

Denver East Neighborhoods First (DENF)

Response Document, 9/14/20

Below are responses to comments provided by DENF on Public Review Draft #1 of the East Area Plan

June 2020 Comments

1. Building Coverage and Bulk Plane Standards

This recommendation is based on community feedback we've heard throughout this process as a desire to discourage teardowns. The recommendation includes potential strategies for allowing compatible additions. The exact strategies will be determined through a future regulatory process.

2. High Capacity Transit Options

- a. Reconsider center-running BRT proposal**
- b. Delay center-running option until an interjurisdictional process with Aurora is established to look at the entire corridor.**
- c. Outside expert panel**
- d. Develop a comprehensive mobility strategy for the entire planning area**
- e. Enlist a study of other cities**
- f. Re-vote on BRT with center-running proposal clearly explained**

The Colfax BRT is a distinct project from the East Area Plan. Please refer to FAQ Response #6.

3. Parking

- a. Areas on Colfax should be identified for garages**

Shared parking arrangements are recommended in Policy M11.

4. Community Benefits

- a. Affordable housing is not the priority**
- b. Build new rec center and libraries in other parts of the plan**

The emphasis on affordable housing as the priority for the height incentive (except for in Mayfair Town Center, where a new park is the primary benefit) was based on community feedback and the desire to achieve as much as affordable housing as possible. This is one recommendation in the plan, and there are many other recommendations that focus on achieving community goals.

The plan prioritizes a new recreation center and library services in the East Colfax neighborhood, which has lower access to opportunity than other neighborhoods in East. These amenities would be accessible to all East Area residents.

5. Infrastructure

- a. More infrastructure planning prior to implementation**

Please see our previous responses to DENF on this topic and FAQ #16.

6. Anti-displacement strategy

- a. Should be applied to entire EAP**
- b. Promote programs that help current households maintain their existing homes**
- c. Maintain missing middle housing stock adjacent to Colfax and avoid displacement**
- d. Restaurants and stores should not be allowed to purchase adjacent homes for business use**

The area-wide recommendations, including those focused on anti-displacement, apply to the entire East area. The Economy and Land Use recommendations include several policies and strategies for helping existing residents stay in place and encouraging the preservation of existing homes.

7. Existing housing

- a. Prioritize retention of existing housing**
- b. Prioritize retention as primary element in addressing affordable housing**
- c. Develop programs to provide assistance to elderly and disable residents. Meaningful surcharges for demolition.**
- d. Retain mid-market homes along Colfax corridor.**
- e. Retention of mid-market homes in address missing middle should be a goal of this plan.**

The Executive Summary on page 9 prioritizes preservation of existing homes and affordable housing strategies that preserve existing affordable housing in the East Area. Housing and assistance for the elderly is included in policies E1-E4.

8. Parks

- a. Develop a strategy for doubling the amount of park land.**
- b. Developers must provide 13 acres for each additional resident.**
- c. Map out additional potential sites, such as National Jewish and VA hospital**
- d. Identify where City currently owns land**
- e. Map out 10-minut walks. Opportunities for linear parkways along Colfax?**

The park land per 1,000 residents metric from Game Plan for a Healthy City is intended to be a citywide benchmark and is not applicable to the neighborhood level. Instead, this plan identifies the goal of having all households within a ten minute walk of a park. The park & open space map (p. 135) has been updated to better show the priority areas for new park space. A recommendation for Johnson & Wales, should the site transition from an educational use, has been added to the South Park Hill section.

See the East Area Plan briefing book for the walkshed mapping and City-owned land.

9. Mislabeled areas as open and park space

- a. Street trees/landscaping are not park space**
- b. Do not show church-owned and college-owned land as open space**

The parks and open space map (p. 135) is intended to visualize the Quality of Life recommendations, which include opportunities for new parks, enhanced parks, contemporary parkways, and shared open spaces. Updates have been made to the map for clarity.

10. Upzoning

Please refer to our previous responses to DENF and FAQ #11 regarding upzoning. Policy Q7 (p. 143) addresses pervious surface coverage.

11. Mayfair Town Center

Policy MC-Q3 (p. 209) has been updated to recommend detailed planning should a property owner engage with the city on creating a park as recommended in the plan. Policy MC-L2 (p. 201) addresses other recommendations for Mayfair Town Center. We do not recommend moving the location of the potential park north due to the desire to maintain character buildings and limited area to accommodate a neighborhood park.

12. Transitions

The plan recommends sensitive transitions to adjacent homes. The exact standards will be determined through a future process. Homes can be up to 2.5 stories, so restricting heights to 1 story is not reasonable. Discouraging visible parking is important to activated, pedestrian-friendly ground floors. Transitional uses in the house from could allow for a more sensitive transition.

13. Waterways

Additional language has been added to the plan to help clarify the flooding issues facing the area, including a recommendation that particular attention be paid to where historic creek beds naturally intersected with major roads like Colfax Avenue. See Policy Q8 (p. 143) and p. 142.

14. Consistency with Citywide Plans

The vision statements of the plan are based on the vision elements of Comprehensive Plan 2040, and the goals and strategies of adopted plans were used, together with community input, in the development of the plan. The staff report for adoption of the East Area Plan will include a detailed explanation of consistency with adopted citywide plans. The plan does include recommendations for increasing and improving park space in the Quality of Life section.

15. Forecast numbers

Please see the description on p. 51 of Blueprint Denver of how projections are conducted. They are regularly updated. Updated projections have not been done at the regional/state level based on COVID 19 impacts.

16. Existing Conditions/Forecasts

Please see the description on p. 51 of Blueprint Denver of how projections are conducted. They are regularly updated. Updated projections have not been done at the regional/state level based on COVID 19 impacts.

Existing conditions data was provided as a general background at the beginning of this project to better understand issues in the area. The plan commits to regularly updating the measurable goals.

The shortage was identified by comparing US Census data on household incomes with housing costs.

Appendices included with the plan will provide all methodology and additional data not already included in the Briefing Book.

17. 11th & Syracuse

Based on community feedback, we are recommending increasing heights where there is the best transit access. The map is consistent with current zoning allowances.

18. Quebec & Colfax

The plan does not recommend increased heights in this area.

19. Yosemite & Colfax

We have reviewed Aurora's plans. The height and place maps are consistent with the plan recommendation to concentrate intensity in areas best served by transit.

July 8, 2020 comments from DENF

9/14/20 CPD responses shown in red.

NOTE: The City's answers are in black. Our responses are in blue.

As you know, we provided draft recommendations in May 2019 followed by a second draft of recommendations in October 2019. The majority of the recommendations have consistently received strong community support and were brought forward into the draft plan with minor updates to address comments. The major updates (which are also highlighted in this summary) include the following:

Which recommendations are you referring to that have received majority support? Can you document that these were members of the EAP or what can you document? And for each recommendation, where can we find the data and the date of this data which supports each recommendation?

See the results of surveying on the first draft (May 2019) recommendations on the plan website.

- p. 39, Policy L6 - Ensure East area neighborhoods are inclusive places by thoughtfully integrating compatibly designed missing middle housing and accessory dwelling units (ADUs) in appropriate locations. (Please identify where are these appropriate locations, how a unit would be qualified, and what percentages they would occupy in each neighborhood?) This recommendation addresses neighborhood housing options feedback that we received through the community workshop, online and in-person comments, and meetings with organizations, including but not limited to DENF.

