

Written Comments Received in Response to Draft DRMC and DZC Amendments

(January 1, 2022 - March 30, 2022)

March 14, 2022

Dear CPD & HOST:

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

We recognize the EHA proposal is a sorely needed policy tool that will create more affordable units through mixed-income development and generate more funding for the City to invest in deeply affordable and long-term housing development. In Denver, rent and mortgage costs have increased over 75% during the last decade while wages have only increased by 32%.¹ As a result, over 100,000 households in Denver are considered cost-burdened, paying more than 30% of their wages on housing.² The affordable housing crisis puts our friends, families, and neighbors at risk of losing the roofs over their heads, reduces access to healthy food and reliable transportation, limits access to adequate healthcare, and more. This critical policy is an important way to ensure all new development is contributing to housing cost relief.

Within the EHA proposal, we particularly support:

- **Tying the creation of new market-rate housing to mandatory, on-site affordable housing units** in all residential development with 10 or more units, with the requirement for a higher percentage of affordable units in more expensive markets. The proposal's incentives for developers to create mixed-income developments is critical to advancing more equitable access to community benefits and economic opportunity.
- **Prioritizing development of affordable units that are attainable for renters and homebuyers with incomes at 60% and 80% of area median income (AMI)**, respectively, while also providing developers the option and flexibility to include units affordable to households with even lower incomes in their developments.
- **Ensuring the fee that developers can choose to pay instead of building on-site affordable units ("fee in-lieu") is high enough to disincentivize developers from choosing this alternative.** We appreciate the proposed fee is one of the strongest in the nation, higher than peer cities like Atlanta, Boston, and Los Angeles, according to data compiled by the [Department of Housing Stability \(HOST\)](#). This will spur more on-site mixed-income development and reduce economic and racial stratification in housing.

¹ 2010 and 2019 ACS Data, Root Policy Research, Apartment Association of Metro Denver.

² 2019 ACS Data, Root Policy Research.

- **Prioritizing neighborhoods where residents are vulnerable to displacement for the City’s investment of fees in-lieu** collected from these neighborhoods. This is a welcome addition from the first proposed iteration of the EHA proposal that we hope will help preserve and produce more—and more deeply affordable—units available for Denverites to remain in their chosen communities.
- **Meaningfully increasing the existing linkage fee** for nonresidential development and residential development with 9 and fewer units. The bolstered linkage fee is projected to create millions of dollars each year of sustainable and dependable funding for the creation and preservation of affordable housing across Denver. The final ordinance should not further lower, or further extend the phase-in of, the currently proposed linkage fees.
- **Greater accountability, tracking, and transparency on program outcomes from the City.** In particular, we appreciate Community Planning & Development’s commitment to report not only the number of units and dollars generated through the EHA initiative on a public dashboard, but also what household incomes are being served and the details of negotiated alternative agreements struck by the City and developers and how they serve the City’s established housing and affordability goals. We urge CPD to provide this information in the most timely, widely accessible way possible.

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

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

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

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

Sincerely,

be well Health and Wellness Initiative

Colorado Children's Campaign

Colorado Coalition for the Homeless

Colorado Poverty Law Project

Covid-19 Eviction Defense Project

The Denver Foundation

Elevation Community Land Trust

Enterprise Community Partners

Healthier Colorado

Mile High Connects

Mothers Advocate for Affordable Housing

Neighborhood Development Collaborative

O'Connor Jones: A People's Law Office, LLC

YIMBY Denver



P.O. Box 9866, Denver, CO 80209 president@WWPNA.org zoning@WWPNA.org

March 7, 2022

Re: Public Comment – Expanding Housing Affordability Project

Dear Ms. Hock:

We write to submit comment in response to the city of Denver’s *Expanding Housing Affordability Project*. We applaud the city’s efforts to begin to address the undeniable housing crisis plaguing Denver’s residents and agree that data undeniably indicates the city is correct when it stated “Denver needs more affordable housing across the income spectrum.”¹

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

- As of January 2022, the average cost to rent a one bedroom in Denver is \$2,064²
- 30% of residents in this neighborhood have incomes below \$50,000 and 10% of residents have incomes below \$24,999 annually³(representing incomes just under 30% of median income and defined as at risk of homelessness)
- Home sales averaged \$689,711 for detached housing and \$450,244 for attached (e.g., condos and townhomes). New listings are down by 48% in as of January 2022 from the previous year.⁴
- 60% of WWPNA residents are renters.⁵
- The Denver Metro Economic Development Corporation estimates Denver’s population will continue to grow at a rate that outpaces comparable cities.⁶
- An examination of residential zoning within the boundaries of this RNO show a predominance of single unit zoning; even existing parcels that presently have 3-story apartment buildings are now zoned as 2-story multi-family housing.⁷

Considering this information, we submit the following comments:

1. We applaud the city in taking a first step with the drafting this policy and acknowledge that other cities have employed similar policies as part of a series of strategies to add affordable housing to the housing supply.
2. This policy puts the costs of building affordable housing on the development of new, mostly multi-family housing. Absent city-wide zoning reform to make multi-family housing legal on all residential parcels, the impact of this approach will be muted as the presence of multi-family housing is prohibited according to current zoning on most of the land within the city’s boundaries. In other words, Denver’s continued reliance on single unit zoning will work against the city’s stated goal to provide more affordable housing.

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

Sincerely,

Amy Kenreich, President
President@wwpna.org

¹ [Expanding Housing Affordability - City and County of Denver \(denvergov.org\)](https://denvergov.org/news/2022/03/07/expanding-housing-affordability-city-and-county-of-denver)

² <https://kdvr.com/news/local/rent-is-up-in-denver-find-out-how-much/>

³ <https://www.census.gov/>

⁴ <https://www.9news.com/article/news/local/historic-low-inventory-expected-price-climb-denver-housing-market/73-3bf45569-9296-4d63-b54e-d3fb19ded66d>

⁵ https://www.census.gov

⁶ <https://www.metrodenver.org/data-central-preview/266>

⁷ [Denver Maps - Zoning \(denvergov.org\)](https://denvergov.org/development/zoning/maps)



MEMORANDUM

DATE: March 14, 2022

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

FROM: Denver Urban Renewal Authority
Tracy Huggins, Executive Director

SUBJECT: Requested Changes to Expanding Housing Affordability Draft Proposal

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

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

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

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

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

Rationale: DURA believes it is vital to collaborate on the review of compliance plans for a High Impact Development leveraging tax increment financing to assure that the plan is consistent with DURA's expectations and DURA's evaluation of the request for tax increment financing.

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

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

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

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

Thank you for taking DURA's requests under consideration.

From: [Kate Barton](#)
To: [Hock, Analiese M. - CPD City Planner Principal](#)
Cc: [Hancock, Michael B. - MO Mayor](#); [dence - City Council](#); [Deborah Ortega - Councilwoman At Large](#); [kniechatlarge; Gilmore, Stacie M. - CC XA1405 President Denver City Council](#); [Hinds, Chris - CC Member District 10 Denver City Council](#); [District 9](#); [Herndon, Christopher J. - CC Member District 8 Denver City Council](#); [Clark, Jolon M. - CC Member District 7 Denver City Council](#); [District 1 Comments](#); [Flynn, Kevin J. - CC Member District 2 Denver City Council](#); [Torres, Jamie C. - CC Member District 3 Denver City Council](#); [Black, Kendra A. - CC Member District 4 Denver City Council](#); [City Council District 5](#); [Kashmann, Paul J. - CC Member District 6 Denver City Council](#); [Aldrete, Laura E. - CPD HA1676 Manager Community Planning and Development](#); [Jennings Golich, Jill R. - CPD CA2951 Deputy Manager](#); [Fisher, Britta E. - HOST MA0054 Director of the Denver Office of Economic Development](#); [Weinig, Brad J. - HOST Director of Catalytic Partnerships](#); [Showalter, Sarah K. - CPD CE3125 City Planning Director](#)
Subject: [EXTERNAL] Business + Development Community Letter Re: Expanding Housing Affordability Proposed Policy Approach
Date: Monday, March 14, 2022 4:17:17 PM
Attachments: [image001.png](#)
[EHA Business and Development Community Letter 3.14.22 FINAL.pdf](#)

Dear Ms. Hock,

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

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

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

Sincerely,

The Downtown Denver Partnership and Signers listed in the attached letter

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



March 14, 2022

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

Re: Expanding Housing Affordability Proposed Policy Approach

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

Dear Ms. Hock,

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

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

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

We appreciate the City's willingness to limit impacts to existing projects by grandfathering them under the current regulatory framework and impact fees. We also understand staff's

decision to provide an outside date of approval (August 30, 2023) for projects that submit their concept site development plan (SDP) by June 30, 2022.

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

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

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

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

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

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

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

Per our conversation with the City on February 23, 2022, we would respectfully request staff consider the following:

- Updating the high-cost and typical cost markets every three years to provide more predictability for the development community;
- Creating an interactive map that clearly shows the visual and statistical boundaries of high-cost and typical cost markets;
- Grandfathering projects into the high-cost and typical cost markets at the time of their concept SDP submittal;

- Clearly communicating with the development community prior to changes in the high-cost and typical cost markets. Communication should occur at-least six months prior to any changes and staff should be transparent about what typical cost areas may become high-cost so developers can plan accordingly.

Maintaining flexibility through alternatives and the need for greater incentives

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

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

Limiting the disincentive to build larger units

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

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

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

options are becoming more and more out of reach due to restrictive and overly burdensome zoning and development regulations.

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

Sincerely,

Michael Gifford
President
**Associated General
Contractors of Colorado**

David Foster
Chair
**Cherry Creek Business
Alliance**

J.J. Ament
CEO
**Denver Metro Chamber of
Commerce**

Nobu Hata
CEO
**Denver Metro Association
of Realtors®**

Rachel Marion
CEO
**Denver Metro Commercial
Association of Realtors®**

Sarah Rockwell
Chair
**Downtown Denver
Partnership**

Kathie Barstnar
Executive Director
NAIOP Colorado

Matt Joblon
CEO
BMC Investments

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

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

Stephen Shepard
Chair
**Colorado Real Estate
Alliance**

Marc Savelle
VP of Development
Broe Real Estate Group

Celeste Tanner
Chief Development Officer
Confluent Development

Tyler Carlson
Managing Principal
Evergreen Devco

Ian Nichols
Senior Director
Flywheel Capital

Kevin Foltz
Managing Partner
Forum Real Estate Group

Ferd Belz
President
L. C. Fulenwider

Ray Pittman
President & CEO
McWhinney

George Thorn
President
Mile High Development

Dorit Fischer
Partner
NAI Shames Makovsky

Rhys Duggan
*President, CEO & Managing
Partner*
Revesco Properties

Tim Welland
Development Manager
Palisade Partners

Dave Davia
Executive VP & CEO
**Rocky Mountain Mechanical
Contractors Association**

Tim Schlichting
Chief Development Officer
Prime West

Bill Mosher
Senior Managing Director
Trammel Crow Company

From: Nathan Adams
To: Hock, Analiese M. - CPD City Planner Principal
Subject: [EXTERNAL] RE: Expanding Housing Affordability Office Hours Confirmation
Date: Sunday, February 27, 2022 11:50:16 AM

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

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

- 1) This policy will make fewer deals pencil meaning less housing, that is much needed, will not get built further exacerbating the problem.
 - 2) At the benefit of affordable housing you are making hard-working middle-class people pay more for their homes, these added fees get passed on to end user, it is exceptionally naive to believe land sellers will take less and developers will reduce margins. That means the cost gets passed on.
- Are city officials aware we have an inventory crisis and runaway appreciation? Please do not try and fix an affordability crisis at the expense of hardworking people who are struggling to find reasonably priced housing. As a developer I will not build if the economics of the build do not pencil, and the problem gets worse. That is the disposition of nearly every developer/builder out there. The higher prices get the worse the problem gets as attainably priced housing disappears and the gap widens between market rate and affordable making your policies even harder to get more housing constructed.

Nathan

Nathan Adams
Chief Executive Officer, redT Homes

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Nathan@redthomes.com www.redthomes.com

Building A Greener Colorado

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

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

Hello Nathan Adams,

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

Expanding Housing Affordability Office Hours

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

Please submit any questions to: Analiese.Hock@denvergov.org.

You can [cancel](#) your registration at any time.

