Expanding Housing Affordability

Outreach Summary Phase 3: January 1, 2022 – March 29, 2022

The purpose of this outreach phase is as follows:

- Share the public review draft reflective of the changes made in response to the Phase 2 engagement comments
- Gaining feedback for refinements to the draft DRMC and DZC amendments
- Listening to community priorities, ideas, and considerations
- Answering questions

Goals for Community Engagement include:

- Informing the community by distributing accurate, objective, and timely information
- Fostering understanding of zoning and affordable housing systems
- Identifying and addressing questions and concerns
- Soliciting input and feedback to ensure key issues, interests and needs are integrated into the process and project outcomes
- Building awareness around the project and informing outcomes.

Principles for Community Engagement include:

- Tailoring content and discussions to the specific needs and interests of the community
- Leveraging existing community groups and networks
- Being efficient and respectful of the time volunteered by all participants
- Engaging in diverse representation with a variety of socio-economic backgrounds and perspectives

Outreach and engagement were conducted using the following approaches:

- Connecting with community groups, industry organizations, and a public advisory committee
- Virtual Open House
- Virtual Office Hours
- Feedback Forms
- Online Survey

Additionally, information was made accessible on the project website.
Key Feedback Themes
The following summarizes the most common themes received through phase three of the outreach conducted from February 1 - March 14, 2022. Additional details specific to different outreach groups follow.

**General.** Many community members expressed strong support for the proposal with a desire to see more affordable housing options and funding for affordable housing become available through these tools.

**Mixed support with additional requests.** Many community members expressed support for the proposal; however, many community members also had reservations. These generally fell into three groupings:

1. Those who felt that the proposal “didn’t go far enough” and wouldn’t create a meaningful impact on funding for affordable housing or create enough units at lower AMIs. Some also cited concerns that the housing outcomes wouldn’t address specific community needs.

   **Changes made to strengthen affordable housing funding through the Linkage fee.**
   In some use categories, the linkage fee has been increased by an additional $1.00/sf in year 2025 to provide additional funding for affordable housing. This will result in fee amounts much closer to the identified financial feasibility maximum while maintaining a gradual increase over four years (previously three), as was requested by industry groups.

   **Changes made to expand community-informed housing commitments.**
   Expanded the applicability of “high-impact developments” to include all sites leveraging Tax-Increment Financing or Metropolitan Districts, regardless of size. High-impact developments must have a housing commitment that furthers the city’s strategic housing goals, adopted plans, and reflects community feedback.

2. Those who felt that without larger zoning reform to allow multi-unit housing citywide, this program would be limited and the supply and demand imbalance to housing would remain the key driver of housing costs.

   **Response to increasing the supply of housing overall.**
   This policy includes zoning incentives that will help remove barriers to the creation of new housing, such as reducing parking requirements, reducing permit fees, and increasing overall density and height in areas of the city close to transit options and major corridors to accommodate additional housing.

3. Industry members felt that these policies are only successful when appropriately calibrated to the market which can change over time. Comments suggested a need for a regular assessment of program outcomes and lessons learned.

   **Changes made to ensure program monitoring and accountability.** In addition to the existing general reporting requirements, language specific to linkage fee and mandatory affordable housing outcomes tracking has been added to this policy which will now also require a publicly available online dashboard. For the linkage fee, this would include monitoring at a minimum: funds collected, allocation of funds, and approved reductions and waivers. For mandatory affordable housing units, this would include monitoring at a minimum: number and types of units created, on-site options selected, fee-in-lieu fund revenues and spending allocations.
Key Milestones

- Public review draft of the DRMC, DZC, and an updated policy document released on February 1, 2022
- Comments were due on March 14, 2022

City Council Committee Meetings

Date: February 8, 2022
Board: City Council Land Use, Transportation, and Infrastructure Committee
Meeting can be seen on Channel 8.

Staff presentation was focused the Linkage Fee piece of the proposal and discussion of changes made in response to feedback and comments received. Council had a lot of clarifying questions; the following are summarizing key comments:

- Desire to see higher linkage fees with a fear that the proposed amounts remain too low, especially compared to peer cities. (reminder that linkage fees need to be looked at in the context and not just a dollars-to-dollars comparison)
- Concern that the larger fee on new large homes won’t be enough to disincentivize scrapes.
- Glad to see the phased in increase over three years to accommodate for COVID and other market impacts.
- Importance of ongoing reporting and compliance.
- Appreciation of the ground floor exemption especially with other planning/regulatory efforts to create more active street level uses.

Date: February 15, 2022
Board: City Council Land Use, Transportation, and Infrastructure Committee
Meeting can be seen on Channel 8.

Staff presentation was focused the Mandatory Affordable Housing piece of the proposal and discussion of changes made in response to feedback and comments received. Council had a lot of clarifying questions that staff responded to, the following are summarizing key comments:

- Discussion on the importance of this program as requiring affordability in ALL developments, not just those seeking rezoning.
- Appreciation of the ground floor exemption especially with other planning/regulatory efforts to create more active street level uses.
- Want to ensure that the city is proactively working to address delays in permitting.

Date: February 22, 2022
Board: City Council Land Use, Transportation, and Infrastructure Committee
Meeting can be seen on Channel 8.

Staff presentation was focused the incentives and high-impact development piece of the proposal and discussion of changes made in response to feedback and comments received. Council had a lot of clarifying questions that staff responded to, the following are summarizing key comments:

- Concern about the parking exemption and the current edition of “transit-rich areas” which does not align with the on-ground reality of our transit network. Related concern that the “as the crow flies” radius doesn’t consider the pedestrian network.
- Want to confirm that these requirements won’t stifle development (e.g., Portland)
- Desire to maintain predictability for high-impact developments
- Concern that 38th and Blake doesn’t currently or as proposed address the issues of displacement that is has contributed to.
Expanding Housing Affordability Advisory Committee
Advisory Committee Meeting #6
Date: February 10, 2022
Complete meeting summary along with the slide deck can be found on the project website.

Advisory Committee Meeting #7
Date: March 22, 2022
Complete meeting summary along with the slide deck can be found on the project website.

Denver Planning Board
Informational Update
Date: February 16, 2022
Meeting can be found on Channel 8.
Staff provided an in-depth presentation on the update EHA proposal and outlined changes made since the October 2021 draft. Board members had a lot of clarifying questions and comments.

Virtual Open House
Date: February 17, 2022
Number of Participants: 104
Recording can be viewed online here: [https://youtu.be/uqR9skSI3_4](https://youtu.be/uqR9skSI3_4)
Councilwomen Sandoval and Kniech provided an introduction. Staff provided a brief presentation of the proposal, interactive audience polling, and Q&A session.

- Of those participating in the Menti (survey) the majority (25) identified as community members followed by housing advocates (12) and development industry members (9) and the remaining selecting city employee or other.
- Those who shared their locations included, Whittier, Platt Park, Washington park, Berkeley, Congress Park, Lowry, Capitol Hill, City Park, Cole, Westwood, Montebello, Mayfair, West Washington Park, Five Points, East Colfax, Green Valley Ranch, Union Station, Globeville, Ruby Hill, Belcaro, Northeast Park Hill, Highlands, Cheesman Park, Five Points, Highlands, North Capitol Hill, and some outside the city an in Aurora or other suburbs.
- Additional details including the meeting summary and outcomes of the Menti Survey are on the project website.
Community Groups and Industry Organizations

*Listed in order by date*

Date: February 2, 2022
**Convening Organization: United for A New Economy (UNE)**
Staff provided an overview of the proposal. UNE was interested in lessons learned, and opportunities of other jurisdictions in the Denver Metro Area to adopt similar programs and create a regional solution.

Date: February 10, 2022 2:30 – 4p (online)
**Convening Organization: Council District 3**
Number of participants: 19
**Organizations Represented:** Council District 3; Rocky Mountain Communities, West Denver Renaissance Collective; Love Thy Neighbor; Enterprise Community Partners; Lifespan Local; NEWSED CDC; Mi Casa Resource Center; NEST; Habitat for Humanity of Metro Denver; BuCu West.

- Staff presentation providing an overview of the public draft, given timing constraints, there wasn’t substantial feedback provided.
- General support for the proposal along with some questions around program design and specifics.

Date: February 15, 2022, 7pm
**East Colfax Neighborhood Association**
Participants: 32

- Staff presentation providing an overview of the public draft, given timing constraints, there wasn’t substantial feedback provided.
- Appreciation of the thoughtful and well-balanced approach to create more affordable housing in the city.
- Concern that a desire to have greater affordability requirements in neighborhoods like East Colfax isn’t represented in the revised proposal. There should be a much higher affordability percent at a lower AMI in NEST neighborhoods.

Date: February 15, 2022, 9am (online)
**Convening Organization: RiNo Art District Board**
Number of participants: approximately ~10-12
Organizations/Companies represented: RiNo Art District Board, EXDO, Westfield/North Wynkoop, others not identified.
Staff presentation providing an overview of the proposed 38th & Blake rezoning approach.
**Key Comments/Questions:**
- Desire to see more height, and a belief by some that there shouldn’t be any height/density limits near transit.
- Concern with the overall EHA proposal citing that this will increase prices or development won’t happen

Date: February 16, 2022, 2pm (online)
**Convening Organization: Native American Housing Circle (NAHC)**
Participants: 15
Organizations Represented: Lifespan Local, DICI, Colorado Commission of Indian Affairs, Amaktoolik Studios, Enterprise Community Partners, DIHFS, Colorado Coalition for the Homeless, Herbal Gardens Wellness, and others not identified.
Key Comments/Questions:
- Questions around the AMI levels and if lower income individuals will be served by the program.
- Regarding the forthcoming prioritization policy, wanted to see if evictions will be a part of the criteria and or native Americans
- Desire to see more funding for affordable housing

Date: February 17, 2022, 1pm (online)
**Convening Organization: Home Builder Association-Denver JTF – Residential Development Coordination**
Participants: 20
Staff provided a brief update to the EHA proposal, given the agenda meeting timing, there wasn’t sufficient time for feedback. Some questions and concerns were raised specific to delays in permitting and review times.

Date: February 26, 2022 (online)
**Convening Organization: Inter Neighborhood Cooperation (INC) – Zoning and Planning Committee (ZAP)**
City staff presented an overview of the updated EHA proposal and took time for questions and feedback.
Key Comments:
- Questions around the importance of incentives and questioned their necessity.
- Glad to see the rise in linkage fees, however stated concern that the fees are still too low (especially for single- and two-unit homes) and the fees should go to the economically feasible amounts. Keeping the fees low and phasing in doesn’t make sense.
- Other comments about other impacts to the housing market (e.g., sewer line capacity, marijuana industry)
- Questions about additional affordability requirements when rezoning.
- Desire to see family housing that is affordable.
- Concern that the policy is not equitable and not proactively reversing practices that lead to displacement.

Date: March 8, 2022, 6pm (hybrid)
**Convening Organization: West Colfax Association of Neighbors (WeCAN)**
Participants: ~30+
Staff provided a brief update to the EHA proposal, given the schedule timing, minimal feedback was provided. This included a few clarifying questions and comments of overall proposal support.

Date: March 8, 2022, 6pm (hybrid)
**Convening Organization: HUNI Planning and Community Development Committee**
Participants: ~8
Staff provided a brief update to the EHA proposal.
Key questions and comments were focused on the applicability of the zoning incentives (height and parking) in the neighborhood.

Date: March 9, 2022, 4pm (hybrid)
**Convening Organization: Denver BIDs council**
Participants: ~10
Staff provided a brief update to the EHA proposal. CASR also provided an overview of their work related to climate action and sustainability.

- Discussion was focused on how these two important city priorities can work together to better meet our housing and climate action goals.
- Overall support for the EHA proposal and particular support for the incentives that increase the supply of housing overall and affordable housing.

Community Office Hours
Dates: February 3, 24, 28, March 3, 10*, 2022
March 10th was focus on the 38th and Blake Rezoning

Key Comments/Questions:

- **Linkage Fee**
  - Desire to see linkage fees raise to the maximum feasible amount. Concern that the policy is not going as far as it could.

- **Income Qualifications**
  - A variety of questions were raised regarding “how” the program would be administered through the permitting phase along with the “who” and “how” do people qualify and access the affordable units created through this program. Follow up questions were raised about the household’s ability to earn more and stay in affordable units.
  - Concern that the AMIs are too low for many working-class families and they will pay the increased prices and be driven out of the city. Desire to see higher incomes served or more programs for down payment assistance.

- **Incentives**
  - Support for the by-right incentives to create more affordable and market rate housing.

- **Zoning and Applicability**
  - Desire to see all developments (less than 9 units) be required to provide affordability and expand zoning allowances (remove single-unit zoning)
  - Desire to see affordable housing created in all the city, not just downtown.
  - Everywhere in the city should allow for townhomes or more density

- **38th and Blake**
  - Desire to see all developments (less than 9 units) be required to provide affordability and expand zoning allowances (remove single-unit zoning)
  - Desire to see affordable housing created in all the city, not just downtown.
  - Concern that added cost will result in lower design quality
  - Desire to see the deadline for approval under existing requirements to be extended
  - Questions about the loss of the “community serving use” alternative to building affordable units.

- **Others**
  - Questions and concerns that there is not a formal “target” for this program because its market based.
  - Concern that this policy is “too late” and that the lower-income households and affordable housing is already gone in the city.
  - Concern that this will be another failed IHO
  - Developers participating on the calls continuously cited concerns that this will limit housing supply and further increase prices, how will we know when the program has failed?
Website Comments

Between February 1 and March 14, Expanding Housing Affordability has received 88 comments and 23 questions from the public related to the project, submitted through the project website. Below is a summary and synthesis of key themes and demographics gleaned through this portion of the EHA engagement and outreach process.

Comments related to EHA broadly fell into four general categories:

1. Suggestions for other policy initiatives that would promote affordable housing (42 comments)
2. Concerns about EHA’s impact on development costs and the overall housing market (20 comments)
3. Suggested changes to EHA to increase housing affordability (14 comments)
4. General expressions of support (9 comments) and opposition (1 comment) to the EHA policy proposal

Other Policy Initiatives

The range of comments suggested additional policy steps that might contribute to the expansion of affordable housing in the City and County of Denver. This category of comments did not directly address the EHA policy proposal, other than to occasionally express support.

Within this category of comments, a clear majority of respondents wrote to request zoning reforms that would allow for increased density, often citing their affiliation with YIMBY Denver. These reform proposals primarily included rezoning to allow for more multifamily buildings, a reduction or elimination of parking minimums, and disincentives (i.e. higher fees) for single-family construction.

Additional policy suggestions included the expansion of the Section 8 Housing Voucher program; regulations to protect against rental discrimination; and conversions of vacant buildings to apartments.