This recommendation applies to all areas of the East Area Plan and provides guidance for a future regulatory process. The details will be determined during the regulatory process.

L6 A (1) Please define what you mean that "single unit areas should remain "primarily" single unit.

See updated FAQs.

L6 (A) 2 Please define "massing characteristics"?

These are described in L5.

L6 (C) There should be a simultaneous goal that the goal is to work towards no displacement and plan provisions to this effect.

This is addressed in strategy C.

L6 (7) What is the City's goal in stating that "individual property owner rezoning are not appropriate"?

The plan recommends that allowances for missing middle be achieved through a regulatory (zoning text amendment) process.

L6 D Because of the character of the neighborhood, ADU's must be designed such that it follows the pattern of the established main home. This would also include, no change to the bulk plane, provide for the permeability prior to the 2010 Code, and can be only a certain percentage of build out of the main home so that the lot carries its share of permeability/ heat island affect. The square footage of the ADU should be included in the total square footage allowed in the lot. Without these parameters, we do not support ADU's. Notice should be given and the opportunity to object for neighbors within a certain distance of the proposed structure.

Blueprint Denver recommends that ADUs should be allowed in all residential areas. The East Area Plan recommends that ADUs regulations should ensure they are context-sensitive.

- p. 31-33, Policy L3 and Maximum Building Heights Map - Allow taller buildings in key locations along Colfax Avenue, within the Mayfair Town Center, and the 9th and Colorado area (see Maximum Building Height Map) when significant community benefits are provided. (Please define how "significant community benefits are determined" and in what order are they prioritized?) The benefit should be proportionate to the height earned. The plan recommends prioritizing affordable housing, except in Mayfair Town Center where a new park is prioritized. This recommendation and the accompanying map address feedback received through the workshop, comments, and organization meetings. In the revised map, heights above 5 total stories along Colfax are limited to Colorado (already allowed), Krameria (up to 7 stories) and Yosemite (up to 7 stories). In addition, increased setbacks from single unit areas are included and there are no

proposed additional height areas above 5 stories adjacent to single unit areas. (We are requesting that the City note in the Plan documents that there were over 1300 signatures that requested for NO up zoning and this would include the up zoning that was included in your first draft.) Since the City has listed parties that do support certain provisions of your plan, to be equitable, it should be noted the number of petitioners (now over 1,500) who did not support four items in the EAP.

We will include your petition in our community feedback summary.

We need to stress that we did not identify affordable housing as the primary goal in this area. While it is a laudable city-wide goal, it is not our primary goal and certainly NOT a goal to the exclusion of other goals of Blueprint Denver. We are severely lacking 332 acres in park access, do not have libraries, recreation centers or gathering places. All of these are equally important goals under Blueprint Denver. Please strike the misleading language that we identified “affordable housing as a primary goal and/or to the exclusion of other EAP goals for Hale, Montclair, and South Park Hill pursuant to Blueprint Denver, Denverite and Game Plan for a Healthy Denver.

The emphasis on affordable housing as the priority for the height incentive (except for in Mayfair Town Center, where a new park is the primary benefit) was based on community feedback and the desire to achieve as much affordable housing as possible. This is one recommendation in the plan, and there are many other recommendations that focus on achieving community goals.

Upzoning will not be necessary if the BRT does not move forward and therefore provisions in the plan need to be stated if in fact this comes to be.

With group housing and ADU’s coming along, upzoning will also not be necessary.

Even before the pandemic, people were moving to the suburbs.

This is a twenty-year plan and should be reviewed for job and population growth every two years, especially with the impending swine flu, current and future pandemics, movement away from Denver to less costly cities, shifting desires to move away from urban life, etc...

Our estimates based on the Colorado Department of Local affairs estimate that we will have 150000 new residents from 2020-2050, which is 5000 people each year for a period of thirty years. You have listed the EAP to expect at a minimum of 4200. Over a 30-year period, this would be 140 residents. In our current zoning what is the actual number of residents we can build for? What is that number we can build for with your proposed upzoning?

See previous response to DENF on upzoning.

- Neighborhood Recommendations (East Colfax – p. 163-180; Hale – p. 181-194; Montclair – p. 195-208; South Park Hill – p. 209-220) o The new additions include detailed mobility recommendations for each neighborhood, and an expanded recommendation for a public park at Mayfair Town Center (p. 207, Policy MC-Q3). For your reference, the DENF comments and petition are posted on the website under “Other Neighborhood Meetings and Events” linked [here](#) and [here](#). The following is provided for your reference in navigating the plan as it relates to DENF’s recommendations and fact sheet.

DENF Recommendations. The bolded statements below are from the DENF Recommendations Regarding East Area Plan (October 24, 2019).

1. Recommendation #1 – Residential Character Preservation The plan should include a real Character and Preservation provision that actually addresses preservation of neighborhood character by calling for the implementation of a preservation overlay. At present, the “Character and Preservation” section of the plan is not about character and preservation at all – instead, it is a building height and density initiative, providing a means by which property owners may expand existing homes to add additional units. Residents of the affected neighborhoods do not support zoning changes that permit the addition of units to existing homes.

The draft plan includes several recommendations focused on character preservation in neighborhood areas, and the recommendation regarding additional housing options in neighborhoods was substantially updated to

incorporate much of the feedback we heard from DENF and discussed in our meetings together in October and December.

- p. 37, Policy L4 – Encourage (the word "encourage should be changed to "REQUIRE") maintaining, rather than demolishing, existing older homes by revising design requirements to encourage renovations and additions.

We cannot require maintaining older homes without establishing a historic district (which still allows demolition under certain circumstances).

p. 37- On your sidebar, it states that there was a community workshop that supported the date. Which communities were involved in this data gathering and from which neighborhoods? How many people participated in this workshop from EAP?

A series of five workshops were held in February and March 2019, including an area-wide meeting and one for each neighborhood. About 150 attended the workshops, and materials were also posted online for feedback.

L4 needs to have environmental support for the amount of square footage that can be reduced to support the permeability of that lot.

L4 was updated to add permeability as a consideration.

We do not support A4. Any addition to a lot cannot be exempted from maximum building coverage requirements. This will contribute to the heat island affect and impervious surfaces in our neighborhoods.

See previous response.

L4 B Question- not enough detail is given here for implementation. What age of home is being considered? What percentage of the materials will be required for reuse?

The plan provides policy guidance. Details will be determined during a future implementation process.

L4C – On the one hand you want to allow exemptions for square footage above but preclude mass scaling etc. so that homes will not be torn down. Please define what this means.

The goal is to allow for compatible additions that meet the goals of the plan.

- p. 38, Policy L5 - Work with neighborhoods to modify zoning standards for new construction to be more consistent with neighborhood character in residential areas. (We need clarification – will you be working with each neighborhood in the EAP, when will this be accomplished, who will be selected, and how will notice be given?)

This will be a regulatory process with community engagement. Right now, we anticipate this will be done through a citywide process to update the zoning regulations.

- p. 39, Policy L6 - Ensure East area neighborhoods are inclusive places by thoughtfully integrating compatibly designed missing middle housing and accessory dwelling units (ADUs) in appropriate locations. (Please identify where appropriate locations are for ADU).

