have less open space within the demonstration site itself. This would clearly go against the vision the Accord planners had for this site.

Important note: Both the applicant and city officials have recently made a rather alarming argument that because the site has its own land use designation it is not required to meet the standards of adjacent Conservation Development areas, and therefore it should not be required to have 50% open space. This argument does not pass the sniff test. Clearly the site was meant to be a demonstration site for other conservation development throughout the planning area. It is simply inconceivable that the Accord planners intended it to have *less* open space than all the surrounding conservation areas. To us this specious argument shows a lack of good faith from the applicant, and frankly city officials.

We will conclude by bringing to your attention the latest major development in the Darby saga. On April 16 the Washington-based group American Rivers placed Big Darby Creek on its list of the Most Endangered Rivers in America. This dubious distinction was based on threats to the watershed from urban sprawl. Although the biggest concerns American Rivers expressed had to do with development pressures west of Franklin County, in conversations with them we also know that they were concerned that the Darby Accord--which they helped initiate by naming Big Darby to the list in 2004--is not being consistently implemented. Following this announcement, on April 19 the *Columbus Dispatch* wrote an editorial in which they agreed that the Darby Accord "hasn't been implemented uniformly," and noted that "the biggest problem is the lack of willingness by authorities in Columbus, Hilliard, and other Darby-area communities to say no to projects that will degrade the creek."

Given the unprecedented threat Big Darby now faces it is absolutely imperative that Columbus not bend rules (open space) or forsake commitments (LEED certification). Columbus has been a leader in Darby protection for a very long time, and committed a lot of time and money to the effort. It would be a tragedy if at this critical juncture Columbus itself contributes to the downfall of the creek.

Please reject this proposal in its current form and insist that the applicant either comply with the letter and spirit of their Special Pilot Site designation, or reduce the density to the normal level, i.e. 1 unit per acre.

Thank you for considering our input.

Sincerely,

John Tetzloff
President, Darby Creek Association



Dear Far West Side Area Commission & The City of Columbus,

RE: Z18-058

Sugar Farms

The recent application from Pulte Homes and Harmony Development for the rezoning of the Alice farm at 1980 Alton Darby Creek Rd., Columbus, OH 43026 has been a topic of discussion among many homeowners in The Coventry HOA. Many of these concerns are listed below:

- With the addition of over 1000+ homes to the Renner Rd corridor, how do the developer and/or the city plan to alleviate the additional traffic in the area. As it stands now from the time of around 7:15 am to 8:30 am it can take 45 minutes to an hour to get to Rome-Hilliard from Spindler Rd. This is about a mile stretch of road.
- The developer states that they will be connecting to an existing city park, they cite the Spindler Rd Sports Complex as a city park. It is not, the gates are always locked, state “fields closed,” and are only open when the fields are rented out to either soccer teams or lacrosse. Both of which have no affiliation with the city as these are all private pay to play club teams that use this “park”.
- There is currently no safe access to the Spindler Park or the Mudsock Dog Park and trail. The only way to access it is drive to it or trespass on someone’s property then cross a 45 mph road. We have seen multiple dogs hit by cars on this road and witnessed two killed. While it will be nice for this new development to have a connecting trail to the existing parks what is being done for the current taxpayers?
- With the phase-out of the win-win between The City of Columbus and Hilliard how will PUD plan to offset the tax base that is needed to fund the local school system. Per Hilliard Schools it cost over \$14,000.00 per year per student which means that the average value of the home in the PUD will need to be over \$400,000.00. The plan does not specify single living, empty nester homes, or senior homes to offset the potential influx of students to the school system. The current residents of Hilliard and Columbus who reside in the Hilliard School District should

not bear the burden via higher taxes to offset this and any other future development of this kind.

- The Developer has asked for a 50 foot height variance for the PUD which will include multi-family. There is no place for a potential 4 story apartment building in this area. There are currently no apartments in this range now and why should there be any in this area.
- Please explain the use of Subarea B-4? The way it looks is it is just an area that is being purchased by the developer to “check” a box for their green space area. This area has no accessibility to the current development.