WAYS TO JOIN ZOOM

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

Join Meeting

If the button above does not work, paste this into your browser:

https://denvergov-org.zoom.us/j/87308903652?tk=8MkCYWaMIDG6T9vzFXIdG-7eRt_UC94NXoygDJZ2RY_DQMAAAUVAQk5BZOUmo4ZXZPOFJxdU5xYmRCbXRQWVNBAAAAAAAAAAAAAAAAAAAAAAAAAAAAA&pwd=SlpMcmNIWGDhWEIfdFM5ay8xcm1wQT09

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US: +1 720 928 9299
Meeting ID: 873 0890 3652

[International numbers](#)

Response Submission Date/Time	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
02/03/2022 0:14 AM	This is so weird. Denver has created this affordable housing crisis by choosing developers that elected to be land grabbers and then capitalizing on it. Denver is following suit with big cities like San Francisco and New York where taxpayers will spend more money on high-priced units probably 500K each and other budgets that are important like paying our police and firefighters a living wage will suffer. In the end, this will be one of the most expensive projects in Denver budgets. Lining the pockets of greedy development that caused the crisis in the first place. Not only cheating the taxpayers out of millions that will soon total to billions of dollars but doing so in a way that the perpetrators of the crisis will control the land indefinitely because true ownership will never go to renters or affordable homeownership that will eventually have to give their units back to the developer. It is time to get HUD back into the picture and make homeownership just that;	Comment	Female	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
02/03/2022 7:00 AM	I have a property at 4365 Cherokee Denver 80216. The property is zoned CMX-8 which allows me to build an 8 story complex to provide affordable housing to the community. I have a conceptual approval from the City Planning office, I have a survey, soils report. But what I don't have is the financing 5 million dollars to build the housing complex. The property free and clear and I owned it right. What I need from the city is subsidized financing. I can be reached at 303 667 4506	Comment	Male	55-64	Hispanic, Latino/Latina/Latin x, or Spanish	Own	\$25,000 - \$49,999
02/03/2022 8:17 AM	Are you all going to release aggregated survey results or detail what changes have been made based on feedback?	Question	Female	45-54	Hispanic, Latino/Latina/Latin x, or Spanish	Rent	\$50,000 - \$99,000
02/03/2022 8:43 AM	The proposed expansion contains positive developments. I, however, do question references to caps at 70% and 80% of the area median income. While these demographics are currently out-priced of the housing market, what is being done for the folks who are making minimum wage and upon whom we rely for our essential services? I would appreciate clarification. I also would like clarification of what is done with monies paid in lieu of providing income-restricted units. \$250-478,000 are grand amounts but for a one-time	Question	Female	65-74	White	Own	\$50,000 - \$99,000
02/03/2022 9:00 AM	Is this a bill that the public will be voting on or just legislators?	Question	Female	55-64	White	Own	Prefer not to answer
02/03/2022 11:23 AM	More permanent affordable housing should be made, as our housing situation for lower middle classes resembles the situation in New York, more and more. We should look more into how the East coast and West coast are handling their affordable housing issues.	Comment	Male	65-74	White	Own	\$25,000 - \$49,999
02/03/2022 12:19 PM	I whole heartedly agree with this proposal! My wife and I want to stay in Denver but need to be able to afford housing. Without good policy and a mandate, developers won't do it.	Comment	Male	35-44	White	Own	\$25,000 - \$49,999
02/03/2022 13:25 PM	I think it is a much needed, if partial, solution to the affordable housing crisis. It's become increasingly clear that unless we fail to provide more affordable housing works will go elsewhere or become homeless.	Comment	Female	75 and older	White	Own	\$50,000 - \$99,000
02/03/2022 14:50 PM	Hello Analise, I am the inclusionary housing program manager for Boulder. I have looked over your policy documents and am impressed with the quality of the work. We anticipate a major update to our code/program later this year. I was wondering if you did most of your analysis and development of the tools in-house or if you used consultants. I assume you used consultants for some of the work, if so, can you tell me what consultants you used and a general idea of the scope of their work? Thank you,	Question	Female	55-64	White	Own	\$50,000 - \$99,000
02/03/2022 19:19 PM	While I understand that this is a requirement under state law, I am never a fan of any kind of provision that allows a developer to opt out of including affordable units, either by moving them off-site or by paying a fee. This should be discouraged in whatever ways are possible. Furthermore, affordable units should not be permitted to be marked or differentiated in any way from market-rate units, either by location, amenities, etc., as this is stigmatizing.	Comment	Non-binary	35-44	White	Rent	\$10,000 - \$24,999
02/04/2022 9:52 AM	More units are needed for people who make below the 60% median. There are a lot of people that don't want to live in a senior or disabled building that make 40% and 30% of what's considered Denver's median for single people. Most cities allow people to sign an interest list on the developers website also.	Comment	Female	65-74	White	Other	\$25,000 - \$49,999
02/04/2022 13:45 PM	The Public Review Draft Summary states that Projects under Site Development Plan (SDP) review could continue under existing rules if they have a: • concept SDP submitted by June 30, 2022; AND • final SDP approved by August 30, 2023 (14-month window). Can you clarify if this means a project needs to have a development concept submitted (initial submittal of a development concept) OR does the project need to have received approval from the project coordinator to advance to the next phase, submitting a formal site development plan?	Question	Male	35-44	Prefer not to answer	Prefer not to answer	\$150,000 - \$199,999
02/07/2022 15:18 PM	I agree with the problem and the need to address it as a community, but I disagree with the poorly conceived proposed solution. Motivate, don't mandate. This solution does not solve the problem of where lower-income residents need to locate in order to thrive, such as along rail lines or adjacent to grocery stores. This solution will only pass the cost burden to the other 90% of homes in the development or simply deflate growth altogether, exacerbating the supply issue even further. At the end of the day, private investment/developers are in the business to make money and they WILL make their money at the expense of others. A better solution would be to motivate or incentivize developers. How about in exchange for 10% affordable homes the City gives expedited permit reviews? Tax credits? Fee waiving? Prompt inspections? One million clever ways to solve the problem exist, but the CCD decides to be the CCP by mandating where money is	Comment	Non-binary	19-34	Black or African American, Hispanic, Latino/Latina/Latin x, or Spanish	Own	\$50,000 - \$99,000
02/08/2022 10:28 AM	The 2 page summary states: "...all new residential buildings of 10 or more units" would look to Options 1 or 2 for building affordable homes on-site. Was this a purposeful use of the word "building" as opposed to referring to a new residential "development" of 10 or more units? The use of "building" may allow developments of 10 or more SF detached homes around this rule. I haven't read the full proposed language of the ordinance, just the summary.	Question	Female	55-64	White	Own	\$100,000 - \$149,999

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
02/08/2022 11:45 AM	There should be more clarity and flexibility when it comes to off-site agreements. Use the outdated section 27-101 for example. The DMC used to allow for flexibility on location allowing for TOD to count as off-site affordability. Leaving off-site agreements up to the discretion of the director has far too much uncertainty and will incur too much negotiation. Surely there is some amount that warrants an off-site right? If the off-site developers exceed the number of affordable units required by 20% or provide an additional 10% affordability depth (50% AMI vs 60% AMI), does this not meet the goals of HOST?	Comment	Male	19-34	White	Own	\$200,000 or more
02/09/2022 6:20 AM	It would be lovely if developers would include affordable housing in every development. But will they? I doubt it. Their job (in a capitalistic society) is to make a profit. That's why the city must mandate the inclusion of affordable housing in every development. There is also an increasing need for affordable independent senior housing for people over 62.	Comment	Female	75 and older	White	Own	\$25,000 - \$49,999
02/09/2022 7:12 AM	Zoning requirements should be weakened. As well as RNOs power to stop development. Single family unit zoning is the main culprits behind high housing costs. To increase affordability the housing stock needs to be denser and higher.	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
02/09/2022 7:15 AM	I appreciate the incorporation of previous public comments, and support the newly proposed project. Denver needs more affordable housing, more options, and the local developers should be contributing more to that goal. It's fine if some of the developers leave this market due to a reduction in profitability - more will come in the future.	Comment	Male	35-44	White	Own	\$200,000 or more
02/09/2022 8:02 AM	After reviewing the proposal, I am very concerned. I do a lot of work with real estate minded people, from developers to investors, and this bill is concerning to me. The construct of the bill seems to miss the one important feature, the developer. What is the incentive to the developer to build in Denver? If you create regulation that prevents profits, why would someone want to invest here? There is no upside with this proposal to the developer. Developers will choose projects with more economic security and less regulation. It is the same reason we are seeing many developers leaving our great city. This bill seems to be ignoring the lessons learned from the Colorado Construction Defects Law Reform. This bill was originally designed to protect people, but	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
02/09/2022 9:42 AM	I beg you - just allow development by-right with clear rules for ensuring the buildings are safe. Stop trying to hit a double-reverse bank shot. Market rate housing has historically allowed people at all income levels to afford housing. You used to be able to buy a house from the Sears catalog! Unfortunately, we don't allow the market to build sufficient numbers of houses to satisfy demand. We have a housing market that artificially limits supply (through regulations, HOAs, existing homeowner demands).	Comment	Male	35-44	White	Rent	\$150,000 - \$199,999
02/09/2022 9:45 AM	I've been a full time real estate professional in Denver since 2000. I hold a BA in Architecture and a Masters in Real Estate & Construction Management from DU. Last year I Chaired the Legislative Policy Committee for the Colorado Association of Realtors. This year I reverted back to my old position of Chairing their Housing Sub Committee. I am a Commissioner on the City of Centennial Planning & Zoning Commission. I've built 29 homes in the City of Denver since 2011. All of my homes when listed for sale were the lowest priced or very close to the lowest price New Construction homes in the City of Denver. Most located near light rail. I'm shutting down my business because I cannot build homes here. The #'s do not work. And here is a proposal that makes that # calculation even	Comment	Male	45-54	White	Own	\$200,000 or more
02/09/2022 10:35 AM	I still don't think this revised plan goes far enough. These are half-measures that won't meaningfully impact the city's housing supply until several years from now. There is a housing crisis NOW. The city's unhoused population has ballooned and will continue to unless housing costs come down. I personally make around 100% of AMI and cannot afford to buy any type of home in the City of Denver right now (I'm talking condo, townhouse, rowhome, etc). This plan should abolish parking minimums on ANY development and let the market decide how much parking to be provided. As long as this city continues to mandate valuable space to cars, there will be more cars. Think about it: the more parking spaces REQUIRED, the less housing units that get built. The city needs to be doing absolutely everything in its power to encourage more dense development and cede less space to cars. City should also consider expedited reviews on any housing project	Comment	Female	19-34	White	Rent	\$50,000 - \$99,000
02/09/2022 11:17 AM	More money for affordable housing is great. Maybe expected, but this will increase prices for everyone else. I'm not sure what the number of affordable housing units this is expected to produce, but I bet it will fall far short of the demand for them. A more serious approach to solving the problem (in concert with this) is to legalize different types of housing in more places. Single family is the only legal housing type in much of my Berkeley neighborhood. That should change to quadplexes by right.	Comment	Male	35-44	White	Own	\$200,000 or more
02/09/2022 11:49 AM	Affordable housing fixing valuation on for-sale product keeps low-income earners in low-income situations by limiting the ability for their property valuation to increase equal to that of market-rate buyers. While I understand the intent to provide low-income opportunities for home ownership, maintaining deed restrictions on these perceived "city assets" of low-income housing keeps the poor, poor. Language allowing subsidy of market-rate non-restricted ownership is a better path than a requirement for deed restrictions, which will allow some, not all, qualifying home owners to get a hand up out of poverty. The view of maintaining home-	Comment	Male	35-44	Prefer not to answer	Own	\$200,000 or more
02/09/2022 14:20 PM	In early 2020 I visited many higher end rental buildings (\$2000+/mo rent for a studio or Jr 1-bdrm) in Denver and noticed many were only 40%-50% occupied. The building owners were more than happy to lose rental income rather than lower the monthly rate to attract more interest. They were also using screening tactics that based approval on how well you matched their existing tenant population like in order to apply each building would require between \$150-\$300 as a deposit, just to apply, which was refunded if denied or the renter changed their mind once approved like 1-2 weeks later. Also, many buildings are mostly occupied by temporary guests using services such as Airbnb which is much more lucrative to the building owner than approving new tenants for 1 or 2 year leases. It is very risky living in a hotel type of environment as a leaseholder because there's a high probability for conflict of interest between the privacy, safety, and security of a	Comment	Female	Prefer not to answer	Prefer not to answer	Rent	Prefer not to answer
02/10/2022 7:47 AM	I fully support the City's efforts in this regard. I think mandatory affordable housing, with incentives such as increased FAR, bulk waivers, and reduction in parking requirements, is a wonderful and much needed proposal. I think the cash-in-lieu options have not produced the necessary affordable housing, especially in neighborhoods that would most benefit from additional housing. So I encourage the city to limit cash-in-lieu options as much as the state law allows.	Comment	Male	35-44	Hispanic, Latino/Latina/Latin x, or Spanish ,White	Rent	\$100,000 - \$149,999
02/10/2022 10:34 AM	Hello - So glad to see these efforts, but they are only focused on new construction. What about incentives and zoning to switch vacant or nearly vacant downtown buildings to apartments? It seems we aren't fully utilizing the spaces we already have built.	Comment	Female	35-44	White	Own	\$100,000 - \$149,999