ADUs are recommended as appropriate in all locations.

13th and Jersey is an example of what needs to be corrected going forward with design. It totally does not fit the neighborhood, shadows other homes, and has hardly any permeability compared to what existed before. As planners, please come up with better building and design requirements so that the neighborhood and character is preserved.

The recommendations for more compatible design standards are included in Policy L5.

Request information on the 9th and Colorado development. Please state the number of housing units and the type. How many units are designated affordable and at what AMI? How many units remain to be developed and time to completion?

HOST maintains this dashboard on income-restricted units:

<https://app.powerbigov.us/view?r=eyJrIjoiMjY4Nzc1ZDUtMjU0My00MzZkLTIhZTEtMGQwZmY4MmFhYzZiliwidCI6IjM5Yzg3YWlzlTY2MTItNDJjMC05NjIwLWE2OTZkMTJkZjgwMyJ9>

- p. 43, Policy L8 - Preserve historic buildings in residential areas. L8B. Why was Hale excluded as a study area for historic preservation?

The map and recommendation was updated to recommend surveying of all neighborhoods.

L 9 A and B needs to be explained further.

We are recommending that all properties come into the Denver Zoning Code so that our latest standards apply. Properties that remain in Former Chapter 59 are not subject to the Denver Zoning Code, including any improvements to the zoning code we make over time to implement plan recommendations.

Recommendation #2 – Build Capacity/Heights The plan should work within the current built capacity and heights of 2010 Denver Zone Code throughout the East Area. We support working with the community before any height regulations are lifted to identify short- and long-term ‘Community Benefits’ that benefit neighbors of all cultures, socioeconomic classes, ages, and abilities.

The height recommendations in the draft plan are intended to help achieve goals that have been prioritized by community members. We continue to believe that zoning is an important tool in achieving community benefits, and therefore, have not removed this recommendation. We have clarified the language, prioritized affordable housing (except for in Mayfair Town Center where a public park is prioritized), and amended the height map based on community feedback we received to reduce height areas above 5 stories and increase setbacks from single unit residential areas. Please also note that Policy L7 (p. 41) addresses the design of these areas to ensure new buildings are compatible with surrounding neighborhoods.

We will continue to repeat, that while affordable housing is a laudable city-wide goal, it is a goal in the EAP as well as other goals in Blueprint Denver. We do not agree that we said affordable housing is our primary goal NOR do we say it is to the exclusion of other goals we want for the neighborhood. It may well be that this is an agreement you have reached with East Colfax, but do not impute this to the other areas without surveying the residents in Mayfair, Montclair, and South Park Hill.

We continue to repeat, that according to past representations, the current zoning can handle the anticipated growth. In addition, with “group living being extended

to up to five adults in a household, housing will be more affordable to a certain range of incomes. Though the City continues to state that you “believe” that up zoning is a tool , it is our position that you can “downzone” to “up zone” back to the 2010 height limits to achieve the community benefits and at the same time develop affordable housing. There are many tools available to the city to achieve affordable housing and up zoning is but one avenue.

See previous responses to DENF on these issues.

For any particular up zoning, which community will be identified to work with? As the RNO’s do not have to reach out to the neighbors, who will the City consult with in the community? How will the neighbors receive notice of a potential up zoning?

The properties that are most difficult to build upon and due to the inadequacy of proposed setback should not be up zoned. These lots should be considered as potential gathering places, parks, libraries, or a recreation center.

Community engagement is part of every rezoning and text amendment process. Rezoning involves postcard notices to property owners within 200 feet. The plan recommends inclusive engagement. Based on our analysis, we believe that approximately 125 feet is a reasonable depth to achieve 5 stories. Areas lacking this depth are recommended to be kept to 3 stories.

- p. 31-33, Policy L3 and Maximum Building Heights Map - Allow taller buildings in key locations along Colfax Avenue, within the Mayfair Town Center, and the 9th and Colorado area (see Maximum Building Height Map) when significant community benefits are provided.

No up zoning.

Under current zoning, we have the ability to take in the requisite residents the City wants to direct to EAP. In addition with group housing now moving forward with at least 5 additional unrelated adults (and an unlimited number of children) in a 1800 square foot, density can also be added without up zoning and at the same time be environmentally friendly (net zero of building materials) provided the infrastructure is in place. ADU’s will also be added.

We request that the City run the data that would include these scenarios to determine what we actually need to have built. This is the most economical way in terms of environmental resources. More importantly, this would demonstrate that the plan truly seeks to reduce our footprint and be climate/environmentally oriented and not a developer plan.

Please see previous responses to DENF.

If the City would build a plan that would incorporate all the corridors in the EAP for affordable housing, the plan would be equitable. City's plan has failed to include corridors such as Colorado Blvd., Monaco, Quebec, Yosemite, 6th Ave, 9th Ave., 17th 21st Ave., and 23rd Ave.

Based on community input, strong transit connections, and existing mixed uses, Colfax provides the best opportunity for additional height. Affordable housing policies in the plan apply throughout the East Area.

It is misleading to say that we have identified affordable housing as our primary goal as we have said before. It is a laudable city-wide goal, but that identified city-wide goal should not exist to the exclusion of other priorities that Mayfair, South Park Hill, and Montclair have identified.

Who will determine what significant community benefits are? How will residents know to participate in these conversations? What notice will be given?

See FAQ response #12.

We support affordable housing at the current zoning levels. We don't believe that for-profit developers can deliver on affordable housing without displacing current residents and driving up rents with luxury units. The model embraced by the City in the plan is failing as clearly evidenced by the multifamily developments proposed and built to date that have done nothing but raise rents with luxury units.

Instead of rezoning, the City should consider increase state tax credit program operated by CHFA through the use of "sin taxes."

The City should give priority to non-profit providers who can build affordable housing at the current zoning levels.

No upzoning until BRT is fully funded and we know where the bus stops are. How can we approve a plan and sites for upzoning when the BRT is in disarray?

We also do not believe that we need to up zone due to the potential passage of group housing and ADU's.

The City has put together a committee surrounding affordable housing incentives but it has yet to make recommendations. Thus, the benefits to be received from the upzoning are undefined and unclear, we cannot agree to the proposed upzoning.

The current model for affordable housing is not working. We should increase the cost of the linkage fee so that we can obtain affordable units at every level of AMI.

The City should consider down zoning so that we can build affordable units at the current zoning heights.

The height incentive is just one recommended strategy to achieve affordable housing. We need as many strategies as possible to face this enormous challenge. See Section 2.2 for additional housing recommendations.

Recommendation #3 - Infrastructure The plan should link all development with improving infrastructure, including sidewalks, bike lanes, and traffic mitigation measures within the neighborhoods and should delineate, in great detail, when and how this infrastructure improvement will occur.

The draft plan includes detailed recommendations for mobility improvements that have been prioritized based on data and community input and are intended to address both existing needs and anticipated future development. These recommendations indicate which improvements should move forward in the near term (5 years or less) and long term. As a policy document, the plan will be used to inform future budgeting decisions and the engineering and design of infrastructure projects. Plans are not capital improvement budgets, but they can provide clear priorities.

Before the City focuses on future residents, the City should deliver on our taxes and take care of our aging infrastructure. The EAP is replete with ideas but the

only item it will deliver upon approval is the opportunity for the developers to build and compromise the quality of life of the current residents.

