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Sloane Walbert
City of Boulder Planning Department
Boulder City Council Members
City of Boulder Planning Board

Transmitted via email

Re: Concept Plan review (LUR2020-00003)
4775 and 4649 Spine Road
Proposed 268 unit development on 9.8 acres at 27 units/acre density

Dear Sloan, City Council and Planning Board:

This comment is submitted on behalf of the Gunbarrel Community Alliance (GCA). It responds to the "Concept Plan review (LUR2020-00003)" proposing a 268 unit housing development on 9.8 acres of land (three separate currently undeveloped parcels) at 4775 and 4649 Spine Road. According to the staff memo, the Concept Plan review is intended to provide the developer with feedback and provide direction should the developer decide to submit Site Review plans.

We appreciate staff and the Planning Board's close review and constructive comments to date and Council's decision to call up the Concept Plan.

At this time, City Council should table and defer action on the Concept Plan to allow the community to complete the Gunbarrel Subcommunity Plan that both the Planning Board and City Council have identified as a priority for the Boulder Valley Comprehensive Plan (BVCP) Midterm Update. In addition, applicant needs to address the ten concerns about the current Concept Plan raised by initial Board and Commission review in March 2020 if applicant hopes for serious consideration of a future proposal.

1. Introduction and Summary

GCA is committed to a Gunbarrel community that is welcoming, diverse, inclusive, resilient and revitalized with a better geographic and overall mix of land uses including residential, commercial, business, industrial, public and open or green spaces and habitat. GCA envisions a future Gunbarrel community that is better planned, better than ever, more livable, and with a better quality of life informed by core principles in the Boulder Valley Comprehensive Plan (BVCP) and community goals, objectives and values.

Intelligent Subcommunity Planning is the only way to achieve Gunbarrel's vision. The Planning Board and City Council committed to Gunbarrel Subcommunity Planning as a top priority for the 2020 BVCP Midterm Update.

Because decisions for significant acreage of undeveloped land in Gunbarrel will impact the imminent Subcommunity Plan, City Council should approve a temporary moratorium on accepting or processing major new development proposals until the new plan is finalized. This request is consistent with and supported by numerous temporary development moratoria approved by the City and County in the last five years and beyond, as detailed below.

Applicants' Concept Plan proposing 268 residential units on 9.8 acres seeks unprecedented 27 units/acre densities of residential development on the outskirts of Gunbarrel for a parcel zoned Industrial Manufacturing. This is a non-starter because it is inconsistent with future zoning and proposes densities wholly inconsistent with the neighborhood character. Because any proposal warranting serious review or advancing to the Site Plan review stage must significantly reduce the proposed density and otherwise alter the project to incorporate mixed uses and provide attractive usable open space including habitat and parks, the current proposal is plagued by too many uncertainties to waste the time of staff and residents debating details such as parking, configuration of buildings, and mix of housing and other uses.

When the applicant adjusts the density to a reasonable number of units, the current 25% on-site affordable housing component could be curtailed or dropped altogether, and it is expected that many other features will need to be significantly altered should applicant seek to move forward informed by the future Subcommunity Plan. Accordingly, the current proposal should be tabled pending completion of the Subcommunity Plan and the applicant should be directed to address the concerns raised by the Board, Commission and the public in any future proposal.

Reasons to deny the proposal at this time or, at a minimum, to defer a decision include:

- The development proposal is a non-starter at this time because the Planning Board and City Council are committed to Subcommunity Planning for Gunbarrel as a top priority of the 2020 Boulder Valley Comprehensive Plan midterm review;
- Subcommunity Planning would risk being a pro forma exercise if, before completion, the City authorized major projects for the small and shrinking base of undeveloped properties that are currently subject to zoning or land use designations that would allow them to meet community needs;
- The current proposal is inconsistent with current zoning, contrary to past commitments, and uninformed by the community's vision to be developed in collaboration with city and county planners, resiliency specialists and other experts;
- The applicants' Concept Plan appears to have ignored Board and Commission feedback from March 2020 on eleven issues (per Staff Memo at page 4):
 - encouraging the applicant to consider a mixed-use development,
 - segregating proposed AH units rather than dispersing throughout the project,
 - allowing a residential use in an IM district "and the loss of industrial space in the city"
 - intensity;
 - "reducing the number of units and size of buildings to be compatible with the surrounding residential development";
 - inordinate amount of site dominated by surface parking;
 - lack of quality open space: "Active open space like a central park space is essential for the development"
 - lack of connectivity for vehicles and bicyclists/pedestrians;

