

From: [Fred Glick](#)
To: [Levingston, Courtney L. - CPD CE0429 City Planner Senior](#)
Cc: [Bruce O'Donnell](#)
Subject: [EXTERNAL] Proposed Map Amendment 2018I-00072
Date: Tuesday, February 05, 2019 7:37:44 AM

Hi Courtney,

I'm writing in support of the above referenced map amendment at 2535 E. 40th Avenue.

I support the application and believe it will contribute to the neighborhood, as well as supporting the City's significant investment at the 39th Avenue Greenway.

The applicants were good enough to accept the invitation of Clayton Urbanists, an interest group associated with Clayton United RNO, to speak with us about their plans, as well as the rezoning proposal. I expect that the RNO will discuss taking a position on the rezoning next week at our regular meeting and will let you know the outcome of that discussion.

thank you,

fred glick
owner and future resident, 3850 York St.
partner, 3840 York St.

**CITY AND COUNTY OF DENVER, COLORADO
REGISTERED NEIGHBORHOOD ORGANIZATION
POSITION STATEMENT**

Following a vote of the Registered Neighborhood Organization, please complete this form and email to rezoning@denvergov.org. You may save the form in *.pdf format if needed for future reference. Questions may be directed to planning staff at rezoning@denvergov.org or by telephone at 720-865-2974.

Application Number	2018I-00072
Location	2535 E. 40th Avenue
Registered Neighborhood Organization Name	Clayton United
Registered Contact Name	Danielle Ongart
Contact Address	
Contact E-Mail Address	claytonneighborhooddenver@gmail.com
Date Submitted	12 February 2019

As required by DRMC § 12-96, a meeting of the above-referenced Registered Neighborhood Organization

was held on , with members in attendance.

With a total of members voting,

voted to support (or to not oppose) the application;

voted to oppose the application; and

voted to abstain on the issue.

It is therefore resolved, with a total of members voting in aggregate:

The position of the above-referenced Registered Neighborhood Organization is that Denver City Council

Application #

Comments: Clayton United supports the rezoning application with the following comments:
 1) We support the applicant's stated intent to include affordable housing in the development. We believe affordable housing is critical for our city and our neighborhood.
 2) We support the applicant's stated intent to include live-work units in the development. We believe live-work is an important tool to promote housing affordability and small businesses.
 3) We encourage Planning Board and Council to consider rezonings of more than 3 stories to promote density along the 40th and (future) 39th Avenue corridors in and adjoining Clayton. This area was specified as 3-stories in the Elyria-Swansea Neighborhood Plan, but we note that though this includes substantial portions of the Clayton neighborhood and any development will have substantial impact on Clayton, the plan was made without input from Clayton.

From: [Candi CdeBaca](#)
To: [Rezoning - CPD](#)
Cc: [Levingston, Courtney L. - CPD CE0429 City Planner Senior](#); [Showalter, Sarah K. - CPD CE2777 Manager](#); [Dalton, Kyle A. - CPD Principal City Planner](#); [Nola Miguel](#); [Drew Dutcher](#)
Subject: [EXTERNAL] Re: FW: CORRECTED Official Map Amendment Land Use, Transportation and Infrastructure Public Meeting Notification #2018I-00072 2535 E 40th Ave.
Date: Tuesday, February 26, 2019 11:09:12 PM
Attachments: [image001.png](#)

Hello,

Cross Community Coalition upon having our most recent annual meeting wishes to go on record opposing the rezoning of this site. Members of our community have asked Councilperson Brooks for more information on this property back on 9/27/18 and have to date not received more information. We are requesting more time to obtain community input on this matter and would like an opportunity to meet with the developer.

I'd love to connect if needed. [Here's my calendar link](#) to make finding time easy!

Best, CC



On Mon, Feb 11, 2019 at 3:55 PM Rezoning - CPD <Rezoning@denvergov.org> wrote:

Please see the below correction.*

OFFICIAL MAP AMENDMENT (REZONING)			
NOTIFICATION OF CITY COUNCIL			
LAND USE, TRANSPORTATION AND INFRASTRUCTURE COMMITTEE MEETING			
APPLICATION #	#2018I-00072	LOCATION	2535 E 40 th Ave.
APPLICANT	Bruce O'Donnell/Starboard Realty 770 Sherman St., Ste. 108 Denver, CO 80203		
PROPOSED ACTION TO REZONE FROM	*I-A & I-A UO-2	TO	I-MX-3
CASE MANAGER	Courtney Levingston Senior City Planner	PHONE/EMAIL	(720) 865-3074 / Courtney.levingston@denvergov.org
CITY COUNCIL LAND USE, TRANSPORTATION AND INFRASTRUCTURE COMMITTEE MEETING INFORMATION			
DATE	Tuesday, February 26, 2019		
TIME	10:30 am		
PLACE	City and County of Denver Building, 1437 Bannock St		
ROOM	Conference Room, Room 391		

INTERESTED REGISTERED NEIGHBORHOOD ORGANIZATIONS	
<p>Inter-Neighborhood Cooperation (INC)</p> <p>Attn: George E. Mayl</p> <p>comayl@aol.com, lorettakoehler@mac.com</p> <p>1075 S. Garfield St.</p> <p>Denver, CO 80209</p>	<p>UCAN</p> <p>Attn: Rey G.</p> <p>reygz303@gmail.com, armandopayan80@yahoo.com</p> <p>4707 Pearl St.</p> <p>Denver, CO 80216</p>
<p>The Points Historical Redevelopment Corp</p> <p>Attn: Robert Eanes</p> <p>thepointsredevelopment@yahoo.com,</p> <p>2518 Kearney St.</p> <p>Denver, CO 80207</p>	<p>Clayton United</p> <p>Attn: Danielle Ongart</p> <p>info@claytondenver.org,</p> <p>Denver, CO</p>
<p>Cross Community Coalition</p> <p>Attn: Candi CdeBaca</p> <p>candicdebaca@gmail.com,</p> <p>4301 Thompson Ct.</p> <p>Denver, CO 80216</p>	<p>Elyria and Swansea Neighborhood Association</p> <p>Attn: Drew Dutcher</p> <p>drewdutcherdirect@gmail.com, pilgrimchurch1@msn.com</p> <p>4653 High St.</p> <p>Denver, CO 80216</p>
<p>Elyria Swansea/Globeville Business Association</p> <p>Attn: Michele Chambers</p> <p>manager@esgba.org, cliff.lind@otak.com</p> <p>4555 York St.</p> <p>Denver, CO 80216</p>	<p>Opportunity Corridor Coalition of United Residents</p> <p>Attn: Donna Garnett</p> <p>dmgdenver@yahoo.com,</p>
<p>Denver Arts and Culture Initiative</p> <p>Attn: Annie Iselin</p> <p>starhustler3@gmail.com, elizabeth.iselin@gmail.com</p> <p>2947 Champa St.</p> <p>Denver, CO 80205</p>	<p>Unite North Metro Denver</p> <p>Attn: Alice Harris</p> <p>sandraerikarp13@yahoo.com, jaguirreija@aol.com</p> <p>4585 Irving St.</p> <p>Denver, CO 80211</p>
CITY COUNCIL MEMBERS AT-LARGE	
<p>Robin Kniech</p> <p>Robin.kniech@denvergov.org</p> <p>City and County Bldg., Room 432</p> <p>Denver, CO 80202</p>	<p>Deborah Ortega</p> <p>Deborah.ortega@denvergov.org</p> <p>City and County Bldg., Room 492</p> <p>Denver, CO 80202</p>
CITY COUNCIL MEMBER – COUNCIL DISTRICT #9	
<p>Albus Brooks</p> <p>2855 Tremont Pl., Ste. 201</p> <p>Denver, CO 80205</p>	

The application for the above-referenced Official Map Amendment and the City's map amendment process may be viewed at www.DenverGov.org/ProposedRezoning.

Any questions regarding this amendment may be directed to the Case Manager above or to the City Council office at 720-337-2000. For more information about the map amendment process, visit www.DenverGov.org/Rezoning.

WRITTEN COMMENTS WILL BE DISPERSED AS FOLLOWS:

Written comments received by CPD staff by 12 p.m. (noon) on the Thursday prior to the City Council public hearing will be included in the CPD staff report packet that is distributed to City Council. Written comments may be emailed to rezoning@denvergov.org. After 12 p.m. (noon) on the Thursday prior to the City Council public hearing and up until 3:00 p.m. on the day of the City Council public hearing, written comments should be emailed to dencc@denvergov.org. To submit written comments after 3 p.m. on the day of the City Council public hearing, bring copies of written comments to the public hearing and ask the Council Secretary to distribute the comments to the Council. Notwithstanding the foregoing, in order to provide Council members adequate time to review written comments, members of the public are strongly encouraged to submit their comments prior to the day of the public hearing.

ALL INTERESTED PERSONS AND ORGANIZATIONS SHOULD EXPRESS THEIR CONCERNS OR SUPPORT AT THE PUBLIC HEARING BEFORE CITY COUNCIL.

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Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

March 8th, 2019

Dear City Councilmembers,

As members of the Swansea community committed to the wellbeing of our neighbors, **we are writing to ask for a delay in the public re-zoning hearing for 2535 40th St., tentatively set for April 8th, to allow the neighborhood and developers to be able to work together around the proposal in a more meaningful way.** This extra time would help to ensure that our neighbors are both aware of the development; and that neighbors are, as much as possible, involved with meaningful and ongoing community participation that makes possible a more equitable process that can lead to more equitable outcomes for the neighborhood. Several upcoming meetings with Swansea neighbors are now scheduled and mediation has been requested to support a process between neighbors and this developer with the hopes to come to a better understanding of both the context of the neighborhood and the parameters of the development. We hope that a Community Benefits Agreement or some sort of agreement can be reached between the developer and neighbors, and the delay of the re-zoning hearing for 2535 40th St. will give the necessary time for this meaningful process to take place.

According to Swansea neighbors that participated in the Elyria Swansea (ES) neighborhood planning process; there was no discussion of this site during the neighborhood planning process. A wide diversity of neighbors that have yet to be engaged feel that the size of this development (14 acres), and its intended uses (760 units and mixed commercial space) will have a huge impact to neighbors, and should be discussed at length in the community for what it is-- a transformative project that will have a widespread impact on Swansea and the people who live here. The proposal to change the zoning at 2535 40th St should require a General Development Plan.

Unfortunately, the ES neighborhood plan does not address or elaborate the concerns and realities of displacement of neighbors that other city plans and city-led analyses have since addressed ([Housing an Inclusive Denver](#)) and (Denver's [Gentrification Study](#)) (*upcoming study on impact of public investment*), and all development should be applied to the context of this site in the Swansea neighborhood, given how displacement pressures created by public and private investments have driven involuntary displacement pressures across Elyria-Swansea. As a neighborhood that has been historically divested from public spending, and now facing billions

of dollars of public investment, it is critical that current realities of the neighborhood, risks to existing neighbors, and development without displacement in tandem with community partnership should have the sufficient time to be evaluated and considered as part of this proposal; deeply considering the [impact of market-rate development](#) on displacement.

In addition to the reasons above, we believe added time before the public hearing would allow for the Office of Denver Economic Development and Opportunity to do an affordable housing agreement with this developer, and for the deeper consideration of the need for a General Development Plan. Considering the proposal plans to add to the street grid, has proximity to large scale construction on both sides of the project (that is already impacting connectivity and quality of life in the neighborhood), has proximity to rail, and since there is desire for additional open spaces as part of the development from both the developers and the neighborhood, **a GDP and “transformative project” additional process is merited to ensure the health and wellbeing of the surrounding neighbors.** We are requesting this postponement in order to have a proposal that is inclusive to members of the neighborhood where this site is located, and give Swansea neighbors a chance to be proactive instead of reacting to ongoing public or private investments.

Sincerely,

(names/groups added with permission)

Maria De Luna, M. Carmen Olague, Carmen Garcia, Celia Gonzalez, Brent Adams, Jen Winkel, Liliana Flores, Yessica Holguin, Yadira Sanchez, Ruben Sanchez, Raymunda Carreon, Otilia Diaz, Modesta Barrales, Nola Miguel, Drew Dutcher, Sandra Ruiz, Robin Reichhardt, Thomas Scharfenberg, Gaby Acevedo, Yeimi Ortega, Guadalupe Barrales, Angelina Torres, Mercedes Gonzales, Holliday Aguilar

GES Coalition members

Swansea neighborhood residents

Elyria Swansea Neighborhood Association

Cross Community Coalition

Unite North Metro Denver

From: [Nola Miguel](#)
To: [Levingston, Courtney L. - CPD CE0429 City Planner Senior](#)
Cc: [Showalter, Sarah K. - CPD CE2777 Manager](#); [Dalton, Kyle A. - CPD Principal City Planner](#); [Aguilar, Irene - OED CA2309 Administrator III](#); [Lindsey, Will M. - CPD CE0371 City Planner Associate](#); [Pacheco, Christopher R. - NDCC Executive Dir](#); [Sandos, Timothy M. - MO MA1785 Executive](#); [Nalley, Steven C. - CPD CE2777 Manager](#); [Sandra Ruiz](#); [Drew Dutcher](#); [Robin Reichhardt](#); [Ortega, Deborah L. - CC Member Denver City Cncl](#); [Kniech, Robin L. - CC Member Denver City Cncl](#); [Brooks, Albus - CC XA1404 Member Denver City Council](#); [Liliana Flores Amaro](#); [Rhea Oberst](#); [Katie McKenna](#); [Salazar, Alan B. - MO Executive](#); [Maria E. De Luna](#); [Candi CdeBaca](#)
Subject: Re: [EXTERNAL] GDP 2535 E. 40th Avenue
Date: Friday, March 15, 2019 10:25:53 AM
Attachments: [image001.png](#)

Dear Interim Director Jennings Golich and Courtney Levingston,
As you are aware the amount of projects in the GES neighborhoods directly related to infrastructure is extremely saturated and extremely impactful especially in Elyria Swansea right now. The City has had ongoing issues with lack of communication, and has not successfully facilitated equitable process' to neighbors in these areas that are majority in protected civil rights classes; and extremely stressed by current construction conditions in the neighborhood. Regarding the 2535 40th St rezone, there are still questions in the neighborhood about WHY the City pushing an IMX3 zoning (this was told to us by the developer, that the City was pushing this) without consulting the neighborhood as part of the conversation or initiating any type of process around this (as we have stated repeatedly, this site was not discussed in the neighborhood plan process, it should never have been just moved on without consultation), WHY a GDP or additional process in the neighborhood was not initiated by the city at the onset of receiving this application (or interest from applicant), with full knowledge about what the neighborhood is currently experiencing and the immensity of this project (14 acres, 760 housing units--equally 40% of units in E-S currently). For this reason we would like to ask how we contest the decision to not have a GDP analysis at this site.

