

Dear Elaine,

January 20, 2021

I am writing to present my initial comments on the site review documents for 4775 Spine Road.

I carefully reviewed the Concept Proposal documents and provided feedback to Sloane Walbert last year for the benefit of the Planning Board and City Council members. This new proposal includes a few improvements, but unfortunately, even doing just this initial review, I see that this plan suffers from the same basic failings as the concept proposal, as I hope is clear from the following high-level observations.

IM ZONING

- This proposal does not fit this location. These parcels are zoned Industrial Manufacturing, and residential use of this land can only occur in “appropriate locations.” The BVCP states that “Housing should occur in a logical pattern and in proximity to existing and planned amenities, including retail services and transit. (e.g., at the intersection of collector/arterial streets, near transit and on underutilized surface parking lots) and along open space and/ or greenway or trail connections.” This location fails in all but the access to streets. The use review should not approve of a large residential development on this IM land.
- Related to the IM zoning is the size of the footprint. If it were to be used for IM, the maximum footprint is much smaller than the 250,669 proposed for this residential use. Why should a non-conforming use be allowed at a higher intensity than the preferred use of the land?
- Planning Board and Council members have voiced concern regarding the dwindling supply of IM land, raising the stakes every time another parcel is removed for other uses.

SUBCOMMUNITY PLANNING

- This proposal comes to the city at an awkward time. Gunbarrel has no subcommunity plan and very few undeveloped parcels of land remain. Council members and Planning Board members have voiced the recognition that Gunbarrel needs the kinds of city amenities and services (I’ll spare you the list) that other Boulder city residents can easily access in their neighborhoods. Likewise our city leaders have voiced support for prioritizing work on a Gunbarrel subcommunity. Such a plan is needed before more case-by-case development decisions gobble up important land in Gunbarrel. The last thing Gunbarrel needs is more residents in an area already starved for amenities and services.

SUSTAINABILITY

- Like the concept proposal, this plan is sprawl into undeveloped land that supports a vibrant wildlife population. Boulder should not break new ground at a time when many locations in Boulder need to be redeveloped. Sustainability and climate sensitivity tell us to not build over natural places, but to reuse existing buildings.
- COVID is accelerating the abandonment of office and retail spaces in Boulder, thereby providing more locations where this kind of development would fit well without destroying habitat and increasing the heat island effect. As a leader in sustainability, climate change, and current thinking and practices, Boulder should reject this plan for this site and ask the developer to find an appropriate location for this plan.

UNIQUE AND HISTORIC SITE

- This location is unique and should not be disturbed for residential use. The one and only Celestial Seasonings tea factory, a world-renowned company started in Boulder more than 50 years ago, occupies the adjacent parcel to the west. This site is to many of us part of a historic landmark, and a source of pride and inspiration to Boulderites and friends.

WILDLIFE

- The site houses a wildlife colony that supports many additional species over a wider area, and Boulder should insist this plan be taken to a more appropriate location. This vibrant “prairie dog

preserve” is not only a popular tourist attraction, but it supports a complex ecosystem of wildlife, an asset to Gunbarrel residents and our guests, who come from next door, and across town, and from around the world to appreciate it. Until such time as development of this land is NEEDED for IM use, we should continue to be stewards of this important wildlife resource and historic place.

LACK OF AMENITIES AND SERVICES

- The site is a semi-rural location miles from the educational, employment, commercial, cultural, and recreational opportunities in the center of Boulder. The urban design is a bad fit here, but it would be a fine fit elsewhere in Boulder.

THREAT TO PRIVATE PARK

- Finally, this location is about 1 mile from the nearest city park, Eaton Park, which is not much more than a covered picnic table, a wild land area some of which is an old fill dirt area, and an abandoned BMX bike course. Resident can reasonably be expected to take advantage of the private Gunbarrel Commons park only a block away for walking their dogs and getting relief from their high-density apartment complex. This points to the need for real park open space closer to this neighborhood. The “park” in this plan is like the rest of the plan: it may meet minimum requirements, but it doesn’t meet the real need.

DENSITY

- The plan is for ultra-high density in a semi-rural location where densities range from 3 units per acre to 17 units per acre. Density of 24 units per acre is inappropriate for this site. The ultra-high density in this location fails Boulder’s “transition” requirement. Instead of this site being a transition between the low density to the south and the medium density to the east, this plan injects ultra-high density in the middle, immediately adjacent to open space on the west and north — another way in which this fails to fit in this location.