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02/10/2022 14:40 PM	I think the easiest way to expand housing affordability is to zone for density around downtown and near transit hubs and major bike trails/lanes. Also, let anyone who owns SFH-zoned property in the city, subject to basic inclusionary parameters, to build an ADU or turn their SFH into a duplex on their property.	Comment	Male	19-34	White	Own	\$200,000 or more
02/11/2022 9:25 AM	I appreciate the time and energy the City has put into this critical effort. As someone who is still very much fighting his way up the learning curve regarding housing and development, I only have broader input to offer, but wanted to submit it nonetheless. Like any other product or service, the more levers we pull to generate a specific type of product or outcome, the more cost implications are created. While I believe developers can likely adapt to these requirements and create projects that "pencil," their concerns with this proposal should not be dismissed. Development requires investment and if the investor calculus becomes unattractive due to these pricing and project mandates, projects will not happen. While I am aware previous affordability policies met similar concerns and yet development remains robust, each time we lump more cost burden onto developers brings us that much closer to a tipping point where their warnings actually do come true. Scarcity remains a massive driver of growing unaffordability in Denver. We need more housing, not just more affordable housing. Focusing solely on the latter will only require more interventions by the City as time goes on. Again, that will only push development in Denver closer to the point where it actually does tip into	Comment	Male	35-44	White	Own	\$150,000 - \$199,999
02/11/2022 11:51 AM	I am contacting you to express my support for the proposed affordable housing mandate. Developers will publically balk at the proposal but, as we have seen time and time again, development continues and developers sustain healthy profits, even with mandated affordable housing. If anything, I believe the proposal could be more stringent and require a higher premium from developers. We have a surplus of luxury apartments in this city and a dearth of affordable housing. This only changes with strict and specific policy.	Comment	Male	19-34	White	Rent	\$25,000 - \$49,999
02/11/2022 11:54 AM	While I applaud the intentions of the Expanding Housing Affordability project, I worry its aims may be thwarted by local constraints. Simply mandating price controls has repeatedly been shown to fail, especially when not combined with addressing the underlying restrictions that prevent building more housing units. Despite being someone who has been unable to afford to live in the city proper even though I'd really like to, I worry this proposal will do little to help people like me. Ultimately, I'd like to see exclusionary zoning addressed. This could be done with protections such as the proposed mandatory inclusionary housing units. Without increasing incentives for development and reducing the regulations that prevent abundant building, I fear this plan will have little upside with the potential	Comment	Male	19-34	White	Rent	Prefer not to answer
02/11/2022 13:51 PM	We should be trying to increase new supply of housing by allowing densification. Imposing hurdles that will reduce new supply will have the opposite of the intended effect.	Comment	Prefer not to answer	19-34	Prefer not to answer	Prefer not to answer	Prefer not to answer
02/11/2022 14:31 PM	I support the Expanding Housing Affordability project. I grew up in Denver, went to Denver Public Schools k-12, and now live in zip code 80218. Denver has become increasingly unaffordable in my lifetime, and this project will help spur affordable housing. I also want to appreciate Councilor Robin Kniech for her work on this issue; she is one of the few politicians in this city pushing for real solutions to the affordable housing crisis.	Comment	Male	19-34	White	Rent	\$50,000 - \$99,000
02/11/2022 16:01 PM	I support this proposed Affordable Housing Mandate. It makes perfect sense for developers to include 8-15% affordable units in new construction, or pay a hefty penalty. Future development will not slow or stop as a result and 'mixed income' residents within a community/building is another societal benefit.	Comment	Female	45-54	White	Own	\$150,000 - \$199,999
02/12/2022 3:04 AM	Fully support this effort by the city, but it needs to go even further. It should have x % of units for low income. Y% of units for middle income. And remaining being uncontrolled. You're effort to help low income is good, but you are doing nothing for people who are in service professions and can't afford live in the metro because they won't qualify for the low income threshold, but don't make enough to afford increasing housing rates in metro with lower middle income levels. Austin, TX has something similar in place where some % of development in an apartment complex is reserved by income limits. Yet it has not slowed down the development rate, nor has it let to an excessive increase on the rent rates for non-income-controlled units. This is a better alternative to government run housing projects. This also does not lead to any additional overhead, as the same property managers are able to verify/validate application requirements for income-controlled vs non-income-controlled units. It also helps disperse and disband, instead of creating concentrated zones of oftentimes high crime rates that are associated with govt housing projects or only low income housing complexes. It gives low income tenants access to better schools, better walkability score neighborhoods, better community facilities that otherwise would not be available for low income only housing development projects built in economically depressed neighborhoods. Those opposing use the similar tactics as back when there was opposition to raising minimum wage to 15 \$/hr, saying businesses will go out and there won't be any jobs ... Yet here we stand where 15-17\$/hr is the norm for gas station convenience stores and you don't see them going out of business.	Comment	Male	35-44	White	Prefer not to answer	\$100,000 - \$149,999

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02/12/2022 11:25 AM	It did not work in portland and somehow yall think it will work here. https://www.upforgrowth.org/news/cautionary-tale-portlands-inclusionary-housing-policy	Comment	Non-binary	18 years or younger	American Indian or Alaska Native,Asian,Black or African American ,Hispanic, Latino/Latina/Latin x, or Spanish ,Middle Eastern or North African ,Native Hawaiian	Prefer not to answer	\$10,000 - \$24,999
02/12/2022 18:44 PM	Public housing is the accommodation of last resort in the U.S. Not so in Austria's capital city, Vienna. You ought to go and talk to your government counterparts in Vienna, which arguably has the best social housing program in the world, to learn, understand and implement similar social housing in Denver as well. With its affordable and attractive places to live, the Austrian capital is fast becoming the international gold standard when it comes to public housing, or what Europeans call "social housing" — in Vienna's case, government-subsidized housing rented out by the municipality or nonprofit housing associations. Unlike America's public housing projects, which remain unloved and underfunded, the city's schemes are generally held to be at the forefront not only of progressive planning policy but also of sustainable design. Today, anyone earning up to \$53,225 a year after taxes is eligible to apply for a subsidized apartment in Vienna in a country where the median gross annual income is about \$31,500. According to the municipality, 62 percent of Vienna's citizens currently live in social housing. Here, rents are regulated and tenants' rights are strongly protected. In contrast, less than 1 percent of America's population lives in public housing, which is limited to low-income families, the elderly and people with disabilities. According to Councillor Gaál, Vienna's annual housing budget — which is spent refurbishing older apartments in the city as well as building new social housing	Comment	Male	35-44	Prefer not to answer	Own	\$200,000 or more
02/12/2022 20:12 PM	So in Green Valley Ranch and the Surrounding areas when can potential moderate income residents expect to buy homes in this area? If this is going to be in the far future what is the city doing to tackle rental costs? I currently pay \$2300-2500 a month and I have 3 kids and another adult, I am the only working adult. The cost of rent alone is draining my finances. Can the city implement a rental reimbursement program to assist people to be able to have down payments to put down on a home if the moderate income homes are not going to be available as soon as this summer? What is the 6 month action plan regarding housing for Denver? Will low income and moderate income families be able to buy a home this year or is it going to be another year of rent that it's too expensive? As far the percentages for how many units that are affordable and low income to be built in with the market rate units and homes, can those percentages be raised to accurately reflect the number of people who are in need of affordable housing. Is it possible to raise the IUCs to 25% and 30%? The community is in	Question	Female	35-44	American Indian or Alaska Native	Rent	\$50,000 - \$99,000
02/13/2022 15:59 PM	This is a commendable ambitious project that will go a long way to relieving housing stress. Affordability of housing does not insure diversity. As a capitol hill resident I can see that affordable housing in central city is only attractive to very nice progressive young white singles and couples. Working families with children and people of color are effectively discouraged from remaining in the city. We older residents who have raised families here are dying off, being replaced by temporary young residents. I hope that the housing affordability initiative will provide incentives for families of all colors to live and grow-up in Denver.	Comment	Male	65-74	Black or African American ,White	Own	\$150,000 - \$199,999
02/14/2022 13:04 PM	I see how the AMI cap is placed on the units. Who determines the acceptable cost of rent based on that AMI? Everyone's situation is different. As a side note I think this proposal could have a massive impact on all of the other rents in a building. Construction cost are out of control as is and proforma will still need to work for any development. If rent is cut from 8 - 10 percent of units that cost will be passed along to the rest of the units perpetuating the current issue with rates. Thanks.	Question	Male	45-54	Prefer not to answer	Prefer not to answer	Prefer not to answer
02/14/2022 13:24 PM	Is it possible to email this out to Denver residents through your technology system? including and especially the homeless population? I would be willing to assist. Susana Sandoval Human Rights Commissioner United Nations Permanent forum for Indigenous Peoples sandovalsusana2021@gmail.com 3123079051cellular	Question	Female	45-54	American Indian or Alaska Native,Hispanic, Latino/Latina/Latin x, or Spanish ,Native Hawaiian or Other Pacific Islander	Prefer not to answer	Prefer not to answer

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
02/14/2022 13:54 PM	<p>I think a more generalized approach to creating affordable housing is needed in Denver. Rather than saddle builders and developers with having to create subsidies for their projects, while other existing multifamily apartments and condominiums not having to comply with those regulations will create an imbalance in the marketplace by raising prices and increasing delays. The effect will be diminished new housing being built, when the market demands require otherwise.</p> <p>Nor should the City of Denver get involved in developing affordable housing, because this is not an expertise and will also have the opposite effect.</p> <p>The affordable housing fees charged on all new construction projects is a fairer way to spread the responsibility across a greater audience. If there is a way to expand this program, that, in my opinion, would be a better way to go.</p> <p>Creating incentives for affordable housing, rather than penalties, will create greater opportunity for developers to want to include more affordable and subsidized housing. The old adage of taxing something you want less of applies here. Incentivizing developers to provide affordable housing through lower real estate taxes, sales tax reductions on the construction materials, and even subsidizing land costs will create this badly needed resource.</p> <p>The city needs to think in terms of helping developers lower their costs to create those offsets. Fees in lieu can work, but not to 250,000 per unit that I've read about.</p> <p>As an architect, I doubt that the city is in a position to expedite permit reviews, and if it was, it surely needs to look into the essentially worthless, expensive and exceedingly time-consuming process of the Site Development Plan. This process was initiated in the 1990's as a way to help design teams to work with the city agencies in a more integrated manner in order to create efficiencies in the various plan reviews. But over the years, the SDP reviews have become a process unto itself with absolutely zero benefit to the design and construction team. It has added a completely new layer on the process. repeal this process and return to</p>	Comment	Male	65-74	White	Own	\$100,000 - \$149,999
02/14/2022 14:00 PM	<p>This project should include specific and strong incentives for re-use of existing structures, and disincentivize scraping and building new. Use of existing structures is far more environmentally sustainable and frankly will result in more modest and consequently more affordable housing units that integrate better into existing neighborhoods. There is plenty of opportunity for responsible affordable in-fill in Denver. Currently, most modest sized older structures, including many older duplexes and triplexes, are scraped in order to build giant all-new and very expensive single-family homes. Tiny bungalows sell for a million dollars only because a giant seven figure single family home can be built on the lot. This buy/scrape model contributes directly to the housing affordability crisis - by inflating the price of otherwise modest homes. Unused or underused commercial buildings could also be repurposed. When will Denver stop prioritizing easy profits for developers</p>	Comment	Female	55-64	Hispanic, Latino/Latina/Latin x, or Spanish ,White	Own	\$25,000 - \$49,999
02/15/2022 15:50 PM	<p>Is the intent of the proposed affordable housing policy to make it significantly more expensive for market rate renters to live in Denver?</p> <p>In the Denver Post Article from Feb 11th, City Councilwoman Robin Kniech is quoted: ""Every policy and every housing agreement I have ever done I have been told will kill development," Kniech said this week. "I still stand here today and look out my window and see the cranes. Ultimately, the market is the evidence.""</p> <p>However, the vast majority of those cranes she sees are for very expensive luxury apartment buildings. Was an increase in luxury housing the intent with previous affordable housing measures?</p> <p>Councilwoman Kniech is correct in that the market will continue to attract developers. However, if this proposed affordable housing measure passes, you are going to see market rents skyrocket even more so than they are now. What is not considered in the analysis is that land prices are doubling and construction costs are up 60%-100% in 12 months alone. Adding further costs will result in two things: 1) projects with cut corners, low finishes, small apartment units, minimal glass, no outdoor space, and cheap building materials or 2) uber expensive luxury like The Pullman or St Paul Collection. Denver's built environment is really going to suffer.</p> <p>When applying the option 2 (15% of units at 70% AMI) on an existing project of mine, the impact is a 13.0% increase in market rents for the 85% of market rate units to make the deal pencil. That impact is approximately \$330 per month or \$3,960 annual increase rental costs for market renters, on average. For the</p>	Question	Female	19-34	White	Own	\$100,000 - \$149,999
02/16/2022 4:27 AM	<p>I live in a building that was built 4 years ago as low-income affordable housing. The mayor even participated in the groundbreaking ceremony. I moved in when it was brand new. We are now on a second property management company and they have made it very clear in their actions that they are not concerned at all with maintaining the entrance doors handicap accessibility opener mechanisms to ensure that they function. It is federal law - the Americans with Disabilities Act but it was signed into law before many of the property management company owners were born and the federal gov't never really does anything to punish for blatant</p>	Comment	Male	55-64	Prefer not to answer	Rent	\$10,000 - \$24,999
02/16/2022 10:14 AM	<p>When I moved to Capitol Hill in the 1990s, all of these apartment buildings had live-in managers. Those managers usually received free or greatly reduced rent for their services. They often had other jobs to make ends meet. They would handle all of the responsibilities of keeping the building maintained, keeping the grounds clean, and everything required to turn over units between tenants.</p> <p>Now large management companies have pushed the live-in managers out. There is no on site person to keep an eye on the premises and many of these places are not kept picked up and clean. Tenants don't like to complain to management companies for fear of being thought of as trouble makers and getting their rent increased. I have often reported problems about the building next to my house to both the city and the management company about trash that not being picked up frequently enough and spilling all over the neighborhood.</p>	Comment	Male	55-64	White	Own	\$25,000 - \$49,999
02/17/2022 14:57 PM	<p>I believe creating an onus for developers to help carry this burden is completely appropriate. I only wonder if we can't help incentivize individuals and smaller entities to support the solution as well. Could we look at making ADUs easier (approved in more of the city) and even partially incentivized (subsidized) so that individual land owners can help solve the demand?</p>	Question	Male	35-44	White	Own	\$100,000 - \$149,999