The Elyria Swansea neighborhood plan is also very clear about involving neighbors in a civic process through implementation of the plan (in recommendation 3 A.6, in the letter from CW Montero "Diverse resident involvement in the implementation of this plan is critical", "Encourage the formation of a Registered Neighborhood Organization (RNO) to continue resident and stakeholder engagement, and focus on building neighborhood unity, identity and establishing neighborhood priorities (A.3, A.4, A.5, A.6, A.7, A.8, A.9, A.10, A.11, E.4, E.5)"; through statements that should have guided anyone in the City to recognize that if the RNO emails listed never got a response, that maybe another method of communication should have been initiated to involve neighbors in this process. A project of this size needs to be treated differently; especially in the lowest income neighborhood in Denver (that is not protected by deed restricted housing) and that has over 2 Billion dollars of public investment coming into it on all sides. We feel disappointed by the lack diligence from CPD and from our City overall. Although we have heard there are changes coming to GDPs and large site evaluation, are we just going to let this one get by? Mediation was offered, the applicant is stating they are going to do a MOU but we have no information on whether any of these things are moving forward; and that is unfair to neighbors to know how to evaluate this proposal without those things in place or time to formulate them in line with the zoning proposal. It is mind boggling to us that with so much focus on GES in the City now, that it seems like even other City Agencies, who are also focused in GES were not aware of this project and its potential impact in Swansea.

Since our request was not considered by City Council, at this point, to add more time before public hearing of this re-zone, we would like to ask for your ideas on how to change this pattern of treatment to GES residents--for this specific circumstance. We can react to this

rezone, as neighbors are constantly forced to do, and not have a healthy proactive solution or we could actually attempt to create something closer to equitable development at a time and place where it is so critical NOW. We are frustrated with the inaction from CPD, and would like to ask, will you be a part of solving this situation?

As a start, we would like for CPD to present at the Open House on Monday, March 18th with or after the developer to answer these questions around the lack of GDP/large site transformative process on the City's side, to involve the neighborhood in consideration of the proposal in front of them. As you can imagine, the nuances between I-A and IMX3 zoning are not super familiar to most people, and even in looking up the differences there doesn't seem to be much; so can you explain the potential outcomes of keeping IA zoning or changing to IMX3 to neighbors please? (remembering that MJ use has a cap on new locations in Elyria Swansea that we fought for) We are having trouble understanding the entirety of this process, and what the elements of the project were that motivated the applicant to re-zone in the first place? and if those motives were to be in-line with the neighborhood desires (as stated in the zone map of the plan but not in other parts of the neighborhood plan), why has there not been a more inclusive process? EQUITY IS ABOUT PROCESS, not predefined outcomes.

We believe that if the neighborhood and developer had been given the time to work together in a healthy way (not under stress of a deadline in 3 weeks) that there could be agreement on a zoning (likely not what is proposed) and project that actually benefits the neighborhood. Our intention of asking for more time was to be able to create a better outcome for all involved; by being able to share perspectives on a more level playing field.

In the type of power dynamic that is happening in Swansea now, the developer should never be the one defining what the "community benefits" of their project; that needs to be defined by the neighbors, or as in this case those so called "benefits" could be the cause of further displacement of neighbors, putting their health and well-being at risk. This is an inherent problem that it is shocking no one at the City identified or is taking action on (that we are aware of). Swansea is not a blank slate and is, in fact, a neighborhood of beautiful cultures, smart, open minded and capable people full of ideas and vision. I hope that we can find ways to heal this ongoing pattern of treatment from the City; starting with acknowledgement that neighbors care about, and want to participate in, what is happening in their neighborhood.

Thank you,
Nola Miguel, GES Coalition

On Fri, Mar 8, 2019 at 9:59 AM Levingston, Courtney L. - CPD CE0429 City Planner Senior <Courtney.Levingston@denvergov.org> wrote:

Good Morning Nola,

As you may or may not know, early in the process, before an official map amendment application, CPD must determine whether a GDP is mandatory based on the information provided. The Denver Zoning Code notes that a General Development Plan may be required when “(1) the specific circumstances warrant a coordinated master framework plan to guide future development; and (2) land use, development, and infrastructure issues related to future development cannot be adequately resolved through other regulatory processes, such as subdivision or site development plan review”. The Code identifies several relevant

factors of a proposed project as examples that should be taken into consideration when determining whether a GDP should be mandatory.

In this case, a GDP was not required as they are adaptively re-using a large portion of the existing building/site and as such, the infrastructure needs are anticipated to be more at a local and can be adequately resolved through other processes such as a concept master plan and during the site development planning phase.

In terms of relevant factors that could be taken into consideration when determining if a GDP is necessary:

- The *Elyria & Swansea Neighborhoods Plan* does not call for a GDP for this site;
- The property is under single ownership and at the time of the decision there was no indication that the applicant intended on developing in phases;
- As proposed, neither anticipated to change the arterial or collector street grid nor impact regional level stormwater system;
- The site is not within close proximity to the South Platte River or Cherry Creek corridor.

Additionally, the adopted *Elyria & Swansea Neighborhoods Plan* didn't show specific desired connections through the site and the requested rezoning is to Industrial Mixed-Use (I-MX-3) from the current Industrial zoning (I-A, I-A UO-2), directly aligning with the *Elyria & Swansea Neighborhoods Plan* guidance.

I hope that helps with understanding. Please let me know if you have any additional questions.

Thanks,

Courtney

Courtney L. Levingston, AICP, LEED AP | Senior City Planner

Community Planning and Development | City and County of Denver

p: (720) 865.3074 | courtney.levingston@denvergov.org

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From: Nola Miguel <nola@gescoalition.com>
Sent: Thursday, March 07, 2019 3:35 PM
To: Levingston, Courtney L. - CPD CE0429 City Planner Senior
<Courtney.Levingston@denvergov.org>
Cc: Candi CdeBaca <candidebaca@gmail.com>; Showalter, Sarah K. - CPD CE2777
Manager <Sarah.Showalter@denvergov.org>; Dalton, Kyle A. - CPD Principal City Planner
<Kyle.Dalton@denvergov.org>; Aguilar, Irene - OED CA2309 Administrator III
<Irene.Aguilar@denvergov.org>; Lindsey, Will M. - CPD CE0371 City Planner Associate
<William.Lindsey@denvergov.org>; Pacheco, Christopher R. - NDCC Executive Dir
<Christopher.Pacheco2@denvergov.org>; Sandos, Timothy M. - MO MA1785 Executive
<Timothy.Sandos@denvergov.org>; Nalley, Steven C. - CPD CE2777 Manager
<Steve.Nalley@denvergov.org>; Sandra Ruiz <sandraerikarp13@yahoo.com>; Drew
Dutcher <drewdutcherdirect@gmail.com>; Robin Reichardt <robin@gescoalition.com>;
Ortega, Deborah L. - CC Member Denver City Cncl <Deborah.Ortega@denvergov.org>;
Kniech, Robin L. - CC Member Denver City Cncl <Robin.Kniech@denvergov.org>;
Brooks, Albus - CC XA1404 Member Denver City Council
<Albus.Brooks@denvergov.org>
Subject: [EXTERNAL] GDP 2535 E. 40th Avenue

Hi Courtney, could we please request a full explanation of why a General Development Plan (as is required for 12 acres and over) is not required for this property that is proposing to add to the street grid, open space, and is adjacent to rail?

Especially considering the proximity to other construction zones and limited access the community already is experiencing?

Thank you,

Nola

sent from my cell please excuse any errors! Nola 3035966425

On Wed, Feb 27, 2019, 2:26 PM Levingston, Courtney L. - CPD CE0429 City Planner Senior <Courtney.Levingston@denvergov.org> wrote:

Greetings,

My name is Courtney Levingston and I am the assigned to the rezoning case located at 2535 E 40th Ave. I am reaching out regarding the city's mediation services to see if you/your organization would be interested in engaging in mediation related to the rezoning at 2535 E. 40th Avenue. As you may or may not know, mediation is a free service provided by a neutral and experienced outside contractor. It is a completely voluntary process and it would give an opportunity to discuss concerns regarding the rezoning with the applicant and hopefully work towards mutually agreeable solutions for all parties.

Please let me know if there is interest and I can contact our third-party mediator, Steve Charbonneau of Find Solutions, and he'll contact you individually regarding next steps.

Thanks!

Courtney L. Levingston, AICP, LEED AP | Senior City Planner

Community Planning and Development | City and County of Denver

p: (720) 865.3074 | courtney.levingston@denvergov.org

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Nola Miguel, MSW, nola@gescoalition.com
GES Coalition Organizing for Health and Housing Justice
<https://www.gescoalition.com>
Office: 3840 York Street, Denver CO 80205
Mail: PO Box 16132, Denver, CO, 80216
303-596-6425 cell



720-515-4751
www.thegrowhaus.org
4751 York Street, Denver, Colorado 80216

March 26, 2019

Denver City Council

City and County Building
1437 Bannock St., Rm. 451
Denver, CO 80202

Re: Zone change hearing for 2535 40th St.

To Whom It May Concern:

I am writing to express my strong support, on behalf of The GrowHaus, for delay in the public re-zoning hearing for 2535 40th Street and a Community Benefits Agreement and General Development Plan, that considers the input of the neighbors in developing an inclusive “transformative project” for the neighborhood of Elyria Swansea.

The mission of The GrowHaus is to create a community-driven, neighborhood-based organization that serves as a hub for food distribution, production, education, and economic opportunity, particularly for the Elyria-Swansea Globeville (GES) neighborhoods. We have been operating in Elyria Swansea for nearly a decade and have become a part of the fabric of this neighborhood as a trusted community partner.

As members of the Swansea community committed to the wellbeing of our neighbors, we are writing to ask for a delay in the public re-zoning hearing for 2535 40th St., tentatively set for April 8th, to allow the neighborhood and developers to be able to work together around the proposal in a more meaningful way. This extra time would help to ensure that our neighbors are both aware of the development; and that neighbors are, as much as possible, involved with meaningful and ongoing community participation that makes possible a more equitable process that can lead to more equitable outcomes for the neighborhood. Several upcoming meetings with Swansea neighbors are now scheduled and mediation has been requested to support a process between neighbors and this developer with the hopes to come to a better understanding of both the context of the neighborhood and the parameters of the development. We hope that a Community Benefits Agreement or some sort of agreement can be reached between the developer and neighbors, and the delay of the re-zoning hearing for 2535 40th St. will give the necessary time for this meaningful process to take place.

According to Swansea neighbors that participated in the Elyria Swansea (ES) neighborhood planning process; there was no discussion of this site during the neighborhood planning process. A wide diversity of neighbors that have yet to be engaged feel that the size of this development (14 acres), and its intended uses (760 units and mixed commercial space) will have a huge impact to neighbors, and should be discussed at length in the community for what it is-- a transformative project that will have a widespread impact on Swansea and the people who live here. The proposal to change the zoning at 2535 40th St should require a General Development Plan.

Unfortunately, the ES neighborhood plan does not address or elaborate the concerns and realities of displacement of neighbors that other city plans and city-led analyses have since addressed (Housing an Inclusive Denver) and (Denver's Gentrification Study) (upcoming study on impact of public investment), and all development should be applied to the context of this site in the Swansea neighborhood, given how displacement pressures created by public and private investments have driven involuntary displacement pressures across Elyria-Swansea. As a neighborhood that has been historically divested from public spending, and now facing billions of dollars of public investment, it is critical that current realities of the neighborhood, risks to existing neighbors, and development without displacement in tandem with community partnership should have the sufficient time to be evaluated and considered as part of this proposal; deeply considering the impact of market-rate development on displacement.

In addition to the reasons above, we believe added time before the public hearing would allow for the Office of Denver Economic Development and Opportunity to do an affordable housing agreement with this developer, and for the deeper consideration of the need for a General Development Plan. Considering the proposal plans to add to the street grid, has proximity to large scale construction on both sides of the project (that is already impacting connectivity and quality of life in the neighborhood), has proximity to rail, and since there is desire for additional open spaces as part of the development from both the developers and the neighborhood, a GDP and "transformative project" additional process is merited to ensure the health and well-being of the surrounding neighbors. We are requesting this postponement in order to have a proposal that is inclusive to members of the neighborhood where this site is located, and give Swansea neighbors a chance to be proactive instead of reacting to ongoing public or private investments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kayla UB" with a horizontal line extending to the right.

Kayla Birdsong
Executive Director | The GrowHaus
(720) 515-4751 x 710
kayla@thegrowhaus.org



Focus Points
FAMILY RESOURCE CENTER
.....
Learn. Grow. Achieve.

March 29, 2019

Denver City Council

City and County Building
1437 Bannock St., Room 451
Denver, CO 80202

Re: Zone change hearing for 2535 40th St.

To Whom It May Concern:

I am writing to express my strong support, on behalf of Focus Points Family Resource Center, for the delay in the public re-zoning hearing for 2535 40th Street and a Community Benefits Agreement and General Development Plan, that considers the input of the neighbors in developing an inclusive “transformative project” for the neighborhood of Elyria Swansea.

Focus Points’ mission is “to build better communities by strengthening families,” particularly for the Globeville Elyria-Swansea (GES) neighborhoods. We have been operating in GES for nearly a decade and have become a part of the fabric of this neighborhood and a trusted community partner.