Comment’s representative of this category include the following:

- “The EHA proposal can be a useful piece of the housing puzzle... However, housing won’t be affordable until more housing is legal across all of Denver. In my neighborhood (East Colfax), most homes are small (600-1400 sq ft) 2-bedroom homes that were built on large 6000+ sq ft parcels throughout the 1940s and 50s. Most of these structures are now reaching the end of their lifespan...With current zoning, it is only possible to replace these older houses with new single-family homes (with or without an ADU). This leads to an unfortunate dichotomy of modern "luxury" homes right next door to aging modest cottages–basically a visual representation of the "missing middle." East Colfax would greatly benefit from changing zoning rules to allow for triplexes, Fourplexes, and micro-apartment blocks, and eliminating set-back requirements..."

- “...These are half-measures that won’t meaningfully impact the city's housing supply until several years from now...This plan should abolish parking minimums on ANY development and let the market decide how much parking to be provided... City should also consider expedited reviews on any housing project and lowering fees... Height restrictions should be abolished as well... Denver has the opportunity to be a leader on housing affordability and I’d hate to see it squandered with a policy that doesn't go far enough."

- “This project should include specific and strong incentives for re-use of existing structures, and disincentivize scraping and building new... Currently, most modest sized older structures, including many older duplexes and triplexes, are scraped to build giant all-new and very expensive single-family homes... This buy/scrape model contributes directly to the housing affordability crisis - by inflating the price of otherwise modest homes. Unused or underused commercial buildings could also be repurposed... Zoning should actively encourage structural re-use to promote a more sustainable city AND a more
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affordable housing environment. It can be done - other more forward-thinking cities are leading the way."

- “[Building owners use discriminatory rental screening tactics] like to apply each building would require
  between $150-$300 as a deposit, just to apply... Also, many buildings are mostly occupied by temporary
  guests using services such as Airbnb which is much more lucrative to the building owner... These and
  other practices result in a highly discriminatory, unnecessarily tight rental market, causing artificial
  inflation that drives up costs..."

**Impacts to Development and the Housing Market Cost**

The second largest category of submitted comments expressed a concern that the mandatory housing policy
will disincentivize residential development, thereby harming housing affordability across the city. Commenters
expressed concern that increased development costs will be passed on to market-rate renters, thus harming
affordability for many Denver residents.

Several of these comments suggested taking a more incentive-based approach, suggesting that the City provide
expedited plan review, density incentives, fee waivers, and tax incentives. Respondents also indicated that
current regulations and zoning laws are already stifling housing development by shrinking developers' profit
margins.

Additional themes included concern about the differential impact on ownership vs. rental projects (i.e. that the
MAH requirement places a relatively larger burden on condominium developers); and several requests to extend
the deadline by which SDP applicants can be grandfathered into the pre-EHA rules.

Comment's representative of this category include the following:

- “…This bill seems to be ignoring the lessons learned from the Colorado Construction Defects Law Reform.
  This bill was originally designed to protect people, but instead it caused developers to just stop building.
  Regulation created higher costs. Regulation always creates higher costs. We essentially eliminated the
  ability for people to enter the housing market through condos. So there is a huge leap from renting to a
  single family home now. Added economic uncertainty to a project will cause it to die on the vine.

- I appreciate the intent of trying to create more affordable housing, but adding regulation to projects with
  the lowest margin will cause those projects to not be funded. Profit is not a bad word. We need to work
  with our developers to find ways that they can be profitable and help on the affordable housing front.”

- “We are at a place where we are going to sell our property and due to this updated policy, the offer we
  have for our land has been decreased 57.5%. We are hearing this from other developers as well. So, for a
  church that is VERY pro affordable housing...we are torn. We want to see them built. But the economic
  impact is so great that developers are either saying they aren't going to work in Denver any longer or
  decreasing their offer so dramatically that we can't sell our property. This then holds us back from doing
  the work we are called to in the city...including helping to build affordable housing units!

- “[CREA’s] industry has long been paying above-average wages, and as market-rate rents increase to
  subsidize units for those within 60-80% AMI, workers in our industry will be forced to move further out
  of the city or limit their salary to stay within the low AMI levels. With one misguided policy, the City will
  drive up rents, disincentivize wage increases, and increase pollution from on-road transportation, which
  currently accounts for 22% of Denver’s greenhouse gas emissions.

- CREA seeks to be a partner with the City in addressing the problem of affordable housing within our
  community and asks the City to consider the following changes to the policy:
    o Raise the AMI limits for affordable housing to 120% AMI while maintaining the revised
      percentage of required onsite affordable units.
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- Leverage existing resources such as the sales tax for housing or enact property tax incentives to encourage and facilitate the development of affordable housing projects; and
- Eliminate the disincentive for building larger units. Larger units (2-4 bedroom units) in the city center can house families and provide de facto affordable housing for young professionals willing to live with roommates.

Suggested Changes
Within this category, there were two main suggestions. About half of commenters expressed a desire to see EHA support community members making below 60% AMI, while others requested an increase in the linkage fee to align it more closely with the maximum fee levels indicated by the feasibility study. Some respondents also expressed concern about the flexibility provided by the Alternative Compliance options, requesting a more prescriptive and less discretionary approach.

- “I have read and am in full support of the letter dated 12/31/21 sent to the EHAA committee (along with other city leaders) from a consortium of groups who work to support community members experiencing homelessness. I have long considered the commonly used definition of "affordable" housing as 80-120% of AGI as an inappropriate guide that excludes our most vulnerable community members who have been or are at risk of being displaced. I have seen my own neighborhood (Cole) rapidly gentrify over the past 10 years - and recognize that I am a part of that gentrification - and we have lost many long-time residents who have been pushed out by landlords or skyrocketing property taxes. It’s past time for Denver to address this issue and finally take steps to protect its lowest income residents, and to show that they too have a place in Denver. I ask that the committee:
  - Raise the Affordable Housing Linkage Fee to better align with the City’s Housing & Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods.
  - Eliminate Section 27-157 of the ordinance, which allows for the Executive Director of the Department of Economic Development to “reduce or waive” the total linkage fee
  - Dedicate a minimum of 20% of the total annual funds generated by the Linkage Fee directly to housing first solutions to those experiencing homelessness.”

- “Fully support this effort by the city, but it needs to go even further. It should have x % of units for low income. Y% of units for middle income. And remaining being uncontrolled. You’re effort to help low income is good, but you are doing nothing for people who are in service professions and can’t afford live in the metro because they won’t qualify for the low income threshold, but don’t make enough to afford increasing housing rates in metro with lower middle income levels.”

- “There should be more clarity and flexibility when it comes to off-site agreements. Use the outdated section 27-101 for example. The DMC used to allow for flexibility on location allowing for TOD to count as off-site affordability. Leaving off-site agreements up to the discretion of the director has far too much uncertainty and will incur too much negotiation. Surely there is some amount that warrants an off-site right? If the off-site developers exceed the number of affordable units required by 20% or provide an additional 10% affordability depth (50% AMI vs 60% AMI), does this not meet the goals of HOST? A clear framework should be established to facilitate this idea. This would allow non-profit developers to meet (and exceed) the affordability requirements of their market-rate partners, facilitating additional market-rate and affordable development for our city.”

General Support
Finally, ten commenters wrote to express their general support (9 comments) and opposition (1 comment) for the EHA policy proposal:
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• “I support the Expanding Housing Affordability project. I grew up in Denver, went to Denver Public Schools k-12, and now live in zip code 80218. Denver has become increasingly unaffordable in my lifetime, and this project will help spur affordable housing. I also want to appreciate Councilor Robin Kniech for her work on this issue; she is one of the few politicians in this city pushing for real solutions to the affordable housing crisis.”

Demographics of commenting respondents:

Gender
People submitting a question or comment to EHA through the website were asked to answer the following demographic question: “What is your gender?” Results below:

• 56 respondents identified as male
• 37 respondents identified as female
• 4 respondents identified as non-binary
• 14 respondents preferred not to identify

Race and Ethnicity
People submitting a question or comment to EHA through the website were asked to answer the following demographic question: “What is your race or ethnicity? Please select all that apply. You may report more than one group” Results below:

• 68 respondents identified as White
• 2 respondents identified as Hispanic, Latino/Latina/Latinx, or Spanish
• 1 respondent identified as American Indian or Alaska Native
• 1 respondent identified as Black or African American
• 1 respondent identified as Asian
• 12 respondents reported more than one group
• 25 respondents preferred not to identify

Rent or Own
People submitting a question or comment to EHA through the website were asked to answer the following demographic question: “Do you rent or own your home?” Results below:

• 64 respondents own their home
• 30 respondents rent their home
• 1 respondent selected “other”
• 16 respondents preferred not to answer the question

Income
People submitting a question or comment to EHA through the website were asked to provide the following information: “Please estimate your total household income, before taxes, in the last 12 months. Please include all sources of income for all adult household members” Results below:

• $200,000 or more: 15 respondents
• $150,000 - $199,999: 10 respondents
• $100,000 - $149,999: 13 respondents
• $50,000 - $99,999: 25 respondents
• $25,000 - $49,999: 15 respondents
• Less than $25,000: 5 respondents
• Prefer not to Answer: 28 respondents
Age
People submitting a question or comment to EHA through the website were asked to answer the following demographic question: “How old are you?” Results below:

- 18 or younger: 3 respondents
- 19-34: 25 respondents
- 35-44: 32 respondents
- 45-54: 13 respondents
- 55-64: 12 respondents
- 65-74: 10 respondents
- 75 and older: 2 respondents
- Prefer not to Answer: 14 respondents

Online Survey
This 14-question survey was presented to the public in February-March 14, 2022 to gauge public feedback on the Expanding Housing Affordability (EHA) policy proposal. Eighty-one responses were collected from the public.

The first question, which asked if respondents think housing in Denver is too expensive, had a strong “yes” response at 81.4% of responses. Of the other possible answers, 9.88% said “no” and 8.64% said “unsure.” The second question asking if Denver should do more to create more deeply affordable and/or subsidized housing had an average response number of four out of five where zero was “strongly disagree that Denver should do more” and five was “strongly agree that Denver should do more.”

Question three dug a bit deeper, asking respondents if they agree that Denver needs more workforce housing for people who make less than the area median income; the average response number was four out of five, with zero being “strongly disagree that Denver needs more workforce housing” and five was “strongly agree that Denver needs more workforce housing.” Question four asked if requiring development of 10 or more units to include affordable workforce housing would align with respondents’ priorities; the average number was four out of five, with zero as “strongly disagree that developers should have to include workforce affordable housing” and five was “strongly agree that developers should have to include workforce housing.” Question five asked if respondents supported giving incentives to developers to support the creation of affordable housing; the average response was a four out of five, with zero being “strongly disagree with providing incentives” and five being “strongly agree with providing incentives.”

Question six was an open-ended query asking if respondents had any other ideas for increasing affordable housing in Denver. Answers ranged from doing nothing and letting people fend for themselves, to relaxing the rules around accessory dwelling units, and increasing zoning density by eliminating or restricting single-family only zoning. Several respondents felt the proposal should be extended to include those making less than a typical workforce household; others felt the costs of the policy could end up being passed on to the affordable homeowner or renter. Multiple respondents expressed that EHA on its own will not be enough; rent control and rent caps were mentioned numerous times as a supplement to EHA. Several respondents expressed concern that the linkage fees would cause a downward trend in housing development, and therefore less housing than before.

In the remaining demographic questions, 71.60% of respondents or someone they know had not experienced a foreclosure; 22.22% said they or someone they know had experienced a foreclosure; and 6.17% were unsure. Community Members made up 58.02% of responses, followed by Housing Advocates at 16.05%,
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Development Industry Members (affordable or mixed income) at 7.41%; Housing Advocates at 7.41%; Others at 4.94%; City Employees at 3.70%; and Development Industry Members (market rate) at 2.47%.

Of the total respondents, 22.22% were age 35-44 and 22.22% were age 65 or older. Ages 45-54 made up 20.99% of responses, followed by 25-34 at 18.52%; 55-64-year-olds came in at 13.58% followed by 18-24 at 2.47%. Most responders, 76.25% identified themselves as white. Black or African American respondents made up 7.50% of results and Asian or Asian American made up 3.75%. Persons identifying as American Indian or Alaska Native were 5.00% of responses, and 11.25% identify as another race. When asked about their ethnicity, 81.48% of responders indicated they were Non-Hispanic/Latino origin, while 9.88% identified as Hispanic/Latino origin, and 8.64% preferred not to respond.

Approximately 16.22% of respondents came from District 10 (Hinds), followed by 14.86% in District 8 (Herndon), 12.16% from District 1 (Sandoval), 12.16 from District 7 (Clark), 12.16% from District 9 (CdeBaca), 6.76% from District 3 (Torres), 5.41% from District 5 (Sawyer), 5.41% from District 6 (Kashmann), 2.70% from District 4 (Black), 1.35% from District 11 (Gilmore), and zero from District 2 (Flynn). Of the respondents, 2.70% indicated they do not live in Denver, and 6.76% indicated they did not know their Council District; 1.35% preferred not to say.
Appendices

Appendix A: List of organizations and or businesses directly engaged through outreach (for the entirety of the project, not just phase 3).