- “very limited” transit access;
- Lack of improvements to Spine Road or providing a more walkable neighborhood;
- Additional analysis needed on BVCP Policy 3.03 “Native Ecosystems” (healthy, thriving prairie dog colony)
- Celestial Seasonings committed to manage the parcel for prairie dog habitat in 1999 and it currently hosts a healthy, thriving prairie dog colony;
- The development proposal is submitted in the midst of a pandemic when the vacancy rate for rental properties in Gunbarrel is currently high;
- The development proposal was not informed by any public meetings or community outreach on the part of the developer;
- The development proposal would dramatically increase the population of incorporated Gunbarrel -- by approximately 15% (at 2.9 residents per unit) without any underlying analysis on *where* it makes sense to direct major increases to Gunbarrel’s housing stock and population centers – and it lacks any mixed use component;
- Nor does the application answer *whether* it makes sense to increase Gunbarrel’s population this much at this time in the context of major residential developments believed to exceed 800 units in recent years; and
- Letters in the Packet ran 105 opposed to the current concept plan, compared to 4 in favor.

2. This is a market rate project

The Concept Plan proposes 268 units of which 200 would be market rate and 68 (25%) would be affordable. The affordable units would be segregated rather than integrated the market rate units. That was identified as a concern by staff. Standing alone, it is reason for close scrutiny, especially in a town noted for income disparities, being out of the reach of lower income individuals and sometimes unwelcoming to disadvantaged populations.

Reducing the proposed density below the 14 units/acre high-density threshold would half the total units and could eliminate all of the currently proposed affordable units from the current plan. If the decision were a generous allowance to develop half the property at 14 units/acre that totals 70 units. Under either scenario the developer might decide to go with in lieu payments for minimum AH requirements rather than sacrifice on-site profit margins. These are currently hypothetical questions. The main point is that the supposed AH component was achieved by proposing ultra-high densities for a Gunbarrel area currently zoned Light Industrial and the community aspired to a rural residential character outside the commercial center.

By comparison 30Pearl in downtown Boulder recently approved 120 units on 4.6 acres at a 26 unit/acre density. 30Pearl has access to everything 4755 Gunbarrel does not in terms of 20-plus unit per acre density making sense from planning, transportation, resiliency and quality of life perspectives: retail, services, community amenities, transport, multi-use paths, etc. The proposed density for Spine Road is a non-starter for rural Gunbarrel lands currently zoned IM, located far from the Commercial Center.

3. Subcommunity Planning

The Planning Department describes Subcommunity Plans as “a tool for residents, landowners, business owners, city officials and city staff that communicates expectations about the future of

a subcommunity and guides decision-making about subcommunity resilience and evolution into the future.” Boulder recommitted to Subcommunity Plans in 2018:

In 2018, at council’s direction, the Comprehensive Planning team began work to re-establish a subcommunity planning program, a localized planning effort to address a range of issues and opportunities and to implement the goals of the Boulder Valley Comprehensive Plan (BVCP). The key features of the program currently are being developed to create an engaging and efficient planning process.

See <https://bouldercolorado.gov/city-council/subcommunity-planning-2>.

The City subsequently completed a new North Boulder Subcommunity Plan, and an East Boulder Subcommunity Plan is believed to be in progress. Other subcommunities such as University Hill and the East Arapaho Opportunity Zone have also revised land use, zoning and related standards and area visions in the last five years. Gunbarrel has not, despite the urgent need.

Earlier this year, the Planning Board and Council committed to the development of a Gunbarrel Subcommunity Plan as a priority for the BVCP Midterm Update. Overall, Subcommunity Planning is recognized as a significant element of the Boulder Valley Comprehensive Plan 2020 Mid-term review. Three references in the June 2020 review presented to City Council support deferring a decision on the proposed development on Spine Road until the completion of Gunbarrel Subcommunity Planning.