As members of the Swansea community committed to the wellbeing of our neighbors, we are writing to ask you to add in conditions to the re-zone that guarantee the developer will have a written agreement with the neighborhood that addresses their concerns on equity. It is imperative to ensure that our neighbors are both aware of the development; and that neighbors are, as much as possible, involved with meaningful and ongoing community participation that makes possible a more equitable process that can lead to more equitable outcomes for the neighborhood. Several upcoming meetings with Swansea neighbors are now scheduled and mediation has been requested to support a process between neighbors and this developer with the hope to come to a better understanding of both the context of the neighborhood and the parameters of the development. We hope that a Community Benefits Agreement or other agreement can be reached between the developer and neighbors.

According to Swansea neighbors that participated in the Elyria Swansea (ES) neighborhood planning process, there was no discussion of this site during the neighborhood planning process. A wide diversity of neighbors that have yet to be engaged feel that the size of this development (14 acres), and its intended uses (760 units and mixed commercial space) will have a huge impact on neighbors, and should be discussed at length in the community for what it is—a transformative project that will have a widespread impact on Swansea and the people who live here. The proposal to change the zoning at 2535 40th St should require a General Development Plan.

Unfortunately, the ES neighborhood plan does not address or elaborate the concerns and realities of displacement of neighbors that other city plans and city-led analyses have since addressed (Housing an Inclusive Denver) and (Denver’s Gentrification Study) (upcoming study on impact of public investment). Given how displacement pressures created by public and private investments have driven involuntary displacement pressures across Elyria-Swansea, all development should be applied to the context of this site in the Swansea neighborhood. As a neighborhood that has been historically divested from public spending, and now facing billions of dollars of public investment, it is critical that current realities of the neighborhood, risks to existing neighbors, and development without displacement in tandem with community partnership should have the sufficient time to be evaluated and considered as part of this proposal; deeply considering the impact of market-rate development on displacement.

In addition to the reasons above, we believe that added in conditions to the re-zone that guarantee the developers will have a written agreement with the neighborhood that addresses their concerns on equity, would allow for the Office of Denver Economic Development and Opportunity to do an affordable housing agreement with this developer, and for the deeper consideration of the need for a General Development Plan. Considering the proposal plans to add to the street grid, has proximity to large scale construction on both sides of the project (that is already impacting connectivity and quality of life in the neighborhood), has proximity to rail, and, since there is desire for additional open spaces as part of the development from both the developers and the neighborhood, a GDP and “transformative project” additional process is merited to ensure the health and well-being of the surrounding neighbors. We are requesting a proposal that is inclusive to members of the neighborhood where this site is located and give Swansea neighbors a chance to be proactive instead of reacting to ongoing public or private investments.

Sincerely,



Jules Kelty
Executive Director
Focus Points Family Resource Center

March 31st, 2019

Dear Denver City Council Members:

Please add to the public record. As a partner organization of the GES Coalition dedicated to the wellbeing of Swansea youth and families, **we are writing to ask that you help establish the conditions set forward by the GES Coalition in regards to the public re-zoning hearing for 2535 40th St., set for April 8th, to allow the neighborhood and developers to better protect the wellbeing of our neighbors.** If the following conditions set by the GES Coalition are not possible, we ask that you DO NOT approve of this rezoning request.

Our letter supports the position of the GES Coalition and Swansea neighbors to “approve the I-MX-3 rezone **with Conditions**” for the proposal at 2535 40th St..The following are the conditions that we would like to see attached to this re-zone regardless of the owner: 1.) A Community Benefits Agreement is developed and signed with the GES Coalition and at least 1 Elyria Swansea Registered Neighborhood Organization before the Site development plan is approved 2.) A full traffic/construction impact analysis reported on to the neighborhood before any construction is started on the site 3.) A transformative planning process in the neighborhood led by the City before Site Development Plan is approved to inform the site plan and design. If adding these conditions is not possible we feel the proposed I-MX-3 would be detrimental to the neighborhood and would ask that you **DO NOT** approve of this change in the zoning code.

As a neighborhood that already faces millions of dollars of public and private investment, it is critical that all community members receive proper and equitable opportunities to engage with developers. It is imperative that **this project not further displace neighborhood residents** and instead address the specific needs for affordable housing in the neighborhood where the project is based.

Project VOYCE serves youth in the GES community through afterschool programming at Bruce Randolph School, which is situated less than a block away from the development at 40th & Clayton. Given the immediate proximity of the new development to our community partner school, we fear this project has not yet included the voices of our most impacted neighbors. For this reason, we ask that our city council representatives support the stance of the GES Coalition to prioritize the wellbeing of our Swansea neighbors by **supporting the conditions above or by not approving of this change in the zoning code.**

Sincerely,



Brea Zeise
Executive Director



Alma Urbano Torres
Program Manager & Swansea Resident

Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

03/31/2019

Dear Denver City Council Members,

Please see the below evidence, categorized under the rezone criteria, that supports the GES Coalition and Swansea neighbors position to “approve the I-MX-3 rezone **with Conditions**” for the proposal at 2535 40th St.. The following are the **conditions** that we would like to see attached to this re-zone regardless of the owner: 1.) A Community Benefits Agreement is developed and signed with the GES Coalition and at least 1 Elyria Swansea Registered Neighborhood Organizations and the developer before the Site Development Plan is approved by the City (see outline of sample agreement in attachments) 2.) A full traffic/construction impact analysis reported on to the neighborhood before any construction is started on the site 3.) A “transformative project” process that includes an “anti-displacement action plan” in the neighborhood, led by the City, completed before Site Development Plan is approved to inform the site plan and design. If adding these conditions is not possible, we feel the proposed I-MX-3 zoning would be harmful to the neighborhood and would ask that you do not approve of this change in the zoning code.

Is the rezoning consistent with completed plans? (excerpts from the ES neighborhood plan are attached)

- Neighborhood plans are no longer reflective of the needs in the neighborhood, especially in relation to housing as displacement started more drastically after the plan was completed. This specific ATT site was not discussed in the Elyria Swansea neighborhood plan process. This 14 acre area merits a transformative project plan where uses are revisited with neighbors; similar sites were analysed in this way in the ES neighborhood plan.
- Unfortunately, the ES neighborhood plan does not address or elaborate the concerns and realities of displacement of neighbors that other city plans and city-led analyses have since addressed ([Housing an Inclusive Denver](#)) and (Denver’s [Gentrification Study](#)-- “*Recommendation 2. Address the potential for involuntary displacement in neighborhood plans. Collaborate with CPD to ensure that neighborhood plans consider the potential for displacement in each neighborhood and include strategies to minimize involuntary displacement. Strengthen CPD and OED coordination on future neighborhood planning efforts to address the need for housing and business opportunity, and to include strategies to mitigate the negative effects of gentrification*”). There is also an upcoming study on the impact of public investment where conclusions need to be applied to this development given the context of this

Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

site in the Swansea neighborhood, and given how displacement pressures created by public and private investments have driven involuntary displacement pressures across Elyria-Swansea. As a neighborhood that has been historically divested from public spending, and now facing billions of dollars of public investment, it is critical that current realities of the neighborhood, risks to existing neighbors, and development without displacement in tandem with community partnership should have the sufficient time to be evaluated and considered as part of this proposal.

- The amount of units proposed in this project is equal to nearly half of the existing units in Swansea, 40% in Elyria and Swansea. This is the largest development ever proposed in Elyria-Swansea. This type of development needs additional process as its impact is so huge on the neighborhood.
- There is a lack of cultural relevance, affordability and neighborhood involvement in this project. This counters (page 2) the Elyria Swansea Neighborhood plan in Councilwoman Montero's letter (also in attachments) "Cultural relevance has been important during this process of neighborhood planning, and is also important in moving forward with implementation"..."I also want to address the fears around gentrification we have heard through the process. Incoming development must not displace current residents. It's imperative that after centuries of living with minimal city services, finally when the neighborhood is getting investment, the current residents must not be pushed out. Diverse resident involvement in implementation of this plan is critical."
- The plan clearly states the need for formation of an RNO, coordination of nonprofits with govt agencies, and the need for bilingual outreach and engagement (p. 18 Elyria Swansea neighborhood plan (ESNP), also attached). Yet none of these things were addressed by the City or the developer during this process.
- There is a lack of neighborhood participation and hence, culture as part of the vision of this project---A.11 (p.21) from the ESNP plan recommends the incorporation of neighborhood culture and identity "for application into private development projects."
- There is a lack of diversity of units or units that are family size in this proposal where the neighborhood plan asks to (p.46 ESNP) "support the creation of family appropriate affordable housing projects that include more bedrooms" ... and "encourage(s) reference to and implementation of Housing Denver..."
- Per the plan there is a need to develop and work with RNOs in the neighborhood which was not sufficiently done by the developer or City. (p.126 ESNP) F.4

Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

recognizes that the City Council and the mayor typically work with the RNOs to promote certain actions and outcomes in the plan.

- (p. 85 ESNP) Recommendation 6-D37 was clearly not followed in this proposal. It states, “**Strengthen Outreach on Development Projects**, The City, private developers, and community partners should continue and strengthen bilingual and culturally-appropriate outreach and communication with residents about upcoming construction and development projects as these communities have historically experienced negative environmental impacts from previous decisions.”

Does the rezoning further public health, safety and welfare?

- This project, being mostly market rate, will worsen involuntary displacement of Swansea residents. Market rate units are known to negatively impact surrounding low-income communities... “the impact of new development in a neighborhood is usually the opposite because it increases demand (for that neighborhood) by more than it increases supply.” https://shelterforce.org/2016/03/10/why_we_must_build/

“Studies show that market-rate housing development is linked to the mass displacement of neighboring low-income residents (Davidson and Lees [2005](#), [2010](#); Pearsall [2010](#)). Such displacement occurs even when low-income housing is not directly demolished and destroyed to make way for new development—because it operates through indirect and exclusionary means, such as “price shadowing” (Davidson and Lees [2005](#), [2010](#)). Market-rate housing production causes significant price impacts in surrounding neighborhoods, raising area rents and real estate taxes (Oliva [2006](#); Pearsall [2010](#); Zuk and Chapple [2016](#)). These price impacts have resulted in [higher housing cost burdens](#) for low-income residents, as well as their displacement (Davidson and Lees [2005](#), [2010](#); Pearsall [2010](#)).”

<https://shelterforce.org/2018/11/05/heres-what-we-actually-know-about-market-rate-housing-development-and-displacement/>

- Ongoing pattern of regional over local benefit in GES, Swansea continues to take on projects (National Western and I-70), (most saturated neighborhood with marijuana licences) and has to bear the burden of the impacts but not be able to define the specific benefits to the community. Swansea should not also have to bear disproportionate amounts of development of housing for the entire City at the sacrifice of people in the neighborhood being displaced. This shows the need for a Community Benefits Agreement to be committed to as a condition of this proposal.

Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

- Impact of Displacement on health

<https://humanimpact.org/hiprojects/health-and-equity-impacts-of-the-proposed-reef-development-project-in-south-central-la/> (also in attachments)

“Community residents who experience financial strain and/or displacement may experience a wide variety of chronic stress-related physical and mental illnesses, including anxiety, depression, hypertension, health disease, obesity, diabetes, and sleep disorders... Additional constraints on health-protecting resources and exposures to health-damaging environments such as substandard and overcrowded housing could further contribute to a variety of negative health outcomes. Disruption of social networks can lead to additional health challenges, including exposure to fragmented social environments that have higher rates of violence and sexually transmitted diseases.” (p. 2 of Executive Summary, attached)

- A pattern of disrespect and lack of equitable process by the applicant (and lack of guidance from the city) with neighbors shows ongoing threat of disclusion to neighbors as part of this development. See email attachments--developer decision to not do MOU with the GES Coalition after committing to one, extremely limited outreach to neighbors, lack of follow up or feedback taken from any neighborhood sessions (done at final hour), and rejection of request for additional time to work with the neighborhood. We feel this is why it is necessary to have conditions, as the developer has not shown they are able to proactively work with the neighborhood. Not a single interaction (back and forth) was had with Swansea neighbors until a news article came out after Council Land Use Transportation and Infrastructure Committee and neighbors became aware of this project.
- Environmental impacts make this site not ideal for a large amount of units. See “Existing and proposed truck routes map” (p.58 ESNP) and “Railroad map” (p.52 ESNP) that show this site is surrounded by 2 major truck routes on 40th and York and 3 major railroad crossings (heavy rail and commuter rail). The site plans shown so far show housing extremely close to the rail. Trucks and rail are 2 forces extremely hard to move or change.
- The existing circumstances are already an extremely unsafe situation, where you have pedestrians (especially middle and high schoolers) and traffic that backs up from constant train traffic on Clayton and York. There are limited ways (York, Clayton or Steele) to get through to 43rd St. and Clayton is the neighborhood arterial that is a very frequently used street by neighbors, crossing Dunham Park on the other side of the train tracks. Adding units that equal more than 40% increase of

Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

households in Swansea to this small, restricted-by-trains area will cause unsafe circumstances, especially for pedestrians.

- I-70 construction is extremely heavy currently in the neighborhood, and set to last an additional 4 years. Elyria Swansea neighbors are already heavily impacted by air quality, noise, walkability/bikeability, traffic, and overall quality of life. The neighbors can't handle another large scale construction project at the same time, especially when it has not been fully analyzed by the City/contractors as to how the construction projects will overlap.
- Criminalization/Discrimination of young people, people of color and neighborhood people at this property. A large private property on walking routes of 2 middle/high schools in the neighborhood with "retail" and "open space" that may not really be open to young people of color is worrisome for the health and well-being of young Swansea residents and could create unnecessary arrests and/or conflicts. With no neighborhood agreement in place, or commitment to local businesses there is additional risk to young people from this property rezoning.

Are there circumstances that justify the rezoning?

- Circumstances the applicant uses cite the public investment in the area (greenway, transit station) that are also factors in amplifying gentrification and displacement. The circumstances used in CLT/Brothers and Habitat rezones (used as precedents in this case) were specifically addressing the need for permanently affordable housing as needed due to public investments already raising the property values and causing displacement. The circumstances merit equitable development (see attached collective ask).
- The circumstances in the neighborhood now (involuntary displacement, construction) merit the conditions to have a Community Benefits Agreement

Is the rezoning consistent with the neighborhood context?