These are most of the concerns that have been raised by the residents of the Coventry HOA which encompasses 193 tax-paying homeowners in the City of Columbus.

Sincerely,

Evan Fracasso

HOA President

Phone conversation of February 26, 2019 with Morgan Gierman, Timberbrook HOA president:

Mr. Gierman stated one of his main concerns is fire and safety services.

- Timberbrook is located in Norwich Township, but most of the time receives fire and medic services from Prairie Township, where the station is located 2 miles from the nearest Columbus fire station.
- Norwich Township, where Timberbrook is located, is often tied-up on mutual aid calls for Columbus residents. He said the "mutual aid" agreement between Columbus and township fire departments usually results in Norwich Township being burdened to service Columbus addresses more than Columbus serves the township (or its own residents)
- Adding these 1,100+ residences in Columbus (in addition to the apartments under construction, in the pipeline and recently completed) without adding the appropriate amount of fire and safety services would burden the townships further, lower response times, and threaten the health and safety of Columbus and township residents.
- Mr. Gierman is a firefighter/EMT with a township (not Norwich or Prairie townships), thus, he is familiar with fire and safety services as both a resident and professional.

He also asked if, given the "up to 10 years" build-out timeline shared by the developers, what are the plans for the build-out of the infrastructure (roads).

Sugar Farm / Renner South Z18-058

Cross Creek Village Civic Association: Planning & Zoning Committee

Meeting: February 6, 2019

Vote: Disapproval; (0 in favor, 3 opposed, 1 absent)

Area Resident Concerns, Questions, and Comments

As our Columbus Metropolitan Area anticipates significant growth in the next few decades, it is important that our Columbus city officials ensure that growth is responsible and attentive to needs and desires of not only our residents, but also ensures good relationships with our neighbors as well. Good communities start with good neighbors and as this particular land is now annexed within Columbus borders, adjoins Norwich Township and Brown Township, and is in close proximity to Hilliard, we want to be mindful of all considerations for not only existing and future Columbus residents, but our larger neighborhood community.

There are several issues that need be addressed before this or any development in this area can progress. These concerns include: city development, the Big Darby Accord and preservation of Clover Groff Run, school and community considerations, plus traffic and safety concerns.

City Development

With respect to city development, the Columbus Citywide Planning Policies (C2P2), adopted by Columbus City Council on July 16, 2018, provides valuable insight and guidance to create communities that will “improve resident’s quality of life.” Following are specific guidelines within C2P2 that are areas of concern in regard to the developers’ proposal.

General Residential Design Guidelines

“5. Development adjacent to parkland should be oriented in such a way that it faces the park (houses should not back up to parkland).” C2P2 p. 22

The PUD-4 Plan diagram illustrates single-family housing backing up to the proposed dedicated parkland and wetlands in Subareas A2 and B2. This has the potential to create conflict between city interests in maintaining parkland in natural states such as meadows vs. homeowners desired for maintained backyards. This tension has been observed in other areas and C2P2’s guidelines wisely recommend avoiding this potential problem by situating housing facing outward to the parkland.

“Residents find out their backyards are not theirs.” Columbus Dispatch. June 1, 2013.

<https://www.dispatch.com/article/20130601/NEWS/306019832>

Single and Two Unit

“1. New single and two-unit housing should be oriented to the street and reflect the prevailing setback and spacing of nearby homes, as appropriate.” C2P2 p. 22

The proposed housing in Subarea B1 does not reflect the spacing of existing homes facing Renner Road. Existing lot sizes range from just under ½ acre to 1½ acres, with the median lot sized just over ½ acre. The proposed lots on the north edge of Subarea B1 are sized such that the spacing results in ratios of 5:2 or even 4:1 along some of the Renner Road residents’ rear property lines. As this area of the Renner South parcel has been zoned R-2 since at least 1968, the current residents had a reasonable expectation that any future development would be consistent with their neighborhood. The density for this particular subarea is over 4 d.u./acre. Better spacing and horizontal articulation of the site is desired.