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02/17/2022 16:43 PM	This proposal will have the OPPOSITE of the intended effect. If you want to lower the cost of housing, you need to INCREASE THE SUPPLY. In order to do that, you should be lowering the costs of, and barriers to, development. This instead substantially increases the cost of developing housing, which basic economics will tell you will result in a lower supply.	Comment	Non-binary	18 years or younger	American Indian or Alaska Native, Black or African American, Hispanic, Latino/Latina/Latin x, or Spanish, Middle Eastern or North African	Rent	\$10,000 - \$24,999
02/18/2022 14:15 PM	What changed allowing this proposal to come to the table? I am under the impression that this sort of plan was determined to be unlawful by the State Supreme Court already.	Question	Prefer not to answer	45-54	Asian, Black or African American, Hispanic, Latino/Latina/Latin x, or Spanish, Native Hawaiian or Other Pacific Islander, White	Own	Prefer not to answer
02/20/2022 14:58 PM	I just wanted to write in and say that I enthusiastically support this measure! We need more affordable options. Thank you all for your work!	Comment	Female	19-34	White	Rent	\$50,000 - \$99,000
02/22/2022 13:41 PM	Analiase: I have a question regarding the effective dates of the proposed Expanding Housing Affordability project. The summary indicates that projects could continue under existing rules if a concept SDP is submitted by June 30, 2022 and final SDP is approved by August 30, 2023. However, for residential review, it would require submittal of a building permit by June 30, 2022 and building permit approval by December 30, 2022. Is that correct? Should that be 2023? How could building permit approval be required by the same date as concept SDP submittal? Building permit submittal is not typically accepted by the Building Dept. until at	Question	Male	45-54	Prefer not to answer	Prefer not to answer	Prefer not to answer
02/23/2022 16:38 PM	While I understand your desire to provide affordable housing, adding complexity and a tax to new housing only increase the cost of housing. Businesses are required to not lose money, or they can't be in business. This means if you raise costs on them, the cost gets passed along in the housing prices to the end consumer. It doesn't require an in-depth analysis to know what is going to happen here: complexity and higher taxes on contractors and developers is going to get passed to buyers... and prices are going to go up. I know this initiative makes some people feel good, and gives "more power and control" to some in government who really want more power and control - but this does nothing to solve the problem. The solution to the problem is very simple: build more housing - increase the supply in the market place. To do this you need	Comment	Male	35-44	Prefer not to answer	Prefer not to answer	Prefer not to answer
02/23/2022 18:08 PM	I am a for-sale condominium developer in Denver since 2009. Of course I don't want to raise costs of projects but I also do believe the City needs help with affordability. I am sure it is not intentional but the most recent details of the Affordable Housing plan disproportionately affect condominium sales vs apartment buildings. Revenue for the apartments would be decreased slightly less from a percentage of building valuation however this impact affects the investor return only slightly. This assumes that rents would not be raised to cover the reduced rent for the affordable units. If rents are raised then there is no financial impact at all. In for-sale housing the investment model is drastically different. Units are sold only once and the investment performance is simple, gross revenue less costs.	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Own	Prefer not to answer
02/24/2022 10:04 AM	I am very concerned about the price of housing in Denver, especially for low income workers and family. The Expanding Housing Affordability is a step in the right direction and I very much support the program.	Comment	Female	35-44	White	Own	\$50,000 - \$99,000
02/24/2022 11:43 AM	It seems to be that this is just going to drive up the cost of housing.	Comment	Female	65-74	White	Own	Prefer not to answer
02/24/2022 16:06 PM	Hello-our company currently owns property in the 38th and Blake Incentive Overlay District. I was reviewing the DRMC Public Review Draft Dated 2/1/22 and had a couple questions. 1. What defines a high market area vs a typical market area. We own property at 34th and Walnut, another at 4001 Walnut, and another at 1335 E 40th St. Would these properties be high market areas or typical market areas? 2. The DRMC document I have reference above has base and enhanced incentive compliance options. Am I correct in my understanding that the enhanced incentive compliance options replace the 38th and Blake Incentive Height	Question	Male	Prefer not to answer	Prefer not to answer	Own	Prefer not to answer
02/25/2022 10:08 AM	Is there a resource where we can verify if a location is considered a high-cost market versus a typical market? I did read the definition in the draft language and understand how it's calculated, but wondering if there's a quick way to verify high-cost versus typical.	Question	Female	35-44	White	Own	Prefer not to answer

Response Submission Date/Time	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
02/27/2022 14:51 PM	<p>Analiene,</p> <p>By way of introduction, I'm a fellow City of Denver resident and current candidate for the City's open Senior Assistant City Attorney (Real Estate & Housing Stability) role. I recently attended your 2/17 Open House on Expanding Housing Affordability. I believe the measures outlined in your presentation (linkage fees, mandatory mixed-income housing, etc.) will go a long way toward ensuring that private developers participate in the solution. I applaud you and staff for taking proactive steps to address the critical issue of housing affordability in our community.</p> <p>I'll continue to gather information and learn about this initiative. And as I waded through the wealth of useful materials at your web page, I am curious as to the top three to five resources you would recommend for me in assimilating the information, with particular emphasis on those materials that might be of greatest interest to a candidate for the City's Legal staff.</p> <p>I look forward to hearing from you.</p> <p>Regards,</p>	Question	Male	45-54	White	Own	Prefer not to answer
02/28/2022 10:28 AM	<p>Overall I completely support the desire to increase the amount of affordable housing in Denver. I work in public health and housing inaffordability is a huge public health issue across the income spectrum, but especially affecting low income folks. One of the primary reasons housing is so unaffordable here is that demand outstrips total supply. This means that even if a number of units are reserved at a certain AMI, housing as a whole will still remain unaffordable and it will become a matter of lottery who is able to stay affordably housed in Denver. This is not a long term solution.</p> <p>Have there been discussions with developers about whether they believe this affordability requirement will disincentivize the construction of new buildings? My worry is that if fewer total housing units are constructed because of this initiative, it may not have the effect on housing price as you might expect. As any</p>	Question	Male	19-34	White	Own	\$100,000 - \$149,999
02/28/2022 11:37 AM	<p>This is a terrible idea! All it will ultimately do is DECREASE the total available housing in Denver since developers will be turned away, INCREASE rents for everyone NOT lucky enough to win this housing "lottery" of affordable units (i.e. MOST people the are renters in Denver) and increase overhead costs due to all the extra administration required for this program. Don't make the same mistakes other cities have made! Artificially capping rents only creates more problems down the line. If you want to make housing more affordable you need to INCENTIVIZE building so there are more units on the market in places where they are</p>	Comment	Male	19-34	Prefer not to answer	Rent	\$50,000 - \$99,000
02/28/2022 12:39 PM	<p>From the public health perspective - the legal / regulatory action as written and as implemented may not be designed to address the problem from an equity perspective. We know that the 30% AMI (\$22,000) is where we have the largest gap yet the policy is designed for 65% (\$48,000) and has loopholes so no units need to be built.</p>	Comment	Male	19-34	White	Own	\$100,000 - \$149,999
03/01/2022 19:16 PM	<p>Having worked on Housing Affordable issues prior - I still have concern for the type of development that will be offered as units classified as the % of units set up for affordable housing. What time frame are we considering? Units already in approved, in the process of being built (beyond just planning); units in available in the Lowry area where multiple units sit empty - will these also be considered? Or is just new development from the planning stage now being established? And what economic development tools are financing this endeavor? TAD or TIF? Will there be a new referendum?</p>	Question	Female	65-74	Hispanic, Latino/Latina/Latin x, or Spanish ,White	Own	\$25,000 - \$49,999
03/01/2022 21:04 PM	<p>Yes, NOT homeless.</p>	Comment	Male	65-74	White	Own	\$25,000 - \$49,999
03/02/2022 12:47 PM	<p>Thank you for receiving feedback on the Expanded Housing Affordability project. I work for a church that has been trying to build an 8 story building for four years that would be majority affordable housing units. The issue has always been setting up the funding for the project. We are at a place where we are going to sell our property and due to this updated policy, the offer we have for our land has been decreased 57.5%. We are hearing this from other developers as well. So, for a church that is VERY pro affordable housing...we are torn. We want to see them built. But the economic impact is so great that developers are either</p>	Comment	Male	45-54	White	Own	Prefer not to answer
03/05/2022 19:01 PM	<p>Presently as a 2 year nurse I can not participate in the affordable housing project. I earn "too much" ha! And they hold a training that is only offered in the evening - and I work night shifts - NO FLEXIBILITY totally discrimination against people who work shift work How are you going to support our health care workers who may make more than 55,000 a year but can not afford a home in Denver.</p>	Question	Female	19-34	White	Rent	\$50,000 - \$99,000
03/07/2022 7:40 AM	<p>Will you expand the IMX-3 to IMX-5 on Larimer St. south of the current boundary ?</p>	Question	Prefer not to answer	Prefer not to answer	Prefer not to answer	Own	\$50,000 - \$99,000
03/08/2022 17:53 PM	<p>Please also consider first time home owners. I've lived in the Denver area my whole life. I work 40-50 hours a week and make decent money, but still can't afford to buy anything except a small basement condo with no outdoor access. Please consider developments for first time home owners that might want access to some green space. Small homes rather than all these McMansions developers keep building.</p>	Comment	Female	35-44	White	Rent	\$25,000 - \$49,999
03/08/2022 18:09 PM	<p>I have read and am in full support of the letter dated 12/31/21 sent to the EHAA committee (along with other city leaders) from a consortium of groups who work to support community members experiencing homelessness. I have long considered the commonly used definition of "affordable" housing as 80-120% of AGI as an inappropriate guide that excludes our most vulnerable community members who have been or are at risk of being displaced. I have seen my own neighborhood (Cole) rapidly gentrify over the past 10 years - and recognize that I am a part of that gentrification - and we have lost many long-time residents who have been pushed out by landlords or skyrocketing property taxes. It's past time for Denver to address this issue and finally take steps to protect its lowest income residents, and to show that they too have a place in Denver. I ask that the committee:</p> <ul style="list-style-type: none"> - Raise the Affordable Housing Linkage Fee to better align with the City's Housing & Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods. 	Comment	Female	55-64	Hispanic, Latino/Latina/Latin x, or Spanish ,White	Own	\$50,000 - \$99,000
03/08/2022 18:15 PM	<p>The market is the best allocator of resources. The less the city council interferes the better. If housing costs rises wages will rise to attract more workers. I support as minimal interference as possible. Forcing restrictions will deter development of new units limiting supply and without decreasing demand increased costs for everyone.</p>	Comment	Male	19-34	Prefer not to answer	Own	\$50,000 - \$99,000