Our infrastructure is aging and EAP neighborhoods experience flooding. The City should take the steps to mitigate flood risks **prior** to any upzoning and that the City financially assist homeowners with the acquisition of flood insurance, which will be an issue, due to the increased development for more residents.

Infrastructure costs should be part of the developers cost and provided for in their plan. These costs should not be shifted to the residents.

It should be a requirement for any development plan to include infrastructure impact studies, traffic studies, environmental studies including but not limited to pollution impacts.

See previous response to DENF.

- p. 67 – Areawide Mobility Recommendations
- p. 163 – East Colfax Key Opportunities
- p. 175-178 – East Colfax Mobility Recommendations
- p. 181 – Hale Key Opportunities

There should be more information on the Hale project included within the borders of this plan, otherwise the Hale area cannot be studied as a whole. Due to the lack of this information, this project should be excluded from this plan.

Hale Parkway is included in the plan and the Upper Montclair Study is referenced.

As noted in many documents submitted to the City, the EAP is lacking in over 332 acres of park access. Hale was specifically noted as being one of five neighborhoods as being most deficient in park access. Hale has 7550 residents as reported in May 2017 and has only one acre of park for every 1000 residents. Mayfair Park is about 4.9 acres. We are therefore deficient 92.6 acres in Mayfair to meet Hancock's Game Plan Denver. These potential areas should be identified now as you did with the drawing at Mayfair Center. It is not enough to say that we will have small pocket parks in the future. These parks should be planned so that everyone is within a ten-minute walk from a park, again, from Game Plan Denver.

The park land per 1,000 residents metric from Game Plan for a Healthy City is intended to be a citywide benchmark and is not applicable to the neighborhood level. Instead, this plan identifies the goal of having all households within a ten minute walk of a park. See updates to the parks map to better illustrate plan recommendations.

In addition, to be a “strong and authentic neighborhood”, the Plan needs to Identify where our neighborhood library and recreation Center will be. Gathering places to enhance neighborhood Social capital is also required. To say that there will be a park at Mayfair town center does not address the city-wide goal that every resident has a right to be within a ten-minute walk to a park.

To not provide for these items will guarantee that future development will negatively impact the area’s environmental quality and mental well-being.

Please provide a map where all residents could access a park within ten minutes in the EAP. These parks should be identified clearly and should reach the 13 acres per resident required under Blueprint Denver/Game Plan for a Healthy Denver before any development. Once our deficiency has been rectified, no development can occur without identifying the requisite acreage per 1000 residents and placed into park space.

HL2 B – Please identify where the missing housing should go and where it is appropriate for ADU’s.

Based on community feedback, we revised this recommendation to not map specific areas but rather provide guidance for a citywide process.

- p. 189-192 – Hale Mobility Recommendations
- p. 195 – Montclair Key Opportunities
- p. 203-206 – Montclair Mobility Recommendations
- p. 209 – South Park Hill Key Opportunities City should be taking steps to preserve the buildings and green space at Johnson and Wales. Opportunities and what steps EAP will take should be listed in the next draft.

See new recommendation added.

- p. 215-217 – South Park Hill Mobility Recommendations

- p. 244 – Implementation Priorities

Recommendation #4 – Affordable Housing Prioritize city-wide affordable housing throughout the metro area, through incentive programs such as tax breaks and land banking. We would like the city to use its extensive resources to try to achieve this goal without blanket upzoning in stable and historic neighborhoods.

We agree that affordable housing is a citywide issue and achieving an inclusive Denver is an effort that extends beyond the neighborhood plan. We continue to believe many tools are needed to help address affordable housing citywide and the shortage faced by existing residents in the East Area. Allowing more affordably priced homes, such as duplexes, triplexes, and townhomes, is very important to many residents who struggle to afford the high costs of housing in Denver. In addition, to enabling more of this “missing-middle” housing stock, CPD is also partnering with the Department of Housing Stability (HOST) to explore innovative ways to encourage the construction of more affordable housing. There are a number of housing recommendations that were bolstered in the Housing & Economy section of the draft plan based on community input, DENF feedback, and meetings with East area organizations.

What other East organizations are you referring to?

East Colfax Community Collective. Fax Partnership.

We applaud the City in achieving its City-wide goal of affordable housing without a blanket up zoning in stable and historic neighborhoods. This should remain in any final EAP plan. Single family zoning remains intact as it did in the Far NorthEast Area Plan.

We agree that there should be affordable housing but that does not mean we define it as our sole community benefit to be obtained. You usurped all of our other community benefits and substituted the city goals. Wherever you have indicated that this is the sole community benefit, or our primary community benefit the residents want in the EAP is false. Any language to this affect should be stricken.

See previous response.

Because we support the city wide goal (ALL NEIGHBORHOODS) of affordable housing , we have the following questions:

- How many affordable units are you projecting to be in each NPI? How were those numbers reached? We do not have a projection in East or for other NPIs. The need for affordable housing is large and a citywide issue.
- How did you reach 1400 for the EAP? We request that you revisit this number. This is an existing condition number based on census data of household incomes and housing costs. It is not a target.
- We request that CPD perform a citywide buildable land analysis to determine where vacant and underutilized lands across the entire city for infill opportunities.

This is outside the scope of the EAP, but the City is continually looking at opportunities and strategies to increase affordable housing.

- With what periodicity will these numbers be reexamined?

We have suggested regular evaluation of the measurable goals.

- How many affordable units will be going in all neighborhoods throughout the city? Please define this now so that we know that all neighborhoods share the responsibility.
More information on Citywide goals can be found in Housing an Inclusive Denver.

As the housing stock along the Colfax corridor is “the Missing middle” which the City seeks to increase, any development that occurs should maintain these historical homes which are often lower in pricing range than homes further away from a transit corridor. Meaningful language needs to be placed to protect those homes such as “no destruction of the nearby homes for the building along the Colfax corridor.”

See previous response.

In the proposed upzoning, how many homes will be removed?

This is not something that can be quantified. It's up to each individual property to decide what to do with their property.

- p. 31-33, Policy L3 and Maximum Building Heights Map - Allow taller buildings in key locations along Colfax Avenue, within the Mayfair Town Center, and the 9th and Colorado area (see Maximum Building Height Map) when significant community benefits are provided.

No upzoning. The City needs to think beyond the current idea that developers will take care of our affordable housing issues, because they have not. 45000 units have been built in the last three years – how many have been affordable?

Please define what significant community benefits are and who and when will the significant community benefits be determined?

It is a misstatement to say, “the current priority for the East area is affordable housing”. This may be a priority for the city, but it is only one of several that the EAP residents have identified. This language is misleading and should be deleted.

To build an inclusive, sustainable, equitable, and robust City and EAP, all corridors should be identified as potential sites for affordable housing. These corridors would include 6th avenue, 9th avenue, 22nd, Colorado Blvd, Monaco, Quebec, and Yosemite. Not all residents of affordable housing will necessarily work along the Colfax corridor. The plan should provide these residents an opportunity for job mobility and opportunities along all corridors in the EAP.

NOTE: Unlike other corridors in Denver, EAP has a high percentage of residents near transit. (79% for East Colfax, 89% for Hale and Montclair, and 74% for South Park Hill.) Rather than pushing more residents into the Colfax corridor, the City should concentrate on a City-wide transportation system that is reliable.)