Figure 1: Subarea B1 adjoining Renner Rd & Alton Darby Creek Rd residents

“6. Attached garages facing front elevations should not exceed 40 percent of the home’s width (including the garage) and be set back at least two feet from the front elevation. In situations where it is not feasible to set back the garage from the front elevation, a functional front porch of at least 100 square feet should extend beyond the face of the garage. Additionally, side facing garages should provide windows on the front elevation



Figure 2: Pulte Homes – Abbeyville model

of the home. Single bay garage doors and/or garage doors with windows are preferred.” C2P2 p. 23

Within the developers’ application to the Big Darby Accord panel (AP-18-02), they have provided several proposed housing options. These are the same housing selections provided in many of their other Central Ohio communities. The majority of the homes feature the garage as the largest element. In the sample “Abbeyville” home, the facing front is at least 50% garage. This is common among the homes being offered in their communities and text indicates garages will be 50% to 55% of the width, in addition

to being flush or even six feet forward on the front. Many models lack porches, and those that incorporate one, do not extend beyond the garage face. The Big Darby Accord Plan “discourages conventional subdivisions” (p. v, Executive Summary) and yet this plan represents yet another standard, sprawling subdivision fronted by garages.

Multiunit C2P2 p. 23

Several guidelines are provided for multiunit housing, but we are unable to evaluate if the proposed development is in alignment with these recommendations as no design has been provided. There are significant concerns about future building design and its incorporation with proposed single-family housing in addition to existing homes. These concerns include topics addresses by C2P2: building articulation, variation in building design, height transitions, landscaping and buffering.

In addition to the above concerns, the additional height for the multiunit dwelling planned for Subarea B3 would abut I-70 and would likely necessitate additional highway noise barriers, at taxpayer expense.

The variance request for 50-foot multi-family height buried in the development text is not in alignment with existing multiunit dwellings of the area and is not acceptable to area residents without additional design information. The requested variance for a reduction in parking spaces from 1.5/unit to 1.0/unit is also concerning as public transportation options are limited and walking connections to employment, shopping, and entertainment are not introduced.

Open Space pg. 24

“1. Open space should be integrated into new development, serving in one or more of the following ways: an organizational element, a central green space, connection to adjacent open space, protection of natural areas, and/or as a buffer along scenic roadways.” C2P2 p. 24

Subarea B4 consisting of forested area to the west of the main site is not integrated into the development in any way. There are no trails connecting this section. It is not adjacent to any other space. As this area is completely separate, it should not be utilized in any density calculation and/or consideration of open space. While it does serve to protect a natural area, this section is not included in the Big Darby Accord for Special Pilot LEED density consideration.

“2. Open space should include landscaping, trees and connections to sidewalks or trails as appropriate. The design and placement of landscaping should consider the type of open space, its relationship to the built environment and the best use of the space.” C2P2 p. 24

The site contains at least three existing wetlands areas. These areas are poorly incorporated into the overall planning as two of the wetland areas in Subarea A1 will be surrounded by roadways, stormwater detention basin and homes. Neighbors have also expressed concern for the wildlife regularly seen in the wooded areas of Subarea B1 which would have limited pathways to stream resources. Better preservation of these wetland and wooded areas would include free movement for wildlife through incorporation with the Clover Groff stream / proposed parkland area and better placement of detention basins.

“5. Neither required stormwater detention basins nor setbacks substitute for recommended open space.” C2P2 p. 24

The text of the developer’s proposal indicates that 50% (184.6 acres) of the overall site is considered open space. (Exhibit B: Planned Unit Development (PUD) Development Plan Text, p. 4) However, in the Post-Development Groundwater Recharge map provided in their Big Darby Accord application (p. 18), it is indicated that 33.2 acres of this site are retention basins/wetland shelves, with an additional 2.2 acres for a bio-retention basin. As indicated within C2P2, these areas are not open space.