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03/08/2022 19:10 PM	<p>I am writing to you as a fairly new resident of Colorado with an urgent request to consider our most vulnerable neighbors as you move forward with the Expanding Housing Affordability Plan. I am not an expert on issues around housing but I do know that I want to live in a city that supports its residents who are struggling the most. I wholeheartedly believe that housing is a human right and, as a community, we need to take action to ensure that we can live up to this ideal. We have the opportunity to make some important changes now. That is why I am echoing the following requests put forth previously by 9 to 5 Colorado, Colorado Coalition for the Homeless, Colorado Cross-Disability Coalition, Colorado Homes for All (and other organizations).</p> <p>1) Raise the Affordable Housing Linkage Fee to better align with the City's Housing & Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods. An appropriate fee would be the Maximum Legally-Justifiable Nexus Fee per the 2016 Denver Affordable Housing Nexus Study for all land use categories, escalated in an amount equal to the changes in the Consumer Price Index for All Urban Consumers (CPI-U).</p> <p>2) Eliminate Section 27-157 of the ordinance, which allows for the Executive Director of the Department of Economic Development to "reduce or waive" the total linkage fee if the applicant "demonstrates that the required amount of fees exceeds the amount that would be needed to mitigate the actual demand for affordable housing created by the development." This reduction/waiver allowance ignores and dismisses the clear causal relationship between gentrification and homelessness, even when developments do not directly generate new residents or employees in need of affordable housing.</p> <p>3) Dedicate a minimum of 20% of the total annual funds generated by the Linkage Fee directly to housing first solutions to those experiencing homelessness.</p>	Comment	Female	19-34	White	Rent	\$50,000 - \$99,000
03/09/2022 10:53 AM	I think ADUs should be encouraged in all contexts, and should get a waiver on linkage fees, and permit fees as a policy matter. This will improve affordability of ADUs. This should also apply to the Tandem house TU building forms.	Comment	Male	55-64	White ,Other: Hanseatic	Own	\$25,000 - \$49,999
03/09/2022 10:53 AM	I appreciate the focus on housing affordability and finding a balance that increases new housing development available at a range of affordability levels. However, I am very concerned that the plan does not provide adequate focus on lower-income individuals and families, who are the most cost-burdened and likely to experience homelessness or housing instability without affordable housing. Affordable "workforce" housing for our teachers, child care workers, and others is quite important, but Denver needs an affordability plan that also includes those most in need.	Comment	Female	35-44	White	Own	\$200,000 or more
03/09/2022 14:22 PM	Why aren't you just using the maximum linkage fee? Why do we commission studies, reports, commissions, etc. to not implement the recommendations? Why does the city not use boldness to meet our challenges and instead chooses cowardice and the status quo? People will die sleeping outside tonight.	Comment	Female	19-34	White	Own	\$200,000 or more

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03/09/2022 21:27 PM	<p>I support affordable housing and I support the creation of an inclusionary housing requirement. However, I believe the implementation of the program and the requirements proposed in the city's policy should be revised prior to adoption in two ways.</p> <p>1)First, the Policy's higher burden placed on for-sale condo development versus rental development should be reversed so that rental is the higher percentage requirement and condo has a lower requirement. This policy as proposed penalizes condo development relative to rental, is fundamentally flawed in its logic, and is bad policy for a City that needs more urban home ownership in general!</p> <p>2)Second, the fee in lieu seems to be grossly exaggerated and should be based on the *difference* in the cost to develop/produce an affordable unit as opposed to the *total* cost to produce a normal unit. If it is based on the total cost of producing a unit, not just the incremental cost of making a market rate unit affordable, then it is a grossly exaggerated fee. The reasonable cost should be the takes the incremental funding / subsidy it takes to make an affordable unit viable.</p> <p>I'd like to dig in a little more on the condo issue, as it is particularly perplexing and troubling....</p> <p>Despite compelling the complications and arguable lower benefit associated with for-sale units, Staff is inexplicably placing a much higher value on "for sale" units than "rental" with a materially higher linkage fee. The fee should be one flat fee regardless.</p> <p>Benefits of Deed-Restricted For-Sale Housing are Frequently Compromised – The value of for sale deed restricted housing relative to rental housing is undermined by several factors:</p> <p>a.It is difficult to qualify buyers, and as a result, a material percentage of the buyers who ultimately do qualify are young adults with parents who help them with qualification rather than the long-term workforce households meant to be served.</p> <p>b.Often, AMI qualifications only matter at time of purchase, and so the housing is not turned over to a new household in need when the occupant exceeds qualification.</p> <p>c.Maintaining compliance on deed restricted housing can be difficult, as the City's historical problems indicate.</p> <p>In contrast... Rental housing is actively managed at all times and is always being maximized for the appropriate households in need.</p> <p>Proposed policy inappropriately penalizes condo development – The proposed policy takes the position that because for sale housing, such as condo, is more expensive and harder to develop, then the city should charge it more per unit. This makes absolutely no sense! There are reasons why condo development in Denver is so limited and why the City is being overrun with rental units and suffering a shortage of for sale housing units. The policy completely ignores these market forces and realities. For sale housing is hard. The idea of making it even harder to do for-sale than rental by imposing higher fees and higher percentages of units is completely backwards and the City's analysis is fundamentally flawed in both logic and economic analysis. The City's proposed policies make the development of condo projects even harder relative to rental, make new 'attainable' condos impossible, and make the only condos viable be the owns</p>	Comment	Male	45-54	Prefer not to answer	Own	Prefer not to answer
03/09/2022 22:54 PM	<p>Hi, please increase the income requirements to qualify for affordable housing townhomes. My income is a little higher than the 2021 limit, but not enough to afford the market prices for a home. Please build more townhomes. The affordable homes are always under contract and sold so quickly. Please also help by removing the down payment and closing cost. 3000 and another 8000 to close is just not possible with having an extremely high rent and other living expenses. Thank you for reading this message.</p>	Question	Female	55-64	Black or African American	Rent	\$50,000 - \$99,000
03/10/2022 15:17 PM	<p>IMO we need to create small scale, replicable housing models that are accessible, affordable, equitable, net zero energy, and possibly manufactured.</p>	Comment	Male	65-74	White	Rent	\$50,000 - \$99,000
03/10/2022 15:21 PM	<p>Please note I submitted a comment early this morning and would like to follow up.</p> <p>Please note that our team inadvertently reviewed a draft prior to 2/1/22, which showed a higher percentage requirement for for-sale than for rental. The draft released Feb 1, 2022 shows the *same percentages* for both for-sale and rental, which is a welcome change in the right direction, and it shows AMI levels are slightly different for rental (60% AMI) and for sale (80% AMI). So my assertion that the draft policy shows higher requirements for for-sale than for rental was incorrect. Apologies. That being said, the economic burden placed on for-sale housing is still materially greater than rental housing and is in my estimation bad policy.</p> <p>Considering the realities of development, the economic burden to a for-sale project (~\$320k-\$340k lost income / unit) is materially higher (~65%) than the economic burden of a rental unit (~ \$180k-\$220k per unit). On a 150 unit project, the developer faces a \$4,950,000 loss of revenue on 150 units of condo versus a \$3.0 M loss of revenue to a rental project, a difference of \$1.95M. Similarly the policy proposed fee in lieu of \$408k for condo and \$250k-295k for rental would be an increase of \$1.7M to \$2.4M for a condo project. So the policy approach effectively penalizes the 150-unit condo development in this example by roughly \$2.0 million additional over and above a rental execution, pushing the developer towards rental housing development.</p> <p>The underlying logic behind the higher fee in lieu for condo, I presume, is that the City is looking for on-site production of units, and they realize that condo units are more expensive to develop. Hence the fee has to be higher to promote on-site units.</p> <p>The main point I was hoping to make was that condo development is hard, and we should not be adopting policies that make condo development relatively harder</p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer

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03/10/2022 17:19 PM	<p>Analiene Hock, Principal City Planner Community Planning & Development, City and County of Denver Wellington E. Webb Municipal Building 201 W. Colfax Ave. Denver, CO 80202</p> <p>Re: Expanding Housing Affordability Proposal Policy</p> <p>CC: Mayor Michael B. Hancock, Denver City Council, EHA Advisory Committee</p> <p>Dear Ms. Hock,</p> <p>The Colorado Real Estate Alliance (CREA) is a coalition of real estate-focused organizations with residential and commercial interests. CREA is writing to express concerns with the City and County of Denver's proposed Enhanced Housing Affordability policy. We recognize the challenge of rising housing costs but do not believe this proposal is the right solution.</p> <p>We appreciate the City's efforts to increase access to affordable housing. However, we do not believe the proposed policy will yield the outcomes the City is seeking – on housing, livable wages, or climate. The inevitable cost-shifting will lead to increased market-rate rents for individuals, families, and small businesses. Our industry has long been paying above-average wages, and as market-rate rents increase to subsidize units for those within 60-80% AMI, workers in our industry will be forced to move further out of the city or limit their salary to stay within the low AMI levels. With one misguided policy, the City will drive up rents, disincentivize wage increases, and increase pollution from on-road transportation, which currently accounts for 22% of Denver's greenhouse gas emissions.</p> <p>CREA seeks to be a partner with the City in addressing the problem of affordable housing within our community and asks the City to consider the following changes to the policy:</p> <ul style="list-style-type: none"> • Raise the AMI limits for affordable housing to 120% AMI while maintaining the revised percentage of required onsite affordable units. • Leverage existing resources such as the sales tax for housing or enact property tax incentives to encourage and facilitate the development of affordable housing projects; and • Eliminate the disincentive for building larger units. Larger units (2-4 bedroom units) in the city center can house families and provide defacto affordable housing for young professionals willing to live with roommates. 	Comment	Male	45-54	White	Own	Prefer not to answer
03/10/2022 20:26 PM	<p>The EHA proposal can be a useful piece of the housing puzzle, but housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group</p>	Comment	Male	45-54	White	Own	\$200,000 or more
03/10/2022 21:04 PM	<p>The EHA proposal is a nice idea but it's incomplete. Without expanding the ability to build more market rate housing an inclusionary zoning policy is doomed to failure. I'd encourage the board to review the impact of Portland's inclusionary zoning regulations on production of affordable housing.</p>	Comment	Male	35-44	White	Rent	\$150,000 - \$199,999
03/10/2022 21:31 PM	<p>Dear CPD Board,</p> <p>The EHA proposal can be a useful piece in solving the housing problem. But, housing won't be affordable until more housing is LEGAL across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable. Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November.</p> <p>Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p> <p>Sincerely,</p> <p>Mark Schuler</p>	Comment	Male	45-54	White	Own	\$200,000 or more
03/10/2022 22:07 PM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle, but housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p> <p>Sincerely,</p>	Comment	Male	35-44	White	Own	\$200,000 or more

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03/10/2022 22:28 PM	Please reduce parking minimums and allow taller buildings throughout Denver as you require affordable housing. It has repeatedly been demonstrated that higher density and less parking produce more financially productive neighborhoods with smaller carbon footprints per resident. Instead of using these as bargaining chips for even more affordable housing in new developments, please just universally grant them to improve our city.	Comment	Male	19-34	White	Own	\$150,000 - \$199,999
03/11/2022 8:34 AM	<p>Dear CPD Board:</p> <p>Please consider the broader picture when trying to create affordable housing in Denver. We are chronically behind on building enough new housing units to keep up with demand, and we need to make it easier for developers to build a lot of units, and to build them densely so that we can have more units in the neighborhoods where people want to live.</p> <p>I support the incentives in the EHA proposal. Developers should be incentivized to include affordable housing in their new developments, and I like the fee reductions for including affordable housing in developments.</p> <p>But more important than forcing developers to have a certain number of affordable units is to incentivize multifamily units and disincentivize single-family-unit developments. As fine as "affordable housing" is, most people either cannot access it, have to wait too long to access it, or don't know how to access it. Most of Denver relies on market-rate housing for their housing needs, and the only way to solve the housing crisis is to build more housing in the neighborhoods where people want to live.</p> <p>Here's some ideas that will really help Denver build more housing and stabilize/decrease housing prices:</p> <ul style="list-style-type: none"> -In all places zoned for residential, allow ALL types of residential housing. Multi-family units (even duplexes, townhouses, and other gentle-density units) are banned in most residentially-zoned areas. This is an artificial and arbitrary rule that suppresses housing supply. -Make the permitting process easier. The quicker developers can build, the quicker we will have new houses, and the cheaper the process will be for them. -Increase permitting fees on single-family-unit developments, and decrease permitting fees on multi-family-unit developments, especially apartment/condo buildings that greatly increase housing supply. -Eliminate parking minimums. Parking spaces take up space that can be used for housing units or other apartment complex amenities. They also contribute to urban sprawl, which makes it harder to increase housing supply and makes people more reliant on cars (which are a huge burden in the average family's transportation budget). 	Comment	Male	19-34	White	Rent	\$25,000 - \$49,999
03/11/2022 9:12 AM	Without liberalizing our zoning code to allow for missing middle housing, we're just going to do what Portland did. They passed an Affordable housing ordinance and it resulted in very few new Affordable homes and had additionally killed all market rate development. Personally, despite making about median AMI and owning a condo, I have no way to afford anything else even if I could find something for sale. We're in a severe decade long housing crisis, made only worse by the pandemic, and the city is spending years proposing half-measures that don't solve the systemic problems created by our historically racist and classist zoning	Comment	Male	35-44	White	Own	\$150,000 - \$199,999
03/11/2022 9:25 AM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle. But, housing won't be affordable until more housing is legal across all of Denver. Any law that interferes with the construction of safe housing is a travesty. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p> <p>Sincerely,</p>	Comment	Prefer not to answer	35-44	Prefer not to answer	Rent	\$50,000 - \$99,000
03/11/2022 9:28 AM	<p>Hi,</p> <p>I grew up in Denver and I am about to turn 30. Over my lifetime, I have seen Denver go from a sprawling yet affordable city to a sprawling *and* unaffordable one. At the same time, traffic and air quality problems have become unsustainable.</p> <p>The EHA project is a great step in the right direction. Streamlined permitting, parking reductions, and height bonuses are concrete changes that will move us in the right direction.</p> <p>However, affordable multi-family housing is still illegal in over 75% of Denver. We cannot fool ourselves into thinking that this single piece will solve the puzzle of affordable housing. Denver's population will only continue to grow as the climate crisis affects quality of life in nearby states such as California, Arizona and New Mexico. We need to be prepared to densify our city in response to increasing urbanization. Traffic and air quality concerns will only get worse here in Denver unless we make systematic change.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November.</p> <p>I urge you to continue the momentum started by the EHA project and focus on broad, systematic changes that will allow more housing to be built in Denver,</p>	Comment	Female	19-34	White	Rent	\$50,000 - \$99,000