AFFORDABLE HOUSING

- Gunbarrel is the affordable housing area of Boulder, where rental costs (and property values) are lower and a dollar buys more than in Boulder. Apartments in Gunbarrel have a high vacancy rate in spite of the rental costs being lower than nearby affordable housing units, many of which are vacant. Gunbarrel — in fact all of Boulder — has enough apartments and many sit vacant. But people cannot find **houses** to rent or buy in Boulder. People need single family homes they can BUY rather than more multifamily housing to RENT. This is increasingly true across the US, as we move toward a post-COVID reality in which people want and need more safe space for themselves and their families.
- Since affordable housing is so important, we should see more of it in this plan. The developer proposes the minimum. Let’s push for twice that since land costs are lower here than in other parts of Boulder. And let’s make it townhouses that people can buy.
- If rentals are part of the final plan, let’s insist that rates be comparable with other apartment rentals in Gunbarrel.

ALTERNATIVE TRANSPORTATION

- Gunbarrel is “out there” northeast of the City, surrounded by farms and open spaces. Being “outside Boulder” means that Gunbarrel residents need cars to go anywhere. Yes, bikes work, too, but our main connection to Boulder is Jay Road and the Diagonal Highway, on which bicyclists have been killed by careless drivers. The lack of a safe, continuous bike path between Gunbarrel and Boulder stands in the way of realizing the projected 20% use of alternative transportation.
- It seems clear to me that the 20% alternative transportation estimate is a convenient number that helps justify the plan’s inadequate number of reasonable size parking spaces. There’s just no room for them, so the plan claims we don’t need them. This is nonsense. Even Boulder’s required number of parking spaces is clearly inadequate, and it doesn’t even factor in things like service vehicles and delivery vehicles.

- RTD's reduction in service to Gunbarrel is also a concern.
- These concerns point to the fact that Gunbarrel residents need cars, because the alternatives are not adequate at this location.

ACCURACY AND VERACITY

These documents include many, many rosy statements that are exaggerated, vague, inaccurate, misleading, unsubstantiated, and in other ways essentially false:

- Rendering diagrams in which buildings appear small and people and green spaces appear large.
- Overly optimistic or unfounded assumptions presented as "data."
- Difficulties that are minimized or ignored.
- The plan is even referred to in the Utility Plan as "medium density." Is this part of the plan sized right?
- Terminology that implies future work, for example, "solar ready." Why not make it solar powered?
- Basic requirements met that are presented as "enhancements" or special improvements beyond what is required in the code. For example, connections of new sidewalks to existing sidewalks cannot be considered an enhancement.

The frequency of these problems in the documents raises questions with the remainder of the documents and planning, and destroys our trust in the ability of this organization to effectively build what they are claiming they will build.

- What will this development be in the long-term? Certainly not the fairy tale they claim it to be.
- Will the engineering be adequate and the construction careful? Will the materials be of good quality?
- Will it be the wonderful improvement to the community that it promises to be?
- Is this gamble worth the sacrifice of the wildlife and open space the community now enjoys?

SUMMARY

This plan is an inappropriate use of IM land and should be rejected outright.

- **A use review to consider whether residential use should be allowed on these IM zoned parcels should reject this application because of the long-term value of these parcels for IM use. They are not appropriate for residential use, as the impacts on the neighborhood are significant and negative and cannot be alleviated. Residential use would be much higher intensity than IM use.**
- **The natural, historic, and wildlife values of the area justify preserving this space until such time as underutilized, abandoned, buildings in Boulder have been fully revitalized and other options are not available. Break no new ground until absolutely necessary.**
- **Boulder and Gunbarrel have no shortage of rental apartments. Vacancies abound. The housing we need is single family units that families can buy: townhouses, duplexes, patio homes.**

Specific aspects of this plan present serious problems.

- **The ultra-high density of the residences are much higher than any surrounding densities and the density does not transition smoothly to adjacent neighborhoods.**
- **The density is forcing the plan to skimp on the size and number of parking spaces because of a lack of space.**
- **An absurdly high estimate for alternative transportation is used to help justify the insufficient parking.**
- **If affordable housing is needed, this plan should provide more than just the minimum. How about 40% AH, like Diagonal Crossing? And why not have half of the entire development be owner-occupied?**
- **Many details seem to be missing: shuttles that do not exist, buildings that are solar ready instead of solar, a library that cannot be funded, social pathways being called bike paths. Even one entire document and random pages in other documents are missing. Consultants**

who provided reports in the package mention information and records they requested that the owner of the land did not provide. And of course, there are the missing amenities and services these residents should have nearby (according to the BVCP).

Because so many aspects of the plan are poorly conceived, exaggerated, and unsupported it should be returned to the applicant to be redone.

Boulder is a special place and deserves better. Even in Gunbarrel.

Thank you for considering these observations. I am available to answer any questions, and I look forward to more opportunities to work with the City on plans for Gunbarrel.

Sincerely,

Kit Fuller
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