Appendix B: Letters received on the draft proposal between January 1, 2022 to March 30, 2022

Appendix C: Complete comments list received from the website from January 1, 2022 to March 30, 2022
Appendix A

Affinity Partners
Aimco
All In Denver
Alliance Residential
Amacon Construction
Amaktoolik Studios
AMBG Consulting
AMIL Residential
Anti-Displacement Policy Network
Apartement Association - Legislative Affairs Committee
Apartment Appraisers
Apartment Association
Archway Housing
Avalon Bay Communities
Avanti Residential
Ballard Spahr
BCM Investments
Bindery on Blake
Boulder Creek Life and Home
Boulder Housing Partners
Broe Development
Brookfield Partners
Brownstein Hyatt Faber Schreck
Bruce Baukol
BuCu West
Burgess Services LLC
Carmel Partners
Cavaliere Denver
CBWPA
Center for Community Wealth Building
Cherry Creek Area Business Alliance
Cherry Creek North BID
Christopher Carvell Architects
City of Aurora Third Sight Strategies
CliftonLarsonAllen
Clolfax Mayfair BID
Colfax Ave BID
Collegiate Peaks
Colorado Apartment Association
Colorado Black Chamber
Colorado Coalition for the Homeless
Colorado Coalition for the Homeless
Colorado Commission of Indian Affairs
Colorado Department of Local Affairs
Colorado Division of Housing
Colorado Gerontological Society
Colorado Housing and Finance Authority
Colorado Legal Services
Colorado Village Collaborative
Communities That Care (CTC)
Community Solutions
Confluent Development
Connectoras de Montbello
Conservation Colorado
Consilium Design
Convergence Multifamily Real Estate
CREA Meeting
Crema
Crescent Communities
Crestone Partners
CRL
Cultivando Network
Cunningham
Currell Program Management
Cypress Real Estate
D4 Urban Land
Daydream Apartments
Del Norte
DEN - Airport
Denver Area Labor Federation (DALF)
Denver Board of Adjustment (BOA)
Denver Health
Denver Housing Authority
Denver Human Services
Denver Indian Center
Denver Metro Association of Realtors (DMAR) - Government Affairs Committee
Denver rescue Mission
Denver Urban Renewal Authority (DURA)
Developer/Business owner
DIG Studio
DIHFS
District 3 Anti-Displacement Housing Group
DOTI Advisory Board
Downtown Denver Partnership BID
Downtown Denver Partnership BID Council
Downtown Denver Partnership City Live
Downtown Denver Partnership Development Council
DR Horton
East Colfax Community Collective
East Colfax Neighborhood Association
East West Partners
Economic an Planning Systems
EDENS
Enterprise Community Partners
EnviroFinance Group
EXPANDING HOUSING AFFORDABILITY
Through market-based tools

Ethos Solutions
Evergreen Development
ExDo
Fax Partnership
FGMC
First Bank
Five Points BID
Focus 360 Development
Forum Real Estate Group
Fulenwider
Gensler
GES Coalition
Golub and Company
Gorman and Company
Greystar
Group 14 Engineering
Guinness Development
Habitat for Humanity
Habitat for Humanity of Metro Denver
Health Colorado
Herbal Gardens and Wellness
Highland Development
Hines
Hogan Lovells
Holland Partners Group
Holleran Group
Home Builder Association (HBA)
Hord Coplan Macht
Housing Stability Strategic Advisors
HUNI
Inter Neighborhood Cooperation (INC) - Zoning and Planning Committee
Jacquard Hotel
Juntos Colorado
Kairoi Residential
Kaplan Kirsch Rockwell
Karoí Residential
Kentro Group
Kentwood Real Estate
Kephart
Koebel Urban Homes
Koelbel & Co
KTGY
Land Title
Larsen Development Company
Leland Ferguson
Lifespans Local
Lincoln Property Company Denver
Liv Sotheby’s Realty
Live Range Water
Love Thy Neighbor
Lowry United Neighborhoods RNO
LPC Development
Lucero Development Services
MAA
MAINSPRING
Matrix Design Group
McWhinney
Melinder White
Mental Health Center of Denver
Mentalo Development
Metro Denver Habitat for Humanity
Mi Casa Resource Center
Mi Familia Vota Education Fund
Mile High Connects
Mill Creek Residential
Montbello Organizing Committee
Mulligan Advisory Services, LLC
NAIOP Colorado
NAIOP Past Presidents Council
National Valuation Consultants
Native American Housing Circle (NAHC)
Near Southeast NPI Steering Committee
Neighborhood Development Cooperative
Newmark
Newseed Community Development Cooperation
Nichols Revesco
Norris Design
North East Denver Housing
Olin Resident Council
Oread Capital Development
Otten Johnson
Oz Architecture
Palace Construction
Palisade Partners
Park Hill UCC
Pat Duncan Photography
People for Bikes/DOTI Advisory Board
Perkins & Will
Pinnacle Real Estate Advisors
PlanWest
Plinth Gallery
PMH
Polisnelli
Prime West Companies
Progressive Urban Management
ProLogis
Property MG
PS. Design
Range Water Real Estate
Real Estate Garage
Red Peak
Revesco Properties
RiNo Art District Board
Rocky Mountain Communities
S. A. Miro, Inc.
Santa Fe BID
Sares-Regis
SCCColorado
EXPANDING HOUSING AFFORDABILITY
Through market-based tools

SCL Advisory
Second Chance Enter
Servios de La Raza
Sewald Hanfling Public Affairs
Shames Makovsky
Shears Adkins Rockmore Architectes
Shopworks Architecture
Shorter AME Social Justice/Together Colorado
Siegel Public Affairs
South West Improvement Council (SWIC)
Southern Land Company
Staff Scales
Starboard Realty Group
Sterling Ranch Authority Board
Story Built
Studio Seed
Sunnyside United Neighbors Inc (SUNI) RNO
Sunshine Home Share
SW Denver Boys & Girls Club
Taylor Morrison
THB SK LLC
The House Worship Center
The John Buck Company
The Kenny Group
The Wall Group
Thrive Home Builders
Trammel Crow
Trinsic Real Estate Partners
Trust for Public Land (TPL)
TTGY
UC Denver
UDR
ULI Colorado
United for A New Economy (UNE)
United Northeast Denver Residents
United Properties
University Park Community Council
Urban Land Conservancy
Urban Land Institute Housing Committee
Urban Land Institute Multi-Family Product Council
Urban League Young Professionals
Urban Renaissance Group
Urban Ventures
Urban Villages
Urbanity Advisors/Metro Impact
US Bank
Volunteers of America
Watson Wenk Group
Wells Fargo
West Colfax Association of Neighbors (WeCAN)
West Colfax BID
West Denver Renaissance Collective
West Neighborhood Area Plan Stakeholder Meeting
Westfield
Westfield/North Wynkoop
Westside
Withing Management Resources
Wood Partners
YIMBY
ZF Capital
Zions Bancorporation
Zocalo Development
Dear CPD & HOST:

We, the undersigned organizations, support the City of Denver's efforts to generate affordable housing units as a condition of new market-rate development as detailed in the Expanding Housing Affordability (EHA) proposed ordinance and companion outline posted to the EHA project site in February 2022. We recognize and appreciate the extensive research and justifications assembled by Root Policy Research and Community Planning & Development (CPD), review and input from the EHA Advisory Committee, and public feedback provided on the September 2021 proposed policy approach that have collectively informed the current draft ordinance.

We recognize the EHA proposal is a sorely needed policy tool that will create more affordable units through mixed-income development and generate more funding for the City to invest in deeply affordable and long-term housing development. In Denver, rent and mortgage costs have increased over 75% during the last decade while wages have only increased by 32%. As a result, over 100,000 households in Denver are considered cost-burdened, paying more than 30% of their wages on housing. The affordable housing crisis puts our friends, families, and neighbors at risk of losing the roofs over their heads, reduces access to healthy food and reliable transportation, limits access to adequate healthcare, and more. This critical policy is an important way to ensure all new development is contributing to housing cost relief.

Within the EHA proposal, we particularly support:

- **Tying the creation of new market-rate housing to mandatory, on-site affordable housing units** in all residential development with 10 or more units, with the requirement for a higher percentage of affordable units in more expensive markets. The proposal’s incentives for developers to create mixed-income developments is critical to advancing more equitable access to community benefits and economic opportunity.

- **Prioritizing development of affordable units that are attainable for renters and homebuyers with incomes at 60% and 80% of area median income (AMI)**, respectively, while also providing developers the option and flexibility to include units affordable to households with even lower incomes in their developments.

- **Ensuring the fee that developers can choose to pay instead of building on-site affordable units (“fee in-lieu”) is high enough to disincentivize developers from choosing this alternative.** We appreciate the proposed fee is one of the strongest in the nation, higher than peer cities like Atlanta, Boston, and Los Angeles, according to data compiled by the Department of Housing Stability (HOST). This will spur more on-site mixed-income development and reduce economic and racial stratification in housing.

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• Prioritizing neighborhoods where residents are vulnerable to displacement for the City’s investment of fees in-lieu collected from these neighborhoods. This is a welcome addition from the first proposed iteration of the EHA proposal that we hope will help preserve and produce more—and more deeply affordable—units available for Denverites to remain in their chosen communities.

• **Meaningfully increasing the existing linkage fee** for nonresidential development and residential development with 9 and fewer units. The bolstered linkage fee is projected to create millions of dollars each year of sustainable and dependable funding for the creation and preservation of affordable housing across Denver. The final ordinance should not further lower, or further extend the phase-in of, the currently proposed linkage fees.

• **Greater accountability, tracking, and transparency on program outcomes from the City.** In particular, we appreciate Community Planning & Development’s commitment to report not only the number of units and dollars generated through the EHA initiative on a public dashboard, but also what household incomes are being served and the details of negotiated alternative agreements struck by the City and developers and how they serve the City’s established housing and affordability goals. We urge CPD to provide this information in the most timely, widely accessible way possible.

We recognize the EHA proposal is one critical piece in the much bigger puzzle of Denver’s affordable housing solution, and that while a critical step forward, this market-driven policy cannot solve for all our challenges including disproportionate lack of access to homeownership for BIPOC Denverites, record-high (and increasing) market-rate rents and mortgages, and restrictive zoning policies that exclude affordable housing from a large portion of Denver neighborhoods and beneficial community resources.

Further, we understand that moderately affordable units created through this policy should ease investment demand for this AMI bracket, allowing the City to dedicate a greater share of its affordable housing resources—including those generated through EHA’s increased linkage fees and fees in-lieu—to providing homes for those with incomes below 60% AMI. We look forward to collaborating with the City to ensure this outcome.

The EHA policy must also complement existing resources and be thoughtfully integrated with the new tools developed in the process of implementing the Department of Housing Stability’s Five-Year Strategic Plan. This includes the housing prioritization policy currently being developed by the Department of Housing Stability, intended to connect those who have experienced or are at risk of involuntarily displacement from their communities with meaningfully affordable homes.

We urge your support of the proposed EHA ordinance, and we look forward to continuing to work with you to advance the many other policies, programs, and resources Denver so desperately needs toward ensuring every person can obtain healthy, safe, high-quality homes connected to community and opportunity.
Sincerely,

be well Health and Wellness Initiative  
Colorado Children’s Campaign  
Colorado Coalition for the Homeless  
Colorado Poverty Law Project  
Covid-19 Eviction Defense Project  
The Denver Foundation  
Elevation Community Land Trust  
Enterprise Community Partners  
Healthier Colorado  
Mile High Connects  
Mothers Advocate for Affordable Housing  
Neighborhood Development Collaborative  
O’Connor Jones: A People’s Law Office, LLC  
YIMBY Denver
March 7, 2022

Re: Public Comment – Expanding Housing Affordability Project

Dear Ms. Hock:

We write to submit comment in response to the city of Denver’s Expanding Housing Affordability Project. We applaud the city’s efforts to begin to address the undeniable housing crisis plaguing Denver’s residents and agree that data undeniably indicates the city is correct when it stated “Denver needs more affordable housing across the income spectrum.”

Before we provide two comments, we include data critical to illustrating the challenges facing residents of this neighborhood:

- As of January 2022, the average cost to rent a one bedroom in Denver is $2,064
- 30% of residents in this neighborhood have incomes below $50,000 and 10% of residents have incomes below $24,999 annually (representing incomes just under 30% of median income and defined as at risk of homelessness)
- Home sales averaged $689,711 for detached housing and $450,244 for attached (e.g., condos and townhomes). New listings are down by 48% in as of January 2022 from the previous year.
- 60% of WWPNA residents are renters.
- The Denver Metro Economic Development Corporation estimates Denver’s population will continue to grow at a rate that outpaces comparable cities.
- An examination of residential zoning within the boundaries of this RNO show a predominance of single unit zoning; even existing parcels that presently have 3-story apartment buildings are now zoned as 2-story multi-family housing.

Considering this information, we submit the following comments:

1. We applaud the city in taking a first step with the drafting this policy and acknowledge that other cities have employed similar policies as part of a series of strategies to add affordable housing to the housing supply.

2. This policy puts the costs of building affordable housing on the development of new, mostly multi-family housing. Absent city-wide zoning reform to make multi-family housing legal on all residential parcels, the impact of this approach will be muted as the presence of multi-family housing is prohibited according to current zoning on most of the land within the city’s boundaries. In other words, Denver’s continued reliance on single unit zoning will work against the city’s stated goal to provide more affordable housing.

WWPNA is a Registered Neighborhood Organization in Denver. Our boundaries are Speer Boulevard on the north, I-25 on the south, Downing Street on the east and Broadway on the west and include approximately 19,000 total residences and businesses. Our membership is voluntary and we have approximately 583 members.

Sincerely,

Amy Kenreich, President
President@wwpna.org

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1 Expanding Housing Affordability - City and County of Denver (denvergov.org)
3 https://www.census.gov/
5 https://www.census.gov
6 https://www.metrodenver.org/data-central-preview/266
7 Denver Maps - Zoning (denvergov.org)
DATE: March 14, 2022

TO: Denver Department of Community Planning and Development
Analiese Hock, Principal City Planner

FROM: Denver Urban Renewal Authority
Tracy Huggins, Executive Director

SUBJECT: Requested Changes to Expanding Housing Affordability Draft Proposal

Thank you for including the Denver Urban Renewal Authority ("DURA") as a member of the Expanding Housing Affordability Advisory Committee. Upon review of the proposed Denver Revised Municipal Code Amendment regarding Expanding Housing Affordability (Public Policy Review Draft 2/2/2022) (the “Amendment”), DURA is suggesting the following changes to the Amendment:

1. Revision of Article X, Division 1, Section 27-219 (l) to state:
   
   **High impact development means any combination of residential, mixed-use residential, non-residential, and mixed-use non-residential structures that are built as a part of a development where the development will be built on:**
   
   (1) ten (10) or more acres without the use of city approved financing tools; OR
   (2) five (5) or more acres and is leveraging a city approved financing tool such as tax increment financing or a metropolitan district; OR
   (3) an area of any size and is leveraging tax increment financing

   Rationale: DURA is committed to the creation of affordable housing and believes that any development seeking the use of tax increment financing should be required to meet the standards for High Impact Developments as proposed in Article X, Division 3 of the Amendment.

2. Revision of Article X, Division 3, Section 27-229 (c) to state:

    The director shall review the plan and approve, approve with conditions, or reject the high impact development compliance plan. The director shall collaborate with the Denver Urban Renewal Authority when reviewing the compliance plan for a High Impact Development leveraging tax increment financing. The approved high impact development compliance plan shall result in an agreement to be signed by the owner or owners of the entire subject property, or the authorized agent of the owner or owners in advance of City Council approval of city financing tools, if applicable, and shall be recorded with the clerk and recorder of the City and County of Denver. For all high impact development compliance plans required under this section, no building permits shall be approved or issued for any structure within a high impact development area until an agreement is approved and recorded.
Rationale: DURA believes it is vital to collaborate on the review of compliance plans for a High Impact Development leveraging tax increment financing to assure that the plan is consistent with DURA’s expectations and DURA’s evaluation of the request for tax increment financing.

3. Addition of clarifying language to Division 3 – High Impact Developments that states:

High Impact Development that does not include either residential or mixed-use residential structures shall be required to adhere to Article V, Division 2 of the Denver Revised Municipal Code including the payment of housing linkage fees as set forth therein.

Rationale: DURA believes it is helpful to explicitly state that High Impact Development which is non-residential must meet the requirements set forth in Article V, Division 2.

It is DURA’s request that suggested revisions 1 and 2 described above be considered in conjunction with each other.

Thank you for taking DURA’s requests under consideration.
Dear Ms. Hock,

In response to the public review period, attached please find a letter in regards to the updated Expanding Housing Affordability policy proposal on behalf of Denver’s local business, residential and commercial development community.

Thank you for your time and the opportunity to provide additional comment on this proposal. As noted in the letter, we continue to come to you collaboratively with a desire to work with City staff, the Mayor’s Office, and City Council on this important policy issue.

We thank you for your consideration of our collective feedback and look forward to next steps.

