

Expanding Housing Affordability

Outreach Summary Phase 1: March – June 2021

The purpose of this outreach phase is as follows:

- Informing the community of the project purpose, timeline, and opportunities to participate
- Building a shared understanding of current programs, outcomes, and lessons learned from peer cities and Denver programs
- 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; and,
- 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; and
- Engaging in diverse representation with a variety of socio-economic backgrounds and perspectives.

Outreach was conducted using the following approaches:

- Connecting with existing community groups and industry organizations
- Office Hours
- Partnering with council offices to share information and co-host community events
- Community Connector information sessions
- Focus Groups
- Feedback Forms

Additionally, information was made accessible on the [project website](#) including reports, summaries, common questions and responses, and four informational videos: 1) Affordable Housing Basics; 2) Project Overview; 3) Denver’s Housing Market; and 4) Peer City Research.

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Key Feedback Themes

The following summarizes the most consistent comments and priorities received through phase one of the outreach conducted from March to June of 2021:

- There is a need for bold and innovative housing programs to better meet housing need along the entire housing continuum. This will require for the city to look at multiple complementary tools to fill gaps and address needs holistically.
- These types of programs can impact the overall housing market if not carefully considered. There is concern that the cost will be put onto those paying the market rents/purchasing homes. Additionally, there are concerns that if the requirement is too great, this will stall development and lead to increased housing supply issues.
- Incentives are a critical element to a mandatory program. While most incentives discussed are desirable to the development industry, a clear cash subsidy to off-set some of the cost to produce the affordable units is seen as the most valuable. Some in the development industry prefer to see programs remain as is or voluntary only.
- Involuntary displacement is a key concern. Community members want to see new affordable units provided at a level that is accessible to the existing residents within the neighborhood. Additionally, there is a desire to see the use of a preference policy along with affirmative marketing to ensure that people at risk of involuntary displacement are prioritized for these units.
- On-site construction of affordable units is the preferred outcome. Especially in high-opportunity areas with good access to jobs, transit, parks, and other services. Fees weren't always seen as clearly addressing the need. If a fee-in-lieu is offered, it should be tailored to the market and cost of constructing those affordable units. This was a key learning from the former IHO program.
- Provide realistic options for compliance. Providing realistic alternative compliance (e.g. fee-in-lieu) and developer options to meet the requirements will be key to the success of the program.
- The timing of implementation and effective date is a critical part of the policy discussion. Many developers have acquired land and made significant investments in project. Therefore, providing a clear expectation and adequate runway for existing projects was very important to the industry.
- Clarity and predictability are critical to the success of this program. While many developers feel that this will impact their development projects, the ability to have clear city expectations (rather than changing priorities every few years) is a strength to these programs. Keeping these programs in place for a longer period (e.g., 5 years) will also be critical to long term predictability.
- Cumulative impacts to the cost of development need to be understood. Concern that the city is not considering the impacts of all requirements (new or existing) being explored and their impacts to development. Example requirements included the Denver Green Code, open space, Transportation Demand Management (TDM), etc.

Additional Feedback that is outside the scope of this project but has been shared with the appropriate agency. For example, some of these comments speak to the broader housing continuum and have been shared with the HOST staff leading the strategic plan update.

- Need for increased education programs, especially related to housing. Additional programs to promote financial stability and upward mobility is also critical so people can reach incomes and financial stability to access housing in the market.
- Need to increase housing options (e.g., ADUs, single-unit homes on smaller lots) and affordability in low-density residential districts. There is a desire for the city to look holistically at all our residential areas to ensure they are meeting the growing housing needs by providing a diversity of housing types and price ranges.
- The city needs to focus more so on attainable housing rather than "affordable."
- The city needs to be focusing more resources to households earning less than 30% AMI and especially those at risk of involuntary displacement.