First, Planning Board minutes from the March 28, 2020 Meeting provide (underlining and highlighting added):

On a motion by **D. Ensign**, seconded by **H. Zuckerman**, the Planning Board voted 7-0 to recommend that City Council prioritize the following work items on the City Planning Department work plan:

- 1) Implement a Neighborhood Infill Pilot Project as outlined in the 2015 Major Update to the BVCP as a near-term project,
- 2) Prioritize TVAP Phase 2,
- 3) Prioritize Gunbarrel Subcommunity Planning.**
- 4) Prioritize Diagonal Plaza Area Planning.

The 7-0 vote and the short list of four priorities establishes the consensus behind the urgent need for a Gunbarrel Subcommunity Plan and the importance of delivering on this commitment before major land use decisions are made that could detract from the process.

Second, the BVCP Midterm Update to City Council (June 2020) provides (at page 21):

Planning Board Action [. . .]

Motion 3: Recommendations for Prioritizing Work Plan

- Unanimous recommendation to City Council to prioritize Neighborhood Infill Pilot Project, TVAP Phase 2, **Gunbarrel Subcommunity Planning**, and Diagonal Plaza Area Planning

See https://www-static.bouldercolorado.gov/docs/5A_BVCP_2020_Mid-Term_Update_Presentation-1-202006021536.pdf?_ga=2.144291957.1177588361.1591048076-527390211.1567003920

Third, the same June 2020 City Council BVCP Midterm Update provides precedent for respecting subcommunity planning processes and priorities in land use and zoning decisions. At page 14, the Update establishes that the City recommended against an application to change zoning (“Proposed change to correct split zoning”) at 1309 Meadows because “the current Low Density/Residential land use designation is consistent with the North Boulder Subcommunity Plan.” Consistent with this recommendation, tabling the Concept Review for Spine Road is appropriate to ensure that any future project is consistent with the pending Gunbarrel Subcommunity Plan.

4. Zoning and Density

When annexed as part of the 52-acre Celestial Seasonings PUD in 1982, the subject parcels were zoned I-D (Industrial-Developing) and are now designated Light Industrial on the BVCP Land Use Map. Staff Memo at 7-8. Light industrial and Mixed-Industrial are both in short supply in Boulder County. The BVCP establishes that both uses are concentrated in Gunbarrel.

[LI]: Characteristics and Locations: LI uses are concentrated primarily in ‘industrial parks’ located within the Gunbarrel area along the Longmont Diagonal and north of Arapahoe Avenue between 33rd and 63rd streets.

Uses: Consists primarily of research and development, light manufacturing and assembly, media and storage or other intensive employment uses. Residential and other complementary uses will be encouraged in appropriate locations. See *Policy 2.21*.

[MUI]Characteristics and Locations: MUI will be encouraged in some industrial areas. Specific zoning and other standards and regulations will be adopted which define the desired form, intensity, mix, location and design characteristics of these uses.

Uses: Light-industrial use will be predominate and neighborhood retail and service uses may be allowed. Housing compatible with and appropriate to the industrial character will be encouraged and may be required.

BVCP at 104.

Residential and complimentary uses “*may be allowed in appropriate locations*” with this zoning. Packet at page 8. That raises the question whether this site is appropriate for the proposed zoning and land use change to designations that date back almost 40 years and were in place when most of the adjacent residential communities were built and current residents moved in? The eleven concerns raised by Board and Commission review establishes that this site is *not* appropriate for the ultra-high density single-use residential development proposed by applicants.

Most of Gunbarrel is currently zoned “low density residential”. BVCP map at page 148. None of Gunbarrel is zoned for “high density residential”. The application proposes for the entire

property to be developed at twice the threshold high density intensity of 14 units per acre. The BVCP provides (at page 104):

Characteristics and Locations: The HR areas are generally located close to the University of Colorado, in areas planned for transit-oriented redevelopment and near major corridors and services.

Uses: Consists of attached residential units and apartments. May include some complementary uses implemented through zoning.

BVCP Density/Intensity: More than 14 dwelling units per acre

The properties are not located anywhere near CU or an area, are not near an area planned for transit-oriented development, and are far from services. The application lacks a mixed use component. It fails on all counts to qualify for the proposed ultra-high density proposed by the applicant. The only high density residential referenced in the BVCP are on the Hill and the Transit Center location. BVCP at 118 and 42, respectively. High density needs to be taken off the table for this rural Gunbarrel location for this location that currently provides important wildlife habitat and ecosystem services.