- The single family home character in Swansea is different than this proposal which is multi-unit, multi-story
- There is no effort to be neighborhood or culturally relevant to the neighborhood
- The most recent rezone cases in Swansea (Habitat, Brothers and ULC) used as precedent by the applicant all had extensive community outreach, buy-in, and deep equitable and affordability plans and commitments.

Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

Does the rezoning align with the zone district's purpose and intent?

- I-MX-3 zoning is supposed to be a buffer to industrial but it is actually putting housing directly next to rail, thus increasing resident proximity to industrial, not “buffering” it
- While the IMX3 zoning is a low-level of density, if a full neighborhood process and equitable development process was done, a potentially more creative set-back style of zoning could better accommodate the situation, get units away from the rail and incorporate more affordability.

Would it result in consistent regulations for each property with the same zoning designation citywide?

- We are concerned about the precedent this sets in neighborhoods that IMX3 zoning is intended for huge amounts of luxury housing. Considering the “future concept land use plan and areas of change map” (p. 96 ESNP) for industrial properties map in the Elyria Swansea plan (also attached), this type of rezone could open the door for similar projects surrounding the residential core of Swansea and without equitable principles that would address displacement of neighbors. This is extremely concerning to neighbors if ongoing change does not involve the neighborhood's participation. This puts over half of the land in Swansea in an “area of change” where this project could **set a precedent of not involving the neighborhood and not doing equitable development/process moving forward.** There needs to be an Equitable Development Plan for GES that guides all large scale development.
- If conditions were added, they could be consistently added to rezones of a certain size that are proposing market-rate units in low income neighborhoods of a displacement-vulnerable population that is predominantly in civil rights protected classes.

Ongoing Community Concerns:

- Lack of outreach to Swansea community and surrounding neighbors; valid community concerns left unaddressed; no relationship formed with developer, no commitments or agreements with neighborhood.
- “Benefits” not for Community; no relevance or alignment with community needs or culture.

Globeville, Elyria-Swansea Coalition Organizing for *Health and Housing Justice*

- Too much housing (equals 40% of existing units in E-S) in one area
- Affordability/Gentrification/Displacement
- Accessibility for neighbors (both to housing, commercial/retail spaces, open spaces)
- Traffic; parking; impact to arterial roads
- No General Development Plan; Development Agreement did not include neighbors, neighbors not included in Open Space Plan
- Use of an outdated neighborhood plan; neighborhood plan used as the neighbors word without the neighbors
- Lots of seniors and big families in area; majority of renters are extremely vulnerable to involuntary displacement

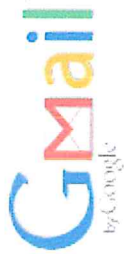
Thank you for your consideration,

Globeville Elyria Swansea Coalition Organizing for Health and Housing Justice

* Given to Applicant March 6th, 2019.

Collective ask for equitable development in Elyria-Swansea

1. **Sign a Community Benefits Agreement** with an organized body composed of $\frac{2}{3}$ Elyria-Swansea residents (and organized by GES Coalition) to address the following:
2. **Commit to increase affordability of units** in order to address the extraordinary circumstances of the neighborhood by providing affordable units (and affordable unit sizes) that match and are proportionate to critical neighborhood displacement pressures and housing needs.
3. Commit that public subsidies, philanthropic funding, and forgivable loans for the development of housing units **provide 50% of units affordable at or below 80% AMI, and that 50% of those units be affordable between 30-50% AMI.**
4. **Commit to meaningful and ongoing community participation** in order to form community oversight and transparency of the development, including decision and review about a variety of topics including but not limited to: selection and evaluation of property management; the rental application process; neighborhood preference program; public subsidies and loans; preferences for local businesses; and local hiring.
5. **Commit to establishing a Neighborhood Preference Program** to make sure that existing and interested Elyria-Swansea neighbors have the first opportunity to apply for affordable rental units. Make a commitment to significantly reduce or eliminate application fees and security deposits for current residents of Elyria-Swansea.
6. **Commit to making a donation to a community-defense fund** in order to support legal costs (for prevention of eviction and foreclosure, pre-eviction and lease termination) for neighbors in Elyria-Swansea who are jeopardized with involuntary displacement.
7. Commit to **give preference to local businesses facing displacement pressures** by including a commitment to: providing a no-compete clause for existing local businesses; bringing in no chain businesses; offering available retail space first to existing local businesses.
8. Commit to **define and set 20% local hiring goals using WorkNow boundaries.**



Nola Miguel <nola@gescoalition.com>

2535 E. 40th / Former AT&T / Wonderbound Rezoning

Nola Miguel <nola@gescoalition.com>

To: Bruce O'Donnell <bodonnell@starboardrealtygroup.com>

Cc: "Brooks, Albus - City Council District 8" <albus.brooks@denvergov.org>, "Ortega, Deborah L. - CC Member Denver City Cncl" <deborah.ortega@denvergov.org>, "Kniech, Robin L. - City Council" <Robin.Kniech@denvergov.org>, "Levingston, Courtney L - PR Parks and Planning - PP" <courtney.levingston@denvergov.org>, "Aguilar, Irene - OED CA2309 Administrator III" <Irene.Aguilar@denvergov.org>, Drew Dutcher <drewdutcherdirect@gmail.com>, Sandra Ruiz <sandraerikarp13@yahoo.com>, Candi CdeBaca <candidebaca@gmail.com>, Robin Reichhardt <robin@gescoalition.com>, "Maria E. De Luna" <maria@gescoalition.com>, "Aldretti, Susan K. - CC City Council At Large" <susan.aldretti@denvergov.org>, "Kyle, Polly A. - CC City Council District 12" <polly.kyle@denvergov.org>, Chy Montoya <chy.montoya@denvergov.org>

Mon, Mar 18, 2019 at 4:08 PM

Hi Bruce,

Wow, we are extremely disappointed to hear that you won't be pursuing a potential MOU since we requested information on the protest petition. We asked for the information on the protest petition as that is within the rights of neighbors, we did not realize that the MOU (that you said in your email to all of city council you were going to do "with the GES Coalition") was conditional on the neighbors not being able to ask for information that is within their rights. We simply asked for the information, have not circulated or signed the petition. We were waiting in good faith for the draft MOU you said you would send me Tuesday morning. At this point, both our coalition members and neighbors close to the property feel like there is a lot of information missing for us to be able to properly come to a decision on what is best for this property. Starting a meaningful relationship with the developer could help that, but it sounds like that is not something you are interested in?

It's disappointing to hear that you will go into this re-zoning request without long-term commitments to the neighborhood that could be established through an MOU, continuing a pattern of disregard of Swansea neighbors.

Although we appreciate that you are working with the City to hopefully get some affordability, I think you understand that is not the same as ongoing, meaningful work with neighbors of this property.

Again, truly disappointed to hear this and hope you will reconsider.

Nola

On Mon, Mar 18, 2019 at 8:14 AM Bruce O'Donnell <bodonnell@starboardrealtygroup.com> wrote:

Nola -

I am contacting you in response to the text you sent me late Friday inquiring about an MOU. Upon receiving notification that you initiated the Protest Petition process we determined not to pursue an MOU with GESC due to your Protest Petition effort.

We are working on a development agreement with the City and will be able to speak to that at tonight's open house.

Bruce C. O'Donnell



STARBOARD Realty Group, LLC
770 Sherman Street, Suite 108
Denver, CO 80203

Work: 720-441-3310

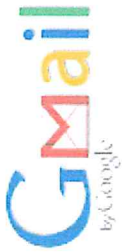
Cell: 303-810-3674

E Mail: bodonnell@starboardrealtygroup.com

Web: www.starboardrealtygroup.com www.denverzoning.com

Nola Miguel, MSW, nola@gescoalition.com
GES Coalition Organizing for Health and Housing Justice
<https://www.gescoalition.com>

Office: 3840 York Street, Denver CO 80205
Mail: PO Box 16132, Denver, CO, 80216
303-596-6425 cell



Nola Miguel <nola@gescoalition.com>

2535 40th St. request for postponement of hearing

Bruce O'Donnell <bodonnell@starboardrealitygroup.com>
To: Nola Miguel <nola@gescoalition.com>

Mon, Mar 11, 2019 at 1:10 PM

Here you go per my earlier email

Bruce C. O'Donnell
STARBOARD Realty Group, LLC
303-810-3674
bodonnell@starboardrealitygroup.com
www.starboardrealitygroup.com
www.denverzoning.com

----- Forwarded message -----

From: **Bruce O'Donnell** <bodonnell@starboardrealitygroup.com>
Date: Mon, Mar 11, 2019, 12:33
Subject: Fwd: [EXTERNAL] 2535 40th St. request for postponement of hearing

To: Miguel, Nola J - City Council Operations <Nola.Miguel@denvergov.org>, Livingston, Courtney L - PR Parks and Planning - PP <courtney.livingston@denvergov.org>, Brooks, Albus - City Council District 8 <albus.brooks@denvergov.org>, Kniech, Robin L. - City Council <Robin.Kniech@denvergov.org>, Ortega, Deborah L. - CC Member Denver City Cncl <deborah.ortega@denvergov.org>, Jolon Clark <Jolon.Clark@denvergov.org>, Thompson, Maggie - City Council Operations <Maggie.Thompson@denvergov.org>, Jennings Golich, Jill R - CPD Office of the Manager <jill.jenningsgolich@denvergov.org>, Montoya, Chy - City Council <Chy.Montoya@denvergov.org>, Black, Kendra A. - City Council <kendra.black@denvergov.org>, Herndon, Christopher J. - City Council District 8 <Christopher.Herndon@denvergov.org>

Nola -

Following up on the letter you received from Bill Moore, I want to assure you that we understand and appreciate GESC's input and concerns and are committed to working with you (GESC) and the City in hopes of having the development plans for 2535 E 40th under new I-MX-3 zoning incorporate GESC's and our common interests and shared visions for the future of the property and the neighborhood. We are committed to work with you and GESC on a Memorandum of Understanding prior to our April 8 City Council hearing date. We are confident sufficient progress can be made on an MOU to provide GESC and the community the predictability you desire on development outcomes to include affordability and open space.

We are also working with the City on a development agreement to address these same issues.

Delaying the application and our April 8 hearing date are unacceptable to us as the project schedule and financing terms can't absorb any delay. If it ends up that you don't like the MOU and development agreement we propose working on you have the right to ask City Council to vote down our rezoning request on April 8. If the April 8 hearing is delayed the community and the City can anticipate the rezoning application to be withdrawn resulting in the property being developed under its current I-A zoning.

We will get you a first draft of an MOU promptly in hopes it will serve to memorialize our common interests and shared vision.

We are available to work with you anytime and look forward to doing so in a civil and congenial manner to identify priorities for our mutual benefit.

Sincerely,

Bruce, Bill and the Wonderbound Team

Bruce C. O'Donnell



STARBOARD Realty Group, LLC
770 Sherman Street, Suite 108
Denver, CO 80203

Work: 720-441-3310

Cell: 303-810-3674

E Mail: bodonnell@starboardrealtygroup.com

Web: www.starboardrealtygroup.com www.denverzoning.com

On Mon, Mar 11, 2019 at 9:44 AM Thomas Gordon <tgordon@iselo.net> wrote:
Here's what I recommend:

Write Nola and copy CPD and Albus that we understand her concerns. We commit to work with them on a memorandum of understanding regarding their issues prior to the April 8 date. If they don't like what we come up with, they have the right to ask the council to vote down our request. However, we cannot accept any further delay. If there is a delay we will be withdrawing our rezoning request.

On Mar 11, 2019, at 8:38 AM, Bruce O'Donnell <bodonnell@starboardrealtygroup.com> wrote:

See email below that I just got and went to every member of Council last night at about 5:00

Bruce C. O'Donnell



STARBOARD Realty Group, LLC
770 Sherman Street, Suite 108
Denver, CO 80203

Work: 720-441-3310

Cell: 303-810-3674

E Mail: bodonnell@starboardrealtygroup.com

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Nola Miguel <nola@gescoalition.com>

UPDATE Re: **City Council First Reading TONIGHT CB 19-0127 Rezoning 2535 E. 40th I-A to I-MX-3 2018I-00072**

Bruce O'Donnell <bodonnell@starboardrealttygroup.com>

Mon, Mar 11, 2019 at 3:59 PM

To: "Brooks, Albus - City Council District 8" <albus.brooks@denvergov.org>, Jolon Clark <Jolon.Clark@denvergov.org>, "Black, Kendra A. - City Council" <kendra.black@denvergov.org>, "Herndon, Christopher J. - City Council District 8" <Christopher.Herndon@denvergov.org>, "Kashmann, Paul J. - CC City Council Elected" <paul.kashmann@denvergov.org>, "Ortega, Deborah L. - CC Member Denver City Cnci" <deborah.ortega@denvergov.org>, "Susman, Mary Beth - City Council" <marybeth.susman@denvergov.org>, "Kniech, Robin L. - City Council" <Robin.Kniech@denvergov.org>, paul.lopez@denvergov.org, "Espinoza, Rafael G. - City Council" <Rafael.Espinoza@denvergov.org>, "Gilmore, Stacie M. - City Council" <stacie.gilmore@denvergov.org>, wayne.new@denvergov.org, "Montoya, Chy - City Council" <Chy.Montoya@denvergov.org>, "Thompson, Maggie - City Council Operations" <Maggie.Thompson@denvergov.org>, "Lara, Adriana - CC City Council Central Office" <adriana.lara@denvergov.org>, City Council Denver <dencc@denvergov.org>, "Flynn, Kevin J. - City Council" <kevin.flynn@denvergov.org>, Nola Miguel <nola@gescoalition.com>

Cc: "Livingston, Courtney L - PR Parks and Planning - PP" <courtney.livingston@denvergov.org>, "Thate, Melissa - OED CA2308 Administrator II" <Melissa.Thate@denvergov.org>, "Lindsey, Will M. - CPD CE0371 Associate City Planner" <William.Lindsey@denvergov.org>, "Showalter, Sarah K - CPD Planning Services" <Sarah.Showalter@denvergov.org>, "Brudzynski, Laura R. - OED CA2309 Administrator III" <Laura.Brudzynski@denvergov.org>, "Dalton, Kyle A. - Community Planning and Development" <Kyle.Dalton@denvergov.org>, "Jennings Golich, Jill R - CPD Office of the Manager" <jill.jenningsgolich@denvergov.org>, "Aguilar, Irene - OED CA2309 Administrator III" <Irene.Aguilar@denvergov.org>, "Hiraga, Eric S. - OED MA0054 Director of the Denver Office of E" <eric.hiraga@denvergov.org>

Members of Denver City Council:

CC: GES Coalition

Here is a quick update on the emails I sent earlier today regarding affordable housing opportunities at the 2535 E 40th redevelopment site. Under I-MX-3 zoning, in addition to the affordable housing commitments I mentioned in my earlier email that will be codified in a development agreement with OED and hopefully in a MOU with GESC, I have now received the following information:

We are optimistic that, in addition to the deed restricted affordable units I mentioned this morning and which will be subject to our development agreement with OED; it now appears the capitalization of and financing arrangements we are pursuing for the redevelopment will allow us to deliver approximately 60 to 80 additional dwelling units that can be offered at below market rates. We anticipate these units will serve residents in the 60% to 80% AMI range and will be working diligently over the next few weeks in pursuit of this opportunity. We look forward to working with the community to positively integrate these dwelling units and the overall redevelopment of the former AT&T industrial property with the neighborhood.