Sincerely,

The Downtown Denver Partnership and Signers listed in the attached letter

Kate Barton | Executive Vice President, Executive Office and Special Projects
Office: 303.571.8202 | Mobile: 303.815.5885
1515 Arapahoe St. Tower 3, Suite 100, Denver, CO 80202
March 14, 2022

Analiese Hock, Principal City Planner
Community Planning and Development, City and County of Denver
Wellington E. Webb Municipal Building
201 W Colfax Ave, Denver, CO 80202

Re: Expanding Housing Affordability Proposed Policy Approach

CC: Mayor Michael B. Hancock, Denver City Council, Laura Aldrete, Jill Jennings Golich

Dear Ms. Hock,

On behalf of Denver’s local business and development community, we want to thank you for the opportunity to provide additional comment on the Expanding Housing Affordability (EHA) process. We appreciate staff’s willingness to consider our letter dated December 21, 2021 and spend additional time addressing our follow-up questions. We value the work that has gone into crafting this proposal and the City’s efforts to increase access to affordable housing.

We are dedicated to being good partners as you work through the legislative process and continue to come to the table with experienced-based feedback. With that said, we have ongoing concerns within inclusionary housing policies and their overall impact on the cost of housing. We hope you’ll strongly consider addressing our latest round of comments as outlined below.

Greater flexibility for projects moving through the review process in good faith

We appreciate the City’s willingness to limit impacts to existing projects by grandfathering them under the current regulatory framework and impact fees. We also understand staff’s
decision to provide an outside date of approval (August 30, 2023) for projects that submit their concept site development plan (SDP) by June 30, 2022.

As you know, there are legitimate concerns about the City not currently having the staffing necessary to process approvals in a timely manner. While we urge the City to focus on bolstering staff to support this proposal, we also know that this issue will only be exacerbated as applications increase prior to the June 30, 2022 deadline. To be clear, this concern not only stems from developers, but also those in the architectural community who have limited capacity to handle the influx of development applications.

We, like the City, want to see projects move forward in good faith to increase the supply of affordable housing. However, that good faith must go both ways. Is it reasonable to not grandfather a project that has been working collaboratively with staff, but may miss the August 2023 deadline by a month or two? Too often the development community has seen significant comments raised at the eleventh hour in the review process.

Per our conversations with City staff, the 14-month window for approvals is based on current and median concept and formal SDP review times. But why base that window on current review times when staff ultimately knows, based on other peer cities, that review times will increase based upon the additional workload.

We’d like to work collaboratively with staff to foster greater flexibility for projects moving through the review process in good faith and codify this within the rules and regulations. Whether it’s providing a more realistic outside date or the ability to appeal to the Executive Director of Community Planning & Development for more time, we would like to see the City propose a solution that more accurately reflects current and future staffing challenges. We’d also appreciate the City providing greater clarity on when a final SDP is “approved.”

Concerns around the City’s review process have been a common theme in our conversations with Denver City Council. Again, we hope we can work on a collaborative solution to provide greater flexibility that ultimately is in line with the intent of this policy and supports those who are working to bring projects to market.

**High-cost vs typical cost markets (mandatory housing and linkage fees)**

While we understand the City’s ongoing position to maintain the high-cost and typical cost markets, we must again go on record and stress that more stringent inclusionary standards and higher linkage fee requirements will likely have the inverse effect and produce less affordable units in the areas where we need them the most.

Per our conversation with the City on February 23, 2022, we would respectfully request staff consider the following:
- Updating the high-cost and typical cost markets every three years to provide more predictability for the development community;
- Creating an interactive map that clearly shows the visual and statistical boundaries of high-cost and typical cost markets;
- Grandfathering projects into the high-cost and typical cost markets at the time of their concept SDP submittal;
Clearly communicating with the development community prior to changes in the high-cost and typical cost markets. Communication should occur at-least six months prior to any changes and staff should be transparent about what typical cost areas may become high-cost so developers can plan accordingly.

**Maintaining flexibility through alternatives and the need for greater incentives**

We are supportive of, and would like to see, the City maintain discretionary agreements in the final EHA proposal. It’s critical for the development community and the City to have the ability to negotiate these agreements to ensure projects are getting built while meeting affordable housing goals.

While we appreciate the City’s willingness to provide incentives, we believe those currently proposed do not do enough to offset development costs which will ultimately be passed onto residents in future projects. Again, to offset rent increases for the “missing middle” (those in the 81-100% AMI range), we believe the City should provide direct credits from the Affordable Housing Fund or another source, or access to the existing loan fund to help cover some of the estimated six-figure delta between the required affordable and market rate units. We would also encourage the City to explore additional incentives such as property tax rebates through legislative change at the state level.

**Limiting the disincentive to build larger units**

While staff provided justification for disincentivizing the construction of larger residential units, we believe there are unintended consequences with the latest fee proposal. We believe, based on our collective experience, that higher fees will steer developers away from slightly larger units which can better accommodate families or those in unique living situations. We are aligned in the belief that it’s important to make homeownership as attainable as possible for all, especially families. Increased fees will undoubtedly be passed onto the owners and renters of the slightly larger homes.

Most importantly, staff and Denver City Council spent a considerable amount of time advocating for changes to the City’s group living housing policy. The modernization of this policy provides flexibility for more unrelated individuals to live together. However, one could argue that slightly larger units would better accommodate unique living situations. Given our ongoing challenges with affordability and need for housing flexibility, we hope the City will lower the proposed fees for larger units to bolster all the work that went into the group living ordinance and ensure greater access to attainable housing for all.

Again, we thank you for your partnership and we welcome the opportunity to work closely with City leaders to take a more holistic, comprehensive approach to solving our city’s housing affordability crisis. We urge the City to consider market-based tools such as increasing supply, reducing overly-restrictive regulations, and leveraging the private market to meet the demand for those individuals and families at all different income levels – including the ever-growing “missing middle” population of Denver - where housing
options are becoming more and more out of reach due to restrictive and overly burdensome zoning and development regulations.

Thank you for taking the time to review our latest feedback. We look forward to working with you on this important effort and welcome the opportunity to provide additional feedback moving forward. Please do not hesitate to contact us if you have any questions regarding our requests.

Sincerely,

Michael Gifford  
President  
Associated General Contractors of Colorado

David Foster  
Chair  
Cherry Creek Business Alliance

J.J. Ament  
CEO  
Denver Metro Chamber of Commerce

Nobu Hata  
CEO  
Denver Metro Association of Realtors®

Rachel Marion  
CEO  
Denver Metro Commercial Association of Realtors®

Sarah Rockwell  
Chair  
Downtown Denver Partnership

Kathie Barstnar  
Executive Director  
NAIOP Colorado

Matt Joblon  
CEO  
BMC Investments

Betsy Laird  
Sr. VP of Global Public Policy  
International Council of Shopping Centers (ICSC)

Rodney M. Milton, Jr.  
Executive Director  
Urban Land Institute (ULI) Colorado

Stephen Shepard  
Chair  
Colorado Real Estate Alliance

Marc Savela  
VP of Development  
Broe Real Estate Group

Celeste Tanner  
Chief Development Officer  
Confluent Development

Tyler Carlson  
Managing Principal  
Evergreen Devco

Ian Nichols  
Senior Director  
Flywheel Capital

Kevin Foltz  
Managing Partner  
Forum Real Estate Group

Ferd Belz  
President  
L. C. Fulenwider

Ray Pittman  
President & CEO  
McWhinney

George Thorn  
President  
Mile High Development

Dorit Fischer  
Partner  
NAI Shames Makovsky

Rhys Duggan  
President, CEO & Managing Partner  
Revesco Properties

Tim Welland  
Development Manager  
Palisade Partners

Dave Davia  
Executive VP & CEO  
Rocky Mountain Mechanical Contractors Association

Tim Schlichting  
Chief Development Officer  
Prime West

Bill Mosher  
Senior Managing Director  
Trammel Crow Company
From: Nathan Adams
To: Analiese M. - CPD City Planner Principal
Subject: [EXTERNAL] RE: Expanding Housing Affordability Office Hours Confirmation
Date: Sunday, February 27, 2022 11:50:16 AM

Analiese – Hope you are well, good to see your name again! I am registered for tomorrow and have exceptionally strong feeling on this one. I could not fit my comments in the limited 255-character space so I am providing them here:

We have a massive need for affordable housing BUT NOT at the expense of attainably priced housing. The policies as I understand them will have two major negative consequences that I do not believe are being thought through and would love to hear the cities disposition:

1) This policy will make fewer deals pencil meaning less housing, that is much needed, will not get built further exacerbating the problem.
2) At the benefit of affordable housing you are making hard-working middle-class people pay more for their homes, these added fees get passed on to end user, it is exceptionally naïve to believe land sellers will take less and developers will reduce margins. That means the cost gets passed on.

Are city officials aware we have an inventory crisis and runaway appreciation? Please do not try and fix an affordability crisis at the expense of hardworking people who are struggling to find reasonably priced housing. As a developer I will not build if the economics of the build do not pencil, and the problem gets worse. That is the disposition of nearly every developer/builder out there. The higher prices get the worse the problem gets as attainably priced housing disappears and the gap widens between market rate and affordable making your policies even harder to get more housing constructed.

Nathan

Nathan Adams
Chief Executive Officer, redT Homes
1335 S. Inca St. Denver, Colorado
303.997.4001 Ext.123
720.255.4101
nathan@redthomes.com
www.redthomes.com

Building A Greener Colorado

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Please consider your environmental responsibility. Before printing this email message, ask yourself whether you really need a hard copy.

From: Analiese Hock <no-reply@zoom.us>
Sent: Sunday, February 27, 2022 11:47 AM
To: Nathan Adams <nathan@redThomes.com>
Subject: Expanding Housing Affordability Office Hours Confirmation

Hello Nathan Adams,

Thank you for registering for Expanding Housing Affordability Office Hours. You can find information about this meeting below.

Expanding Housing Affordability Office Hours

Date & Time: Feb 28, 2022 04:00 PM Mountain Time (US and Canada)
Meeting ID: 873 0890 3652
Passcode: EHA

Please submit any questions to: Analiese.Hock@denvergov.org.
You can cancel your registration at any time.

WAYS TO JOIN ZOOM

1. Join from PC, Mac, iPad, or Android

Join Meeting

If the button above does not work, paste this into your browser:
https://denvergov.org.zoom.us/j/87308903652?pwd=MzEyTUVOMm5tM2x1ZzluQjJLRTlYQT09

To keep this meeting secure, do not share this link publicly.

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2. Join via audio

One tap mobile: US: +17209289299, 87308903652#
Or dial: For higher quality, dial a number based on your current location.
US: +1 720 928 9299
Meeting ID: 873 0890 3652

International numbers
This is so weird. Denver has created this affordable housing crisis by choosing developers that elected to be land grabbers and then capitalizing on it. Denver is

While I understand that this is a requirement under state law, I am never a fan of any kind of provision that allows a developer to opt out of including affordable

The 2 page summary states: ...all new residential buildings of 10 or more units would look to Options 1 or 2 for building affordable homes on-site. Was this a

I think it is a much needed, if partial, solution to the affordable housing crisis. It's become increasingly clear that unless we fail to provide more affordable housing

I wholeheartedly agree with this proposal! My wife and I want to stay in Denver but need to be able to afford housing. Without good policy and a mandate,

More permanent affordable housing should be made, as our housing situation for lower middle classes resembles the situation in New York, more and more. We

I would like clarification of what is done with monies paid in lieu of providing income-restricted units. $250-478,000 are grand amounts but for a one-time

Are you all going to release aggregated survey results or detail what changes have been made based on feedback?

The proposed expansion contains positive developments. I, however, do question references to caps at 70% and 80% of the area median income. While these
demographics are currently out-priced of the housing market, what is being done for the folks who are making minimum wage and upon whom we rely for our
essential services? I would appreciate clarification.

Is this a bill that the public will be voting on or just legislators?

I own a property at 4365 Cherokee Denver 80216. The property is zoned CMX-8 which allows me to build an 8 story complex to provide affordable housing to the
community. I have a conceptual approval from the City Planning office. I have a survey, soils report. But what I don't have is the financing 5 million dollars to build
the housing complex. The property free and clear and I own it right. What I need from the city is subsidized financing. I can be reached at 303 667 4506

Thank you,

Hello Analise,

More units are needed for people who make below the 60% median. There are a lot of people that don't want to live in a senior or disabled building that make

Thank you,

I agree with the problem and the need to address it as a community, but I disagree with the poorly conceived proposed solution. Motivate, don't mandate. This
solution does not solve the problem of where lower-income residents need to locate in order to thrive, such as along rail lines or adjacent to grocery stores. This
solution will only pass the cost burden to the other 90% of homes in the development or simply deflate growth altogether, exacerbating the supply issue even
further. At the end of the day, private investment/developers are in the business to make money and they WILL make their money at the expense of others. A
better solution would be to motivate or incentivize developers. How about in exchange for 10% affordable homes the City gives expedited permit reviews? Tax
credits? Fee waiving? Prompt inspections? One million clever ways to solve the problem exist, but the CCD decides to be the CCP by mandating where money is
spent. This is what we are fighting, developers won't do it.

A better solution would be to motivate or incentivize developers. How about in exchange for 10% affordable homes the City gives expedited permit reviews? Tax
credits? Fee waiving? Prompt inspections? One million clever ways to solve the problem exist, but the CCD decides to be the CCP by mandating where money is
spent. This is what we are fighting, developers won't do it.

Thank you,

The Public Review Draft Summary states that Projects under Site Development Plan (SDP) review could continue under existing rules if they have a:
• concept SDP submitted by June 30, 2022; AND
• final SDP approved by August 30, 2023 (14-month window).

Can you clarify if this means a project needs to have a development concept submitted (initial submittal of a development concept) OR does the project need to
have received approval from the project coordinator to advance to the next phase, submitting a formal site development plan?

I also would like clarification of what is done with monies paid in lieu of providing income-restricted units. $250-478,000 are grand amounts but for a one-time

I am the inclusionary housing program manager for Boulder. I have looked over your policy documents and am impressed with the quality of the work. We
anticipate a major update to our code/program later this year. I was wondering if you did most of your analysis and development of the tools in-house or if you
counted on consultants. I assume you used consultants for some of the work, if so, can you tell me what consultants you used and a general idea of the scope of their
work?

I have received approval from the project coordinator to advance to the next phase, submitting a formal site development plan? 

What is your gender?

Please select if you are submitting a question or a comment.

What is your race or ethnicity?

Please select if you are submitting a question or a comment.

What is your income, before taxes, in the last

Do you rent or own your home?

Please estimate your total household income, before taxes, in the last

What is your total household income, before taxes, in the last

What is your religion?

Please select all that apply. You may report more than one answer.
There should be more clarity and flexibility when it comes to off-site agreements. Use the outdated section 27-101 for example. The DMC used to allow for

prefer not to

$25,000 - $49,999

In early 2020 I visited many higher end rental buildings ($2000+/mo rent for a studio or Jr 1-bdrm) in Denver and noticed many were only 40%-50% occupied. The
female

Zoning requirements should be weakened. As well as RNOs power to stop development. Single family unit zoning is the main culprits behind high housing costs.