City Council and Planning Board

Date: March 4, 2021

Board: City Council Budget and Policy Committee

Meeting can be seen on Channel 8 here: <http://archive->

[media.granicus.com:443/OnDemand/denver/denver_e1ec85ab-84ca-4de8-976f-3816222212a1.mp4](http://archive-media.granicus.com:443/OnDemand/denver/denver_e1ec85ab-84ca-4de8-976f-3816222212a1.mp4)

Key Comments:

- Interest in learning more about specific peer city programs.
- Questions about the separate pilot program for affordable and green code projects.
- Don't want to see a one-size-fits all approach, Denver neighborhoods are very different so we shouldn't make every neighborhood look like Capitol Hill.
- Questions around NPI plans (which provide policy guidance but are not regulatory) and this regulatory implementation project around height guidance.
- Desire to see greater predictability in the development process for neighborhoods and developers.
- Questions around local cities' policies such as Boulder and Longmont and how they have been able to create programs given the Telluride decision.
- Desire to see additional discussion around open space and other quality of life amenities.

Date: March 17, 2021

Board: **Denver Planning Board**

Meeting can be seen on Channel 8 here: <http://archive->

[media.granicus.com:443/OnDemand/denver/denver_c5209c21-1e3c-47b0-b942-5fd89fab0a.mp4](http://archive-media.granicus.com:443/OnDemand/denver/denver_c5209c21-1e3c-47b0-b942-5fd89fab0a.mp4)

Key Comments:

- Interest in looking at other funding mechanisms such as property taxes, concern that increasing the linkage fee or other "asks" of development only serve as a "band aid" and don't address the root problem, which is supply and employment.
- Concerns over the former IHO and concerns with the units that went into foreclosure and those who lost equity.
- Concerns over the lack of condo development and impacts of construction defects on the supply.
- There is a need to create more robust preservation programs
- There needs to be more "loosening" for the private development market to create more market rate and affordable housing. The primary goal should be getting people into safe and accessible housing, earning equity is a second-tier priority.
- The linkage fee needs to be increased to a reasonable rate, the peer city research clearly shows that we are behind, and this current system is destined to fail because it doesn't address the problem and it doesn't create enough programs.
- This program will be successful when we create complimentary blended programs that should be used in moderation to minimize distortion to the market.
- The city needs to be look much more closely at preserving older housing stock that is naturally occurring (e.g., mobile home parks).
- Need for the city to have a quantified need and goal for the city overall. This will create a clear target.
- Desire to see missing middle housing types setting robust goals for housing affordability.

Existing community groups and industry organizations

Date: March 15, 2021

Convening Organization: Southwest Denver Communities that Care (CTC)

Number of individuals invited: 25

Number of participants: 9

Organizations represented: Communities That Care (CTC); Health Colorado; Denver Indian Center; Denver Health; SW Denver Boys and Girls Club

Key Themes:

- Desire to see long term affordability options being explored (e.g. 99-year/perpetual affordability)
- Interest in increase in educational programs to equip existing homeowners stabilize and remain in their communities of choice.

Date: March 16, 2021

Convening Organization: Neighborhood Development Collaborative (Policy Sub-Group)

Number of participants: 9

Organizations represented: Boulder Housing Partners, Mental Health Center of Denver; Metro Denver Habitat for Humanity; Rocky Mountain Communities

Key Comments:

- Interest in learning more about how the linkage fee can be more productive to support more affordable housing projects.
- Concerns over a “siloeed” approach to housing. (e.g. Board of Adjustment denying relief for affordable housing projects)
- The former IHO failed in part because the fee-in-lieu was too low, especially for high-cost areas. Options for alternative compliance will need to be properly calibrated.
- The former programs have been too moderate, this is the time to create a robust and meaningful program.
- Interested in additional opportunities to improve homeownership programs and land acquisition funding.

Date: March 18, 2021

Convening Organization: Downtown Denver Partnership (DDP) Business Improvements District (BID) Council

Number of participants: 8

BIDs/Organizations represented: Santa Fe BID, Cherry Creek North, Progressive Urban Management Associates (PUMA), West Colfax BID, Downtown Denver Partnership BID, Five Points BID, Colfax Mayfair BID; Colfax Ave BID

Key Comments:

- Interest in ensuring that all new housing enables for “flexible families”
- The city needs a clear goal for units needed at each income level and identified programs to address each figure. The policy should then reply to satisfy the demand.
- Interest in learning more about anti-displacement strategies being provided by HOST and NEST
- The city needs to do a better job telling the story around housing needs and the overall impacts to the community.
- Through the East Area Plan, there was a clear desire for more mixed-income housing rather than exclusively market rate and exclusively affordable. This should continue to be a priority at a citywide scale.

- Transit needs to be a key consideration in relation to opportunity, density, and multi-modal options.