5. Development Timeouts in the City and County of Boulder

Temporary pauses on processing and approving major development proposals or land use changes are a commonly used land use planning tool in the City and County of Boulder. A few recent examples include:

- The Opportunity Zone. In 2018 the City imposed a moratorium on new projects in the “opportunity zone” area, which runs in the area around 28th to 55th, Arapaho and the Diagonal Highway.
 - Concerns included the pace of development, the number and scale of proposals, and consistency with existing plans, visions and priorities for the opportunity zone specifically and the community as a whole. Some citizens perceived that staff actions promoting and processing applications had gotten ahead of the ability of the community to thoughtfully review proposals and ensure consistency with community visions and goals.
 - The moratorium was specifically motivated in part by the need to develop new zoning regulations for the area consistent with the newly approved BVCP.
 - Prior to lifting the moratorium, the City altered policies going to land use and procedural standards, as well as efforts to better balance uses such as commercial, retail and residential against BVCP and other community goals.
 - As such, many of the same issues behind the Opportunity Zone moratorium are found in Gunbarrel. The need to halt development to implement BVCP policies and priorities is directly on point.
- Niwot Commercial District. In 2018, the County imposed a moratorium on accepting or processing new applications for development in the Niwot commercial district,
 - in part because residents had expressed concerns about the adequacy of density and design parameters in the current land use code as applied to Niwot, and to allow residents and other stakeholders more participation and a great voice on the future of the community.

- This makes the Niwot timeout an excellent parallel and precedent for Gunbarrel. Both communities are small towns that retain a rural feel located between Boulder and Longmont, and, like Niwot, much of Gunbarrel is unincorporated.
- **University Hill.** In 2015, the City imposed a housing moratorium on University Hill notwithstanding a consensus on the need for more student housing and rentals to support the University of Colorado (CU).
 - The rationale included the need to integrate retail and commercial space with new student rental housing, consistent with the designation of the area as an “Activity Center” in the BVCP.
 - Speaking to the need for the temporary moratorium, “Councilman Macon Cowles said that while student housing may be the most profitable use of the University Hill, it might not be the highest and best use as far as the city is concerned” See <https://www.housinghelpers.com/blog/boulder/moratorium-boulder-university-hill-student-housing-developments/>
 - In contrast to the Hain property in Gunbarrel which is miles from any businesses, University Hill is near a wealth of retail, service and commercial businesses – but the moratorium was still judged necessary to address issues specific to address local issues and concerns consistent with City and County planning charter.
 - As such, the University Hill moratorium is another strong precedent for halting the Spine Road proposal pending a new Gunbarrel Subcommunity Plan. BVCP decisions and implementation inform the need for temporary development moratoria to address the best location for new rental properties and achieving the desired mix of land uses including commercial and retail services to serve and benefit from significant new housing developments.
- **Planning Reserve.** Since the original Boulder Valley Comprehensive Plan developed in the 1970s, the City and County have imposed a development moratorium for lands within the “Planning Reserve” northeast of Jay Road and US 36, an approximately 500-acre property with 235 acres owned by the City and the balance in private ownership.
 - Notably, proposals for 100% affordable housing development on private property have been deferred pending a community planning process for the Reserve.
 - The rationale for the decades-long development moratorium for the Reserve is to be used for unmet future community needs which could include affordable housing, public infrastructure or facilities, and green space, open spaces, habitat, wildlife corridors, multi-modal transit options, parks, playing fields, etc.

In sum, temporary development moratoria are routinely employed by the City and County of Boulder to ensure intelligent land use decisions and support rational implementation of the BVCP and other community planning charters.

6. Density, Demographics, Population, Mixed Uses and Gunbarrel

At an average occupancy rate of 3 persons per unit in the proposed development, the 800-some new residents would increase the population of incorporated Gunbarrel (estimated at 5,250) by significantly more than 10%.