Rather than giving incentives to for profit developers, priority should be given to non-profit developers who have demonstrated a commitment to this vulnerable population (as opposed to developers who see only a profit line) and will build to the characteristics of the neighborhood.

Please see previous response. The plan's housing policies apply throughout the East Area.

- p. 52, Policy E1 - Stabilize residents at risk of involuntary displacement. This should be for each EAP neighborhood.

This applies to all neighborhoods.

E1(D) Strike the verbiage after "projects."

The additional language is provided for more detail.

- p. 52, Policy E2 - Preserve existing affordability and housing quality. This should be for each EAP neighborhood.

This applies to all neighborhoods.

- p. 53, Policy E3 - Create new affordable housing with access to transit and amenities. This is in contradiction of Housing an Inclusive Denver 2020-2023. Hale as a type 4 neighborhood is specifically excluded from development and development at transit stations.

The Housing an Inclusive Denver neighborhood types provide general guidance for strategies to consider. The EAP provides more specific guidance.

Density does not equal affordability.

We do not need upzoning in the hopes of getting affordable housing units.

Here are questions we would like the plan to address;

- How many affordable or income restricted units would-be built-in exchange for the increased heights?
- Are these units for sale or rent?
- Will the developer be required to build these units on site where the increased height is proposed (or be able to build elsewhere or pay a linkage fee and not build the unit at all?)
- Where are the studies that support height increases work for community benefits?

See FAQ response #12. A citywide regulatory project is underway to implement zoning incentives for affordable housing. More information is available here:

https://www.denvergov.org/content/dam/denvergov/Portals/646/documents/Zoning/text_amendments/affordable-housing-zoning-incentive/Affordable_Housing_Zoning_Incentive_Background_Report.pdf

Potential site for future developments and in particular the lots owned by National Jewish and the Veterans Hospital should indicate future sites of affordable housing in this Plan as well as park AND open space. City should other lots that are city-owned and identify such lots on the maps.

The plan recommends new affordable housing and parks throughout the East Area. See plan updates regarding large campuses and to the parks map.

p. 54, Policy E4 - Expand diversity of housing types and affordability to support households of different sizes, ages, and incomes in all neighborhoods. This is in contradiction of Housing an Inclusive Denver 2020-2023. Hale as a type 4 neighborhood is specifically excluded from development and development at transit stations.

The neighborhoods do not blanket support ADU's without further refinement and meetings for discussion. Please refer us to all construction barriers that you would remove in the EAP and in other zone and code regulations.

When we met at Phoenician Kabob we were told by the City that ADU's would not be allowed everywhere. Please tell us what the qualifications would be that would allow ADU's and please tell us how many properties under the guidelines would be allowed to add an ADU in the EAP.

Our discussion was around other missing middle opportunities. Blueprint Denver recommends ADUs everywhere.

Under E4, the plan states that: 'The neighborhood chapters of the area plan will provide existing conditions and recommendations for individual neighborhoods.' Who are these neighborhoods chapters? What type of notice responsibilities do they have to their neighbors? What geographical area be required to be noticed?

This was a reference to the neighborhood sections in the plan. The sentence has been clarified.

C1- Where are these appropriate locations and how was this determined? Please refer us to EAP which discusses what barriers to be removed.

Policy L6 provides guidance for the future regulatory process. See Blueprint Denver for some of the specific barriers to be evaluated for ADUs. Financial and technical barriers are discussed in this section.

C2- We would need further discussion and explanation on what this is. As it currently stands, we do not believe the City should subsidize ADU's with forgivable loans or other financial means.

Many existing homeowners are unable to build ADUs due to the cost. The sidebar on this page provides an example of the WDSF+ program that provides financial assistance in exchange for affordability commitments.

RECOMMENDATIONS ON ADU:

Though ADU may be a citywide goal, it has not received much support in the EAP. Your workshops show only 53 people responded that ADU's were a priority for making housing more affordable. (March Draft Plan page 49)

The ADU should be no larger than a certain percentage of the main dwelling.

Land permeability per lot should be no less than the zoning code previous to 2010. This has become clear after the development of the northwest corner Jersey and 13th.

Bulk plane and side areas should be placed back to pre-2010 zoning.

The building character of the ADU should be built to maintain the character of the main house or of the neighborhood immediately surrounding it. For example, although not an ADU, the units at 13th and Jersey are an eye sore to most neighbors. This type of development should not be allowed.

D1 should be revised or eliminated. We cannot determine if we can support regulations that have not come to be.

Case Study. Please direct us to ADU's that have been completed under WDSF.

<https://www.mywdrc.org/adu-pilot-program>

While in concept ADU's maybe beneficial, we would need to work into the plan the regulations that would assist in maintaining permeability, maintain or reduce the heat island affect, and retain the character of the neighborhood. We would like to work with you with what per centage the size of the ADU can be which would be determined by the size of the main house if the other factors listed here have been met.

The follow-up regulatory process will include community engagement. The plan recommends they should be context-sensitive and address flooding issues.

ADU's should be an exception to block form so that adjacent property owners can receive notice and object if warranted to neighboring properties proposed construction.

ADU's greatly impact adjacent neighbors and therefore there should be a public process for the adjacent neighbors to participate in. Regulations are appropriate in Hale, Montclair, and South Park Hill. We assume that the needs of East Colfax are being directly addressed to you.

ADU's should have the character and design of the main house. They should not be tandem units and instead a smaller square footage footprint.

A permeability study should be done with each new project because with the addition of ADU's, group living situations, and the increase of residents anticipated, the City needs to have staff ready to acknowledge how the infrastructure will be impacted, the heat island affect, permeability, and flooding to neighboring residents.

We would like to know if you have run the EAP as currently proposed or are you required to run the EAP through engineers who can attest that the infrastructure can accommodate your vision?

The East Area Plan is a long-term policy document, and we do coordinate with interdepartmental partners. Specific infrastructure needs for a particular lot would be coordinated during permitting and site plan review.

Due to the pandemic, it will be unclear if there will be an exodus out of the City. It already was reported in the papers that people were tired of the urban living and how Denver is currently being run and were beginning to migrate to other areas surrounding Denver. Furthermore, now with an unknown downturn, more residents may migrate out of Colorado to one of the other 32 states where housing is more affordable.

Based on the above, we suggest that an examination of the migration trends be reexamined as each project comes through the planning process. Results should be made available to the public.

See FAQ responses regarding COVID 19.

Recommendation #5 - BRT This area plan was driven by Bus Rapid Transit, and with the delay or “death” of BRT, the recommendation for increased building height around BRT stops are not necessary.

Colfax Avenue has the highest bus ridership of any corridor in the region. The 15/15L routes combined see seven million annual boarding’s — over 22,000 per weekday — and weekday ridership is projected to increase to over 50,000 in 2035. The East Area Plan provides an opportunity to plan for the long-term future of the area, ensuring that the community benefits both from its existing transit access and the improvements still forthcoming with BRT. The BRT project is moving forward as explained in the FAQs. More information is available at www.colfaxbrt.org.

We agree that implementation of regulatory land use changes should be coordinated with transit investments, as recommended by Blueprint Denver (See Blueprint Denver Land Use & Built Form: General, Policy 1.B, p. 72).