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
03/11/2022 9:37 AM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together!</p> <p>The EHA proposal can be a useful piece of the housing puzzle. I appreciate the steps our city is taking to improve access to reasonably affordable housing. However, housing won't be affordable until more housing is legal across all of Denver. In my neighborhood (East Colfax), most homes are small (600-1400 sq ft) 2 bedroom homes that were built on large 6000+ sq ft parcels throughout the 1940s and 50s. Most of these structures are now reaching the end of their lifespan, which really shows if you take a drive around the area! With current zoning, it is only possible to replace these older houses with new single family homes (with or without an ADU). This leads to an unfortunate dichotomy of modern "luxury" homes right next door to aging modest cottages—basically a visual representation of the "missing middle." East Colfax would greatly benefit from changing zoning rules to allow for triplexes, Fourplexes, and micro-apartment blocks, and also eliminating set-back requirements. This would allow the area to adapt gradually and also increase density along the Colfax corridor.</p>	Comment	Male	19-34	White	Own	\$50,000 - \$99,000
03/11/2022 9:54 AM	<p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle. Market-rate development is the engine that drives this policy. Market-rate addition of housing, rather than just housing replacement, is illegal across 70+% of buildable land in Denver.</p> <p>Housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p>	Comment	Male	35-44	White	Own	\$150,000 - \$199,999
03/11/2022 11:30 AM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle. But, housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p> <p>Sincerely,</p>	Comment	Male	35-44	White	Own	\$100,000 - \$149,999
03/11/2022 15:13 PM	<p>Denver is experiencing a widespread housing crisis - we lack the number of homes we need, and so we are experiencing extreme price increases. This policy, while well intentioned, imposes the cost of adding affordable housing on primarily those who buy or rent multi family housing. This strikes me as highly inequitable. What expectation is there that existing property owners start to take ownership in the problems we have created for ourselves? To that end, please consider the following:</p> <ol style="list-style-type: none"> 1. Legal multi family housing on every single parcel in the city. If we are going to require that the costs be funded largely be users of multi family housing (development costs will obviously be passed down), we at least have a chance of building more units. Right now multi family housing is illegal on most residential parcels. 2. Can we just re-evaluate our entire zoning code and process? Our zoning code is entirely too complicated, which results in significant added expense at every point in the process. It should be easy to build multi family housing. 3. Remove all parking requirements - people say how much they like the smaller apartment buildings, but literally none of those can be constructed now due to 	Comment	Female	35-44	White	Own	\$200,000 or more
03/11/2022 15:22 PM	<p>The Colorado Gerontological Society has followed closely with Denver's Expanding Housing Affordability Project. Over the last few month, CGS has worked closely with diverse community members in our grass-roots Affordable Housing Coalition, educating members and seeking their input regarding the City's three tools that are being utilized to promote the creation of affordable housing. We have outlined a few comments and recommendations based off our conversations:</p> <p>Consumer Perspective:</p> <ol style="list-style-type: none"> 1. When defining "affordable" within this project, it is unclear exactly what the City's definition is. The Office of Economic Development defines affordability as spending 30% or less of your total income on housing costs. That includes rent or mortgage plus utilities. <ul style="list-style-type: none"> a. We want to bring to attention that even if affordability addresses those living at the 30% AMI threshold, there remains a vulnerable and very low-income group of people who cannot afford housing at the 30% AMI standard. This is of deep concern and should be addressed. This population would include those living on Disability, Old Age Pensioners, Social Security income, and the homeless. <p>What is the City doing to ensure those who cannot afford housing at 30% AMI are being considered and protected in this project?</p> <p>Developer Perspective:</p> <ol style="list-style-type: none"> 1. Propose the idea of a "pre-packaged" deal between the City and the developer. This would create yet another incentive for developers who choose to invest in building affordable housing. This proposed package could include a streamlined application process relating to zoning/regulations, permitting, land acquisition, etc.,. <p>After receiving feedback from developers, it has been brought to attention the grave "red tape" that surrounds the process in developing housing within the City of Denver. The current oversight processes in place creates a complicated and time-consuming process for developers before they can actually start building. We are concerned that these pain points in the development process may deter future developers. We do not have time to wait—people need affordable housing</p>	Comment	Female	19-34	White	Rent	\$100,000 - \$149,999

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
03/11/2022 16:03 PM	<p>I am writing to you as a fairly new resident of Colorado with an urgent request to consider our most vulnerable neighbors as you move forward with the Expanding Housing Affordability Plan. I am not an expert on issues around housing but I do know that I want to live in a city that supports its residents who are struggling the most. I wholeheartedly believe that housing is a human right and, as a community, we need to take action to ensure that we can live up to this ideal. We have the opportunity to make some important changes now. That is why I am echoing the following requests put forth previously by 9 to 5 Colorado, Colorado Coalition for the Homeless, Colorado Cross-Disability Coalition, Colorado Homes for All (and other organizations).</p> <p>1) Raise the Affordable Housing Linkage Fee to better align with the City's Housing & Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods. An appropriate fee would be the Maximum Legally-Justifiable Nexus Fee per the 2016 Denver Affordable Housing Nexus Study for all land use categories, escalated in an amount equal to the changes in the Consumer Price Index for All Urban Consumers (CPI-U).</p> <p>2) Eliminate Section 27-157 of the ordinance, which allows for the Executive Director of the Department of Economic Development to "reduce or waive" the total linkage fee if the applicant "demonstrates that the required amount of fees exceeds the amount that would be needed to mitigate the actual demand for affordable housing created by the development." This reduction/waiver allowance ignores and dismisses the clear causal relationship between gentrification and homelessness, even when developments do not directly generate new residents or employees in need of affordable housing.</p> <p>3) Dedicate a minimum of 20% of the total annual funds generated by the Linkage Fee directly to housing first solutions to those experiencing homelessness.</p>	Comment	Male	19-34	White	Rent	\$50,000 - \$99,000
03/11/2022 18:24 PM	<p>I appreciate the effort to do something about the housing affordability problem in Denver. It is a problem that is seen in cities across the country and has been building for a long time. Subsidized Affordable Housing is definitely needed for our lowest income residents so I applaud the effort to increase the availability of those type of homes.</p> <p>However, much more needs to be done to address the overall problem of affordability. When median home prices have risen to over half a million dollars, it's clear that a few subsidized units don't come close to addressing the root cause of our problem. We have a shortage of housing, brought on by decades of land use policy that prevents housing construction. These same policies have created the same problem in cities all over the country. We've downzoned and downzoned to the point where we have very little capacity to grow. For many years we were able to push population growth out onto the plains in the form of suburban sprawl. This has its own host of problems, including traffic and air pollution, but it did create new housing which kept home prices within a range reachable by people of average incomes. That sprawl now has begun to reach the limits of what people are willing to put up with in terms of travel distance from the city, and we have a new generation of people that do want to live in the city, if they can afford to. With this rising demand to live in the city, we must be able to</p>	Comment	Male	35-44	White	Own	\$50,000 - \$99,000
03/12/2022 11:38 AM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together. The EHA proposal can be a useful piece of the housing puzzle. I like parking reductions and height bonuses because they allow more and better housing. But, housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p>	Comment	Male	19-34	White	Rent	\$25,000 - \$49,999
03/12/2022 14:25 PM	<p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle, but, housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, building more housing is the most important part of making housing affordable.</p> <p>More housing is better for affordability, better for the environment, better for traffic, and better for neighborhoods. Great cities evolve and change. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p> <p>Sincerely,</p>	Comment	Female	55-64	White	Own	\$100,000 - \$149,999
03/12/2022 16:17 PM	<p>I currently would not qualify for "affordable" housing and may not qualify for low income housing because I'm on Soc Sec disability. There should be automatic Section 8 vouchers for low income citizens who need housing.</p>	Comment	Female	65-74	Other: Black and Hispanic	Prefer not to answer	\$10,000 - \$24,999

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03/13/2022 6:51 AM	<p>Hi,</p> <p>My name is Luke Teater, I'm an independent housing policy consultant and the former Chief Economist for Governor Polis, commenting on my own behalf. I'm asking you not to pass the EHA proposal in it's current form because it does not address the root cause of our housing crisis, and in fact will make it worse.</p> <p>The root cause of the housing crisis we're facing right now is a severe shortage of available homes. Colorado has a shortage of 175,000 homes, and Denver makes up the plurality of that total. The financial incentives already exist for developers to provide that much housing at very little cost to the city, all we have to do is change our zoning and land use policies to allow them to end that shortage for us.</p> <p>Inclusionary zoning (IZ) serves as a tax on new development. Given that we need substantial amounts of new housing development in order to end this crisis, that is the wrong approach. It will result in higher rents for new market-rate units and fewer housing projects that pencil out, reducing new housing at exactly the time when we need it most. I'd encourage you to look to look at how new housing construction sharply declined in Portland after they passed their IZ policy (https://bit.ly/3KWFmvN).</p> <p>While IZ can and does work well if the additional benefits and incentives to developers outweigh the costs of providing additional income-restricted units, this proposal does not offer sufficient benefits or incentives to meet that standard. I would encourage you to increase the zoning and financial incentives available in the proposal to meet that standard.</p> <p>Finally, I would encourage you to prioritize further easing zoning and land use restrictions in order to add the tens of thousands of new units that Denver desperately needs right now. Rather than use lower parking requirements as an incentive, let's eliminate parking minimums citywide. Rather than using height increases as an incentive, allow much taller buildings by-right throughout the city, but especially near transit.</p> <p>Denver is thriving, but our housing shortage threatens that by making it an increasingly unaffordable and exclusive place to live. If we truly believe that Denver is</p>	Comment	Male	35-44	White	Own	\$50,000 - \$99,000
03/13/2022 14:53 PM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle. As evidenced in Portland and other cities, IZ housing policies are well-intentioned, but definitively fail to create the scale of housing that a city like Denver desperately needs, and prevents market rate units from coming online as quickly as we need. Housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70/30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p>	Comment	Male	19-34	White	Rent	\$50,000 - \$99,000
03/13/2022 19:24 PM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle. Affordable housing is a major issue for young, old, poor, rich, and all those in between. But, housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p> <p>Sincerely,</p>	Comment	Male	35-44	Asian	Own	\$100,000 - \$149,999