Hispanic,

75 and older

I appreciate the incorporation of previous public comments, and support the newly proposed project. Denver needs more affordable housing, more options, and
male

More money for affordable housing is great. Maybe expected, but this will increase prices for everyone else. I'm not sure what the number of affordable housing
female

I beg you - just allow development by-right with clear rules for ensuring the buildings are safe. Stop trying to hit a double-reverse bank shot.

Hello - So glad to see these efforts, but they are only focused on new construction. What about incentives and zoning to switch vacant or nearly vacant
dead.

This bill seems to be ignoring the lessons learned from the Colorado Construction Defects Law Reform. This bill was originally designed to protect people, but
prefer not to answer

neighborhoods that would most benefit from additional housing. So I encourage the city to limit cash-in-lieu options as much as the state law allows.

is risky living in a hotel type of environment as a leaseholder because there's a high probability for conflict of interest between the privacy, safety, and security of a
prefer not to answer

I don't think this revised plan goes far enough. These are half-measures that won't meaningfully impact the city's housing supply until several years from now.
female

I still don't think this revised plan goes far enough. These are half-measures that won't meaningfully impact the city's housing supply until several years from now.

I don't think this revised plan goes far enough. These are half-measures that won't meaningfully impact the city's housing supply until several years from now.

After reviewing the proposal, I am very concerned. I do a lot of work with real estate minded people, from developers to investors, and this bill is concerning to
prefer not to answer

I've been a full time real estate professional in Denver since 2009. I hold a BA in Architecture and a Masters in Real Estate & Construction Management from
male

I've been a full time real estate professional in Denver since 2009. I hold a BA in Architecture and a Masters in Real Estate & Construction Management from
male

55-64

200,000 or more

I'm shutting down my business because I cannot build homes here. The #'s do not work. And here is a proposal that makes that # calculation even
male

My homes when listed for sale where the lowest priced or very close to the lowest price New Construction homes in the City of Denver. Most located near

I'm shutting down my business because I cannot build homes here. The #'s do not work. And here is a proposal that makes that # calculation even

I'm shutting down my business because I cannot build homes here. The #'s do not work. And here is a proposal that makes that # calculation even

We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.
preference

There should be more clarity and flexibility when it comes to off-site agreements. Use the outdated section 27-101 for example. The DMC used to allow for
flexibility on location allowing for TOD to count as off-site affordability. Off-site agreements up to the discretion of the director has far too much uncertainty and will incur too much negotiation. Surely there is some amount that warrants an off-site right? If the off-site developers exceed the number of affordable units required by 20% or provide an additional 10% affordability depth (50% AMI vs 60% AMI), does this not meet the goals of HOSST?

It would be lovely if developers would include affordable housing in every development. But will they? I doubt it. Their job (in a capitalistic society) is to make a profit. That's why the city must mandate the inclusion of affordable housing in every development. There is also an increasing need for affordable independent senior housing for people over 62.

Zoning requirements should be weakened. As well as RNOs power to stop development. Single family unit zoning is the main culprits behind high housing costs.

This bill seeks to be ignoring the lessons learned from the Colorado Construction Defects Law Reform. This bill was originally designed to protect people, but
prefer not to answer

Unfortunately, we don't allow the market to build sufficient numbers of houses to satisfy demand. We have a housing market that artificially limits supply (through regulations, HOAS, existing homeowner demands).

I've been a full time real estate professional in Denver since 2009. I hold a BA in Architecture and a Masters in Real Estate & Construction Management from
DU. Last year I Chaired the Legislative Policy Committee for the Colorado Association of Realtors. This year I reverted back to my old position of Chairing their

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male
<table>
<thead>
<tr>
<th>Response Submission Date/Time</th>
<th>We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.</th>
<th>Please select if you are submitting a question or a comment.</th>
<th>What is your gender?</th>
<th>How old are you?</th>
<th>What is your race or ethnicity?</th>
<th>Please select all that apply. You may report more</th>
<th>Do you rent or own your home?</th>
<th>Please estimate your total household income, before taxes, in the last 12 months</th>
</tr>
</thead>
<tbody>
<tr>
<td>02/10/2022 14:40 PM</td>
<td>I think the easiest way to expand housing affordability is to zone for density around downtown and near transit hubs and major bike trails/lanes. Also, let anyone who owns SFH-zoned property in the city, subject to basic inclusionary parameters, to build an ADU or turn their SFH into a duplex on their property.</td>
<td>Comment</td>
<td>Male</td>
<td>19-34</td>
<td>White</td>
<td>Own</td>
<td>$200,000 or more</td>
<td></td>
</tr>
<tr>
<td>02/11/2022 9:25 AM</td>
<td>I appreciate the time and energy the City has put into this critical effort. As someone who is still very much fighting his way up the learning curve regarding housing and development, I only have broader input to offer, but wanted to submit it nonetheless. Like any other product or service, the more levers we pull to generate a specific type of product or outcome, the more cost implications are created. While I believe developers can likely adapt to these requirements and create projects that &quot;pencil,&quot; their concerns with this proposal should not be dismissed. Development requires investment and if the investor calculus becomes unattractive due to these pricing and project mandates, projects will not happen. While I am aware previous affordability policies met similar concerns and yet development remains robust, each time we lump more cost burden onto developers brings us that much closer to a tipping point where their warnings actually do come true. Scarcity remains a massive driver of growing unaffordability in Denver. We need more housing, not just more affordable housing. Focusing solely on the latter will only require more interventions by the City as time goes on. Again, that will only push development in Denver closer to the point where it actually does tip into a vicious cycle. This only changes with strict and specific policy.</td>
<td>Comment</td>
<td>Male</td>
<td>35-44</td>
<td>White</td>
<td>Own</td>
<td>$150,000 - $199,999</td>
<td></td>
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<tr>
<td>02/11/2022 11:51 AM</td>
<td>I am contacting you to express my support for the proposed affordable housing mandate. Developers will publically balk at the proposal but, as we have seen time and time again, development continues and developers sustain healthy profits, even with mandated affordable housing. If anything, I believe the proposal could be more stringent and require a higher premium from developers. We have a surplus of luxury apartments in this city and a dearth of affordable housing. This only changes with strict and specific policy.</td>
<td>Comment</td>
<td>Male</td>
<td>19-34</td>
<td>White</td>
<td>Rent</td>
<td>$25,000 - $49,999</td>
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<tr>
<td>02/11/2022 11:54 AM</td>
<td>While I applaud the intentions of the Expanding Housing Affordability project, I worry its aims may be thwarted by local constraints. Simply mandating price controls has repeatedly been shown to fail, especially when not combined with addressing the underlying restrictions that prevent building more housing units. Despite being someone who has been unable to afford to live in the city proper even though I'd really like to, I worry this proposal will do little to help people like me. Ultimately, I'd like to see exclusionary zoning addressed. This could be done with protections such as the proposed mandatory inclusionary housing units. Without increasing incentives for development and reducing the regulations that prevent abundant building, I fear this plan will have little upside with the potential unintended effect.</td>
<td>Comment</td>
<td>Male</td>
<td>19-34</td>
<td>White</td>
<td>Rent</td>
<td>Prefer not to answer</td>
<td></td>
</tr>
<tr>
<td>02/11/2022 13:51 PM</td>
<td>We should be trying to increase new supply of housing by allowing densification. Imposing hurdles that will reduce new supply will have the opposite of the intended effect.</td>
<td>Comment</td>
<td>Prefer not to answer</td>
<td>19-34</td>
<td>Prefer not to answer</td>
<td>Prefer not to answer</td>
<td>Prefer not to answer</td>
<td></td>
</tr>
<tr>
<td>02/11/2022 14:31 PM</td>
<td>I support the Expanding Housing Affordability project. I grew up in Denver, went to Denver Public Schools k-12, and now live in zip code 80218. Denver has become increasingly unaffordable in my lifetime, and this project will help spur affordable housing. I also want to appreciate Councillor Robin Kloech for her work on this issue; she is one of the few politicians in this city pushing for real solutions to the affordable housing crisis.</td>
<td>Comment</td>
<td>Male</td>
<td>19-34</td>
<td>White</td>
<td>Rent</td>
<td>$50,000 - $99,999</td>
<td></td>
</tr>
<tr>
<td>02/11/2022 16:01 PM</td>
<td>I support this proposed Affordable Housing Mandate. It makes perfect sense for developers to include 8-15% affordable units in new construction, or pay a hefty penalty. Future development will not slow or stop as a result and 'mixed income' residents within a community/building is another societal benefit.</td>
<td>Comment</td>
<td>Female</td>
<td>49-54</td>
<td>White</td>
<td>Own</td>
<td>$150,000 - $199,999</td>
<td></td>
</tr>
<tr>
<td>02/12/2022 3:04 AM</td>
<td>Fully support this effort by the city, but it needs to go even further. It should have x % of units for low income. 1% of units for middle income. And remaining being uncontrolled. You're effort to help low income is good, but you are doing nothing for people who are in service professions and can't afford live in the metro because they won't qualify for the low income threshold, but don't make enough to afford increasing housing rates in metro with lower middle income levels. Austin, TX has something similar in place where some % of development in an apartment complex is reserved by income limits. Yet it has not slowed down the development rate, nor has it led to an excessive increase on the rent rates for non-income-controlled units. This is a better alternative to government run housing projects. This also does not lead to any additional overhead, as the same property managers are able to verify/validate application requirements for income-controlled vs non-income-controlled units. It also helps disperse and disband, instead of creating concentrated zones of oftentimes high crime rates that are associated with govt housing projects or only low income housing complexes. It gives low income tenants access to better schools, better walkability score neighborhoods, better community facilities that otherwise would not be available for low income only housing development projects built in economically depressed neighborhoods. Those opposing use the similar tactics as back when there was opposition to raising minimum wage to 15 $/hr, saying businesses will go out and there won't be any jobs ... Yet here we stand where 15 $/hr is the norm for gas station convenience stores and you don't see them going out of business.</td>
<td>Comment</td>
<td>Male</td>
<td>35-44</td>
<td>White</td>
<td>Prefer not to answer</td>
<td>$100,000 - $149,999</td>
<td></td>
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</tbody>
</table>
It did not work in Portland and somehow you all think it will work here. [Link to cautionary tale about Portland's inclusionary housing policy]

Comment: Male 35-44 Prefer not to answer

Public housing is the accommodation of last resort in the U.S. Not so in Austria's capital city, Vienna. You ought to go and talk to your government counterparts in Vienna, which arguably has the best social housing program in the world, to learn, understand and implement similar social housing in Denver as well.

Comment: Male 35-44 Prefer not to answer

So in Green Valley Ranch and the surrounding areas when can potential moderate income residents expect to buy homes in this area? If this is going to be in the far future what is the city doing to tackle rental costs? I currently pay $2,300-2,500 a month and I have 3 kids and another adult. I am the only working adult. The cost of rent alone is draining my finances. Can the city implement a rental reimbursement program to assist people to be able to have down payments to put down on a home if the moderate income homes are not going to be available as soon as this summer? What is the 6-month action plan regarding housing for Denver? Will low income and moderate income families be able to buy a home this year or is it going to be another year of rent that it's too expensive?

Question: Female 35-44 American Indian or Alaska Native Rent $50,000 - $99,999

This is a commendable project that will go a long way to relieving housing stress. Affordability of housing does not insure diversity. As a Capitol Hill resident I can see that affordable housing in central city is only attractive to very nice progressive young white singles and couples. Working families with children and people of color are effectively discouraged from remaining in the city. We older residents who have raised families here are dying off, being replaced by temporary young residents. I hope that the housing affordability initiative will provide incentives for families of all colors to live and grow-up in Denver.

Comment: Male 65-74 Black or African American, White Rent $150,000 - $199,999

I see how the AMI cap is placed on the units. Who determines the acceptable cost of rent based on that AMI? Everyone's situation is different. As a side note I think this proposal could have a massive impact on all of the other rents in a building. Construction cost are out of control as is and proforma will still need to work for any development. If rent is cut from 8 - 10 percent of units that cost will be passed along to the rest of the units perpetuating the current issue with rates.

Question: Male 45-54 Prefer not to answer

Is it possible to email this out to Denver residents through your technology system? Including and especially the homeless population?

Question: Female 45-54 American Indian or Alaska Native, Hispanic, Latino/Latina/Latinx, or Other Pacific Islander Prefer not to answer
I think a more generalized approach to creating affordable housing is needed in Denver. Rather than saddle builders and developers with having to create 
subsidies for their projects, while other existing multifamily apartments and condominiums not having to comply with those regulations will create an imbalance in the
marketplace by raising prices and increasing delays. The effect will be diminished new housing being built, when the market demands require otherwise.

Nor should the City of Denver get involved in developing affordable housing, because this is not an expertise and will also have the opposite effect. The affordable housing fees charged on all new construction projects is a fairer way to spread the responsibility across a greater audience. If there is a way to
expand this program, that, in my opinion, would be a better way to go.

Creating incentives for affordable housing, rather than penalties, will create greater opportunity for developers to want to include more affordable and subsidized
housing. The old adage of taxing something you want less of applies here. Incentivizing developers to provide affordable housing through lower real estate taxes, sales tax reductions on the construction materials, and even subsidizing land costs will create this badly needed resource.

The city needs to think in terms of helping developers lower their costs to create those offsets. Fees in lieu can work, but not to 250,000 per unit that I've read about.

As an architect, I doubt that the city is in a position to expedite permit reviews, and if it is, it surely needs to look into the essentially worthless, expensive and exceedingly time-consuming process of the Site Development Plan. This process was initiated in the 1990's as a way to help design teams to work with the city agencies in a more integrated manner in order to create efficiencies in the various plan reviews. But over the years, the SDP reviews have become a process
unto itself with absolutely zero benefit to the design and construction team. It has added a completely new layer on the process, repeal this process and return to

This project should include specific and strong incentives for re-use of existing structures, and disincentivize scraping and building new. Use of existing structures
is far more environmentally sustainable and freely will result in more modest and consequently more affordable housing units that integrate better into existing
neighborhoods. There is plenty of opportunity for responsible affordable in-fill in Denver. Currently, most modest sized older structures, including many older
duplexes and triplexes, are scraped in order to build giant all-new and very expensive single-family homes. Tiny bungalows sell for a million dollars only because a giant seven figure single family home can be built on the lot. This buy/scape model contributes directly to the housing affordability crisis - by inflating the price of otherwise modest homes. Unused or underused commercial buildings could also be repurposed. When will Denver stop prioritizing easy profits for developers

Is the intent of the proposed affordable housing policy to make it significantly more expensive for market rate renters to live in Denver?

In the Denver Post Article from Feb 11th, City Councilwoman Robin Kniech is quoted: “Every policy and every housing agreement I have ever done I have been
told will kill development,” Kniech said this week. “I still stand here today and look out my window and see the cranes. Ultimately, the market is the evidence.”

However, the vast majority of those cranes she sees are for very expensive luxury apartment buildings. Was an increase in luxury housing the intent with
previous affordable housing measures?