We have attached our resident expert on the traffic issues in the EAP. The City should retain him as a consultant and use his invaluable traffic history with the City as well as other cities to develop a sustainable transit corridor.

We continue to stand that we did not approve a center running bus and suggest that you check with the City attorneys. The ballot initiative reads as follows:

“Add rapid transit service and pedestrian safety improvements along Colfax Ave. to reduce congestion and increase safety.

“Improve exiting transit stations and routes with pedestrian safety enhancements, traffic signal improvements and bus lanes.”

The language above does not state anything about a center running bus. Our recommendation is to do the appropriate studies, move forward with the improvements above without the center running bus.” We can decrease our pollution now and not wait 10-15 years. The City has the ability to protect its citizens now – why would you not do so?

Because the ballot measure does not state “center running buses”, it should be put to a vote after the studies are done.

The EAP has failed to consider **all corridors for affordable housing** and for smooth transit for all transit north/South and East/West. We would like to see how all these transits will work in the EAP.

The plan recommends affordable housing throughout the East Area. Transit recommendations are based on Denver Moves and community input. See previous responses regarding BRT.

Work with Aurora so that we know what the entire Colfax corridor will look like.

The BRT project team is coordinating with Aurora.

We would like to see an analysis of the impact of group housing will have on affordability and the necessity of 1400 units in the EAP and the impact of group housing on up zoning.

Group living refers to the number of people living in a house, not to the number of units.

We recommend no upzoning be approved until we know if we will have a BRT and it is fully funded and all corridors are utilized for affordable housing, so that this population has more opportunities for employment other than places on the Colfax corridor.

Studies have to be conducted on adjacent streets and the plan should require mitigation efforts to address associated impacts to nearby residents/streets prior to the construction of BRT.

Why do we have a Colorado side running bus but a center running bus on Colfax?

This is an illustrative drawing. The Colorado design would be determined through a future process.

The EAP should do an analysis with other East/West corridors to make our traffic patterns seamless.

Traffic patterns throughout the area were considered in existing conditions analysis and development of recommendations.

Provisions should be in the plan if the BRT suffers a death.

BRT has voter-approved funding and is moving forward with implementation. As stated previously, even without BRT, the 15 and 15L are major transit lines connecting a number of residents and job centers and consistently have some of the highest ridership in the region.

Recommendation #6 – Environment The plan’s focus on environment should be equal to its focus on development. The Neighborhood Planning Initiative provide a framework for rezoning but do not provide requirements for green building design and public park space.

The draft plan includes areawide and neighborhood policies for open space, new parks, tree canopy, green infrastructure and sustainable water management practices.

- p. 129, Policy Q1 - Leverage the historic parkways to connect existing open space, parks and recreational assets. These are historical parkways and should be left alone short of storm water management including sidewalks which would only reduce the impervious surfaces.

See previous response. Updates were made to the plan to clarify that any improvements should be in keeping with historic guidelines.

- p. 130, Policy Q2 - Develop new Contemporary Parkways that connect the community to open space, parks, and recreational assets, as well as serve multiple community functions. [See above.](#)
- p. 131, Policy Q3 - Create new community open space, parks and recreation facilities. [We do not see libraries or recreation centers or any parks other than at the Mayfair town center. Please place these on your next plan. Small patches on Colfax do not count as park space.](#)

[Map updated to better reflect recommendations. The recreation center prioritized in East Colfax based on equity.](#)

- p. 132, Policy Q4 - Enhance existing community open space, parks and recreation facilities.
- p. 138, Policy Q5 - Strengthen the existing tree canopy and increase tree canopy coverage within the public right-of-way. [What metrics will be employed and available to the public?](#)

[See measurable goal description on p. 125.](#)

- p. 139. Policy Q6 - Protect and preserve existing tree assets in all development or redevelopment efforts. [What metrics will be employed and available to the public?](#)

[See measurable goal description on p. 125.](#)

- p. 141, Policy Q7 - Increase the pervious surface coverage through the design and implementation of green infrastructure systems to increase environmental performance (infiltration, evaporation, evapotranspiration, carbon sequestration, shade, and urban heat). [What metric will be employed and available to the public? What metric will be employed for the heat island affect and will it be available to the public?](#)

[See measurable goal description on p. 125.](#)

- p. 142, Policy Q8 - Encourage sustainable water management practices including stormwater management, flood protection, water quality, and water use. [“Encourage” should be changed to “develop and maintain.”](#)

Updates made to Policy Q8.

- p. 29, Policy L1 - Ensure compatible development on institutional sites within neighborhoods. Strategy B recommends new open space. The park space should be identified and future sites for park space as well. Otherwise, how do residents know that the goal of game plan Denver is being met year over year?

See updated map.

- p. 185, Policy H-L1 - Ensure development on the hospital campuses promotes the success of the health care industry while ensuring compatibility with the surrounding neighborhood. Strategy B recommends new open space. It should be required not recommended. We would like to see a metric of how many affordable units would be required of this area and how much park space? No new development should occur until lack of park access is rectified and 13 acres of park space is required for every additional 1000 residents.

The East Area Plan is a policy document; not regulations. Plans only include recommendations to guide future decisions. The park land per 1,000 residents metric from Game Plan for a Healthy City is intended to be a citywide benchmark and is not applicable to the neighborhood level. Instead, this plan identifies the goal of having all households within a ten minute walk of a park. Additionally, the Park, Recreation and Open Space Opportunities map has been updated to better illustrate the plan recommendations for open space.

- p. 207, Policy MC-Q3 - Create a new neighborhood park in the Mayfair Town Center. The number one amenity cited is grocery shopping and the assumed attendant parking spaces. The rendition does not show either despite the fact EAP document states our desires. Please remap both grocery stores and attendant parking into the Center. (Perhaps this is an oversight, but why would the City take away our shopping while adding another 4200 residents plus?)

The plan does not recommend removing the grocery stores. Rather it identified the current parking lot at Krameria and 14th as one potential location for a future park. The rendering of this potential park includes a call out for a grocery store on the first. 59) See Q5. Mayfair Town Center is within both an area that is not within a 10-minute walk to a park as well as within an area that sees frequent flooding.

Residents continue to state NO upzoning in Hale, Montclair, or South Park Hill. We understand you are working with East Colfax as to the desires of that area.

p. 241-242, Policies C-Q1, C-Q3, and C-Q4 – Colfax-specific Quality of Life

If you place all affordable housing on Colfax you are condemning those residents to the Colfax corridor pollution. In order to not heavily expose the most vulnerable to concentrated pockets of pollution, affordable housing should be built throughout EAP.

What studies have been done to determine the exposure to pollution if you build the density along Colfax? This affects the quality of life of the current residents.

Blueprint Denver recommends directing growth to key corridors and centers, and this was also highlighted in early community outreach for the East Area Plan. Housing in this area gives residents the opportunity to live close to high-frequency transit and amenities. While additional height is not proposed away from the mixed use centers and corridors, the affordable housing recommendations apply throughout the East Area.

Recommendation #7 – Citywide Goals We would like the city to provide greater detail about how the EAP will achieve overall city goals. The relationship between Citywide plans and neighborhood plans was discussed extensively at the November 23 workshop. This relationship is also addressed on p. 7 of the draft plan. Implementation is discussed on p. 244.