According to U.S. census data, the area of the Gunbarrel Census-Designated Area (CDA) is 6.4 square miles or 4,096 acres. Thus, the developers are proposing to increase the total population

of Gunbarrel by approximately 8% on a parcel of land that accounts for approximately ¼ of 1% of the total area of the CDA (the 9.8 acre parcel is 0.00239% of the 4,096 total acres). In 2010, Gunbarrel's population density was 1,472 people per square mile. Assuming 800 new residents packed into 9.8 acres at the proposed Spine Road development, the density would be 51,200 per square mile – quite a bit higher than the rural residential character emphasized by existing zoning and supported by residents.

The proposed 268-unit development would be constructed far from any commercial or retail businesses or even a nearby stop-and-go or neighborhood grocer. It is proposed for an area and a CDA notoriously lacking quality public amenities and infrastructure, as further explained below. These components of the applicant's proposal cannot be stressed enough, nor can the applicants' decision to ignore Board and Commission feedback to consider a mixed use development.

In the unlikely event Gunbarrel's pending Subcommunity Plan prioritized that level of population growth and a single-use project in this area at the applicants' proposed densities, the proposal would be likely to be approved after the plan is completed. In the more likely event that the Subcommunity Plan charts a different course for Gunbarrel, the developer would be advised to either walk away or adjust future proposals consistent with the new plan.

7. The Gunbarrel Center Community Plan

The Gunbarrel Center Community Plan (GCCP") was approved in 2004 and amended in 2006.

Goals and objectives relevant to the current proposal include:

Goal: Provide opportunities for developing a viable, easily accessible, pedestrian-oriented retail town center of appropriate scale to serve the Gunbarrel subcommunity, outlying subdivisions and employment centers.

Objectives:

- Create a pedestrian-friendly and community-oriented retail district with an identifiable "main street."
- Provide a variety of public and civic uses to meet the needs of the subcommunity and add vitality to the commercial center.
- Provide a central public open space area that will be a focus of the village center and encourage community-wide activities.
- Provide opportunities for adding more housing to the commercial area of a size, character, and density that will help support the retail uses and bring day and evening activity into the commercial center.
- Provide an appropriate mix of housing densities and types that is compatible with the surrounding neighborhoods and provides affordable housing to workers in the area.

The transportation oriented goal of providing safe and convenient vehicular and non-vehicular connections between the commercial center and the surrounding area provided for objectives including:

- Provide better access to retail uses, improve the pedestrian experience, and provide linkages; improving and providing adequate access to public transit;

- Encourage walking and biking as viable transportation options;
- Improve off-road transportation linkages from the outlying residential and nonresidential neighborhoods to the commercial center.

Currently, public transit between 4755 Spine Road and the commercial district is not a viable alternative to driving – as Powderhorn residents on the east of Spine Road can attest. RTD’s budget woes make it more likely that transit will be cut back than expanded in the foreseeable future. The 4755 Spine development proposal lacks any commitment to improving walkability and bike-ability including off-road linkages from the proposed development to the Commercial Center.

8. Public Infrastructure and Amenities

Gunbarrel lacks public infrastructure and amenities including a library, recreation center, swimming pool, adequate parks and playgrounds, a senior center, or playing fields. When the population was only a few thousand people, this was a lesser concern. Now that Gunbarrel has more than 10,000 residents including 5,250 annexed into Boulder, this is a hugely significant concern.

For those who can afford it, the country club and other private businesses offer some recreational amenities. For those who can’t afford it, these amenities of modern life aren’t available. Gunbarrel residents’ vision for a more inclusive and welcoming community depends on ensuring that public amenities and infrastructure can be integrated into the community. Instead of approving 268 new residential units without regard for future planning, the Board and Council need to await the results of subcommunity planning on how much undeveloped land has zoning and land use designations that will support public infrastructure, and where that land is located vis a vis population and other considerations.

Questions include:

- What are Gunbarrel’s infrastructure needs, including ranking by priority, need and resident interest
- How many undeveloped parcels in Gunbarrel might support such infrastructure?
- Based on size and location, what uses might be supported by each parcel?
- What about access to existing public spaces and future infrastructure, including non-vehicular transport that encourages walking, biking, transit and other environmentally friendly modes, including needed improvements and connections between existing multi-modal paths?
- If the highest ranked parcels are not currently in public ownership, are there options to acquire such parcels to implement the new Subcommunity Plan?
- If funding is an issue, what options are available for raising funds to implement the Plan?