Councilwoman Kniech is correct in that the market will continue to attract developers. However, if this proposed affordable housing measure passes, you are
going to see market rents skyrocket even more so than they are now. What is not considered in the analysis is that land prices are doubling and construction
costs are up 60%-100% in 12 months alone. Adding further costs will result in two things: 1) projects with cut corners, low finishes, small apartment units, minimal
features, no outdoor space, and cheap building materials 2) uber expensive luxury like The Pullman or St Paul Collection. Denver's built environment is really
ever going to suffer.

When applying the option 2 (15% of units at 70% AMI) on an existing project of mine, the impact is a 13.0% increase in market rents for the 85% of market rate
units to make the deal pencil. That impact is approximately $330 per month or $3,960 annual increase rental costs for market renters, on average. For the

I live in a building that was built 4 years ago as low-income affordable housing. The mayor even participated in the groundbreaking ceremony. I moved in when it
was brand new. We are now on a second property management company and they have made it very clear in their actions that they are not concerned at all with
maintaining the entrance doors handicap accessibility opener mechanisms to ensure that they function. It is federal law - the Americans with Disabilities Act but it
was signed into law before many of the property management company owners were born and the federal gov't never really does anything to punish for blatant

When I moved to Capitol Hill in the 1990s, all of these apartment buildings had live-in managers. Those managers usually received free or greatly reduced rent
for their services. They often had other jobs to make ends meet. They would handle all of the responsibilities of keeping the building maintained, keeping the
grounds clean, and everything required to turn over units between tenants.

Now large management companies have pushed the live-in managers out. There is no on site person to keep an eye on the premises and many of these places are
not kept picked up and clean. Tenants don’t like to complain to management companies for fear of being thought of as trouble makers and getting their rent
increased . I have often reported problems about the building next to my house to both the city and the management company about trash that not being picked
up frequently enough and spilling all over the neighborhood.

I believe creating an onus for developers to help carry this burden is completely inappropriate. I only wonder if we can’t help incentivize individuals and smaller
entities to support the solution as well. Could we look at making ADUs easier (approved in more of the city) and even partially incentivized (subsidized) so that
individual land owners can help solve the demand?

What is the intent of the proposed affordable housing policy to make it significantly more expensive for market rate renters to live in Denver?

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Comment

Please select if you are submitting a question or a comment.

What is your gender?

How old are you?

What is your race or ethnicity?

Please select all that apply. You may report more.

Do you own or rent your home?

Please estimate your total household income, before taxes, in the last 12 months.

02/14/2022 13:53 PM

02/14/2022 14:00 PM

02/15/2022 15:50 PM

02/16/2022 4:27 AM

02/16/2022 10:14 AM

02/17/2022 14:57 PM

Comment

Comment

Question

Comment

Comment

Freelancer

Male

Female

Female

Female

Male

Male

Male

55-64

55-64

19-34

65-74

Own

Own

Own

$100,000 - $149,999

$25,000 - $49,999

$25,000 - $49,999

$100,000 - $149,999

$100,000 - $149,999

$100,000 - $149,999
This proposal will have the OPPOSITE of the intended effect. If you want to lower the cost of housing, you need to INCREASE THE SUPPLY. In order to do that, you should be lowering the costs of, and barriers to, development. This instead substantially increases the cost of developing housing, which basic economics will tell you will result in a lower supply.

Comment
Non-binary
18 years or younger
American Indian or Alaska Native, Black or African American, Hispanic, Latino/Latina/Latinx, or Spanish, Middle Eastern or North African
Rent
$10,000 - $24,999

What changed allowing this proposal to come to the table? I am under the impression that this sort of plan was determined to be unlawful by the State Supreme Court already.

Question
Prefer not to answer
45-54
Asian, Black or African American, Hispanic, Latino/Latina/Latinx, or Spanish, Middle Eastern or North African
Own
Prefer not to answer

I just wanted to write in and say that I enthusiastically support this measure! We need more affordable options. Thank you all for your work!

Comment
Female
19-34
White
Rent
$50,000 - $99,999

I have a question regarding the effective dates of the proposed Expanding Housing Affordability project. The summary indicates that projects could continue under existing rules if a concept SDP is submitted by June 30, 2022 and final SDP is approved by August 30, 2023. However, for residential review, it would require submittal of a building permit by June 30, 2022 and building permit approval by December 30, 2022. Is that correct? Should that be 2023? How could building permit approval be required by the same date as concept SDP submittal? Building permit submittal is not typically accepted by the Building Dept. until at least a year after the concept SDP is submitted.

Comment
Male
35-44
Prefer not to answer
Prefer not to answer
Prefer not to answer
Prefer not to answer

I am a for-sale condominium developer in Denver since 2009. Of course I don’t want to raise costs of projects but I also do believe the City needs help with affordability. I am sure it is not intentional but the most recent details of the Affordable Housing plan disproportionately affect condominium sales vs apartment buildings. Revenue for the apartments would be decreased slightly less from a percentage or building valuation however this impact affects the investor return only slightly. This assumes that rents would not be raised to cover the reduced rent for the affordable units. If rents are raised then there is no financial impact at all. Building in Denver is drastically different. Units are sold only once and the investment performance is simple, gross revenue less costs.

Comment
Male
35-44
Prefer not to answer
Prefer not to answer
Prefer not to answer
Prefer not to answer

I am very concerned about the price of housing in Denver, especially for low income workers and family. The Expanding Housing Affordability is a step in the right direction and I very much support the program.

Comment
Female
35-44
White
Own
$50,000 - $99,999

It seems to be that this is just going to drive up the cost of housing.

Comment
Female
65-74
White
Rent
Prefer not to answer

Hello, our company currently owns property in the 38th and Blake Incentive Overlay District. I was reviewing the DRMC Public Review Draft Dated 2/1/22 and had a couple questions. 1. What defines a high market area vs a typical market area? We own property at 34th and Walnut, another at 4001 Walnut, and another at 1335 E 40th St. Would these properties be high market areas or typical market areas? 2. The DRMC document I have reference above has base and enhanced incentive compliance options. Am I correct in my understanding that the enhanced incentive compliance options replace the 38th and Blake Incentive Height

Question
Male
Prefer not to answer
Prefer not to answer
Prefer not to answer
Prefer not to answer

Is there a resource where we can verify if a location is considered a high-cost market versus a typical market? I did read the definition in the draft language and understand how it’s calculated, but wondering if there’s a quick way to verify high-cost versus typical.

Question
Female
35-44
White
Own
Prefer not to answer
Analiese, 
65-74 Hispanic, 
Thank you for receiving feedback on the Expanded Housing Affordability project. I work for a church that has been trying to build an 8 story building for four years. 
$25,000 - $49,999 Presently as a 2 year nurse I can not participate in the affordable housing project. I earn "too much" ha!  And they hold a training that is only offered in the 
Male 45-54 White 
Comment $50,000 - $99,000 Prefer not to 
The market is the best allocator of resources. The less the city council interferes the better. If housing costs rises wages will rise to attract more workers. I support 
White 19-34 $50,000 - $99,000 Prefer not to  
Having worked on Housing Affordable issues prior - I still have concern for the type of development that will be offered as units classified as the % of units set up 
Male White Hispanic, Latino/Latina/Latin x, or Spanish 
I have read and am in full support of the letter dated 12/31/21 sent to the EHAA committee (along with other city leaders) from a consortium of groups who work 
30/01/2022 19:16 PM 
Women who may make more than 55,000 a year but can not afford a home in Denver. 
Female 19-34 White Own $25,000 - $49,999 
We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below. 
Question What is your gender? How old are you? What is your race or ethnicity? Please select all that apply. You may report more Do you rent or own your home? Please estimate your total household income, before taxes, in the last 

02/27/2022 14:51 PM Analiese, 
By way of introduction, I’m a fellow City of Denver resident and current candidate for the City’s open Senior Assistant City Attorney (Real Estate & Housing Stability) role. I recently attended your 2/17 Open House on Expanding Housing Affordability. I believe the measures outlined in your presentation (linkage fees, mandatory mixed-income housing, etc.) will go a long way toward ensuring that private developers participate in the solution. I applaud you and staff for taking proactive steps to address the critical issue of housing affordability in our community. I’ll continue to gather information and learn about this initiative. And as I wade through the wealth of useful materials at your web page, I am curious as to the top three to five resources you would recommend for me in assimilating the information, with particular emphasis on those materials that might be of greatest interest to a candidate for the City’s Legal staff. I look forward to hearing from you. 

Regards, 

02/28/2022 10:28 AM Overall I completely support the desire to increase the amount of affordable housing in Denver. I work in public health and housing inaffordability is a huge public health issue across the income spectrum, but especially affecting low income folks. One of the primary reasons housing is so unaffordable here is that demand outstrips total supply. This means that even if a number of units are reserved at a certain AMI, housing as a whole will still remain unaffordable and it will become a matter of utility who is able to stay affordably housed in Denver. This is not a long term solution. Have there been discussions with developers about whether they believe this affordability requirement will disincentivize the construction of new buildings? My worry is that if fewer total housing units are constructed because of this initiative, it may not have the effect on housing price as you might expect. As any developer will tell you, supply and demand determine prices. If we want to make housing more affordable you need to INCENTIVIZE building so there are more units on the market in places where they are needed. The market is the best allocator of resources. The less the city council interferes the better. If housing costs rises wages will rise to attract more workers. I support the Lowry area where multiple units sit empty - will these also be considered? Or is just new development from the planning stage now being established? And how economic development tools are financing this endeavor? TAD or TIF? Will there be a new referendum? 

03/02/2022 12:47 PM Thank you for receiving feedback on the Expanded Housing Affordability project. I work for a church that has been trying to build an 8 story building for four years that would be majority affordable housing units. The issue has always been setting up the funding for the project. We are at a place where we are going to sell our property and due to this updated policy, the offer we have for our land has been decreased 57.5%. We are hearing this from other developers as well. So, for a church that is VERY pro affordable housing... we are torn. We know that the economic impact is so great that developers are either forced to charge more than market rate or just not build at all. A candidate for the City’s Legal staff might find these thoughts helpful.

03/05/2022 19:01 PM Presently as a 2 year nurse I can not participate in the affordable housing project. I earn "too much" ha!  And they hold a training that is only offered in the 
Female 19-34 White Rent $50,000 - $99,999 

03/07/2022 7:40 AM Will you expand the IMX-3 to IMX-5 on Latimer St. south of the current boundary ? 

03/08/2022 17:53 PM Please also consider first time home owners. I've lived in the Denver area my whole life. I work 40-50 hours a week and make decent money, but still can't afford to buy anything except a small basement condo with no outdoor access. Please consider developments for first time home owners that might want access to some green space. Small homes rather than all these McMansions developers keep building. 

03/08/2022 18:09 PM I have read and am in full support of the letter dated 12/31/21 sent to the EHAA committee (along with other city leaders) from a consortium of groups who work to support community members experiencing homelessness. I have long considered the commonly used definition of "affordable" housing as 80-120% of AGI as an inappropriate guide that excludes our most vulnerable community members who have been or are at risk of being displaced. I have seen my own neighborhood (Cole) rapidly gentrify over the past 10 years - and recognize that I am a part of that gentrification - and we have lost many long-time residents who have been pushed out by landlords or skyrocketing property taxes. It's past time for Denver to address this issue and finally take steps to protect its lowest income residents, and to show that they too have a place in Denver. I ask that the committee: - Raise the Affordable Housing Linkage Fee to better align with the City’s Housing & Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods. 

03/08/2022 18:15 PM The market is the best allocator of resources. The less the city council interferes the better. If housing costs rises wages will rise to attract more workers. I support as minimal interference as possible. Forcing restrictions will deter development of new units limiting supply and without decreasing demand increased costs for everyone. 