This particular topic was raised during discussions by members of the Big Darby Accord Panel and city staff did not have a clear response regarding the use of retention ponds as open space. The information is in the guidelines provided in C2P2. Given the close

LAND USE (TOTAL)

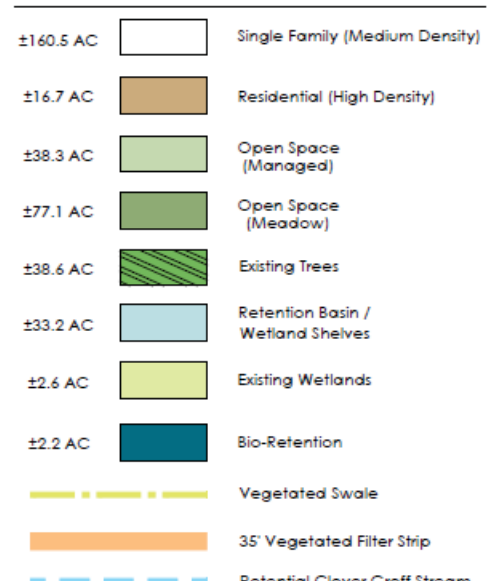


Figure 3: Post-Development Groundwater Recharge map legend

nature of the vote (4-3) by the Big Darby Accord Panel to approve this application, it is disappointing they were not provided clear direction from the city on these guidelines which may have been a factor in voting.

“6. Development should address open space—buildings should front parks and open space.” C2P2 p. 24

As addressed earlier in a previous C2P2 guideline, homes should not back up to park land or open space. This situation occurs in multiple areas within the plan and will create conflict for maintenance. Visitors to the area should not feel they are intruding on homeowners’ backyards and private space. If space is meant to be public area, it is should feel open and accessible to the public.

Connectivity

“2. Connectivity within and among developments to parks and open space should be a design priority.” C2P2 p. 25

There is limited public connectivity to the proposed parkland in Subareas A2 and B2. The only path available to public outside of development is via Spindler Park which is often congested spring through fall with soccer field usage. While this proposal may add 50 acres of public parkland, it will largely be inaccessible to the majority of the public.

“3. Connectivity between developments via public streets is encouraged. In the case connectivity via public streets is not feasible, pedestrian connections should be considered.” C2P2 p. 25

Zero walking connectivity to existing neighborhoods is provided. Zero walking connectivity to retail and shopping is provided. In order to create healthy communities, walkability issues must be addressed side by side with street / traffic considerations.

“4. Traditional suburban curvilinear block and street design should be avoided unless it facilitates preservation of natural features.” C2P2 p. 25

Standard suburban curvilinear street design proposed. What innovations in suburban design should be explored?

Landscaping, Buffering and Screening

“1. Landscape installations should enhance buildings, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.” C2P2 p. 26

Retention basins are added as an afterthought and not integrated into the use and aesthetics of the community. Recommend review of the recent development proposal just to the north in Hilliard, Alton Place, slated for Alton Darby Creek Road and Roberts Road parcels. (Alton Place will be located under a ½ mile from this proposal on the same corridor.) Retention basins are incorporated into their site design such that they become part of the recreational activity of the community. Additionally, the Alton Place proposal strategically places a variety of homes, townhomes,



Figure 4: Alton Place development proposal (Hilliard)

multiunit, and retail uses. The Alton Place proposal shows very good effort in articulation of the site.

“2. Buffering of adjacent uses, particularly lower density residential, should use elements such as existing and new vegetation, fencing, masonry walls, mounding, orientation of residential garages, and placement of site lighting such that it avoids spillage into adjacent sites.” C2P2 p. 26

No buffering or landscaping consideration is provided for existing homeowners at 6248, 6399, and 6435 Renner Road as proposed development exits face directly into their properties. (See “Street F” and “Street A” on map.) Lights from traffic will shine directly into their homes. Creating new communities also means creating new neighbors and taking their needs into account.