Upzoning. The fact that you up zone does not mean affordable homes will be built. Density does not mean affordability. The tools currently in place for affordable housing do not work. 45000 units have been built in the last three years. How many are affordable and at what AMI? What other tools may you have that are not listed?

See the affordable housing dashboard linked above. Policy L3 prioritizes on-site affordable housing in order to achieve height.

Park Space. We are short 332 acres or thereabouts of green space. You have only identified one park that will be about 1 ace. Please set in the next draft the ten-minute walk for every resident and where additional park space can be added.

Short of this, this plan has failed to achieve Game Plan Healthy Denver which we have identified as a priority for us.

The park land per 1,000 residents metric from Game Plan for a Healthy City is intended to be a citywide benchmark and is not applicable to the neighborhood level. Instead, this plan identifies the goal of having all households within a ten minute walk of a park. See updates to the parks map to better illustrate plan recommendations.

Trees. What metrics do you have that will watch our tree canopy so that we met our goal in each of the neighborhoods in 2040?

See measurable goal description on p. 125.

Permeability. Where are the metrics that will or are employed as development occurs to decrease permeability? With each storm water design, how much will we gain in terms of permeability?

See measurable goal description on p. 125.

Trees and the Heat Island affect. Where are the metrics year over year how we are doing this and how we are moving to our 2040 goal?

See measurable goal description on p. 125.

Complete neighborhoods. Where are the recreation centers and Libraries for each neighborhood?

The plan recommends a recreation center and library services, and it prioritizes East Colfax as the location when applying an equity lens.

Community Benefits. Although it is a city-wide goal to have affordable housing, that has not been identified as our number one priority in South Park Hill, Hale, or Montclair. Your documents should reflect this.

Correct the park deficiency and tell us your strategy.

What is the plan once this deficiency is taken care of?

See previous response.

Need to add your recreation centers (Hale, Montclair, SouthPark Hill), and libraries for Hale and Montclair. We assume you are working directly with East Colfax Collective on their needs here as well as on other issues.

See previous response.

8. Significant Added Density and Effective Elimination of Single-Family Zoning.

Please see the updates to the recommendation for additional neighborhood housing options on p.39, Policy L6. How will “primarily single family” be identified under L6? We need to have a definition in the Plan for present discussion and for future reference.

The plan is a policy document and provides guidance for future regulatory implementation. The regulatory project will establish the proposed zoning and will involve additional community feedback.

9. No New Infrastructure to Support Proposed Density

General Comment: The City needs to place into the plan which studies have to accompany a proposed plan before its approval, including but not limited to: traffic, flood, heat island affect, permeability and pollution.

The plan is a policy document and will be used to inform future budgeting decisions and projects. Major infrastructure projects will include extensive analysis prior to implementation.

- The draft plan has many recommendations addressing the need for new and improved infrastructure throughout the plan area.
- The draft plan recommends 110 transportation infrastructure projects with detailed recommendations for mobility improvements throughout the plan area, including traffic calming in neighborhoods (See mobility recommendations referenced in #3 above).
- The plan also includes recommendations for green infrastructure and addressing flood plain issues (see environment recommendations referenced in #6 above).

- p. 39, Policy L6 specifically states that street parking impacts and flood plain issues should be addressed during implementation of the policy to integrate additional housing units.
- The draft plan recommends evaluating parking requirements in order to reduce barriers for adaptive reuse and new, lower-scale buildings on small lots along Colfax. See p. 227, Policy C-L1. [The parking requirements should remain prior to the 2010 zoning.](#)

[We have consistently heard a desire to support adaptive reuse and small-scale development on Colfax. This recommendation supports that goal.](#)

- The draft plan also recommends developing strategies to make alternative travel options easier and reduce the need for car trips (See p. 122, Policy M12).
- Area plans are used to inform future infrastructure improvements in the city. Detailed evaluation of infrastructure improvements is integrated into permitting of new development. See p. 244, Implementation.

[General Comments: These are desirable goals BUT with no concrete ability for implementation. Where is the accountability?](#)

[General Comment: The City needs to place into the plan which studies have to accompany a proposed plan before its approval, including but not limited to: traffic, flood, heat island affect, permeability and pollution.](#)

[See previous response.](#)

10. The Plan Adds More Cars to the Streets while Reducing Traffic Lanes. [The studies to date have been insufficient. See Dennis Royer attachment.](#)

[See FAQ response #6 and #31.](#)

11. Bus Rapid Transit Will Not Offset Increased Density, and Density is Not Needed to Support Bus Rapid Transit. [Under your current direction, EAP has the potential to more than double its required growth because we currently have the ability to take in the City's directed growth. To protect from over-growth, metrics need to be run on how to limit overgrowth in our area.](#)

[See FAQ responses #7, 11, and 13.](#)

12. Bus Rapid Transit is Not a Solution to Existing Problems with Transit This information addresses questions 10, 11, and 12. Denver is projected to add many more residents over the next 20 years, thus this plan includes detailed recommendations for mobility improvements throughout the plan area, including traffic calming in neighborhoods and making biking, walking, and taking transit easier (See mobility recommendations referenced in #3 above). Additionally, as discussed in #2 above, the recommendations for increased height and neighborhood housing options are intended to help meet community goals for affordable housing and other community priorities, not to support BRT.

It's also worth noting that the BRT and East Area Plan are separate projects. The relationship between BRT and the East Area Plan is addressed in the FAQs.

They maybe separate projects, but they are intricately intertwined. With no BRT, they would be no reason to up zone and no reason to place so many residents along Colfax. Our neighborhood would gently in-fill.

What is the plan if the BRT fails? What then is the contingency plan for the Colfax corridor?

Or will there be a change to your plan if the BRT is moved to the side of Colfax as it is in Aurora and in West Denver?

With a middle of the street bus, who will be responsible to plow the roads so that the physically challenged will be able to get to the stop?

See previous response and FAQ #6.

13. Neighborhood character will be lost. Please see the policy recommendations and updates referenced in #1 above.

14. Affordability is not required, and current affordable units could be lost.

Please see the policy recommendations and updates referenced in #1, 2 and 4 above. In particular, please note:

- p. 31, Policy L3 prioritizes affordable housing (except for in Mayfair Town Center where a public park is prioritized as the community benefit)
- p. 39, Policy L6 states that affordability and tools to help existing homeowners should be addressed in the implementation of additional housing options

- p. 52, Policy E2 recommends strategies to preserve existing affordability
- p. 53, Policy E3 recommends strategies to create new affordable housing
- Blueprint Denver Land Use & Built Form: Housing Policy 6 (p. 85) recommends continuing to advocate for changes to state law that remove barriers to access affordable housing options.

Comments on affordable housing.

How serious can the City be to build affordable housing when 45,000 units have been built in the last three years and how many units were affordable? We cannot build our way out and we should stop denying this truth.

Using reports of levels of residents in 2019, the city would need 26,735 rental units for those making \$19,500 per person, 11,900 units for the very low-income bracket, and 3340 for the low income bracket for a total of 41,975.00 units. (Westward, October 25, 2019.)

The City should consider increasing state tax credit program operated by the Colorado Housing and Finance Authority through the use of “sin taxes.”