Bruce C. O'Donnell



STARBOARD Realty Group, LLC
770 Sherman Street, Suite 108
Denver, CO 80203

Work: 720-441-3310
Cell: 303-810-3674

E Mail: bodonnell@starboardrealtygroup.com

Web: www.starboardrealtygroup.com www.denverzoning.com

On Mon, Mar 11, 2019 at 12:33 PM Bruce O'Donnell <bodonnell@starboardrealtygroup.com> wrote:
March 11, 2019

Members of Denver City Council:

RE: CB 19-0127

This Council Bill, is for rezoning application 2018I-00072, rezoning 2535 E. 40th Ave from I-A to I-MX-3. It is at Council for First Reading tonight. I am writing you to request that CB 19-0127 not be called out and delayed and that our Public Hearing remain on schedule for April 8.

The individuals, Brooke and Tom Gordon, for this project are committed to immediately begin negotiations on and enter into a development agreement with the City that will provide assurances around the shared vision for and the redevelopment of the property concerning:

1. Provisions for the building of affordable housing on site at 60% AMI or lower, with advertising and first purchase opportunities targeted to teachers at the Bruce Randolph School and neighborhood residents.
2. The creation of public open space to include programming such as playgrounds, community gardens, trails and plazas.
3. Other possible community benefits related to the arts to include the donation of property for a non-profit performing arts complex and the development of live-work space for artists.

We are available to meet with City Staff anytime, including today, and in working with staff at CPD and OED look forward to identifying specific terms for such an agreement immediately. We have also offered to work towards and agreement with the community through a Memorandum of Understanding with the GES Coalition.

The Gordon's are not a large development company but a family that has a shared vision for this property. The financial burden of mortgage payments, maintenance, insurance and taxes on the 230,000 sq. ft. building, and all development costs are paid for out of their pocket. Any delay will necessitate a rethinking of the project.

Therefore it is important that this rezoning not be delayed and we respectfully request that our April 8 public hearing date be kept. There is plenty of time to work on an agreement that will memorialize our vision and commitments for the site (which are largely shared with the community) between now and April 8; and we are continuing our ongoing efforts to engage with the community, which we have been doing since July 22, 2018.

For your information, we directly and proactively contacted Elyria and Swansea ("ES") RNOs on July 22, 2018, October 16, 2018 and again on February 4, 2019 explaining the project, providing copies of the rezoning application and requesting the opportunity to meet with the ES RNOs. We never received a reply from an ES RNO on any of these repeated attempts to engage with them.

In addition, the City provided public notice via email to the RNOs on October 11, 2018, January 18, 2019 and again on February 11, 2019. As is required, the City also mailed 49 public notice postcards to property owners twice, on October 16 and again on January 22 for a total of 98 postcards.

Documentation on all of this applicant outreach and City notice is attached.

Again, all of these combined notifications resulted in no response or engagement efforts of any kind by these ES RNOs. Our proactive engagement and outreach did, however, result in positive community engagement with Clayton United and the Elyria Swansea Globeville Business Association who both responded to our same outreach.

Sufficient notice and requests to engage and solicit community input have been given and are ongoing. We are scheduled to meet with the community on March 18 at an Open House we are hosting at the site, and again in March 25 at the Unite North Denver RNO meeting

Delay is not beneficial or needed as community engagement is ongoing and sufficient progress can be made on a development agreement with the City and the MOU with the community to create the assurances on development outcomes shared by the developer and the community between now and April 8.

We look forward to continuing work with the City and the community, and to having our public hearing on April 8 as scheduled.

Sincerely,



Bruce O'Donnell
STARBOARD Realty Group, LLC
Owner's Representative

Bruce C. O'Donnell



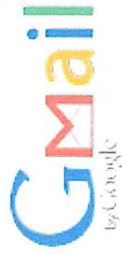
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Nola Miguel <nola@gescoalition.com>

GDP 2535 E. 40th Avenue

Jennings Golich, Jill R. - CPD CA1769 Executive <jill.jenningsgolich@denvergov.org>

Mon, Mar 18, 2019 at 5:12 PM

To: "nola@gescoalition.com" <nola@gescoalition.com>

Cc: "Nalley, Steven C. - CPD CE2777 Manager" <Steve.Nalley@denvergov.org>, "Dalton, Kyle A. - CPD Principal City Planner" <Kyle.Dalton@denvergov.org>, "Showalter, Sarah K. - CPD CE2777 Manager" <Sarah.Showalter@denvergov.org>, "Champine, Caryn M. - CPD Director" <Caryn.Champine@denvergov.org>, "Livingston, Courtney L. - CPD CE0429 City Planner Senior" <Courtney.Livingston@denvergov.org>, "Aguilar, Irene - OED CA2309 Administrator III" <Irene.Aguilar@denvergov.org>, "Lindsey, Will M. - CPD CE0371 City Planner Associate" <William.Lindsey@denvergov.org>, "Pacheco, Christopher R. - NDCC Executive Dir" <Christopher.Pacheco2@denvergov.org>, "Sandos, Timothy M. - MO MA1785 Executive" <Timothy.Sandos@denvergov.org>, "Kniech, Robin L. - CC Member Denver City Cncl" <Robin.Kniech@denvergov.org>, "Ortega, Deborah L. - CC Member Denver City Cncl" <Deborah.Ortega@denvergov.org>, "Brooks, Albus - CC XA1404 Member Denver City Council" <Albus.Brooks@denvergov.org>, "Salazar, Alan B. - MO Executive" <Alan.Salazar@denvergov.org>, "sandraerikarp13@yahoo.com" <sandraerikarp13@yahoo.com>, "drewdutchdirect@gmail.com" <drewdutchdirect@gmail.com>, "robin@gescoalition.com" <robin@gescoalition.com>, "fioresamaro@gmail.com" <fioresamaro@gmail.com>, "roberst@habitatmetrodenver.org" <roberst@habitatmetrodenver.org>, "kmckenna@habitatmetrodenver.org" <kmckenna@habitatmetrodenver.org>, "maria@gescoalition.com" <maria@gescoalition.com>, "candidebaca@gmail.com" <candidebaca@gmail.com>

Hello Nola.

My apologies for the delay in responding as I didn't get this email until late Friday.

Caryn Champine, our Director of Planning Services, will be attending the meeting tonight. I want you to know that we do value the input of the neighborhood, and have ensured that the zoning code required steps for outreach were completed.

Regardless, we are very willing to continue the conversation after tonight about how we do a better job in ensuring appropriate outreach.

Thank you,

Jill

From: Nola Miguel <nola@gescoalition.com>

Date: March 15, 2019 at 10:25:33 AM MDT

To: "Levingston, Courtney L. - CPD CE0429 City Planner Senior" <Courtney.Levingston@denvergov.org>
Cc: "Showalter, Sarah K. - CPD CE2777 Manager" <Sarah.Showalter@denvergov.org>, "Dalton, Kyle A. - CPD Principal City Planner" <Kyle.Dalton@denvergov.org>, "Aguilar, Irene - OED CA2309 Administrator III" <Irene.Aguilar@denvergov.org>, "Lindsey, Will M. - CPD CE0371 City Planner Associate" <William.Lindsey@denvergov.org>, "Pacheco, Christopher R. - NDCC Executive Dir" <Christopher.Pacheco2@denvergov.org>, "Sandos, Timothy M. - MO MA1785 Executive" <Timothy.Sandos@denvergov.org>, "Nalley, Steven C. - CPD CE2777 Manager" <Steve.Nalley@denvergov.org>, Sandra Ruiz <sandraerikarp13@yahoo.com>, Drew Dutcher <drewdutcherdirect@gmail.com>, Robin Reichhardt <robin@gescoalition.com>, "Ortega, Deborah L. - CC Member Denver City Cncl" <Deborah.Ortega@denvergov.org>, "Kniech, Robin L. - CC Member Denver City Cncl" <Robin.Kniech@denvergov.org>, "Brooks, Albus - CC XA1404 Member Denver City Council" <Albus.Brooks@denvergov.org>, Liliana Flores Amaro <lfloresamaro@gmail.com>, Rhea Oberst <roberst@habitatmetrodener.org>, Katie McKenna <kmckenna@habitatmetrodener.org>, "Salazar, Alan B. - MO Mayor's Office" <Alan.Salazar@denvergov.org>, "Maria E. De Luna" <maria@gescoalition.com>, Candi CdeBaca <candicdeBaca@gmail.com>

Subject: Re: [EXTERNAL] GDP 2535 E. 40th Avenue

Dear Interim Director Jennings Golich and Courtney Levingston,

As you are aware the amount of projects in the GES neighborhoods directly related to infrastructure is extremely saturated and extremely impactful especially in Elyria Swansea right now. The City has had ongoing issues with lack of communication, and has not successfully facilitated equitable process' to neighbors in these areas that are majority in protected civil rights classes; and extremely stressed by current construction conditions in the neighborhood. Regarding the 2535 40th St rezone, there are still questions in the neighborhood about WHY the City pushing an IMX3 zoning (this was told to us by the developer, that the City was pushing this) without consulting the neighborhood as part of the conversation or initiating any type of process around this (as we have stated repeatedly, this site was not discussed in the neighborhood plan process, it should never have been just moved on without consultation), WHY a GDP or additional process in the neighborhood was not initiated by the city at the onset of receiving this application (or interest from applicant), with full knowledge about what the neighborhood is currently experiencing and the immensity of this project (14 acres, 760 housing units--equally 40% of units in E-S currently). For this reason we would like to ask how we contest the decision to not have a GDP analysis at this site.

The Elyria Swansea neighborhood plan is also very clear about involving neighbors in a civic process through implementation of the plan (in recommendation 3 A.6, in the letter from CW Montero "Diverse resident involvement in the implementation of this plan is critical", "Encourage the formation of a Registered Neighborhood Organization (RNO) to continue resident and stakeholder engagement, and focus on building neighborhood unity, identity and establishing neighborhood priorities (A.3, A.4, A.5, A.6, A.7, A.8, A.9, A.10, A.11, E.4, E.5)"; through statements that should have guided anyone in the City to recognize that if the RNO emails listed never got a response, that maybe another method of communication should have been initiated to involve neighbors in this process. A project of this size needs to be treated differently; especially in the lowest income neighborhood in Denver (that is not protected by deed restricted housing) and that has over 2 Billion dollars of public investment coming into it on all sides. We feel disappointed by the lack of diligence from CPD and from our City overall. Although we have heard there are changes coming to GDPs and large site evaluation, are we just going to let this one get by? Mediation was offered, the applicant is stating they are going to do a MOU but we have no information on whether any of these things are moving forward; and that is unfair to neighbors to know how to evaluate this proposal without those things in place or time to formulate them in line with the zoning proposal. It is mind boggling to us that with so much focus on GES in the City now, that it seems like even other City Agencies, who are also focused in GES were not aware of this project and its potential impact in Swansea.

Since our request was not considered by City Council, at this point, to add more time before public hearing of this re-zone, we would like to ask for your ideas on how to change this pattern of treatment to GES residents--for this specific circumstance. We can react to this rezone, as neighbors are constantly forced to do, and not have a healthy proactive solution or we could actually attempt to create

something closer to equitable development at a time and place where it is so critical NOW. We are frustrated with the inaction from CPD, and would like to ask, will you be a part of solving this situation?

As a start, we would like for CPD to present at the Open House on Monday, March 18th with or after the developer to answer these questions around the lack of GDP/large site transformative process on the City's side, to involve the neighborhood in consideration of the proposal in front of them. As you can imagine, the nuances between I-A and IMX3 zoning are not super familiar to most people, and even in looking up the differences there doesn't seem to be much; so can you explain the potential outcomes of keeping IA zoning or changing to IMX3 to neighbors please? (remembering that MJ use has a cap on new locations in Elyria Swansea that we fought for) We are having trouble understanding the entirety of this process, and what the elements of the project were that motivated the applicant to re-zone in the first place? and if those motives were to be in-line with the neighborhood desires (as stated in the zone map of the plan but not in other parts of the neighborhood plan), why has there not been a more inclusive process? **EQUITY IS ABOUT PROCESS**, not predefined outcomes.

We believe that if the neighborhood and developer had been given the time to work together in a healthy way (not under stress of a deadline in 3 weeks) that there could be agreement on a zoning (likely not what is proposed) and project that actually benefits the neighborhood. Our intention of asking for more time was to be able to create a better outcome for all involved; by being able to share perspectives on a more level playing field.

In the type of power dynamic that is happening in Swansea now, the developer should never be the one defining what the "community benefits" of their project; that needs to be defined by the neighbors, or as in this case those so called "benefits" could be the cause of further displacement of neighbors, putting their health and well-being at risk. This is an inherent problem that it is shocking no one at the City identified or is taking action on (that we are aware of). Swansea is not a blank slate and is, in fact, a neighborhood of beautiful cultures, smart, open minded and capable people full of ideas and vision. I hope that we can find ways to heal this ongoing pattern of treatment from the City; starting with acknowledgement that neighbors care about, and want to participate in, what is happening in their neighborhood.