Date: March 24, 2021

Convening Organization: **Anti-Displacement Policy Network (ADPN)**

Number of individuals invites: 84

Number of participants: 34

Spanish interpretation provided.

Organizations represented: West Denver Renaissance Collaborative (WRDC); Fax Partnership; Colorado Housing and Finance Authority (CHAFA); Office of Financial Empowerment; Mi Familia Vota Education Fund; Mile High Connects; Colorado Legal Services; Denver Office of Economic Opportunity (DEDO); Enterprise Community Partners; Council District 11; GES Coalition; Center for Community Wealth Building; Office of Councilperson Kniech; Neighborhood Development Cooperative; Urban Land Conservancy; Servicios de La Raza

Key Comments:

- The city needs to be more proactively addressing small or low-density housing solutions (e.g. ADUs, Tandem Houses, Cottage Housing). Incentives should go beyond density and height which are only applicable in higher-intensity centers and corridors. *Future regulatory projects will further explore missing middle housing types and recommendations identified in adopted city and neighborhood plans.*
- Interest in looking at financial empowerment opportunities and the boarder system in which housing needs exist.
- Need for an “equity scorecard” along with community control to ensure that housing meets community needs.
- Interest in alternative forms of housing (e.g. Community Owned Housing cooperatives) and partnerships with CHAFA (regarding lending opportunities) and educational programs.

Date: March 25, 2021

Convening Organization: **NAIOP – Past Presidents Council**

Number of individuals invites: 34

Number of participants: 10

Companies represented: Liv Sotheby Realty; Withing Management Resources; Prime West Companies; Lincoln Property Company Denver; Pinnacle Real Estate Advisors; Hogan Lovells; Evergreen Development; United Properties.

Key Comments:

- Strong desire to be a part of creating solutions to address housing need
- Seeking greater transparency around how the city is currently spending funds (e.g., how much is going into services/unit creation vs administrative costs)
- The city should be focused on preservation of existing naturally occurring affordable housing (NOAH), not focusing on new housing (which is the most expensive housing on the market)
- Concern that linkage fees simply pass along increased costs to residents, negating affordability benefits
- Disagreements about the idea that new development should be play a key role in the housing crisis, should be focused on the community as a whole
- Existing development review process needs improvement, concerns around adding more regulatory/process barriers. Interest in a streamlined or fast track review process.
- Concern with Denver Green Code and the associated cost increases of the standards which also get passed on to the resident/tenant. This should be integrated into feasibility. *Denver green code is voluntary, feasibility modeling will acknowledge other “additional costs”*
- Feel that there should be a study of low-cost cities in red or purple states, concern that these programs will move Denver to a coastal city.

- Development business is simple – it’s about providing an appropriate yield for investor, so they move forward with the investment. These tools reduce the yield to the investor and therefore fewer projects can move forward.

Date: March 25, 2021

Convening Organization: **Southeast Denver Town Hall, organized by Council Districts 4, 5, 6, 10, DPS School Board District 1, 3; and RTD District A.**

Number of live participants on Zoom: 8 (content also streamed on Facebook live and posted to council websites/social media)

Key Comments:

- Interest in finding opportunities to ensure that these programs address the growing senior population, multigenerational families, and school children.
- Curiosity about how this program will address residential low areas. *ADUs, and missing middle housing types (e.g. Triplexes, rowhouses, cottage housing) are anticipated to be addressed through a future regulatory project. However, inclusionary and linkage fee policies would apply to all new development.*

Date: April 1, 2011

Convening Organization: **Urban Land Institute (ULI) Multi-Family Product Council**

Number of individuals invites: 45

Number of participants: 20

Organizations represented: Urban Land Institute, Palisade Partners, RangeWater Real Estate, Kairoi Residential, Koelbel & Co., Alliance Residential, Crescent Communities, Apartment Appraisers, Consilium Design, Kephart, DR Horton, National Valuation Consultants, Convergence Multifamily Real Estate, Leland Ferguson, Brookfield Residential, OZ Architecture, Sares-Regis, Polsinelli, Group 14 Engineering, Trinsic Real Estate Partners, US Bank, Holland Partners Group

Key Comments:

- Inclusionary housing effects landowners (their land value decreases) the most, and then market rate renters, therefore incentives and off-sets are important to mitigate the financial impacts. Property tax abatement and expedited processing were the most valuable incentives. *Colorado state law does not allow for a property tax abatement program. The city could explore a rebate or subsidy program; however, this would require funding to be re-allocated from other existing housing programs.*
- Income restricted for-sale housing has been a mess with the city. Especially regarding qualifications as the city and the lending banks have different expectations.
- City staff inconsistencies lead to a lack of transparency and/or predictability.
- The city should be aware that all these added program requirements lead to increased development costs.
- These programs are taxing and further burdening housing opportunity rather than solving for affordability.
- Desire to see voluntary programs over mandatory.
- Program success should not be reviewed by total number of income restricted units produced, rather the impact to the overall housing market and affordability.

Date: April 6, 2021

Convening Organization: **Urban Land Institute (ULI) Housing Committee**

Number of individuals invites:

Number of participants: 34

Organizations represented: Shopworks Arch, KTGy, Colorado Coalition for the Homeless (CCH), First Bank, Boulder Creek Life and Home, City of Aurora Third Sight Strategies, Neighborhood Development Collaborative, Habitat for Humanity, ProLogis, First Bank, Koebel Urban Homes, SCL Advisory, Otten Johnson, Land Title, Cunningham, Hord Coplan Macht, Volunteers of America (VOA), Thrive Home Builders, Colorado Department of Local Affairs, PlanWest, Sterling Ranch Authority Board, Economic and Planning Systems, CliftonLarsonAllen, Oread Capital Development, Boulder Housing Partners, EnviroFinance Group, Daydream Apartments, Currell Program Management, Gensler.

Key Comments:

- Interested in opportunities for regional coordination on housing tools and strategies.
- Interest in looking at vehicle parking reductions, this has been a key element of California's incentives.
- Want to know the number of units the city needs to address the growing housing need by affordability level.
- Concern that the root cause of affordability is within our single-unit neighborhoods, especially those that were downzoned at the 2010 rezoning, with the desire to look at programs like Minneapolis and Berkeley that remove these single unit limits in all neighborhoods.
- Concern with the focus on new homes and new development. Need to look more comprehensively at preservation strategies of existing homes.
- Concerns with prior IHO lessons, it will be important to engage developers with prior experience as new policies are created.
- Need to examine tools for medium density housing and opportunity to develop housing on small lots.
- Cost assumptions need to be well tested/vetted to ensure that we are creating programs that solve the housing needs, rather than create more barriers. There needs to be a reality check of what the market and these tools can provide.

Date: April 8, 2021

Convening Organization: **Denver City Council District 3, Anti-Displacement Housing Group**

Number of participants: 14

Organizations represented: Love Thy Neighbor, Rocky Mountain Communities, GES Coalition, West Denver Renaissance Collaborative, Del Norte, Enterprise Community Partners, Habitat Community of Metro Denver, Newseed Community Development Cooperation.

Key Comments:

- With the expansion of affordable home ownership opportunities, there needs to be greater down payment resources for first time homebuyers.
- Interest in learning more about the preservation ordinance and opportunities for these programs to benefit the existing community.
- Interest in having tools to better leverage equity for existing homeowners and businesses in the community.

April 22, 2021

Convening Organization: **Sunnyside United Neighbors Inc (SUNI) RNO**

Number of Participants: 22

Key Comments:

- Interest in specifics of programs and impacts to the neighborhood
- Concern with the number of scrapes of naturally occurring affordable housing (NOAHs) being replaced with large expensive homes
- Interest in participating in future discussions and learning about the interaction between this implementation effort and the NPI Near Northeast Plan

April 27, 2021

Convening Organization: **Habitat for Humanity of Metro Denver** - Advocacy Advisory Committee

Key Comments:

- Strong desire to see more options and incentives for small or low-density housing solutions (e.g. allowing homes on smaller lots). Incentives should go beyond density and height which are only applicable in higher-intensity centers and corridors and into low-density neighborhoods. *Future regulatory projects will further explore missing middle housing types and recommendations identified in adopted city and neighborhood plans.*
- Discussion on the city's response to HB-1117 and potential changes
- Desire to see a greater focus on affordable homeownership opportunities

May 7, 2021

Convening Organization: **Council District 9** – NE Elected Town Hall

Streamed to Facebook live and posted online to council social media pages

Key Comments:

- Desire to see more social/public housing. *The legal framework does not allow for the city to own/operate affordable housing, but rather partner with housing authorities (e.g., Denver Housing Authority)*
- Questions around specific housing demand by AMI and household size

Date: May 27, 2021

Convening Organization: **Downtown Denver Partnership (DDP) City Live**

Number of participants: 34

Attendee Focus: Downtown residents

Key Comments:

- Interest in learning more about opportunities with HB21-1117
- Seeking more clarity on implementation/effective date (will be discussed as a part of policy discussion in Summer)

Date: June 3, 2021

Convening Organization: **Lowry United Neighborhoods RNO**

Number of participants: 12

Key Comments:

- Concern that allowing increased height in exchange for affordability will only make things worse. Same goes for parking reductions.
- Questions about who can live in affordable units, how affordability is defined, and the system to become eligible. Concern that the current lottery system does not work.
- Discussion about the need for new housing to be in transit-rich, job centers such as the downtown core where people aren't dependent on cars to access services and employment.

Community Office Hours

Dates: Thursday April 1st, 7th, 8th and May 13th and 20th

Participants: (26) Neighborhood Residents in Capitol Hill, Curtis Park, Sunnyside, West Denver, Cole, Berkeley, Sunnyside, and East Colfax; and housing advocates, architects, and folks interested in creating affordable housing.

Key Comments:

- Interest in supporting a broader range of housing services and opportunities across this city from safe outdoor spaces to mixed use housing.
- Teachers are witnessing the negative displacement and housing insecurity impacts and want to learn more about resources to support their community/residents.
- Interest in learning more about city ADU programs and how various city agencies support anti-displacement efforts – *connected participants to staff in NEST and HOST to speak to specific program opportunities.*
- There is a significant gap in housing needs, especially for low/moderate income households who can no longer afford the high housing costs.
- Disappointment with current linkage fee and program outcomes. More funding is needed to capture impacts of new development.
- Concern if there is a focus to only increase housing options in transit-rich areas. This will continue to enable wealthier neighborhoods from providing their share of new market and affordable housing. Additionally, there was concern with RTDs ability to implement and support transit as needed.

Community Conversations

April 22nd and April 27th, 2021

The city hosted two “community conversations” to connect with leaders and organizations in commonly underrepresented communities and/or neighborhoods vulnerable to displacement. The ask to these organizations was to...

- Connect with community members so we can bring more people who are commonly left out into this important conversation.
- Understand how to best connect and engage with your community; and,
- Understand where community members may have questions about the project to proactively address.

Spanish Interpretation provided.

Organizations represented: East Colfax Community Collective, Second Chance Center, Elevation Community Land Trust, Montbello Organizing Committee, University Park Community Council, Lowry United Neighborhoods, Enterprise Community Partners, Juntos Colorado, Cultivando Network, Connectoras de Montbello, Archway Housing, SCCColorado, DHS.

No feedback was submitted following these sessions, but it did provide the city with good insight on how we can better connect with underrepresented communities.

Phase One General Feedback Form

Dates: Available on the project website from March to June 15th

When asked what your top priorities for these programs the following were ranked in order of priority from most important to least.

1. More Mixed Income Housing
2. More funds to support affordable housing
3. Long Term Affordability
4. Affordability targeted at lower income levels

The following were the key themes of the comments provided.

- There is a need to ask more of the development community, but it needs to be a balanced approach to housing policies.
- Understanding the overall impacts of city requirements to development is important.
- Create predictable and regular updates to the ordinance, 5+ years, to give stability to the market and avoid ad hoc changes that are responsive to politics.
- Do not expand RNO or community organizations role in the process to create affordable housing. This only politicizes and delays outcomes.
- All neighborhoods should be part of the solution to accommodate more housing (both market rate and affordable).
- There is a need to look at loosening restrictive zoning that creates artificial housing supply issues.

Phase One Industry Feedback Form

Dates: Available on the project website from March to June 15th

The following were the key themes of the comments provided.