Comment Male 19-34 White Prefer not to answer Own $50,000 - $99,999
<p>| Response Submission Date/Time | We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below. Please select if you are submitting a question or a comment. | What is your gender? | How old are you? | What is your race or ethnicity? Please select all that apply. You may report more. | Do you rent or own your home? | Please estimate your total household income, before taxes, in the last 03/08/2022 19:10 PM | I am writing to you as a fairly new resident of Colorado with an urgent request to consider our most vulnerable neighbors as you move forward with the Expanding Housing Affordability Plan. I am not an expert on issues around housing but I do know that I want to live in a city that supports its residents who are struggling the most. I wholeheartedly believe that housing is a human right and, as a community, we need to take action to ensure that we can live up to this ideal. We have the opportunity to make some important changes now. That is why I am echoing the following requests put forth previously by 9 to 5 Colorado, Colorado Coalition for the Homeless, Colorado Cross-Disability Coalition, Colorado Homes for All (and other organizations). 1) Raise the Affordable Housing Linkage Fee to better align with the City’s Housing &amp; Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods. An appropriate fee would be the Maximum Legally-Justifiable Nexus Fee per the 2016 Denver Affordable Housing Nexus Study for all land use categories, escalated in an amount equal to the changes in the Consumer Price Index for All Urban Consumers (CPI-U). 2) Eliminate Section 27-157 of the ordinance, which allows for the Executive Director of the Department of Economic Development to “reduce or waive” the total linkage fee if the applicant “demonstrates that the required amount of fees exceeds the amount that would be needed to mitigate the actual demand for affordable housing created by the development.” This reduction/waiver allowance ignores and dismisses the clear causal relationship between gentrification and homelessness, even when developments do not directly generate new residents or employees in need of affordable housing. 3) Dedicate a minimum of 20% of the total annual funds generated by the Linkage Fee directly to housing first solutions to those experiencing homelessness. Comment | Female | 19-34 | White | Rent | $50,000 - $99,000 |
| 03/09/2022 10:53 AM | I think ADUs should be encouraged in all contexts, and should get a waiver on linkage fees, and permit fees as a policy matter. This will improve affordability of ADUs. This should also apply to the Tandem house TU building forms. Comment | Male | 55-64 | White, Other: Hanseatic | Own | $25,000 - $49,999 |
| 03/09/2022 10:53 AM | I appreciate the focus on housing affordability and finding a balance that increases new housing development available at a range of affordability levels. However, I am very concerned that the plan does not provide adequate focus on lower-income individuals and families, who are the most cost-burdened and likely to experience homelessness or housing instability without affordable housing. Affordable “workforce” housing for our teachers, child care workers, and others is quite important, but Denver needs an affordability plan that also includes those most in need. Comment | Female | 35-44 | White | Own | $200,000 or more |
| 03/09/2022 14:22 PM | Why aren’t you just using the maximum linkage fee? Why do we commission studies, reports, commissions, etc. to not implement the recommendations? Why does the city not use boldness to meet our challenges and instead chooses cowardice and the status quo? People will die sleeping outside tonight. Comment | Female | 19-34 | White | Own | $200,000 or more |</p>
<table>
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| 03/09/2022 21:27 PM | I support affordable housing and I support the creation of an inclusionary housing requirement. However, I believe the implementation of the program and the requirements proposed in the city's policy should be revised prior to adoption in two ways.  
1) First, the Policy's higher burden placed on for-sale condo development versus rental development should be reversed so that rental is the higher percentage requirement and condo has a lower requirement. This policy as proposed penalizes condo development relative to rental, is fundamentally flawed in its logic, and is bad policy for a City that needs more urban home ownership in general!  
2) Second, the fee in lieu seems to be grossly exaggerated and should be based on the "difference" in the cost to develop/produce an affordable unit as opposed to the "total" cost to produce a normal unit. If it is based on the total cost of producing a unit, not just the incremental cost of making a market rate unit affordable, then it is a grossly exaggerated fee. The reasonable cost should be the takes the incremental funding/subsidy it takes to make an affordable unit viable.  
I'd like to dig in a little more on the condo issue, as it is particularly perplexing and troubling….  
Despite compelling the complications and arguable lower benefit associated with for-sale units, Staff is inexplicably placing a much higher value on "for sale" units than "rental" with a materially higher linkage fee. The fee should be one flat fee regardless.  
Benefits of Deed-Restricted For-Sale Housing are Frequently Compromised – The value of for sale deed restricted housing relative to rental housing is undermined by several factors:  
a. It is difficult to qualify buyers, and as a result, a material percentage of the buyers who ultimately do qualify are young adults with parents who help them with qualification rather than the long-term workforce households meant to be served.  
b. Often, AMI qualifications only matter at time of purchase, and so the housing is not turned over to a new household in need when the occupant exceeds qualification.  
c. Maintaining compliance on deed restricted housing can be difficult, as the City's historical problems indicate.  
In contrast... Rental housing is actively managed at all times and is always being maximized for the appropriate households in need.  
Proposed policy inappropriately penalizes condo development – The proposed policy takes the position that because for sale housing, such as condo, is more expensive and harder to develop, then the city should charge it more per unit. This makes absolutely no sense! There are reasons why condo development in Denver is so limited and why the City is being overrun with rental units and suffering a shortage of for sale housing units. The policy completely ignores these market forces and realities. For sale housing is hard. The idea of making it even harder to do for-sale than rental by imposing higher fees and higher percentages of units is completely backwards and the City's analysis is fundamentally flawed in both logic and economic analysis. The City's proposed policies make the development of condo projects even harder relative to rental, make new "attainable" condos impossible, and make the only condos viable be the owns... |
| 03/09/2022 22:54 PM | Hi, please increase the income requirements to qualify for affordable housing townhomes. My income is a little higher than the 2021 limit, but not enough to afford the market prices for a home. Please build more townhomes. The affordable homes are always under contract and sold so quickly. Please also help by removing the down payment and closing cost. 3000 and another 8000 to close is just not possible with having an extremely high rent and other living expenses. Thank you for reading this message. |
| 03/10/2022 15:17 PM | IMO we need to create small scale, replicable housing models that are accessible, affordable, equitable, net zero energy, and possibly manufactured. |
| 03/10/2022 15:21 PM | Please note I submitted a comment early this morning and would like to follow up.  
Please note that our team inadvertently reviewed a draft prior to 2/1/22, which showed a higher percentage requirement for for-sale than for rental. The draft released Feb 1, 2022 shows the "same percentages" for both for-sale and rental, which is a welcome change in the right direction, and it shows AMI levels are slightly different for rental (60% AMI) and for sale (80% AMI). So my assertion that the draft policy shows higher requirements for for-sale than for rental was incorrect. Apologies. That being said, the economic burden placed on for-sale housing is still materially greater than rental housing and is in my estimation bad policy.  
Considering the realities of development, the economic burden to a for-sale project (~$320k-$340k lost income/ unit) is materially higher (~65%) than the economic burden of a rental unit (~ $180k-$220k per unit). On a 150 unit project, the developer faces a $4,950,000 loss of revenue on 150 units of condo versus a $3.9 M loss of revenue to a rental project, a difference of $1.95M. Similarly the policy proposed fee in lieu of $408k for condo and $250k-295k for rental would be an increase of $1.7M to $2.4M for a condo project. So the policy approach effectively penalizes the 150-unit condo development in this example by roughly $2.0 million additional over and above a rental execution, pushing the developer towards rental housing development.  
The underlying logic behind the higher fee in lieu for condo, I presume, is that the City is looking for on-site production of units, and they realize that condo units are more expensive to develop. Hence the fee has to be higher to promote on-site units.  
The main point I was hoping to make was that condo development is hard, and we should not be adopting policies that make condo development relatively harder... |
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| 03/10/2022 17:19 PM         | Analiese Hock, Principal City Planner
Community Planning & Development, City and County of Denver
Wellington E. Webb Municipal Building
201 W. Colfax Ave. Denver, CO 80202
Re: Expanding Housing Affordability Proposal Policy
CC: Mayor Michael B. Hancock, Denver City Council, EHA Advisory Committee
Dear Ms. Hock,
The Colorado Real Estate Alliance (CREA) is a coalition of real estate-focused organizations with residential and commercial interests. CREA is writing to express concerns with the City and County of Denver's proposed Enhanced Housing Affordability policy. We recognize the challenge of rising housing costs but do not believe this proposal is the right solution.
We appreciate the City's efforts to increase access to affordable housing. However, we do not believe the proposed policy will yield the outcomes the City is seeking – on housing, livable wages, or climate. The inevitable cost-shifting will lead to increased market-rate rents for individuals, families, and small businesses. Our industry has long been paying above-average wages, and as market-rate rents increase to subsidize units for those within 60-80% AMI, workers in our industry will be forced to move further out of the city or limit their salary to stay within the low AMI levels. With one misguided policy, the City will drive up rents, disincentivize wage increases, and increase pollution from on-road transportation, which currently accounts for 22% of Denver's greenhouse gas emissions.
CREA seeks to be a partner with the City in addressing the problem of affordable housing within our community and asks the City to consider the following changes to the policy:
• Raise the AMI limits for affordable housing to 120% AMI while maintaining the revised percentage of required onsite affordable units.
• Leverage existing resources such as the sales tax for housing or enact property tax incentives to encourage and facilitate the development of affordable housing projects; and
• Eliminate the disincentive for building larger units. Larger units (2-4 bedroom units) in the city center can house families and provide defacto affordable housing for young professionals willing to live with roommates.

Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,
Mark Schuler |
| Comment | Male | 45-54 | White | Own | Prefer not to answer | $200,000 or more |
| 03/10/2022 20:26 PM         | The EHA proposal can be a useful piece of the housing puzzle, but housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.
Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November.

Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,
Mark Schuler |
| Comment | Male | 45-54 | White | Own | $200,000 or more |
| 03/10/2022 21:04 PM         | The EHA proposal can be a useful piece in solving the housing problem. But, housing won't be affordable until more housing is LEGAL across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable. Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November.

Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,
Mark Schuler |
| Comment | Male | 35-44 | White | Rent | $150,000 - $199,999 | $200,000 or more |
| 03/10/2022 21:31 PM         | Dear CPD Board,
The EHA proposal can be a useful piece of the housing puzzle, but housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.
Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,
Mark Schuler |
| Comment | Male | 35-44 | White | Own | $200,000 or more |
| 03/10/2022 22:07 PM         | Dear CPD Board,
I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.
The EHA proposal can be a useful piece of the housing puzzle, but housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.
Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,
Mark Schuler |
| Comment | Male | 35-44 | White | Own | $200,000 or more |
Dear CPD Board,

Please consider the broader picture when trying to create affordable housing in Denver. We are chronically behind on building enough new housing units to keep up with demand, and we need to make it easier for developers to build a lot of units, and to build them densely so that we can have more units in the neighborhoods where people want to live.

I support the incentives in the EHA proposal. Developers should be incentivized to include affordable housing in their new developments, and I like the fee reductions for including affordable housing in developments.

But more important than forcing developers to have a certain number of affordable units is to incentivize multifamily units and disincentivize single-family-unit developments. As fine as "affordable housing" is, most people either cannot access it, have to wait too long to access it, or don't know how to access it. Most of Denver relies on market-rate housing for their housing needs, and the only way to solve the housing crisis is to build more housing in the neighborhoods where people want to live.

Here's some ideas that will really help Denver build more housing and stabilize/deside housing prices:

- In all places zoned for residential, allow ALL types of residential housing. Multi-family units (even duplexes, townhouses, and other gentle-density units) are banned in most residentially-zoned areas. This is an artificial and arbitrary rule that suppresses housing supply.
- Make the permitting process easier. The quicker developers can build, the quicker we will have new houses, and the cheaper the process will be for them.
- Increase permitting fees on single-family-unit developments, and decrease permitting fees on multi-family-unit developments, especially apartment/condo buildings that greatly increase housing supply.
- Eliminate parking minimums. Parking spaces take up space that can be used for housing units or other apartment complex amenities. They also contribute to urban sprawl, which makes it harder to increase housing supply and makes people more reliant on cars (which are a huge burden in the average family's transportation budget).

Without liberalizing our zoning code to allow for missing middle housing, we're just going to do what Portland did. They passed an Affordable housing ordinance. Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,

[Name]

I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.

The EHA proposal can be a useful piece of the housing puzzle. But, housing won't be affordable until more housing is legal across all of Denver. Any law that interferes with the construction of safe housing is a travesty. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.

Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,

[Name]

I grew up in Denver and I am about to turn 30. Over my lifetime, I have seen Denver go from a sprawling yet affordable city to a sprawling "and" unaffordable one. At the same time, traffic and air quality problems have become unsustainable.

The EHA project is a great step in the right direction. Streamlined permitting, parking reductions, and height bonuses are concrete changes that will move us in the right direction.

However, affordable multi-family housing is still illegal in over 75% of Denver. We cannot fool ourselves into thinking that this single piece will solve the puzzle of affordable housing. Denver's population will only continue to grow as the climate crisis affects quality of life in nearby states such as California, Arizona, and New Mexico. We need to be prepared to densify our city in response to increasing urbanization. Traffic and air quality concerns will only get worse here in Denver unless we make systematic change.

Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November.

I urge you to continue the momentum started by the EHA project and focus on broad, systematic changes that will allow more housing to be built in Denver.
Dear CPD Board,

I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.

The EHA proposal can be a useful piece of the housing puzzle. I appreciate the steps our city is taking to improve access to reasonably affordable housing. However, housing won't be affordable until more housing is legal across all of Denver. In my neighborhood (East Colfax), most homes are small (600-1400 sq ft) 2 bedroom homes that were built on large 6000+ sq ft parcels throughout the 1940s and 50s. Most of these structures are now reaching the end of their life span, which really shows if you take a drive around the area! With current zoning, it is only possible to replace these older houses with new single family homes (with or without an ADU). This leads to an unfortunate dichotomy of modern “luxury” homes right next door to aging modest cottages—basically a visual representation of the “missing middle.” East Colfax would greatly benefit from changing zoning rules to allow for triplexes, Fourplexes, and micro-apartment blocks, and also eliminating set-back requirements. This would allow the area to adopt gradually and also increase density along the Colfax corridor.

Denver is experiencing a widespread housing crisis - we lack the number of homes we need, and so we are experiencing extreme price increases. This policy, while well intentioned, imposes the cost of adding affordable housing on primarily those who buy or rent multi family housing. This strikes me as highly inequitable. What expectation is there that existing property owners start to take ownership in the problems we have created for ourselves? To that end, please consider the following:

1. Legal multi family housing on every single parcel in the city. If we are going to require that the costs be funded largely be users of multi family housing (development costs will obviously be passed down), we at least have a chance of building more units. Right now multi family housing is illegal on most residential parcels.
2. Can we just re-evaluate our entire zoning code and process? Our zoning code is entirely too complicated, which results in significant added expense at every point in the process. It should be easy to build multi family housing.
3. Remove all parking requirements - people say how much they like the smaller apartment buildings, but literally none of those can be constructed now due to the “missing middle.” East Colfax would greatly benefit from changing zoning rules to allow for triplexes, Fourplexes, and micro-apartment blocks, and also eliminating set-back requirements. This would allow the area to adopt gradually and also increase density along the Colfax corridor.

Sincerely,

[Signature]

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Dear CPD Board,

I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.

The EHA proposal can be a useful piece of the housing puzzle. Market-rate development is the engine that drives this policy. Market-rate addition of housing, rather than just housing replacement, is illegal across 70+% of buildable land in Denver.

Housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.

Denver is experiencing a widespread housing crisis - we lack the number of homes we need, and so we are experiencing extreme price increases. This policy, while well intentioned, imposes the cost of adding affordable housing on primarily those who buy or rent multi family housing. This strikes me as highly inequitable. What expectation is there that existing property owners start to take ownership in the problems we have created for ourselves? To that end, please consider the following:

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<td>I am writing to you as a fairly new resident of Colorado with an urgent request to consider our most vulnerable neighbors as you move forward with the Expanding Housing Affordability Plan. I am not an expert on issues around housing but I do know that I want to live in a city that supports its residents who are struggling the most. I wholeheartrly believe that housing is a human right and, as a community, we need to take action to ensure that we can live up to this ideal. We have the opportunity to make some important changes now. That is why I am echoing the following requests put forth previously by 9 to 5 Colorado, Colorado Coalition for the Homeless, Colorado Cross-Disability Coalition, Colorado Homes for All (and other organizations). 1) Raise the Affordable Housing Linkage Fee to better align with the City’s Housing &amp; Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods. An appropriate fee would be the Maximum Legally-Justifiable Nexus Fee per the 2016 Denver Affordable Housing Nexus Study for all land use categories, escalated in an amount equal to the changes in the Consumer Price Index for All Urban Consumers (CPI-U). 2) Eliminate Section 27-157 of the ordinance, which allows for the Executive Director of the Department of Economic Development to “reduce or waive” the total linkage fee if the applicant “demonstrates that the required amount of fees exceeds the amount that would be needed to mitigate the actual demand for affordable housing created by the development.” This reduction/waiver allowance ignores and dismisses the clear causal relationship between gentrification and homelessness, even when developments do not directly generate new residents or employees in need of affordable housing. 3) Dedicate a minimum of 25% of the total annual funds generated by the Linkage Fee directly to housing first solutions to those experiencing homelessness.</td>
<td>Comment</td>
<td>Male</td>
<td>19-34</td>
<td>White</td>
<td>Rent</td>
<td>$50,000 - $99,000</td>
<td></td>
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<td>03/11/2022 18:24 PM</td>
<td>I apriate the effort to do something about the housing affordability problem in Denver. It is a problem that is seen in cities across the country and has been building for a long time. Subsidized Affordable Housing is definitely needed for our lowest income residents so I applaud the effort to increase the availability of those type of homes. However, much more needs to be done to address the overall problem of affordability. When median home prices have risen to over half a million dollars, it’s clear that a few subsidized units don’t come close to addressing the root cause of our problem. We have a shortage of housing, brought on by decades of land use policy that prevents housing construction. These same policies have created the same problem in cities all over the country. We’ve downzoned and downzoned to the point where we have very little capacity to grow. For many years we were able to push population growth out onto the plains in the form of suburban sprawl. This has it’s own host of problems, including traffic and air pollution, but it did create new housing which kept home prices within a range reachable by people of average incomes. That sprawl now has begun to reach the limits of what people are willing to put up with in terms of travel distance from the city, and we have a new generation of people that do want to live in the city, if they can afford to. With this rising demand to live in the city, we must be able to</td>
<td>Comment</td>
<td>Male</td>
<td>35-44</td>
<td>White</td>
<td>Own</td>
<td>$50,000 - $99,000</td>
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<tr>
<td>03/12/2022 11:38 AM</td>
<td>Dear CPD Board, I support YIMBY Denver, and I’m asking for you to put the whole housing puzzle together. The EHA proposal can be a useful piece of the housing puzzle. I like parking reductions and height bonuses because they allow more and better housing. But, housing won’t be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable. Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it’s popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</td>
<td>Comment</td>
<td>Male</td>
<td>19-34</td>
<td>White</td>
<td>Rent</td>
<td>$25,000 - $49,999</td>
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<td>03/12/2022 14:25 PM</td>
<td>I support YIMBY Denver, and I’m asking for you to put the whole housing puzzle together. The EHA proposal can be a useful piece of the housing puzzle, but, housing won’t be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, building more housing is the most important part of making housing affordable. More housing is better for affordability, better for the environment, better for traffic, and better for neighborhoods. Great cities evolve and change. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future. Sincerely,</td>
<td>Comment</td>
<td>Female</td>
<td>55-64</td>
<td>White</td>
<td>Own</td>
<td>$100,000 - $149,999</td>
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<tr>
<td>03/12/2022 16:17 PM</td>
<td>I currently would not qualify for “affordable” housing and may not qualify for low income housing because I’m on Soc Sec disability. There should be automatic Section 8 vouchers for low income citizens who need housing.</td>
<td>Comment</td>
<td>Female</td>
<td>65-74</td>
<td>Other: Black and Hispanic</td>
<td>Prefer not to answer</td>
<td>$10,000 - $24,999</td>
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Hi,

My name is Luke Teater, I'm an independent housing policy consultant and the former Chief Economist for Governor Polis, commenting on my own behalf. I'm asking you not to pass the EHA proposal in it’s current form because it does not address the root cause of our housing crisis, and in fact will make it worse.