Thank you,

Nola Miguel, GES Coalition

On Fri, Mar 8, 2019 at 9:59 AM Levingston, Courtney L. - CPD CE0429 City Planner Senior <Courtney.Levingston@denvergov.org> wrote:

Good Morning Nola,

As you may or may not know, early in the process, before an official map amendment application, CPD must determine whether a GDP is mandatory based on the information provided. The Denver Zoning Code notes that a General Development Plan may be required when "(1) the specific circumstances warrant a coordinated master framework plan to guide future development; and (2)

land use, development, and infrastructure issues related to future development cannot be adequately resolved through other regulatory processes, such as subdivision or site development plan review". The Code identifies several relevant factors of a proposed project as examples that should be taken into consideration when determining whether a GDP should be mandatory.

In this case, a GDP was not required as they are adaptively re-using a large portion of the existing building/site and as such, the infrastructure needs are anticipated to be more at a local and can be adequately resolved through other processes such as a concept master plan and during the site development planning phase.

In terms of relevant factors that could be taken into consideration when determining if a GDP is necessary:

- The *Elyria & Swansea Neighborhoods Plan* does not call for a GDP for this site;
- The property is under single ownership and at the time of the decision there was no indication that the applicant intended on developing in phases;
- As proposed, neither anticipated to change the arterial or collector street grid nor impact regional level stormwater system;
- The site is not within close proximity to the South Platte River or Cherry Creek corridor.

Additionally, the adopted *Elyria & Swansea Neighborhoods Plan* didn't show specific desired connections through the site and the requested rezoning is to Industrial Mixed-Use (I-MX-3) from the current Industrial zoning (I-A, I-A UO-2), directly aligning with the *Elyria & Swansea Neighborhoods Plan* guidance.

I hope that helps with understanding. Please let me know if you have any additional questions.

Thanks,

Courtney

Courtney L. Levingston, AICP, LEED AP | Senior City Planner

Community Planning and Development | City and County of Denver

p: (720) 865.3074 | courtney.levingston@denvergov.org

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Please let me know if there is interest and I can contact our third-party mediator, Steve Charbonneau of Find Solutions, and he'll contact you individually regarding next steps.

Thanks!

Courtney L. Levingston, AICP, LEED AP | Senior City Planner

Community Planning and Development | City and County of Denver

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Nola Miguel, MSW, nola@gescoalition.com

GES Coalition Organizing for Health and Housing Justice

<https://www.gescoalition.com>

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City and County of Denver

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Email: Judy.Montero@denvergov.org



Judy H. Montero
Councilwoman, District Nine

Denver City Council, Main Office:
City and County Building
1437 Bannock Street, Room 451
Denver, Colorado 80202
Phone: 720-865-9534

Dear Elyria and Swansea neighbors,

This neighborhood plan, adopted by City Council, gives a new active vision and a foundation for future regulations to: make Elyria and Swansea a healthier place for people, control safe and responsible development, protect the character of the neighborhood and help stabilize the community. The Elyria Swansea (ES) neighborhood plan gives direction and restrictions according to what you, the neighborhood, have said in the planning process. The long needed connectivity improvements in your neighborhood are officially outlined in this plan including roads that connect, missing sidewalks, and safe passages around train tracks. The heart of the neighborhood is you, your aspirations and concerns created this plan to maintain cultural and historical relevancy, address affordability and health, and bring needed services to the neighborhood. **This plan is meant to empower you and the Elyria Swansea community moving forward.**

The formations of these historic neighborhoods are highlighted as part of the ES neighborhood plan including the environmental justice issues the neighborhood has faced. As you know, Elyria and Swansea long had "unknowns" like the I-70 viaduct that needs to be replaced, and the National Western's future. These undecided large-scale projects have had an enormous presence, and its time they started to bring benefits instead of burden to the neighborhoods. Heavy manufacturing has had a lasting impact on the quality of life in Elyria and Swansea. The neighborhood plan recommends a buffer between residential and industrial areas and addressing issues like odor, noise and truck traffic. The environmental quality issues affecting the health of the residents, from the history of smelters and other polluting factors, need to be addressed; moving forward air, soil and water sustainable practices will be essential.

During this neighborhood planning process we have had simultaneous processes about the I-70 project and the National Western project, and it is important to me that you have a neighborhood plan first to guide these projects. **Cultural relevance has been important during this process of neighborhood planning, and is also important in moving forward with implementation.** The neighborhoods of Elyria and Swansea have been a safe place for Latino immigrants for the last 25 years and have a distinct urban-Latino spirit where brightly painted homes, altars to *Nuestra Senora de Guadalupe*, water fountains and garden patios fill the yards of your homes. It is important to me that this culture is recognized and that current residents feel comfortable in the neighborhoods.

At one time, Elyria and Swansea had all the services to sustain its people, like markets, creameries, butchers and entertainment. Residents were employed and profited from the surrounding factories and were able to walk to work. I see this in the future of the neighborhoods as well. **I also want to address the fears around gentrification we have heard through the process. Incoming development must not displace current residents. It's imperative that after centuries of living with minimal city services, finally when the neighborhood is getting investment, the current residents must not be pushed out. Diverse resident involvement in implementation of this plan is critical.** Thank you to all who have been involved and guided this process,

A handwritten signature in black ink that reads "Judy Montero".

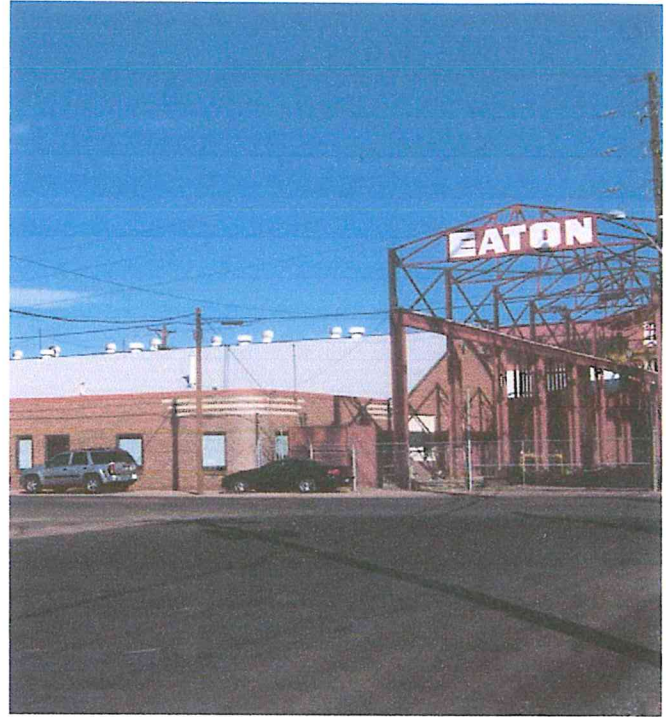
Councilwoman Judy H. Montero, Denver City Council President Pro-Tem



Detail of a mural by Joshua Mayson on the GrowHaus building located at 47th Ave. and York St. in Elyria

A.3 ENCOURAGE THE FORMATION OF A UNIFIED NEIGHBORHOOD ORGANIZATION

- Encourage community leaders to form a registered neighborhood organization (RNO) that represents the neighborhoods, including English and Spanish speaking residents. The RNO could provide the neighborhoods with a process to create unity, identify priorities, and provide neighborhood statements to the City, CDOT, RTD and other agencies.
- Build on the planning process to explore resources and partnerships to provide ongoing staffing resources for bilingual outreach and engagement.
- Strengthen coordination between nonprofit organizations, government agencies, community and religious organizations to raise awareness of neighborhood issues, outreach efforts, assets and resources that could be leveraged, and avoid redundancies including excessive and uncoordinated neighborhood outreach efforts.
- Support safety watch programs, communication with police departments, tree planting programs, property improvements and other programs that build upon the neighborhoods' assets and strengthen the its identity.



Eaton Metal Products is an established steel fabricator that has been in the neighborhood since 1924.

A.4 CELEBRATE THE ENTERPRISING IDENTITY

- Work with Elyria Swansea Globeville Business Association to coordinate manufacturing interests with city agencies, registered neighborhood organization(s), non-profit groups, community-based organizations and initiatives focused on the community to implement recommendations provided in this plan.
- Encourage business / manufacturing interests to work with residential groups to further establish good neighbor agreements and reduce conflicts between residential and industrial uses, including trucking routes, odor emissions and visual transitions.
- Coordinate efforts to attract new businesses with desirable manufacturing profiles that contribute to the quality of life in the neighborhood, including the transition between existing residential and manufacturing uses.

A.5 ESTABLISH NATIONAL WESTERN CENTER'S IDENTITY

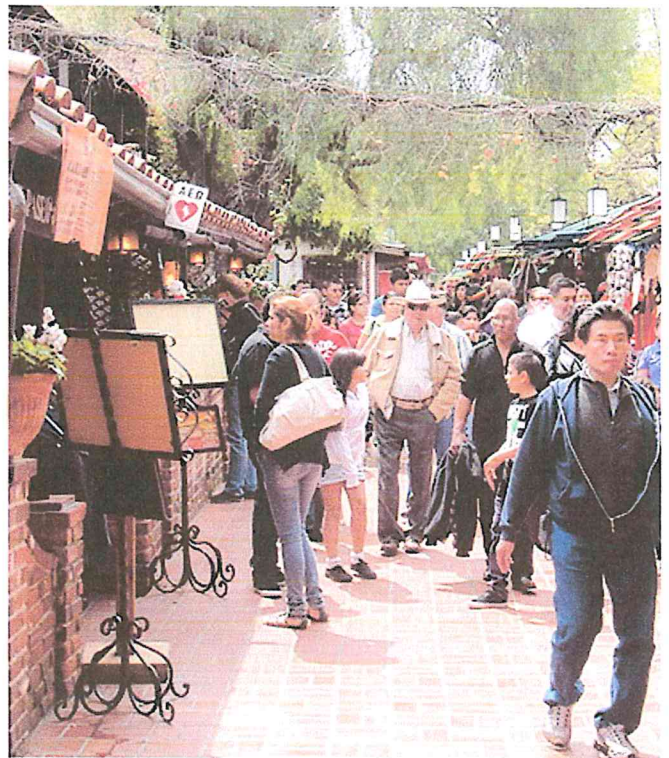
- The National Western Center should reflect the history and tradition of the Stock Show and the diverse mix of uses and evolving culture of Elyria and Swansea, while expanding its focus on agricultural research and related industries. Visitors, residents, and employees throughout the community should know they are in a place that is unique to the national and international community.



A.11 PROMOTE CULTURAL RELEVANCE IN DESIGN AND ARCHITECTURE

Neighborhood culture and identity can be defined and expressed visually through forms, colors, textures and symbology.

- Engage the neighborhood and document desired architectural forms, design elements, art motifs and landscaping features
- Explore design opportunities to express culture and enhance the public realm with wayfinding signage, interpretive displays, benches, bus stops, or information posting areas along existing public streets and public buildings.
- Share preferred neighborhood design elements and cultural identity with developers for consideration and voluntary application into private development projects.



RECOMMENDATION 5

IMPROVE ACCESS TO HOUSING, JOBS, SERVICES & EDUCATION

Residents desire to maintain housing affordability as neighborhood investments and new development projects create greater diversity in housing, services and employment. They also would like to gain the necessary training and skills required to work for local employers.

B.23 INCREASE ACCESS TO HOUSING

- Work with property owners near transit stations to explore development options, and to identify funding sources to support income restricted residential development and, if necessary, environmental assessment and remediation.
- Identify funding sources, such as the Mile High TOD Fund and the Colorado Housing and Finance Authority's Low Income Housing Tax Credit program, to acquire and develop property for workforce housing and mixed income projects near transit stations and other neighborhood amenities.
- Help acquire, rehabilitate and covenant restrict existing residential properties that are at risk of becoming unaffordable to workforce populations.
- Connect residents to existing programs that assist low-income households with maintaining, repairing and environmentally remediating their homes, such as the Denver Urban Renewal Authority's Single Family Rehabilitation and Emergency Home Repair programs, and Northeast Denver Housing Center's Healthy Homes Initiative.
- Identify vacant and distressed parcels, blocks and potential redevelopment sites with a priority to develop those sites for new residential housing. Regularly check the status of government or quasi-government owned properties, such as the City and County of Denver, the

Denver Housing Authority, the Colorado State Land Board, Colorado Department of Transportation and the Regional Transportation District, to see if suitable parcels become available for development.

- Support the creation of family appropriate affordable housing projects that include more bedrooms and offer proximate and safe access to educational facilities, recreational opportunities and fresh food.
- Provide a broad range of housing types by allowing for moderate increases in density and household economic stabilization by allowing options that supplement an existing single family home, including accessory dwelling units, duplexes and tandem houses (see the Concept Land Use Map).

B.24 ESTABLISH AFFORDABLE AND MIXED INCOME HOUSING STRATEGIES AND FUNDING OPPORTUNITIES

- Encourage reference to, and implementation of Housing Denver, the 2015-2019 City of Denver housing plan.
- Increase housing development resources available to the City and, by extension, to the Elyria Swansea Neighborhood. Prioritize potential Elyria Swansea residential projects that could be funded the City's recently established Revolving Affordable Housing Loan Fund.
- Work with non-profit housing partners, Denver Office of Economic Development, CDOT and other financing entities to explore a replacement housing strategy associated with the CDOT I-70 acquisitions. New affordable housing units should be built in the neighborhood that will exceed the number of units acquired for I-70 expansion, in addition to the number of homes acquired for the original I-70 project construction.



HIA STRATEGIES RELATED TO THIS RECOMMENDATION:

- D17. Attract Key Retail and Services.
- D18. Increase Food Access at the National Western Center.
- D19. Improve Healthy Food Access at Existing Retailers.
- D20. Use Mixed-Use Development to Improve Access to Goods and Services.
- D21. Create Neighborhood-Focused Flex Space.