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03/13/2022 20:53 PM	<p>Dear CPD Board,</p> <p>I support YIMBY Denver, and I'm asking for you to put the whole housing puzzle together.</p> <p>The EHA proposal can be a useful piece of the housing puzzle. It's important that we have housing that works for everyone, and EHA moves in that direction. But, housing won't be affordable until more housing is legal across all of Denver. Fourplexes, ADUs, missing middle...whatever shape it takes, we know that building more housing is the most important part of making housing affordable.</p> <p>Not only is more housing better for affordability, better for the environment, better for traffic, and better for neighborhoods, it's popular! Denver upheld the group living changes by defeating 2F by a 70-30 vote last November. Thanks for your consideration, and I look forward to continued and stronger housing efforts in the future.</p> <p>Sincerely,</p> <p>Casey Roberts</p>	Comment	Female	35-44	White	Own	\$200,000 or more
03/14/2022 4:04 AM	<p>Hi Team,</p> <p>I just learned about today's (March 14) public hearing and the associated deadline for public comments. What happens during today's hearing and what's next? Are there future opportunities to comment? If so, when and where?</p> <p>Also, is a project calendar or timeline posted anywhere? Would love to get a list of 2022 meetings, deadlines and critical dates?</p> <p>Thanks for the hard and important work you do!</p> <p>Meghan Osborn 919-265-7812 meg.osborn@gmail.com</p>	Question	Female	35-44	White	Own	\$100,000 - \$149,999
03/14/2022 8:35 AM	<p>Berkeley Regis United Neighbors Zoning & Planning Committee (BRUN ZAP), in consultation with the Berkeley Regis United Neighbors Board (BRUN RNO), has reviewed the Expanding Housing Affordability draft DZC Text Amendment. BRUN RNO is generally in agreement with the concept and goals of this text amendment to facilitate the construction of more affordable housing. BRUN RNO has the following specific comments:</p> <p>There is sensitivity to any impacts on the recently adopted DO-8, although at this juncture there appear to be none.</p> <p>There is concern about any zoning changes that potentially increase the bulk and height of projects in neighborhoods like Tennyson and the embedded commercial district at West 44th and Lowell, that potentially conflict with the existing neighborhood character.</p> <p>There is concern about any zoning changes that potentially increase the amount of on-street parking from larger scale projects in neighborhoods like Tennyson and the embedded commercial district at West 44th and Lowell, where added on-street parking from new projects in the commercial district would overflow into</p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
03/14/2022 10:39 AM	<p>I am opposed to this proposal. While I agree that affordable housing is a huge problem, this proposal is just a tax on the middle class. Looking at the future linkage fees, an average family is expected to pay thousands of dollars more to build their house. This is not the American Dream. You're making housing more unaffordable to a greater number of people, and will create a larger problem in the long-run.</p>	Comment	Male	19-34	White	Rent	\$25,000 - \$49,999
03/14/2022 14:17 PM	<p>It was forecasted that by the year 2050 90% of the worlds population will HAVE to live in urban centers. That has now been moved up to 2045. Currently, 82% of the world's population has to live in Cities (Urban Centers). It is projected that the United States will need to add 600,000 units of not just affordable, but attainable units well PER YEAR by 2030!! We need to throw everything and the kitchen sink at this problem that IS coming and its coming sooner than you think. I haven't cross-analyzed the proposed fee structure but I think it's in everyone's, and most importantly the City Of Denver, best interest to at least extend the</p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
03/14/2022 15:08 PM	<p>The propasal is looking good</p>	Comment	Male	18 years or younger	White	Own	Prefer not to answer
03/14/2022 17:04 PM	<p>Hi - I'm providing comment regarding the SDP date of August 30th, 2023 as being too soon for when an SDP needs to be completed in order to vest to the existing affordable housing requirements. Given City staffs current review timelines with workload, differing reviewers having different review timelines on projects, additional workload with new submittals spurred by the legislation and additional layers of review required in different districts (ex. golden triangle design review) I recommend that the completed SDP date be moved out a few months longer in order to allow for all projects to have a more equal chance of making it through SDP by the ending vesting date regardless of where the are located in the City of Denver, what their additional process might be to obtain an SDP and who their specific reviewers are.</p>	Comment	Female	35-44	White	Own	\$150,000 - \$199,999

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03/14/2022 20:00 PM	<p>More should be required for lower AMI's not higher AMs. Not enough is being done for our service workers.</p> <p>'Close the gaps in the linkage fees</p> <p>Linkage fees should be higher</p> <p>Each area should have affordable units</p> <p>Each neighborhood should have a say in the development of these units and not get a pass simply through zoning. Residents who make 100% AMI's have more opportunity for locations whereas the lower income workers do not.</p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Own	Prefer not to answer
03/14/2022 21:32 PM	<p>As part of the City's Expanding Housing Affordability initiative, we have an opportunity—and in fact, an obligation—to expand the existing Affordable Housing Linkage Fee to create a dedicated funding source for housing-first solutions for our neighbors experiencing homelessness.</p> <p>Since the linkage fee was adopted in 2017, rent in city proper has risen by 50% on average. The linkage fee proposal is weak, heavily influenced by the development community intent on extracting wealth from already struggling neighborhoods, and will severely limit the city's responsibility in ensuring affordable housing stock for Denver residents.</p> <p>Here are some major problems with the proposed changes under consideration:</p> <ol style="list-style-type: none"> 1. Current amounts for each category are not within the range recommended by the City's own feasibility study. 2. Current levels do not account for inflation, which is expected to rise 7-8% over the next year. 3. Is not comparable to peer cities, including Austin and Boston, which have linkage fees ranging from \$12-\$18 per sq foot. <p>It is imperative that we increase the linkage fee for each category to align with the range indicated in the City's feasibility study. What I have heard city officials say is that developers need time to adapt; well residents don't have time to adapt, especially those who are unhoused. The City's response falls short with overreliance on feedback from developers at the expense of residents.</p> <p>Additionally, the proposed linkage fee schedule is too drawn out for effective implementation. If the proposal is passed as is, the full linkage fee will not apply until July of 2024. That means we'll be waiting several more years to collect the funding we so desperately need to begin building more affordable housing. This does not match the urgency of residents in Denver – homelessness doubled since COVID and 1 in 3 renters are cost burdened. Therefore, the linkage fee should be applicable immediately upon passage of this policy proposal, not three years down the road. Many vulnerable residents cannot wait any longer.</p> <p>The percent of affordable housing required needs to be higher than what is proposed. Current proposed percentages are not comparable to peer cities, nor the levels of affordability achieved in rezones. Neighborhoods vulnerable to displacement that are mostly naturally occurring affordable housing need a higher requirement of affordability at the neighborhood median income or lower. Thus, Denver should require 15% affordability and 20% in areas vulnerable to displacement.</p> <p>"Affordable" housing, while supporting some income brackets of renters, does not provide the support needed to help the city's most vulnerable populations making 30% of the Area Median Income (AMI) or less. Much of our city's affordable housing stock is priced for people making between 80% and 120% AMI. This means that in 2020, much of the city's affordable housing stock was priced for single people making between \$54,950 and \$84,000 per year, or families with children making up to \$139,200 per year. The lower-tier affordable housing stock developed by the Denver Housing Authority, priced at 50% AMI, requires single tenants to make \$35,000, and families to make up to \$58,000.</p> <p>Working a minimum wage job at \$15.87/hour full-time with no days off1 a single mother with two children makes \$33,010 each year and wouldn't qualify for this</p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer

Response Submission Date/Time	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
03/14/2022 21:37 PM	<p>As part of the City's Expanding Housing Affordability initiative, we have an opportunity—and in fact, an obligation—to expand the existing Affordable Housing Linkage Fee to create a dedicated funding source for housing-first solutions for our neighbors experiencing homelessness.</p> <p>Since the linkage fee was adopted in 2017, rent in city proper has risen by 50% on average. The linkage fee proposal is weak, heavily influenced by the development community intent on extracting wealth from already struggling neighborhoods, and will severely limit the city's responsibility in ensuring affordable housing stock for Denver residents.</p> <p>Here are some major problems with the proposed changes under consideration:</p> <ol style="list-style-type: none"> 1. Current amounts for each category are not within the range recommended by the City's own feasibility study. 2. Current levels do not account for inflation, which is expected to rise 7-8% over the next year. 3. Is not comparable to peer cities, including Austin and Boston, which have linkage fees ranging from \$12-\$18 per sq foot. <p>It is imperative that we increase the linkage fee for each category to align with the range indicated in the City's feasibility study. What I have heard city officials say is that developers need time to adapt; well residents don't have time to adapt, especially those who are unhoused. The City's response falls short with overreliance on feedback from developers at the expense of residents.</p> <p>Additionally, the proposed linkage fee schedule is too drawn out for effective implementation. If the proposal is passed as is, the full linkage fee will not apply until July of 2024. That means we'll be waiting several more years to collect the funding we so desperately need to begin building more affordable housing. This does not match the urgency of residents in Denver – homelessness doubled since COVID and 1 in 3 renters are cost burdened. Therefore, the linkage fee should be applicable immediately upon passage of this policy proposal, not three years down the road. Many vulnerable residents cannot wait any longer.</p> <p>The percent of affordable housing required needs to be higher than what is proposed. Current proposed percentages are not comparable to peer cities, nor the levels of affordability achieved in rezones. Neighborhoods vulnerable to displacement that are mostly naturally occurring affordable housing need a higher requirement of affordability at the neighborhood median income or lower. Thus, Denver should require 15% affordability and 20% in areas vulnerable to displacement.</p> <p>"Affordable" housing, while supporting some income brackets of renters, does not provide the support needed to help the city's most vulnerable populations making 30% of the Area Median Income (AMI) or less. Much of our city's affordable housing stock is priced for people making between 80% and 120% AMI. This means that in 2020, much of the city's affordable housing stock was priced for single people making between \$54,950 and \$84,000 per year, or families with children making up to \$139,200 per year. The lower-tier affordable housing stock developed by the Denver Housing Authority, priced at 50% AMI, requires single tenants to make \$35,000, and families to make up to \$58,000.</p> <p><i>Working a minimum wage job at \$15.87/hour full-time with no days off a single mother with two children makes \$33,010 each year and wouldn't qualify for this</i></p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
03/15/2022 15:56 PM	<p>Hello,</p> <p>Are you also looking at what short term rentals (AirBnB's) are doing to hinder affordable housing in Denver? Big business is buying up residential homes and turning them into nightly rentals for out of town/out of state people. Example home near me used to rent out for \$2k/month to a local resident, now someone turned it into an AirBnB and makes \$200/night making more from out of town visitors versus supplying housing to someone that lives here. And they have</p>	Question	Male	45-54	Prefer not to answer	Own	Prefer not to answer
03/17/2022 21:13 PM	<p>Hello,</p> <p>Do the June 30, 2022 and August 30, 2023 deadlines also apply for a development seeking to utilize an incentive height under the IO-1 incentive overlay?</p> <p>Thank you.</p>	Question	Female	19-34	White	Own	\$150,000 - \$199,999
03/18/2022 9:20 AM	<p>I think this is wonderful idea. Providing a way to have more families affordably live in the area will better help the community. I believe it will help to lessen those experiencing homelessness because they will have an affordable option for housing. I also think it will give newly married couples and young families a chance to buy or live in an affordable residence. My husband and I are recently married, we both work and are having a hard time finding an affordable house to buy. Our rent has been going up. I hope we will be able to buy a house one day and I think expanding this will help.</p>	Comment	Female	35-44	White	Rent	\$25,000 - \$49,999
03/21/2022 9:16 AM	<p>I listened to your work shop recording about affordable housing but found it related to mainly to that 30 percent of median income people. What happens to those people who make only minimum wage? I have worked out a scheme, using containers, that can give a one bedroom unit for less than \$500 per month. What I am looking at though is using the air space over some city drainageways. Would this be even discussable with city officials? I am looking at five locations right now but three would use those air rights but without disturbing the required flow areas. They are all near areas with high minimum wage employers, all looking for</p>	Question	Male	75 and older	White	Other	\$200,000 or more
03/24/2022 20:02 PM	<p>Hi Analiese,</p> <p>I see the Affordable Housing Zoning Incentive Report indicates a parking reduction of .5 spaces per unit as "Bace Incentive" (p. 26). I cannot find that anywhere in the draft Planning Board regs. Have I missed it, or is it still coming?</p> <p>Thanks,</p>	Question	Male	55-64	White	Own	\$100,000 - \$149,999

Written Comments Received in Response to Draft Policy Proposal

(October 1 - January 30, 2021)

Note - formal comments closed on December 31, 2021

TO: Analiese Hock, Denver Community Planning & Development & Brad Weinig,
Denver Department of Housing Stability

FROM: Jennie Rodgers, VP & Denver Market Leader, Enterprise Community Partners

RE: Expanding Housing Affordability Through Market-Based Tools Proposed Policy
Approach

Enterprise Community Partners appreciates the opportunity to share feedback on the Expanding Housing Affordability (EHA) project proposed policy approach published October 1, 2021. I was pleased to have been an active member of Advisory Committee that was integral to creating the draft proposal; we value the thoughtful, evidence-driven process of the Committee, Community Planning and Development (CPD), the Department of Housing Stability (HOST), and Root Policy Research.

Enterprise fundamentally supports the EHA proposal. It is critical for the City to enact such market-driven policies to further the production of much-needed affordable housing. Based on the extensive research and justifications assembled by Root Policy Research and CPD, we back the proposal as a logical and realistic way forward that has the potential to meaningfully advance the availability of desperately needed affordable homes throughout Denver.