The root cause of the housing crisis we're facing right now is a severe shortage of available homes. Colorado has a shortage of 175,000 homes, and Denver makes up the plurality of that total. The financial incentives already exist for developers to provide that much housing at very little cost to the city, all we have to do is change our zoning and land use policies to allow them to end that shortage for us.

Inclusionary zoning (IZ) serves as a tax on new development. Given that we need substantial amounts of new housing development in order to end this crisis, that is the wrong approach. It will result in higher rents for new market-rate units and fewer housing projects that pencil out, reducing new housing at exactly the time when we need it most. I’d encourage you to look at how new housing construction sharply declined in Portland after they passed their IZ policy (https://bit.ly/3KWFmvN).

While IZ can and does work well if the additional benefits and incentives to developers outweigh the costs of providing additional income-restricted units, this proposal does not offer sufficient benefits or incentives to meet that standard. I would encourage you to increase the zoning and financial incentives available in the proposal to meet that standard.

Finally, I would encourage you to prioritize further easing zoning and land use restrictions in order to add the tens of thousands of new units that Denver desperately needs right now. Rather than use lower parking requirements as an incentive, let’s eliminate parking minimums citywide. Rather than using height increases as an incentive, allow much taller buildings by-right throughout the city, but especially near transit.

Denver is thriving, but our housing shortage threatens that by making it an increasingly unaffordable and exclusive place to live. If we truly believe that Denver is

03/13/2022 6:51 AM

Hi,

My name is Luke Teater, I'm an independent housing policy consultant and the former Chief Economist for Governor Polis, commenting on my own behalf. I'm asking you not to pass the EHA proposal in it's current form because it does not address the root cause of our housing crisis, and in fact will make it worse.

The root cause of the housing crisis we're facing right now is a severe shortage of available homes. Colorado has a shortage of 175,000 homes, and Denver makes up the plurality of that total. The financial incentives already exist for developers to provide that much housing at very little cost to the city, all we have to do is change our zoning and land use policies to allow them to end that shortage for us.

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Denver is thriving, but our housing shortage threatens that by making it an increasingly unaffordable and exclusive place to live. If we truly believe that Denver is

03/13/2022 14:53 PM

Dear CPD Board,

I support YIMBY Denver, and I’m asking for you to put the whole housing puzzle together.

The EHA proposal can be a useful piece of the housing puzzle. As evidenced in Portland and other cities, IZ housing policies are well-intentioned, but definitively fail to create the scale of housing that a city like Denver desperately needs, and prevents market rate units from coming online as quickly as we need. Housing won’t be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.

Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,

03/13/2022 19:24 PM

Dear CPD Board,

I support YIMBY Denver, and I'm asking you to put the whole housing puzzle together.

The EHA proposal can be a useful piece of the housing puzzle. Affordable housing is a major issue for young, old, poor, rich, and all those in between. But, housing won’t be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.

Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.

Sincerely,
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<tr>
<th>DateTime</th>
<th>Response Submission</th>
<th>We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.</th>
<th>Please select if you are submitting a question or a comment.</th>
<th>What is your gender?</th>
<th>How old are you?</th>
<th>What is your race or ethnicity?</th>
<th>Please select all that apply. You may report more</th>
<th>Do you rent or own your home?</th>
<th>Please estimate your total household income, before taxes, in the last</th>
<th>Comment</th>
<th>What is your race or ethnicity?</th>
<th>How old are you?</th>
<th>Do you rent or own your home?</th>
<th>Please estimate your total household income, before taxes, in the last</th>
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<td>03/13/2022 20:53 PM</td>
<td>Dear CPD Board,</td>
<td>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together. The EHA proposal can be a useful piece of the housing puzzle. It's important that we have housing that works for everyone, and EHA moves in that direction. But, housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable. Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</td>
<td>Comment</td>
<td>Female</td>
<td>35-44</td>
<td>White</td>
<td>Own</td>
<td>$200,000 or more</td>
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<td>03/14/2022 4:04 AM</td>
<td>Hi Team,</td>
<td>I just learned about today's (March 14) public hearing and the associated deadline for public comments. What happens during today's hearing and what's next? Are there future opportunities to comment? If so, when and where? Also, is a project calendar or timeline posted anywhere? Would love to get a list of 2022 meetings, deadlines and critical dates? Thanks for the hard and important work you do!</td>
<td>Question</td>
<td>Female</td>
<td>35-44</td>
<td>White</td>
<td>Own</td>
<td>$100,000 - $149,999</td>
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<td>03/14/2022 8:35 AM</td>
<td>Berkeley Regis United Neighbors Zoning &amp; Planning Committee (BRUN ZAP), in consultation with the Berkeley Regis United Neighbors Board (BRUN RNO), has reviewed the Expanding Housing Affordability draft DZC Text Amendment. BRUN RNO is generally in agreement with the concept and goals of this text amendment to facilitate the construction of more affordable housing. BRUN RNO has the following specific comments: There is sensitivity to any impacts on the recently adopted DD-8, although at this juncture there appear to be none. There is concern about any zoning changes that potentially increase the bulk and height of projects in neighborhoods like Tennyson and the embedded commercial district at West 44th and Lowell, that potentially conflict with the existing neighborhood character. There is concern about any zoning changes that potentially increase the amount of on-street parking from larger scale projects in neighborhoods like Tennyson and the embedded commercial district at West 44th and Lowell, where added on-street parking from new projects in the commercial district would overflow into existing on-street parking. Linkage fees, an average family is expected to pay thousands of dollars more to build their house. This is not the American Dream. You're making housing more unaffordable to a greater number of people, and will create a larger problem in the long-run.</td>
<td>Comment</td>
<td>Prefer not to answer</td>
<td>Prefer not to answer</td>
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<td>03/14/2022 10:39 AM</td>
<td>I am opposed to this proposal. While I agree that affordable housing is a huge problem, this proposal is just a tax on the middle class. Looking at the future, I haven't cross-analyzed the proposed fee structure but I think it's in everyone's, and most importantly the City Of Denver, best interest to at least extend the</td>
<td>Comment</td>
<td>Male</td>
<td>19-34</td>
<td>White</td>
<td>Rent</td>
<td>$25,000 - $49,999</td>
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<td>03/14/2022 14:17 PM</td>
<td>It was forecasted that by the year 2050 90% of the worlds population will HAVE to live in urban centers. That has now been moved up to 2045. Currently, 82% of the world’s population has to live in Cities (Urban Centers). It is projected that the United States will need to add 600,000 units of not just affordable, but attainable units well PER YEAR by 2030!!!! We need to throw everything and the kitchen sink at this problem that IS coming and its coming sooner than you think.</td>
<td>Comment</td>
<td>Prefer not to answer</td>
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<td>03/14/2022 15:08 PM</td>
<td>The proposal is looking good</td>
<td>Comment</td>
<td>Male</td>
<td>18 years or younger</td>
<td>White</td>
<td>Own</td>
<td>Prefer not to answer</td>
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<td>03/14/2022 17:04 PM</td>
<td>Hi - I'm providing comment regarding the SDP date of August 30th, 2023 as being too soon for when an SDP needs to be completed in order to vest to the existing affordable housing requirements. Given City staffs current review timelines with workload, differing reviewers having different review timelines on projects, additional workload with new submittals spurred by the legislation and additional layers of review required in different districts (ex. golden triangle design review) I recommend that the completed SDP date be moved out a few months longer in order to allow for all projects to have a more equal chance of making it through SDP by the ending vesting date regardless of where the are located in the City of Denver, what their additional process might be to obtain an SDP and who their specific reviewers are.</td>
<td>Comment</td>
<td>Female</td>
<td>35-44</td>
<td>White</td>
<td>Own</td>
<td>$150,000 - $199,999</td>
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<td>03/14/2022 20:00 PM</td>
<td>More should be required for lower AMI's not higher AMIs. Not enough is being done for our service workers.</td>
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<td>'Close the gaps in the linkage fees</td>
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<td>Linkage fees should be higher</td>
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<td>Each area should have affordable units</td>
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<td>Each neighborhood should have a say in the development of these units and not get a pass simply through zoning. Residents who make 100% AMI's have more opportunity for locations whereas the lower income workers do not.</td>
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<td>03/14/2022 21:32 PM</td>
<td>As part of the City's Expanding Housing Affordability initiative, we have an opportunity—and in fact, an obligation—to expand the existing Affordable Housing Linkage Fee to create a dedicated funding source for housing-first solutions for our neighbors experiencing homelessness.</td>
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<td>Since the linkage fee was adopted in 2017, rent in city proper has risen by 50% on average. The linkage fee proposal is weak, heavily influenced by the development community intent on extracting wealth from already struggling neighborhoods, and will severely limit the city's responsibility in ensuring affordable housing stock for Denver residents.</td>
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<td>Here are some major problems with the proposed changes under consideration:</td>
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<td>1. Current amounts for each category are not within the range recommended by the City’s own feasibility study.</td>
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<td>2. Current levels do not account for inflation, which is expected to rise 7-8% over the next year.</td>
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<td>3. Is not comparable to peer cities, including Austin and Boston, which have linkage fees ranging from $12-$18 per sq foot.</td>
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<td>It is imperative that we increase the linkage fee for each category to align with the range indicated in the City's feasibility study. What I have heard city officials say is that developers need time to adapt; well residents don't have time to adapt, especially those who are unhoused. The City's response falls short with overreliance on feedback from developers at the expense of residents.</td>
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<td>Additionally, the proposed linkage fee schedule is too drawn out for effective implementation. If the proposal is passed as is, the full linkage fee will not apply until July of 2024. That means we’ll be waiting several more years to collect the funding we so desperately need to begin building more affordable housing. This does not match the urgency of residents in Denver – homelessness doubled since COVID and 1 in 3 renters are cost burdened. Therefore, the linkage fee should be applicable immediately upon passage of this policy proposal, not three years down the road. Many vulnerable residents cannot wait any longer.</td>
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<td>The percent of affordable housing required needs to be higher than what is proposed. Current proposed percentages are not comparable to peer cities, nor the levels of affordability achieved in rezones. Neighborhoods vulnerable to displacement that are mostly naturally occurring affordable housing need a higher requirement of affordability at the neighborhood median income or lower. Thus, Denver should require 15% affordability and 20% in areas vulnerable to displacement.</td>
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<td>&quot;Affordable&quot; housing, while supporting some income brackets of renters, does not provide the support needed to help the city’s most vulnerable populations making 30% of the Area Median Income (AMI) or less. Much of our city’s affordable housing stock is priced for people making between 80% and 120% AMI. This means that in 2020, much of the city's affordable housing stock was priced for single people making between $54,950 and $84,000 per year, or families with children making up to $139,200 per year. The lower-tier affordable housing stock developed by the Denver Housing Authority, priced at 50% AMI, requires single tenants to make $35,000, and families to make up to $58,000.</td>
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<td>Working a minimum wage job at $15.87/hour full-time with no days off, a single mother with two children makes $33,010 each year, and wouldn't qualify for this...</td>
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</table>
As part of the City’s Expanding Housing Affordability initiative, we have an opportunity—and in fact, an obligation—to expand the existing Affordable Housing Linkage Fee to create a dedicated funding source for housing-first solutions for our neighbors experiencing homelessness.

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1. Current amounts for each category are not within the range recommended by the City's own feasibility study.
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It is imperative that we increase the linkage fee for each category to align with the range indicated in the City’s feasibility study. What I have heard city officials say is that developers need time to adapt, well residents don’t have time to adapt, especially those who are unhoused. The City's response falls short with overreliance on feedback from developers at the expense of residents.

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Working a minimum wage job at $15.67/hour full-time with no days off, a single mother with two children makes $33,510 each year, and wouldn't qualify for this.

Are you also looking at what short term rentals (AirBnB's) are doing to hinder affordable housing in Denver? Big business is buying up residential homes and turning them into nightly rentals for out of town/out of state people. Example home near me used to rent out for $2k/month to a local resident, now someone turned it into an Airbnb and makes $200/night making more from out of town visitors versus supplying housing to someone that lives here. And they have

Question  Male  45-54  Prefer not to answer  Own  Prefer not to answer

Do you rent or own your home?  What is your race or ethnicity?

Question  Female  19-34  White  Own  $150,000 - $199,999

Are the June 30, 2022 and August 30, 2023 deadlines also apply for a development seeking to utilize an incentive height under the IO-1 incentive overlay?

Question  Female  35-44  White  Rent  $25,000 - $49,999

I think this is wonderful idea. Providing a way to have more families affordably live in the area will better help the community. I believe it will help to lessen those experiencing homelessness because they will have an affordable option for housing. I also think it will give newly married couples and young families a chance to buy or live in an affordable residence. My husband and I are recently married, we both work and are having a hard time finding an affordable house to buy. Our rent has been going up, I hope we will be able to buy a house one day and I think expanding this will help.

Question  Male  75 and older  White  Other  $200,000 or more

Hi Analiese, I see the Affordable Housing Zoning Incentive Report indicates a parking reduction of .5 spaces per unit as “Base Incentive” (p. 26). I cannot find that anywhere in the draft Planning Board regs. Have I missed it, or is it still coming?

Question  Male  55-64  White  Own  $100,000 - $149,999

Thank you.