Moving Forward



Partnership Implementation Priorities for Elyria and Swansea:

- Encourage the formation of a Registered Neighborhood Organization (RNO) to continue resident and stakeholder engagement, and focus on building neighborhood unity, identity and establishing neighborhood priorities (A.3, A.4, A.5, A.6, A.7, A.8, A.9, A.10, A.11, E.4, E.5).
- Work with non-profit housing partners, Denver Office of Economic Development, and other potential financing entities to explore opportunities for new affordable and mixed income housing units in the neighborhoods (B.3, B.6, B.23, B.24, E.2, E.22, E.28, E.30).
- Encourage neighborhood engagement with residents, and collaboration with community organizations and the Denver Police, and Denver Neighborhood Inspection Services to increase safety and security for residential and business areas (E.5, E.7).
- Increase the neighborhood's access to Jobs and services (A.4, A.9, B.4, B.5, B.6, B.25, B.26, B.27, E.7, E.8).
- Partner with NDCC to implement the plan vision for neighborhood integration and cultural expression at the rail stations, the National Western Center, I-70 and Brighton Blvd. (A.1 through A.11).

- Partner with zoning regulations align with the plan vision, including strategies for increasing access to mixed income and affordable housing and establishing transit-oriented development near rail stations (B.3, B.21, B.22, E.2).

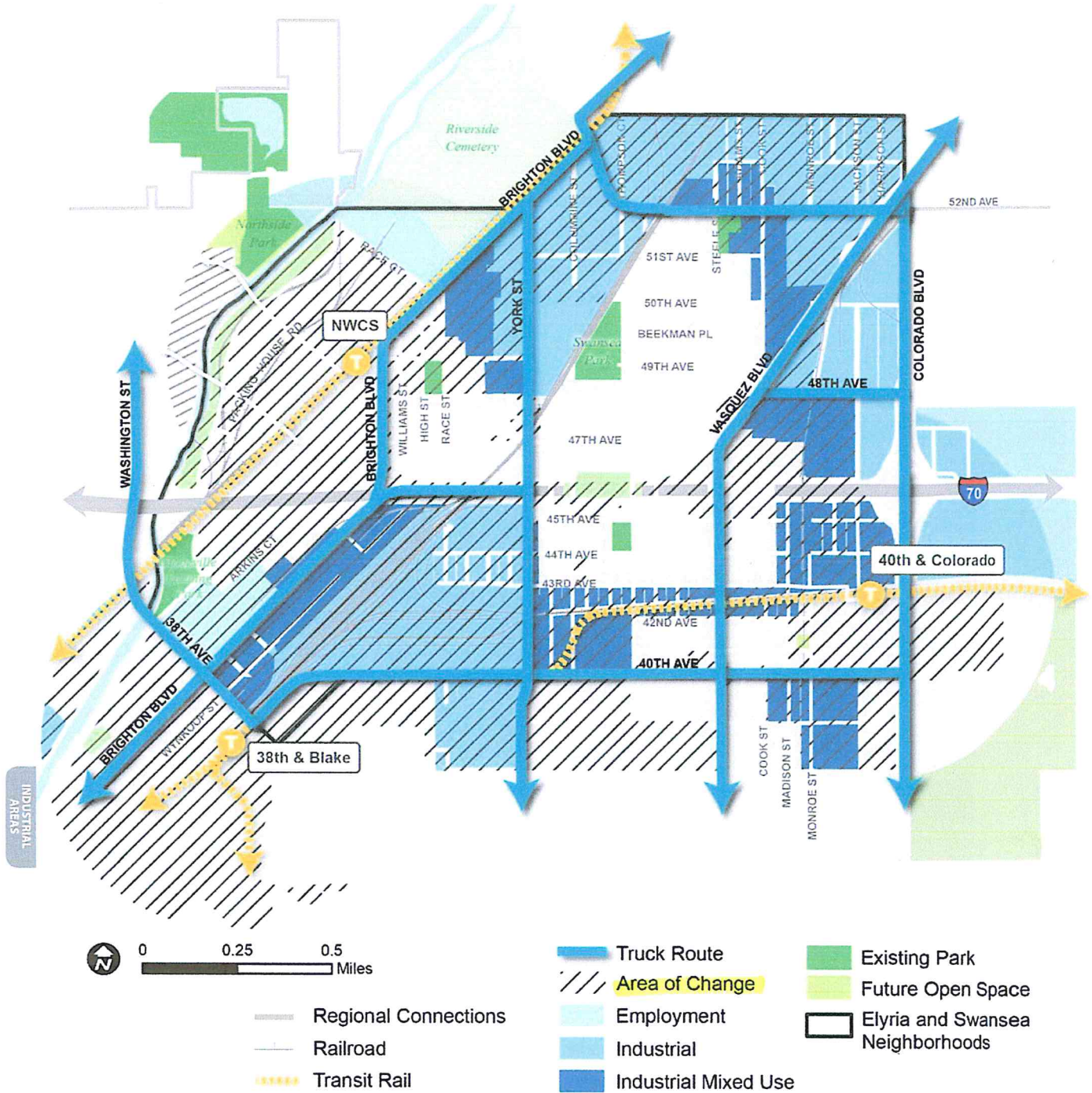
F.4 CHAMPIONS AND ADVOCATES

Once a plan is adopted as a supplement to the Comprehensive Plan, the City has the necessary direction to begin implementing the plan. Given the number of adopted plans, competing interests in the City, and the budget limitations at all levels of government, little plan implementation is undertaken without champions for certain actions and advocates for the neighborhood. Typically registered neighborhood organizations work with the Mayor and their City Council representatives to promote certain actions and outcomes. Membership organizations such as merchant associations, business partnerships, and nonprofits do the same for business areas.

F.5 PUBLIC FUNDING SOURCES AND STRATEGIES

Funding sources available to public and private entities are continually evolving based on economic, political, legal and neighborhood objectives. Though the names and purposes of specific funding sources can change over time, the following

FUTURE CONCEPT LAND USE AND AREAS OF CHANGE MAP - INDUSTRIAL AREAS



D32. ADDRESS NUISANCE ODORS

Address nuisance odors through specific actions including:

- DEH should work with City agencies, other government, non-profit, community, and industry partners to form a long-term steering committee to implement solutions to reduce odors, potentially including recommendations for local and state policy changes.
- DEH should create and lead a community partnership of interested organizations to pursue funding for research on manufacturing processes that produce odors and odor monitoring technologies to address nuisance odors in Globeville and Elyria Swansea.
- DEH should continue its work with the Northeast Metro Pollution Prevention Alliance (NEMPPA) to cooperate on potential solutions for odor reduction from industries located outside of City boundaries.

D34. IMPROVE WATER QUALITY EDUCATION AND OUTREACH

DEH should partner with other agencies and organizations to improve education and outreach to businesses and residents related to water quality in Globeville, Elyria, and Swansea, including providing information to developers about City regulations for stormwater runoff and fugitive dust and dirt.

D35. UPDATE SUPERFUND SITE STATUS

DEH should work with the EPA to continue to take steps to remove the residential portion DEH/EPA (Operable Unit 1) of VB/I-70 from the Superfund site (i.e., de-list OU1) as the remedy has been completed.

D36. USE ENVIRONMENTAL DESIGN PRINCIPLES TO IMPROVE SAFETY

The City and private developers should work together to encourage crime prevention and safety through the use of environmental design principles for new development, including large projects such as the National Western Center (see A.10).

D37. STRENGTHEN OUTREACH ON DEVELOPMENT PROJECTS

The City, private developers, and community partners should continue and strengthen bilingual and culturally-appropriate outreach and communication with residents about upcoming construction and development projects as these communities have historically experienced negative environmental impacts from previous decisions.

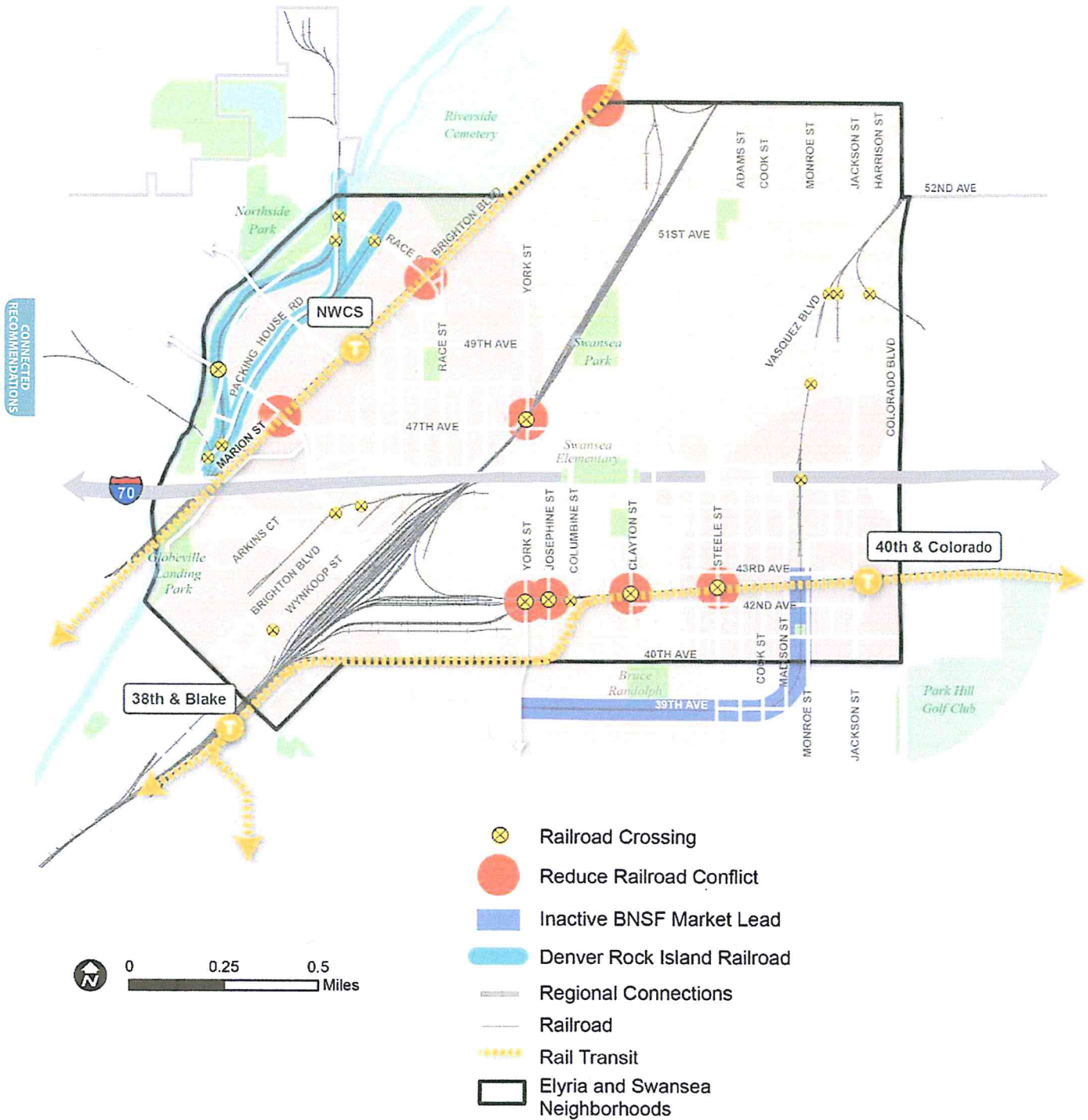


EXISTING AND PROPOSED TRUCK ROUTES MAP



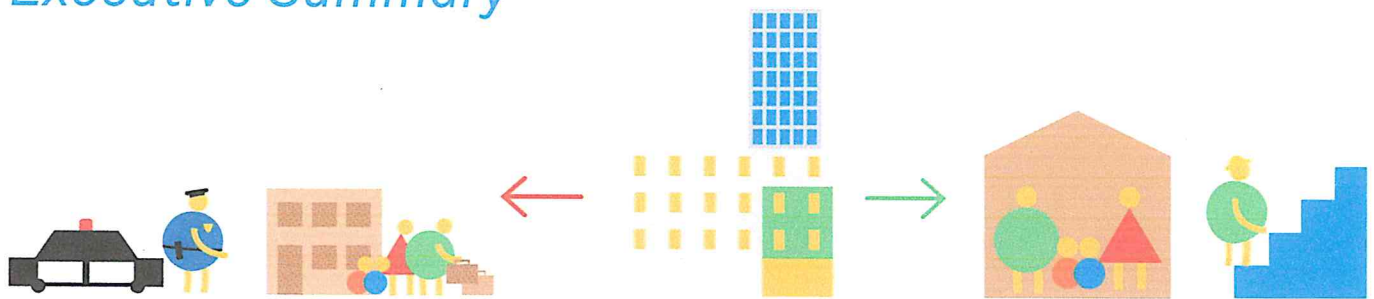
RECOMMENDATION 1 REDUCE RAILROAD CONFLICTS

RAILROAD MAP



Assessing Health and Equity Impacts of the Proposed Reef Development Project in South Central Los Angeles

Executive Summary



INTRODUCTION

The Reef Development Project plans for the total renovation and expansion of a commercial area in South Central Los Angeles – an area that is located in the Southeast Los Angeles Community Plan Area and the City’s 9th Council District. The project would cover 9.7 acres, and would include a 208-room hotel, two high-rise condominium towers, 528 mid-rise residential units, and 21 low-rise live/work residential units.

This research project, informed by a Health Impact Assessment framework, was conducted to provide empirical data on the potential health and equity impacts that the proposed Reef Development Project could have on the South Central Los Angeles community, and to propose recommendations to the developers and the City. The study was conducted with the additional goal to engage and empower community members, including neighborhood residents and stakeholders, to participate in the development process.

Key Finding: The Reef Development Project will place thousands of South Central Los Angeles residents at high or very high risk of financial strain or displacement.

FINDINGS

Gentrification often results when developments like the Reef Development Project occur in neighborhoods like South Central. Gentrification can lead to financial strain and indirect displacement – a kind of displacement that occurs when residents and businesses are gradually priced out of the area and must involuntarily leave.