Natural Resources

“2. Protected natural areas should be clearly delineated from development to prevent encroachment, particularly in the case of single-unit homes (e.g. split-rail fencing and bollards).” C2P2 p. 27

Proposed parkland and wetland buffers are adjacent to housing lots. Potential encroachment issues are inadequately addressed.

Big Darby Accord & LEED

Density

The framework of the Big Darby Accord provides that development within the protected area occurs at a gross density of one dwelling unit per acre. Special provisions were carved out for the parcels to the east of Alton Darby Road north and south of Renner Road for a higher density of 3 units per acre. (Shown in tan to right.) Within the Big Darby Accord (p. 3-13), the area designated for this treatment only encompasses 328 acres thus allowing for a maximum of 984 dwellings, not the 1108 the developers are proposing. The developers’ application (p. 4) to the Big Darby Accord Advisory Panel states: “The plan recommends development of around 1,400 units in the entire LEED area.” This is untrue. Per the Big Darby Accord Plan (p. 4-26): “Capacity exists for approximately 1,400 equivalent dwelling units in this area.” While the capacity may exist for this extreme number, in no section of the plan is this amount “recommended.”

Special Residential LEED	328	1%
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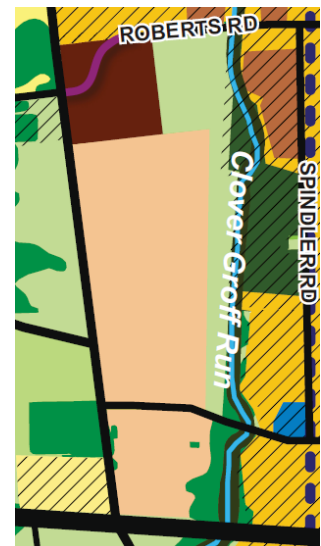


Figure 5: Big Darby Accord General Land Use - Special Pilot LEED area

As addressed previously, Subarea B4 (27.52 acres) should not be included for the density calculations for this proposal. This forested area is in the 1 unit / acre of the remainder of the Accord Area, not part of the LEED project area. It is unfortunate that scare tactics are being employed, e.g. potential logging of the forested area, as a means to advocate for the inclusion of this subarea into the overall density plan. The further municipalities allow developers “density bonuses,” the further the ecological balance is upset.

LEED Certification

Additionally, the basis for any increased density in this area must be examined. The land use planning of the Big Darby Accord allows for higher density in this particular area to encourage development using LEED,

Leadership in Energy and Environmental Design, techniques. The developer has argued (p. 4) that “the development would score high enough to (LEED) certification if not for locational restrictions.” Basic certification levels begin at 40-49 points, with the developers self-scoring at a claimed level of 46 points (34 meeting LEED, 12 only meeting intent). This barely achieves a certification level, much less than a silver, gold or platinum standard.

Two of the points claimed by the developer on this checklist were for “Community Outreach and Involvement.” Per the guidelines within “LEED v4 for Neighborhood Development” (p. 50), to achieve two points for this topic, true engagement with the community in the predesign and preliminary design phases is necessary. It calls for the development team to “work directly with community associations and/or the local government to advertise [community] meeting(s) and workshops. Collect and summarize comments generated at the meeting(s). Modify the project’s preliminary design as a direct result of community input, or if modifications are not made, explain why community input did not generate design modifications.” This did not occur. Better planning would have involved reviewing several options for housing placement and meeting with area residents to discuss concerns and goals prior to design in workshops as recommended by LEED ND, rather than a single site plan presented fait accompli.

