

MKSK Studios

Attn: Bryan Clark

Re: Big Darby Accord Amendment Draft Comments

The Big Darby Accord represents a cooperative, multi-jurisdictional effort to develop strategies for development that will preserve, protect, and improve the condition of the Big Darby Creek, a truly unique environmental feature and public resource that we are fortunate to share. In much the same way, over the past several years, the local governments of the Hilliard area have strived to work together in a cooperative fashion to ensure that all voices are considered and, to the greatest extent possible, we work in a collaborative manner. It is in that spirit that the City of Hilliard, the Hilliard City School District, Norwich Township, and Brown Township respectfully, and jointly, wish to express our concern with the Amended General Land Use Map as currently proposed in the Big Darby Accord Amendment.

We are grateful for the effort of BDART and MKSK over the past year plus in developing this draft. There are numerous positive developments that have come through the process, such as stronger environmental protections in the development standards, an improved revenue program that should allow for the preservation of important tracts of land, and a stronger commitment to testing and evaluation of the health of the Big Darby Creek and the species that call it home. Although there may be adjustments to each of these elements during the current review phase, the framework is strong and represents tangible improvements on the existing Big Darby Accord.

It is our joint belief that the Big Darby Accord originated, rightly, as a document with a primary focus on environmental protection of the Big Darby Creek, one of the most biologically diverse waterways in the United States. The amendment process seems to have added a new goal of addressing housing affordability at parity with the continued environmental protection goals. Given the national housing shortage environment and the projections for regional growth, this is an understandable consideration.

Scientific modeling, testing procedures, and best management practices have all evolved since the time of the original accord. With new information and new capabilities, it seems possible that the Big Darby Accord region could sustain more development than was originally foreseen. A commitment to testing and monitoring, in theory, will make that increased development less risky, although that is not to say *without risk*.

Of significant concern is that, while adding the new goal of expanding housing stock, no impact, aside from environmental, has been considered at all. To make such significant

changes to a land use plan without that research is to put the cart several miles ahead of the horse. This land use plan, if followed, will have dramatic impact on the ability of local jurisdictions to provide public safety services, impacts on traffic flow and congestion, and on the local community fabric.

In our area we are fortunate to receive fire and EMS services provided by ISO Class 1 certified Norwich Township Fire Department. The proposed density of development could stretch the ability of NTFD to continue providing those top-notch services. We have already seen in our own area what can happen when emergency services are stretched too thin. NTFD routinely receives calls for assistance from residents who leave their Columbus residence and drive into territory covered by NTFD so that they can receive immediate service. With the Columbus Fire Department already stretched thin and with the draft amendment encouraging the use of TIF incentives for residential development, which would negatively impact NTFD funding, there is a true danger that the proposed land use plan would have a grave impact on public safety services being delivered to the public.

The ability to provide public education is one of the most important responsibilities of local government. Although the proposed amendment encourages the use of only non-school TIF incentives, we remain in a very uncertain environment as it pertains to property tax revenues due to state law changes and potential ballot issues that could take away much of that funding our schools rely on without a plan to make it up. The potential for high density, residential only developments, would have a dramatic impact on HCSD. We currently have one of the most diverse and most successful districts in the State of Ohio for educating children of all backgrounds and economic statuses. The need to acquire new land, build new facilities, and increase personnel hiring at the rapid rate those developments could require would jeopardize the fiscal stability of the district and the ability to educate our students.

The City of Hilliard and Brown Township each recently completed new Comprehensive plans for their jurisdictions. The Hilliard plan was approved in 2023 and the Brown Township plan in 2025. These plans were the result of many months of research. Factors such as traffic, economic development, environmental protection, and fiscal impact were all part of a very deliberative process in crafting these plans. Perhaps most importantly, enormous amounts of effort went into soliciting feedback from residents to learn how they wanted to see their respective communities grow in the future. The proposed draft land use plan differs in significant respects from both the land use maps in the Hilliard and Brown Township Comprehensive Plans. Unfortunately, no new research, study, or public input was considered prior to developing the draft map. For us, as local elected officials to be asked to approve this draft map, is akin to asking us to simply tell our residents “No

thanks” as it relates to the visions that they shared and asked to be incorporated into those documents.

Although, as previously stated, we recognize that there have been many improvements that may allow for more development in an environmentally responsible way, it is important to return to this topic, which was the foundation of the original Big Darby Accord. The Big Darby Creek is recognized as a state and national scenic river, it is home to numerous endangered species, and is one of the most unique ecosystems in the United States. Given what is at risk, it is prudent to move slowly on any additional allotment for development in this region. Initial phases of testing are only now being completed. More time is required for evaluating that data, developing models, and conducting additional study and data collection. We need a greater understanding of how water temperatures may be impacted and what this would do to aquatic life; what are the impacts of peak outflows being extended in duration even if the peak volume is held constant; what are the contingency plans if future testing does show degradation to the ecosystem. Additionally, there are significant concerns that if development happens quickly, that by the time new data is collected, it could be too late to undo any discovered degradation. The plan does not specify any triggers for adjusting the proposed development map based on new science and research. All these concerns point towards a slower approach than is proposed in the draft land use map.

In conclusion, we are grateful for many of the elements in the proposed amendment. We recognize the housing shortage in our region, and nationally, but that does not mean that a one size fits all approach is necessary in every area. Ultimately, our concerns with the draft land use map force us to ask for a pause until it can be amended to be more congruent to the existing Comprehensive Plans of Hilliard and Brown Township and until the other listed concerns can be studied and addressed.

Respectfully,



**City of Hilliard**

Emily Cole, City Council President  
(Council Vote 7-0 on 1/12/26)



**Hilliard City Schools**

Dave Stewart, Superintendent



**Brown Township**

Joe Martin, Chair

(Trustee Vote 2-0 on 1/15/26)



**Norwich Township**

Dave Baird, Fire Chief

(Trustee Vote 3-0 on 1/15/26)