Language should be added to the plan to give priority to non-profit housing developers who have demonstrated the ability to listen to the community in which they would like to build in and the ability to construct affordable and low income housing within existing zoning and ensure access to housing.

Instead of focusing on incentive programs for developers such as 100% waiver of property taxes which simply shifts the tax burden to homeowners including updating and maintaining infrastructure, the Plan should provide programs that will help residents remain in place. (Denver Business Journal June 2020)

The best option to obtain affordable housing is to override Telluride at the state level or raise taxes combined with a serious linkage fee so that it is better to build an affordable unit than to pay your way out of building one. Until this is done, the City cannot take care of this issue but most certainly, residents will experience a decrease in the overall quality of life of all residents.

See previous responses. Working towards amending state laws was added to the plan.

Since Hale is identified as a type 4 neighborhood, no development can occur until the plan is east of Elm. The plan should be corrected to comply with Housing for an Inclusive Denver and Blueprint Denver.

See previous response.

15. The Plan Does Nothing to Address the Lack of Park Access in the East Area.

The draft plan includes areawide and neighborhood policies for open space and parks.

- p. 129, Policy Q1 - Leverage the historic parkways to connect existing open space, parks and recreational assets. These are historic and generally define the character of the neighborhood and should be left intact. The plan should not decrease the acreage of the parkways for right of way purposes.

See previous response. The plan does not recommend removing historic parkways.

- p. 130, Policy Q2 - Develop new Contemporary Parkway that connect the community to open space, parks, and recreational assets, as well as serve multiple community functions.
- p. 131, Policy Q3 - Create new community open space, parks and recreation facilities.

MAYFAIR PARK – General comments

Despite the fact in 2017 and in the more recent meetings, our residents have said that the number one amenity in our neighborhoods is grocery shopping your illustration shows what we consider a “bodega”. Please draw a correct rendition for this area with our number one amenity (King Soopers and Safeway) in this neighborhood for Hale, Mayfair, Montclair and South Park Hill. (EAP at 29 and 125.)

The rendering includes a grocery store.

How many residents will you displace with this upzoning and how many residents can you place with this upzoning?

The goal is to mitigate displacement and give residents options to stay in the neighborhood. See Blueprint Denver projections on population.

This rendition displaces the middle missing housing that the plan seeks. We already have these new units at Colorado and 8th. In the future we will have these units along Hale as Hale develops as well as National Jewish and the VA hospital.

The rendering is shown in areas that currently zoned mixed use. Specifically, the park is shown in the location of an existing parking lot.

Where will everyone park?

The rendering shows a shared parking garage and mobility improvements that makes it easier to get to the center without driving.

Please reinstate surface parking for the grocery stores. Again, the residents like the way they shop now with surface parking. Asking the physically challenged or parents shopping with children drag their bags to the garages either located in the basement of a building or across the street to the one garage that we can determine exists, is a substantial departure from the amenity the residents enjoy.

Please include a step down of the tall buildings to work with the adjoining neighborhoods. We assume that you will not shadow their homes.

Appropriate transitions are recommended in Policy L7.

- p. 132, Policy Q4 - Enhance existing community open space, parks and recreation facilities. [See below](#).
- p. 146, Policy Q13 - Expand healthy meal options available in the East area. Support food growing and production included in community amenities. Strategy A recommends community gardens.
- p. 29, Policy L1 - Ensure compatible development on institutional sites within neighborhoods. Strategy B recommends new open space. [Strategy B should read "be required" not "recommended" by stating it should meet Blueprint Denver and Game Plan for a Healthy Denver.](#)

The plan is a policy document, not regulations. The parks map was updated to better illustrate the recommendation for campuses.

- p. 29, Policy L2 - Encourage shared use and activation of institutional and quasi-public facilities during off-peak times.

- p. 185, Policy H-L1 - Ensure development on the hospital campuses promotes the success of the health care industry while ensuring compatibility with the surrounding neighborhood. Strategy B recommends new open space. **Strategy B should read” be required not recommended by stating it should meet Blueprint Denver and Game Plan for a Healthy Denver.”**

The plan is a policy document, not regulations. The parks map was updated to better illustrate the recommendation for campuses.

- p. 207, Policy MC-Q3 - Create a new neighborhood park in the Mayfair Town Center.
- p. 241, Policy C-Q1 - Colfax-specific open space recommendation. **Patches of green area are not open space nor park access and should not be identified as such.**

General Park Comments.

- There is no need for financial incentives to developers for parkland or for open space. In 2018, the Denver voters passed Measure 2A generating to date more than 150 million in sales tax revenue to acquire, develop and maintain parkland, trails, and open spaces. Yes, this plan as well as the previous plans do no attempt to designate the 332 acres, we are short of in this area which is a goal of Game Plan for a Healthy Denver. The City should be looking at this area and finding where the City might acquire parks.
- If the City gives developers incentives to create parkland, it should be designated as parkland in perpetuity under the Denver City Charter. It should be designated as such so that it cannot be sold at a later date or repurposed.
- The patches of green space along Colfax is not park access.
- Map out the ten-minute walk to the park thus identifying where potential parks should be located.
- State in the plan the strategy for 13 acres per 1000 residents.
- No new development until the deficiency has been met.
- Once this number has been reached, developers must provide 13 acres for each additional 1000 residents.
- Map out National Jewish and VA hospitals for park and affordable housing.

See updates to park map, Johnson & Wales recommendation, and previous response.

General Comments/recommendations on Parking.

Given the potential of group housing and ADU's, we need to plan for parking. It is a pipe dream that everyone will go without a vehicle. The population is coming for our outdoor lifestyle. They will need at least one car. The Citywide average is 1.4 vehicles, East Colfax at 1.3, Hale at 1.2, Montclair at 1.6 and South Park Hill at 1.8. You can google and discover that one of the top ways to get out of poverty is to have access to a vehicle. The numbers in Hale and East Colfax indicate that though you may have less household income, having a vehicle is important.

In 2018, a survey was done with 300 people who live within a 10-minute walk to the light rail station in Denver. The study compared travel habits or market rate housing to low income households. 90 % of the market rate households owned at least one car and used their vehicle 70% of the time for their travel. Less than half of the of the low-income households had a vehicle and used transit 66% of the time. These statistics indicate that regardless of income, people have a vehicle for travel. (Why affordable Housing Is So Important for Development Near Transit, Streetsblog, June 2018.)

Recommendations:

Each unit built should provide at least one parking space and depending on the square footage of the unit, additional parking spots should be required.

The Denver Zoning includes parking requirements. See FAQ responses and previous response to DENF.

Due to the Pandemic, parking preference for businesses should be limited and preference given to the residents.

See curbside management recommendation.

We have to consider parking in light of the proposed group housing on our streets.

Group living considers parking. The East Area Plan recommends that implementation of more housing options should consider street parking impacts.

Parking garages should be built on Colfax that will complement and be consistent with the character of our neighborhood.

SUMMARY: This document consists of our second set of review with questions and recommendations the previous set being sent to you on or about June 15, 2020. We do have a third set that is almost completely. We look forward to meeting with you.

Attachments:

Dennis Royer Letter May 9, 2020

Flood Plain drawing by Brian Hyde

Approximately 1500 Signatures opposing the EAP – due to volume will be sent in a separate email.