- Predictability is needed for the programs to be successful. This is important for each individual project and in the long term. This was identified as the key priority from participants.
- Providing a menu of options to meet the requirement. This should include providing units at different AMIs.
- The city should provide only incentives, not mandates. Don't see the need for more funding given the recent sales tax increase. The program should provide direct financial support for deeper levels of affordability (e.g. cash grants, low-interest and/or forgivable subordinated loans, waiver of City fees (not just linkage fees), property tax relief, tap fee waivers, etc.
- The project needs to fill the gap and address attainable housing needs, shouldn't be reaching for AMI levels covered by LICHT.
- Concern that these programs will only increase the overall cost of development and push out developers and residents who need attainable housing.
- So long as developers with existing land can advance their active projects under current regulation, new projects will be able to accommodate.
- Using height as the primary incentive is counterintuitive. Communities don't want to see the impacts in their community and building costs increase with height.
- Remove the uncertainty around rezoning applications by making it an across-the-board requirement so that staff and Council don't extract "voluntary" Affordable Housing Agreement concessions from rezoning applicants that aren't evenly applied to existing use-by-right development applications.
- A funding mechanism that funds vouchers is the best overall mechanism for affordable housing.
- The program needs to offer a fee-in-lieu. Some projects are not viable to create the units on-site.
- Programs need to adjust different requirements based on the varied land costs and market conditions.

- Contrary to the above point, there were others that felt that program requirements shouldn't vary by market area and need to be as simple as possible.
- Requiring 80% AMI units is achievable intermixed with market rate units. We do not need special financing and do not need to rely on lengthy tax credit processes. Requiring anything deeper (30-60% AMI) will be difficult to finance without significant subsidy.
- The process will need to be clear and simple, requiring developers to change their business model. The city must play an active role in educating property manager on income qualification, reporting, etc.

Industry Focus Group

Dates: May 18th and 26th

Organizations: Southern Land Company, Urban Villages, Red Peak, Thrive Home Builders, Kentro Group, North East Denver Housing, Aimco, Colorado Apartment Association (CAA), Trammel Crow, Southern Land Company, Lucero Development Services, Westside, Range Water Real Estate, Brookfield, Liv Sotheby's, Rocky Mountain Communities, Nichols, Revesco, Palisade Partners, UDR, Edens, Wood Partners, Cypress Real Estate, CRL, Gorman and Company, Bruce Baukol Capital Partners, Trammel Crow.

Key Comments:

- Peer cities with tiered programs (Boston and Seattle) that vary based on market area and rents is an appropriate approach for Denver. This will require for Denver to update every 2-years in response to market changes, but it could ensure that development is balanced across the city.
- The timing when fees are assessed (e.g., linkage) can have an impact on the project. If these fees aren't collected until the certificate of occupancy (CO) is issued, this can have a significant benefit on the cash and operations of the project.
- In Fairfax County, the inclusionary program has been successful due to the consistency leadership and clarity over the process. Clarity is key for developers. Additionally, the program focused on affordable and workforce housing which was tied to the zip code to align with community need.
- Concern that the city has too many competing priorities and expectations for the developer. E.g. desire for open space, historic preservation, housing, mobility. There is a need for better city coordination, especially on larger redevelopment sites.
- Desire to promote more missing middle and ownership housing types, this could be done through waiving the linkage fee or reducing.
- Some don't see added value in an expedited review unless it reduces the need for rezonings which introduce "NIMBYs" and unpredictability with council.
- Incentives need to be a part of any mandatory program and add significant value.
- Desire to see a property tax exemption or like reduce development costs.
- Regarding the current system, what isn't working is the lack of clear requirements and expectations. This project should move swiftly to create clear requirements to start meeting housing need.
- Developers also offered feedback on prototype proformas to inform feasibility testing.
- The following are the summary of revisions made based on meeting feedback and additional data:
 - Reduced sale price of single family and townhome
 - Changed target return on ROC to 6.5% to reflect 150 bps spread from cap rate.
 - Increased rents by about 5% (except for 3-story)
 - Increased tenant finish cost
 - Increased building costs by about 10% (note our costs are per GSF, not NRA)
 - Increased OPEX and replacement reserves
 - Increased cost of underground parking
 - Increased land cost for 4-8 stories (low and midrise)
 - increased development financing interest rate to 4.15%
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 - Increased rents by about 5% (except for 3-story)
 - Increased tenant finish cost
 - Increased building costs by about 10% (note our costs are per GSF, not NRA)
 - Increased OPEX and replacement reserves
 - Increased cost of underground parking
 - Increased typical land cost for 4-8 story prototypes
 - Increased development financing interest rate to 4.15