The above infrastructure issues go to land use. Other concerns may be equally important and likely to arise in a subcommunity planning process to make Gunbarrel more welcoming, inclusive and livable for residents from diverse backgrounds including disadvantaged or marginalized populations.

Issues like municipal high-speed internet and community schools also might be identified in or addressed by holistic subcommunity planning. Schools are a fundamental building block of

community and public infrastructure that has been long neglected in Gunbarrel – where families drive 15-45 minutes each way, every day to get their students to school.

Consistent with prioritizing Gunbarrel subcommunity planning prioritized in the BVCP Midterm Update, Boulder needs to defer decisions on major projects which could undermine Gunbarrel's ability to implement the goals, objectives and vision in its pending plan. The opportunity cost of prematurely rushing ahead with Site Review is missing the ability to consider other uses for the property. The same logic the City applied to other recent development moratoria and the Planning Reserve should be applied to this undeveloped parcel in 2020.

9. History and Past Property Owner Commitments

History and past commitments specific to this parcel of land is relevant to the disposition of the current proposal. Specifically, the parcel is almost wholly occupied by a healthy prairie dog colony which Celestial Seasoning committed to protect in 1999. Board and Commission feedback on the Concept Plan review identified this concern in stating that “additional analysis is necessary to determine the implications of any agreements made by Celestial Seasonings and to determine compliance with Policy 3.03 “Native Ecosystems” of the BVCP.” Staff Memo at 5.

The Staff Memo states that “the proposed development would affect the established prairie dog colony on the site.” Packet at 34. In plain English, the colony would have to be relocated and, if relocation sites are not available, removed through lethal control. Relocation success is never assured and even the best planned relocation efforts are sometimes a death sentence for the majority of animals.

In 1999, lethal prairie dog control activities on this property resulted in Celestial Seasoning publishing a full-page open letter in the Boulder Daily Camera, attached as Exhibit 1. Staff Memo at 15.

Celestial Seasoning's 1999 Open Letter to the community apologized for the lethal control efforts and committed to “be a model for handling environmental issues in a humane and earth friendly manner.” Celestial Seasons Action Plan including the following numbered commitments:

1. Immediately limit prairie dog colony management activity to relocation within property boundaries only.
2. Continue meeting with leading environmental and wildlife organizations to hear their concerns first-hand and ask their help to develop our long-term strategy for co-existence with the prairie dog colony.
3. Explore the potential for some relocation of prairie dogs to our property.
4. In anticipation of a facility expansion plan, create a buffer around the facility with minimal impact on the existing habitat.
5. Ensure that the colony is protected during all activities utilizing the facility and, most importantly, that the fields are not used for parking.
6. Establish the Celestial Seasonings Environmental Grant Program [funded “up to \$50,000 per year in total”].
7. Include education regarding the value and the plight of prairie dog ecosystems in our company tour and consumer relations efforts.

Celestial Seasonings merged with Hain in 2000 to form the Hain Celestial Group, which earned \$2.7 billion in revenue in 2015. Celestial Seasonings annual gross sales are estimated at \$100 million, or less than 4% of Hain's total sales.

When Celestial was locally owned, any development proposal would have been far more likely to reflect local values, be informed by community input, and speak to past commitments to habitat, wildlife and surrounding residents. The prairie dog reserve example demonstrates Celestial's past responsiveness to public concerns and sincere efforts to be a good corporate citizen. To date, Hain has failed this test for the proposed development.

8. Resiliency and Climate

The BVCP establishes the importance of incorporating concerns going to resiliency, climate and environmental protection into all land use decisions, and subcommunity planning as a way to adapt policies to local areas. Vehicle-oriented development that destroys important habitat is inconsistent with these provisions.

Resiliency and Climate Commitment

Climate change and risks associated with other uncertain social and economic forces outside the city's control are addressed in the city's Resilience Strategy and woven through the plan to provide guidance regarding how to become a more resilient community. Resilience is addressed in the revamped vision/ values. It is also in new policies about community work to transform its energy system and achieve energy system resilience. Policies also aim to improve community capacity and self-reliance, address preparedness, response, and recovery to disruptions such as floods, fires, or economic downturns, and improve community connectivity and communication about such disruptions. Several sections of the plan further acknowledge the community's commitment to and actions toward emissions reduction, reducing burning fossil fuels, and supporting climate stabilization, such as through soil carbon sequestration.