An additional point was claimed for “neighborhood schools” as “site is within ½ mile of the Horizon Elementary and sidewalks are included through the site.” Horizon Elementary optimal capacity is 600 students. As of November 2018, this is school is already over capacity at 608 students. Neither existing sidewalk nor proposed paths would connect to the school. Developers also referenced Horizon Elementary as part of the “Community



Figure 6: "Community Connections Plan"

Connections Plan” within their application to the Big Darby Accord Panel, but as this school is already over capacity, it is clear it should not have been included for consideration.

Three points were claimed for inclusion of “EV charging stations in the multi-family development and will offer EV-charging as an option for single-family homes.” Yet this option does not appear in any of the text of development proposal.

Any LEED scoring should be evaluated in depth by independent reviewers and held to a much higher standard. This Special Pilot

LEED area should “**serve as a model for development for sustainable design**” that future growth should look to emulate (BDA p. 3-18).

Stream Restoration & Preservation

The priority of the Big Darby Accord is to “preserve, protect, and improve” the Big Darby Creek Watershed. Effort should be made to create a comprehensive plan for this particular section of the Clover Groff Run to restore the stream in an environmentally sound manner. The current proposal only seeks to squeeze restoration efforts into the current floodplain space. If the goal is to improve the overall health of streams feeding into Big Darby, best practice would indicate that stream restoration planning should be prioritized over residential development. As seen further north in the proposed Alton Place proposal, stream restoration has occurred in advance and altered the floodplain area.

As noted by the Office of Sustainability: “The City of Columbus is home to state and national scenic rivers, diverse wildlife and wetlands, forests and prairies. The City of Columbus and its partners strive to ensure these significant areas are cared for responsibly.” It is important to protect the wildlife that is a part of this stream ecology as well. Movement of wildlife between established wooded areas and wetlands is impeded by multiple conditions: home placement, retention ponds, and road paths. Siting should include a more comprehensive approach for wildlife corridors.

Schools and Community

This area is served by the Hilliard City School District, a district that already has the highest total property tax school millage among school districts in Franklin County. Local leaders have failed to responsibly control residential growth, especially City of Columbus leaders who have allowed significant residential growth vis-à-vis “extended stay hotels.” A solely residential development of this size will potentially add 800 more students K-12 into the community. This will necessitate the building of at least another elementary school as the nearest school is already above capacity. In addition to a bond levy for construction, additional operating levy dollars will be needed to staff another school. The taxpayers of this district are already burdened with the highest rates in the area and will see additional increases as the district heads to the ballot again in 2020. In order to have sustainable growth within in a school system, residential development must be balanced with appropriate commercial growth in order to relieve pressure from homeowners, and renters, in the funding of schools. This proposed development only exacerbates the unbalanced residential growth in the area, especially at this scale. A mixed-use community is a more sustainable approach to help offset student growth.

HILLIARD CITY SCHOOL DISTRICT COMPARISON OF FRANKLIN COUNTY SCHOOL DISTRICT MILLAGE RATES RESIDENTIAL & AGRICULTURAL PROPERTY TAX COLLECTION YEAR 2017				
School District	General Fund	Bond Retirement Fund	Permanent Improvement Fund	Total Millage
Hilliard	51.687469	7.400000	1.940236	61.027705
New Albany-Plain Local	48.990934	10.750000	-	59.740934
Westerville	51.724377	3.650000	3.784312	59.158689
Dublin	47.479209	8.990000	-	56.469209
Worthington	51.331717	3.800000	-	55.131717
* Reynoldsburg	36.911768	14.150000	0.500000	51.561768
* Canal Winchester	38.967845	11.450000	0.500000	50.917845
Columbus	45.432382	4.200000	0.916290	50.548672
Whitehall	40.866652	8.750000	0.500000	50.116652
* Bexley	44.059185	3.250000	1.380000	48.689185
Upper Arlington	44.719618	1.900000	1.846562	48.466180
South-Western	38.675908	6.100000	2.000000	46.775908
Grandview Heights	41.225165	2.900000	1.753520	45.878685
Groveport-Madison	40.709002	2.000000	1.470000	44.179002
Gahanna-Jefferson	39.682384	1.000000	2.144106	42.826490
Hamilton	23.293158	7.500000	1.833654	32.626812
Average	42.859798	6.111875	1.285543	50.257216