An estimated 4,445 renters who live within ½ mile of the proposed Reef Development Project are already experiencing housing cost burdens and could be at high or very high risk of financial strain or displacement as a result of the development. An additional 39,311 renters who live between ½ mile and 2 miles of the project could be at moderate risk. Overall, 52% of the nearly 84,000 residents living within 2 miles of the project could be at risk of financial strain or displacement as a result of the Reef Development Project.

Some focus group participants from the area anticipate they may become homeless.

“I keep thinking, ‘What am I going to do if this doesn’t work out? Where am I going to go? Am I going to see my neighbors again? Where am I going to find this kind of community again? Going to have to start over. Going to be homeless, without a family.”
—Anayetzy

WHY THIS MATTERS TO HEALTH

Community residents who experience financial strain and/or displacement may experience a wide variety of chronic stress-related physical and mental illnesses, including anxiety, depression, hypertension, heart disease, obesity, diabetes, and sleep disorders. Additional constraints on health-protecting resources and exposures to health-damaging environments such as substandard and overcrowded housing could further contribute to a variety of negative health outcomes. Disruption of social networks can lead to additional health challenges, including exposure to fragmented social environments that have higher rates of violence and sexually transmitted diseases.

Multi-generational traumas can result from serial forced displacement resulting in a condition called “root shock”. Black and Latin@ residents who located to South Central Los Angeles to escape racial and political discrimination and violence brought with them the memories and traumas of previous displacements, which could be exacerbated by this project.

THE CONTEXT

Displacement and financial pressures from the Reef Development Project will happen within the context of ongoing challenges with housing affordability and homelessness that are happening in the area.

- Los Angeles lost 65% of state and federal funding for affordable housing between 2009 and 2014
- Over half a million affordable rental homes are needed in the city
- Lack of affordable housing is the main cause of homelessness in the U.S.
- Los Angeles has the largest homeless population of any urban area in the U.S.

Most South Central Los Angeles households are occupied by renters and nearly half of residents are in poverty. On average, neighborhood residents earn half the household income as the City as a whole. Many businesses do not have leases for their business spaces, or have leases that will expire soon.

	South Central	City of Los Angeles
Average household income*	\$36,830	\$77,000
Residents in poverty*	45%	22%
Renters*	79%	62%
Median monthly rent for 1 bdrm apt**	\$1000	\$1830
> 1 person per room (overcrowded)*	41%	14%
Workers who took transit to work*	26%	11%
Workers who drove alone to work*	49%	67%

* 2009-2013 American Community Survey

** Zumper.com, Sept. 2015

Residents are already struggling intensely to afford housing, and are engaging in a variety of methods to address this problem: by making difficult choices on what necessities to do without, by living in overcrowded and substandard housing, and by looking for additional sources of income.

Despite these challenges, residents and small business owners in the neighborhood have developed strong social ties and a sense of attachment to the area, and they want to stay. Many of the residents and businesses in South Central have been in the neighborhood for 10-20 years or more.

Residents of the neighborhood came to South Central seeking economic opportunity, and built a thriving community. Over time, however, the city began to engage in a variety of different policies that led to increased segregation, concentrated poverty, and limited opportunity. This was followed by prolonged civic disinvestment that has perpetuated poverty and segregation to this day.

RECOMMENDED ACTIONS

The developers of the Reef Development Project and the City of Los Angeles have a unique opportunity to develop this property in a way that reduces the potential to further traumatize and harm the physical and mental health of current residents through increased financial strain and displacement.

Rather than continuing the legacy of racism and segregation through the replacement of current residents with those who hold more economic and political power, the developers and the City have an opportunity to engage in a cutting-edge trauma-informed

Here's What We Actually Know About Market-Rate Housing Development and Displacement

Amee Chew · November 5, 2018



Photo by Evan Bench via flickr, CC BY 2.0

Rent control. It's on the ballot in California this November [[here's some lessons from its loss](#)] as tenant campaigns pick up steam across the country and revive an old refrain: "The rent is too damn high!" The real estate industry's biggest argument in opposition? Rent control will hurt new construction. And, as developers would have us believe, the only way to pull ourselves out of our dire housing shortage would be by building new construction.

But this unquestioning reliance on new construction—a code phrase used by developers to signify for-profit building—is deeply flawed.

For one, for-profit new construction is overwhelmingly geared toward the luxury market. But it's lower-income households who face the most severe affordable housing shortfalls. While our high-end stock has steadily grown, since 1990 on balance we've lost over 2.5 million affordable units renting for under \$800. To what? In large part, rent increases.

Secondly, new construction takes decades to depreciate down to rents that are actually affordable to most renters. "Trickle down" isn't happening fast enough. [See: "[Trickle Up Housing: Filtering Does Go Both Ways.](#)"]

Even worse, however, new construction actually fuels displacement in the short term, even when no already existing housing is knocked down. Why? Numerous studies show that market-rate housing development has price ripple effects on surrounding neighborhoods, driving up rents and increasing the burden on lower-income households. Many residents in communities transformed by gentrification can already attest to the connection between for-profit development, rising living costs, and the mass exodus of lower-income residents. Maybe this won't play out in Malibu, or a sparse neighborhood with very few low-income folk, but otherwise the above effects are widespread in our cities.

We need to talk about market-rate construction, and displacement. Here is the what the research says:

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- Studies show that market-rate housing development is linked to the mass displacement of neighboring low-income residents (Davidson and Lees 2005, 2010; Pearsall 2010). Such displacement occurs even when low-income housing is not directly demolished and destroyed to make way for new development—because it operates through indirect and exclusionary means, such as “price shadowing” (Davidson and Lees 2005, 2010). Market-rate housing production causes significant price impacts in surrounding neighborhoods, raising area rents and real estate taxes (Oliva 2006; Pearsall 2010; Zuk and Chapple 2016). These price impacts have resulted in **higher housing cost burdens** for low-income residents, as well as their displacement (Davidson and Lees 2005, 2010; Pearsall 2010). In fact, a study of displacement in New York City based on a survey of 18,000 housing units found that most displaced households were forced to move due to cost considerations; in contrast, low-income residents who managed to remain in gentrifying neighborhoods overwhelmingly lived in public housing or rent stabilized units insulated from price dynamics (Newman and Wyly 2006, 29, 41, 43). Rent burdens rose considerably in gentrifying areas, so that only 1 out of 15 poor renters remaining in these New York City neighborhoods rented in the unregulated market (40-1).
- The influx of higher-income residents, whom market-rate developments are typically geared toward, is itself associated with the displacement of vulnerable groups from the same area. Studies in London, Sydney, and Melbourne using longitudinal census data found that increases in high-income and professional households in a neighborhood were correlated with greater losses or displacement of low-income, family, and working-class households, as well as elderly, disabled, and unemployed residents, from that community (Atkinson 2000a, 2000b; Atkinson et al. 2011). One study found that in neighborhoods with an influx of higher-income residents, working-class residents moved at three times the rate compared to in other areas—and usually out of the neighborhood (Atkinson 2000a, 159).
- Location matters in predicting the pathway of gentrification. Gentrification is more likely for poor neighborhoods that border rich neighborhoods (Kolko 2007; Guerrieri et al. 2013). A study of over 27 metro regions in the U.S., including Los Angeles, found that out-migration of poor residents and in-migration of richer residents was 64 percent more likely for neighborhoods within half a mile of an existing rich neighborhood, compared to those further from the nearest rich neighborhood (Guerrieri et al. 2013, 59). Again, this is likely due to price effects: housing prices in poor neighborhoods that bordered or were within a mile of rich areas appreciated by a significantly higher amount than prices in poor neighborhoods further away (51, 56). Housing booms do not affect prices in all neighborhoods equally; in fact, poor neighborhoods that start out with low housing prices and are near richer neighborhoods experience the largest price increase effects (46).
- Unfortunately, in our market-based housing system, proximity to transit stations is a risk factor for gentrification. Numerous studies show that neighborhoods within half a mile of a transit station experience significant housing price and rent increases (Immergluck 2009; Pollack et al. 2010); loss of affordable units (Chapple and Loukaitou-Sideris 2017); increased share of high-income households and decreased share of low-income households (Dominie 2012; Chapple and Loukaitou-Sideris 2017); and increased prices of commercial properties (Weinberger 2001; Debrezion et al. 2007). Moreover, plans for transit investment can drive up property values and housing costs even before construction begins due to real estate speculation, as the plans become known (Knaap et al. 2001; Immergluck 2009).

- Likewise, new higher-end commercial amenities and big box retailers also add to displacement pressures, again, largely due to the overall marketization of housing in the U.S. and lack of sufficient protections against rising costs. Such commercial development contributes to rising property values, as well as the influx of white and more affluent residents, heightening displacement through competition and rising rents (Zukin 2009). The arrival of large, national retailers has been linked to net job and business loss, as well as decreases in retail wages (Dube et al. 2007). But even smaller-sized yet upscale boutiques contribute to the displacement of local stores and services that long-time, lower-income residents rely on—notwithstanding boutique owners’ purported sensitivity to community identity and racial solidarity (Zukin et al. 2009).
- Some academic studies have contested whether gentrification in fact causes displacement. However, whether studies detect displacement very much has to do with how they measure, and define, gentrification. For instance, one famous study often cited to prove gentrification does not cause displacement relied on survey data that did not count residents who had doubled-up, moved out of the city, or became homeless (Freeman and Braconi 2004; Newman and Wylie 2006). Even so, though it failed to count the displaced, the study still admits class change was occurring in gentrifying neighborhoods, though if not through direct ‘displacement,’ through ‘replacement’ and probable exclusionary displacement (Freeman and Braconi 2004). And even this study found that gentrification in New York City harmed low-income households by increasing their rent burdens: the researchers reported the average rent burden for poor households in gentrifying areas was 61 percent, compared to 52 percent for poor counterparts in other neighborhoods; and that rents for unregulated apartments in gentrifying neighborhoods increased an average of 43 percent from 1996 to 1999, compared to 11 percent for rent stabilized apartments (50–1). In contrast, a finer analysis of the same New York City survey data by other researchers, that carefully considered place and motive, succeeded in uncovering evidence of gentrification-fueled displacement and migration flows, with rent increases, landlord harassment, and condo conversion emerging as key reasons for moves (Newman and Wylie 2006).
- Real estate interests and some scholars [and many activists] argue that unaffordable housing costs are primarily due to a shortage in housing supply, and that any increase in supply—including luxury development—will ultimately help depress rents. While there is some evidence new housing production does eventually help lower median rent in the neighborhoods where construction occurred compared to other areas, these effects take decades to surface (Zuk and Chapple 2016; Rosenthal 2014). Worse, by the time such price effects register, large numbers of low-income residents have likely already been pushed out: as one study of construction in the Bay Area found, the increased cost burdens which market-rate production puts on low income residents are far more immediate than any long-term decrease in rents (Zuk and Chapple 2016). And even if median rent is eventually, somewhat, lower than in areas without construction, who is to say that the median rent is actually affordable? In the above study, researchers noted median rents of all areas might still be out of reach for low-income households. During the decades analyzed, significant displacement had already occurred and median rents were hiked up by gentrification. In contrast, the production of subsidized housing had more than double the impact on eventually reducing rents at a regional level, compared to market-rate units. Thus, the production of non-market rate housing matters deeply. [Editor’s note: *There is also an argument that production of moderate-income housing is relevant as well.*]

In sum, luxury development that centralizes a concentration of higher-income residents in a lower-income surrounding community puts neighboring poor residents at risk of displacement due to the impact on increased living costs. Both luxury development itself and the influx of higher-income residents are linked to higher housing cost burdens for low-income residents, as well as displacement. Because

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increases before construction begins. Place matters, and proximity to richer neighborhoods as well as massive capital investment, whether in the form of private development projects or transit infrastructure, are risk factors for gentrification.

Stability for renters should be valued. Housing instability is bad for health and worsens poverty. Even without gentrification, U.S. neighborhoods experience high endemic levels of displacement and eviction when it comes to low-income families, who face dire intergenerational consequences. Gentrification uproots low-income families to relatively far-flung and less-resourced places, with added political, social, and health impacts.

So what is there to do? Rent control must be paired with any strategy of new construction and investment in order to prevent displacement. On a practical level, rent control would stop the hemorrhage of remaining affordable units now—provided allowed rent increases are appropriate to low-income renters' finances—and include strong protections against eviction and landlord harassment. Rent control would also preserve and potentially even recover the affordability of tens of millions of homes nationally, working on a scale unrivaled by Section 8 vouchers and any new construction.

Construction trickles, but **rent control works** instantly. Rent control costs the public little. And while Section 8 follows prices set by the market, thus doing little to stop rents from increasing overall, rent control would make sure landlords get a fair return but cannot rent gouge. Section 8's targeted subsidies, supposedly more "efficient" because they help only a few of the neediest, can perversely reward landlords who impose large rent increases. But rent control's more universalist approach, covering all renters, better protects the public good.

Finally, as bitter a pill as it may be to swallow, we cannot rely on the private market to provide the new construction we need. Our housing market is broken. **Most renters** now pay unaffordable levels of income on rent. But for-profit housing cannot meet most renters' needs, and that's by design: when profit determines pricing, the housing needs of low-income folks never matter as much as the demand of a few rich individuals at the luxury end.

Instead, we must massively expand non-profit finance, development, and **construction of social and public housing**. We must protect land and housing from the vagaries of the market by creating community land trusts, cooperative housing, and mutual housing on a large scale. Other wealthy countries have done it. Sweden addressed its dire postwar housing shortage with hundreds of thousands of cooperatives and an even more massive boom in public housing construction. Thanks to these policies, along with with strong rent regulations, a much larger swathe of its population enjoys extremely low housing costs than in the U.S.

We can start by pooling our own money into cooperative banks, to finance these nonprofit housing schemes. As much as this country's administration, headed by a tax-evading slumlord-in-chief, is **gutting all our safety nets**—they can't stop us from doing that.

If you're interested in research on this topic, see also our researcher roundtable, "What We Don't Know About Displacement and

Development" and What We Know About Housing Construction and Displacement.

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