The Vision and Core Values and Sections 3, 4, 5, 6, 8 and 10 address resilience and climate action.

Subcommunities and Area Planning

The community has been eager to do fine-grained planning and develop targeted solutions for different community geographies, including addressing community benefits desired. The plan includes revised criteria and approaches to local area planning, including an action plan goal to prioritize area plans for neighborhood commercial centers and allowing for updates to the comprehensive plan land use plan when area plans are completed.[...]

Chapter V includes the new criteria for subcommunity and area planning. The action plan identifies future area plans and is available at www.bouldervalleycompplan.net.

Chapter V - Subcommunity & Area Planning: Subcommunity and area planning bridges the gap between the broad policies of the comprehensive plan and site-specific project review (development applications or city capital projects). This chapter describes the purpose, approach and criteria for subcommunity, and area planning and summarizes the plans to date.

According to the Community Sustainability Framework chart in the BVCP, development standards and zoning and other BVCP implementation decisions flow from Subcommunity and Area Plans and other sources. BVCP at page 18. Subcommunity plans provide direction for

specific geographic areas. They provide a link between the broad policies of the comprehensive plan and more detailed zoning, development review and capital improvement programming decisions. Chapter V, Subcommunity and Area Planning, describes the criteria and approach to local area planning.

Subcommunity planning in Gunbarrel will be an opportunity to effectuate the community's interest in resiliency, environmental protection and climate action. As the nation eyes a Green New Deal, subcommunity plans might be an opportunity to specify future building standards to make real progress reducing GHG emissions.

Net-zero building is recognized as a key climate strategy in the building sector, but applicants are not proposing this climate-friendly approach. The Spine concept plan lacks any real commitment to emissions reduction, environmental protection or moving Gunbarrel towards a less automobile-centric, more livable community.

10. Gunbarrel Needs a Voice and Asks to be Heard

It is believed that Councilperson Nagel is the first city Council member to be elected from Gunbarrel in the almost 40-years. Councilperson Nagel gets Gunbarrel and is attuned to the perspectives and vision of community members. As Gunbarrel comes together to chart its future, her views should be appropriately weighted on major short-term site-specific decisions that, individually and collectively, will have much to say about Gunbarrel's coherence, consistency with BVCP principles and quality of life and c in 10, 50 or 100 years.

That means tabling and deferring applications such as the ultra-high density residential development currently proposed for lands on Spine Road that are neither zoned nor appropriate for that use.

11. Conclusion

Confronted with policy challenges, it is common to ask 1) what is the problem you hope to solve, 2) what is your proposed solution, 3) whether it has been tried before, and, 4) if so, what were the results? For Gunbarrel's future and the current proposal:

- 1) The problem is that Gunbarrel was not planned in the past;
- 2) Subcommunity Planning is the proposed solution, and a temporary moratoria on major development and land use or zoning changes to maintain the status quo in the interim;
- 3) Subcommunity Planning was prioritized for Gunbarrel in the 2020 BVCP Update because it is a proven approach that works for all stakeholders and the entire community; and moratoria are similarly proven under the current circumstances;
- 4) Temporary moratoria have worked for the University Hill, Niwot, and the Opportunity Zone – and are currently working for the Planning Reserve and oil and gas development. Subcommunity Planning has worked most recently for North Boulder.

Informed decision-making and intelligent land use planning dictate looking before we leap. The Concept Plan would greatly increase demand and need for community services and public amenities while significantly curtailing the availability of potentially developable land on which to locate such uses.

The BVCP provides that a mixed use residential use *may* be considered *if* the property is deemed appropriate but offers zero support for the ultra-high density residential uses currently proposed by the applicant.

The applicants' current concept plan is inconsistent with the current neighborhood character and residents' vision for the community. In light of the above, GCA respectfully requests that the City reject outright or table the Concept Plan review, and allow the applicant the opportunity to resubmit a future proposal informed by the pending Gunbarrel Subcommunity Plan and seriously addressing the eleven concerns summarized above for the current proposal, as well as the additional issues raised by the community and the public.

Thank you for your attention to this comment and for calling up the Concept plan, and please do not hesitate to reach out with any questions.

Very sincerely yours,

/s

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