* These Districts also have a School District Income Tax, which is not included in the millage above.
 Reynoldsburg 0.50%
 Canal Winchester 0.75%
 Bexley 0.75%

Source: Franklin County Auditor (2016 Res/Agr Tax Rates for the County)

Figure 7: School District Millage Rates

Schools planning also must be fully incorporated into the design of the area. Schools cannot be added an afterthought in the process. When schools are not fully walkable, additional concerns and funding for transportation and safety arise. School communities are more successful when students and families can easily access their school both during the day, for afterschool activities, and summer programming.

Developers’ proposal also includes potential revenue generation of 5-10 mils through the use of a New Community Authority. ORC 349.02 specifically states NCAs are designed “for purposes of encouraging the orderly development of well-planned, diversified, and economically sound new communities.” This proposal does not represent a well-planned, diverse, nor economically sound community. Additionally, tax increment financing (TIF) is being explored as well. Even though a TIF would not impact school or fire funding, it is a view of this community, that TIF options are inappropriate for residential only development.

Area residents are also currently underserved with respect to public community space. Not a single community center, shelter house, pool, or athletic complex is easily accessible to west side Columbus residents living outside of I-270. The nearest community center is more than five miles away from this site. The closest

pool is nearly seven miles away. Opportunities for responsible land use in this area of the city are shrinking. Without thoughtful consideration of community needs for residents, it is irresponsible to add more residential housing at this scale without planning /providing community and civic space for city residents. This is a topic that is even treated within the Big Darby Accord Plan, which includes “reasonable access to health, education, recreation, police and fire protection, library and postal services.” “Equally important, adequate funding...must be considered.” It also additionally recommends a minimum of “10 acres of parkland per 1,000 residents.” (p. 5-15)

Traffic and Safety

While a traffic study is still pending, area residents do not need to wait for another report to tell of the dangerous traffic conditions that exist in the area. Already, in September 2018, MORPC identified the nearest major intersection of Hilliard Rome Road and Renner Road as the 5th worst intersection in the region.

<http://www.morpc.org/news/morpc-releases-top-100-high-crash-intersections/>

Further west, the residents located on Renner Road and Alton Darby Creek Road already know that it is a dangerous stretch as traffic races in front of their homes. Before approving further residential development and the additional cars it will bring, a comprehensive plan must be put forth to address the traffic issues

already present in the area. There exists a unique opportunity to change road configurations if necessary to achieve better traffic flow and safer conditions before additional homes or apartments are built. Over 150 years ago, Renner Road connected directly to Walker Road. Could a look to the past offer different ideas on how to better connect the area? As previously discussed, should a new school be incorporated into the planning area? As school considerations are not incorporated into this design, what safety and transportation issues will be encountered by students and families attending a school located most likely to the west of Alton Darby Creek Road and the high speed traffic already present? There is already a shortage of funding available for necessary road improvements in the region, and this proposed development will aggravate the issue with additional traffic if not properly



Figure 8: 1856 Franklin County Map overlay

placed within a comprehensive traffic plan.

“Money for major Ohio road projects is gone; gas-tax hike proposed.” Columbus Dispatch. Jan. 13, 2019 <https://www.dispatch.com/news/20190113/money-for-major-ohio-road-projects-is-gone-gas-tax-hike-proposed>

Area residents have also raised concerns about delivery of fire and police services. This site is surrounded by Norwich, Brown, and Prairie Townships. With the general area being served via multiple jurisdictions, confusion can and has arisen in servicing residents’ needs. One gentleman experienced terrible pain during a fall as dispatchers did not understand which jurisdiction covered the area which caused significant delay in help being received. Closer collaboration is necessary in facilitating safety planning for all residents of our