At the same time, Enterprise hears and agrees with community concerns that the EHA proposal should go further to help prevent involuntary displacement and should include clearer guidelines for the City's capacity to negotiate alternatives to the standard mandatory housing requirements. We urge CPD and HOST to proactively address these areas of concern before moving to finalize the policy.

The EHA policy should more directly serve Denver's neighborhoods that are particularly prone to involuntary displacement. Specifically, we urge:

- directing linkage fee revenue to the development of affordable units in these geographic areas and providing for a process for meaningful community input for projects funded through this mechanism.
- increasing the fees associated with development of single-family homes larger than 1,400 square feet to partially offset the impact that scrape-offs and development of large homes have on affordability, causing displacement of long-time residents and contributing to increasing home prices.
- intentionally advancing this policy in tandem with HOST's forthcoming housing prioritization policy to ensure those who have experienced or are at greatest risk of displacement benefit from production enabled by the EHA proposal.

The EHA policy should also articulate guidelines on when and to what community benefit the City will negotiate alternatives. We understand there are and will continue to be instances in which the City's ability to negotiate with a developer will allow for creative outcomes benefitting unique communities, and appreciate the examples detailed in the draft proposal. However, we urge greater detail be provided, particularly on the HOST Executive Director's ability to negotiate discretionary agreements. The final policy should include clearer parameters on when HOST would deem such negotiations appropriate and what types of outcomes would be desirable, as well as offer ways for community to be involved in those determinations. Doing so would help ensure CPD and HOST's intent for negotiated alternatives long-term, as well as promote community accountability and the adoption of community-identified priorities.

Finally, Enterprise acknowledges that while a critical step, the EHA policy proposal is just one piece in the much bigger puzzle of Denver's affordable housing solutions. Mandatory units, linkage fees, and incentives cannot and were never intended to address the full range of our city's dire housing needs. The EHA proposal must be thoughtfully integrated with current and new tools HOST develops in implementing its 5-year strategic plan—particularly the housing preference policy. This market-driven policy must also be augmented by ongoing, additional public investments in producing and preserving affordable homes for people with extremely low incomes.

We look forward to working together with CPD, HOST, and other city policymakers to ensure passage and implementation of a meaningful EHA policy, alongside the full range of solutions necessary to advance stable, healthy, affordable homes connected to opportunity for all Denverites. Please reach out to Kinsey Hasstedt, State and Local Policy Director (khasstedt@enterprisecommunity.com) with any questions.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Jennie Rodgers". The signature is fluid and cursive, written over a white background.

Jennie Rodgers



Mile High Connects

Opportunity for all through transit

12/23/2021

Subject: Expanding Housing Affordability Policy- Recommendations to Ensure Equitable Outcomes

On behalf of Mile High Connects (MHC), a broad partnership of nonprofits, community organizers, philanthropic organizations, and private and public sector partners working to advance racial equity and prioritize equitable investment into community driven solutions, we are writing to commend the City and County of Denver for its ongoing work and commitment to creating new, mixed-income communities within reach for those that need it the most.

The Expanding Housing Affordability (EHA) proposed policy is a critical step to provide housing opportunity and stability for Denver residents, particularly those that continue to be disproportionately impacted by lack of housing affordability and displacement. This moment is an opportunity to institutionalize policy shifts that will enhance the long-term impact of housing affordability and accessibility.

MHC recognizes that this policy is just one piece of a larger housing strategy to create and preserve affordable housing. We greatly appreciate the following components listed in the EHA proposed policy:

- The City and County's acknowledgement of the cost burden of housing and that new housing tends to only serve higher income households.
- Creation of a mandatory affordable housing requirement sets a precedent that affordable and mixed-income developments are crucial for a more equitable and inclusive Denver.
- Requirement of developer-built affordable units to remain affordable for 99 years is an effective way to ensure longer-term affordability.
- Increased incentives around development of affordable housing, including waiving of municipal fees for developers.
- Inclusion of additional financial and zoning incentives for projects that create all-affordable developments, not solely the minimum percentage.

Nevertheless, MHC believes that further measures should be addressed within the policy to ensure that it meets the needs of those who are most disproportionately impacted by Denver's housing environment and provides deeper opportunities for equitable investment and programs within our most vulnerable neighborhoods.

As MHC, we urge you to consider the following recommendations that seek to create a more equitable process and outcome for new, affordable housing developments in Denver:

- 1. Prioritize Disproportionately Impacted Communities and Center Racial Equity:** For too long Black, Brown, Indigenous, and People of Color (BIPOC), low-income, immigrant and refugee communities have received the brunt of lack of affordable housing, gentrification, and

displacement. While the proposed policy focuses on providing housing options for those with lower average median income levels, it fails to provide explicit measures for community benefit and does not emphasize the need to center racial equity. To prioritize community benefit and advance racial equity, the policy should result in the creation and implementation of a Racial Equity Scorecard to assess the community impact of new developments prior to a project's approval. Assessment criteria should be vetted by community and address community-voiced needs and priorities. Furthermore, the City and County of Denver should increase opportunities for community engagement and outreach to identify housing disparities among community. Continued data collection and analysis of project metrics is also imperative to ensure projects are indeed abiding by the EHA policy mandates. Evaluation metrics should be shaped based on community input to determine the specific equity and housing improvement metrics and outcomes used to measure development benefits. Additionally, City resources and funding should be dedicated to promoting and amplifying community informed processes to assess and co-create solutions that mitigate the impact of displacement and gentrification.

- 2. Incentives for Increased Number of Affordable Housing Units:** The current policy includes incentives for developments that incorporate baseline percentages of affordable housing options within projects. To further increase the number of affordable and accessible homes, additional incentives and prioritization should be granted to developers who exceed the minimum requirement. Additional incentives and prioritization should be granted to projects that preference multi-family units, that provide more affordable bedrooms and access to 3–4-bedroom units as part of the existing discretionary agreements. The policy should also incorporate weighted reviews for developments that provide deep accessibility for legacy residents, disproportionately impacted communities, and neighborhoods most at-risk of displacement. Lastly, greater incentives should be available for developments that provide flexibility in affordable housing building type, such as cooperative housing and Community Land Trusts (CLTs).
- 3. Initial Uses of Funds Collected:** Mile High Connects would like to make recommendations on how linkage fees and Fee in-Lieu payments are utilized to advance community pathways to building assets and wealth. Specific uses for these funds include:
 - a. Support community capacity building programs that increase community ownership and shared equity structures for housing. Community ownership models have proved an effective way to ensure power stays within communities and increases the opportunity for intergenerational wealth and cultural preservation.
 - b. Prioritize the use of linkage fees and Fee in-Lieu payments toward supporting community programs like CLTs and cooperative housing for communities most vulnerable to displacement.
 - c. Prioritize collected fees for community benefits outside of housing to encourage economic development such as workforce training options and promoting minority owned, women-owned, or emerging small businesses.
- 4. Transparency and Accountability to Community:** It is crucial that the City and County commit to timely, readily available information that can be accessed by community. Implementation

processes should also include mandatory community reporting through meaningful assessments of policy success, progress, and any unintended consequences of the policy. Effective and open communication with the community is a must to ensure that future research, development, and policy is informed by those who are impacted the most.

5. Additional Considerations to Ensure a More Equitable and Resilient Denver:

- a. Establish adequate, permanent revenue sources dedicated to supporting community pathways to building assets and wealth.
- b. Consider the impacts on BIPOC developers within future policy development. Centering racial equity, BIPOC developers should be beneficiaries of the policy and ensure that if implemented, the policy works to reduce barriers to participating and incentivizes to engage in the development of affordable housing.
- c. To ensure long-term and future affordability in Denver, the City should acquire strategic properties such as undeveloped public land, City owned land, and parking lots for future affordable housing sites. These sites should then be given first to affordable housing developers.
- d. Prioritize equitable transit-oriented development for community benefit. The current policy includes parking exceptions for developments that provide a greater percentage of affordable housing options than the minimum requirements. To offset unintended consequences of lack of parking, affordable housing developments should be coupled with transit passes or discounted fares to promote multi-modal transportation and greater access to transportation options.

We appreciate your commitment to addressing housing insecurity and affordable and workforce housing in Denver, and your consideration of these recommendations.



December 31st, 2021

Re: Expanding Housing Affordability Draft Proposal

Dear Analiese and Brad,

Thank you for all of the time and effort you have invested in crafting the City's draft proposal for Expanding Housing Affordability. The Neighborhood Development Collaborative has been following the process very closely and appreciates the thoughtful approach as well as the nuance that is woven into the proposal.

Many NDC members have been involved with past efforts to better engage the market with workforce housing goals. These include the Denver Inclusionary Housing Ordinance for for-sale housing, the 38th and Blake Overlay District, and efforts in other metro-area communities such as Longmont and Boulder. From this experience, NDC would like to recommend a few additions, changes, and clarifications to the current draft proposal.

1. Negotiated Agreements

Concern: The option for negotiated agreements opens up the opportunity for protracted negotiations that delay getting essential housing in service; additionally, the discretionary agreements may be vulnerable to political pressure in future administrations.

Recommendations: Create a process for negotiated agreements that is completely transparent and measurable. The City should:

- a. Go beyond providing examples of project components that would lead to a discretionary agreement. Instead, we recommend using the goals in the 5-year Strategic Plan to create a list of objectives that could trigger a discretionary agreement.
- b. Create clarity around how each negotiable component of a project is valued. Example: Are 3+ bedroom units worth more in certain parts of the city over others? In short, codifying the value of negotiated items creates less room for perceived bias.
- c. Leverage the "but for..." test when entering into a negotiated agreement to ensure that negotiated alternatives are *only* used in cases where a preferred outcome could not be reached without them. In addition, each use of a negotiated alternative should be reported in reference to identified housing needs. These reports should be analyzed for patterns and used to inform future adjustments to the Mandatory Housing Program.

2. Single-Family Residential Development

Concern: The current design of the mandatory housing requirement asks developers of large-scale multi-family developments to help address the housing needs of our community in a way that is both impactful and creates mixed income communities. Meanwhile, developers building single-family or small-scale multi-family housing are asked to pay a relatively small linkage fee. This despite the fact that the business model for some

developers and investors is to purchase and flip many single-family homes spread across multiple neighborhoods or communities. These homes are often converted into luxury for-sale or rental units. The impact of these conversions, while dispersed over a larger area, can have a greater impact on displacement than larger developments due to the erosion of affordable single-family for-sale housing stock, and the resulting increase in property taxes for nearby homeowners.

Furthermore, by *not* applying the mandatory housing requirements to residential development that produces fewer than 8 units, many areas of the city that restrict multifamily development will remain exempt from including affordable housing options by default. This precludes access to high-amenity areas in the City, continues to promote income/racial segregation, and is in direct opposition to the equity goals of the City.

Recommendations: To incorporate affordability more equitably across the city, developers who build or rebuild 8 or more single-family homes in a year should be subject to the mandatory housing policy. Affordable single-family homes created through this process should be deed-restricted or placed in a land trust to preserve long term affordability.

Note: We recognize that 2-7 unit developments will still be exempt from the mandatory housing policy. While this does create some inconsistencies, it may also motivate increased development activity in this under-utilized range.

3. Linkage Fee & Fee-in-Lieu Uses

Concern: Some housing advocates argue that new affordable housing should be focused in lower-income neighborhoods that are facing displacement pressure. This is especially called for in cases where these neighborhoods are unlikely to see the new multifamily development that would include affordability through EHA. While we agree that it is essential to support these neighborhoods, we feel that it is also critical to create affordable housing options in high-amenity areas that have traditionally excluded low-income and minority residents. These two priorities can sometimes be perceived as in opposition to one another.

Recommendation: The City should take an intentional approach to new affordable housing that will leverage funds from the linkage fee and fee-in-lieu programs. This approach should balance creating housing in both contexts: areas vulnerable to displacement and areas that have a history of exclusion, thus, offering Denverites more choice to determine what best meets the needs of their households and addressing all 3 of the Blueprint Denver Equity Concepts.

4. Linkage Fee Exemptions for Affordable Commercial Space

Concern: Similar to how affordable housing providers work in partnership with the City to address local housing goals, some commercial landlords offer favorable, below market terms to support Denver entrepreneurs, nonprofit facilities, and general economic development within the City. Unfortunately, assessing a linkage fee on these properties will have the unintended consequence of reducing the ability of landlords to keep costs low for community-serving commercial tenants.

Recommendations: As affordable housing providers are exempt from the mandatory housing requirements, landlords providing affordable commercial space should also be exempt from the linkage fee. NDC recognizes that there are less agreed upon metrics to measure affordable commercial space. Some places to start may include basing exemption eligibility on:

- a. Triple Net Lease Structure - this supports the regularity of tenant costs and encourages landlords to make building efficiency upgrades, also addressing the goals of Energize Denver.
- b. Below Market Rate Rent Standardization - require eligible units to be rented out at a specified percentage below market rate, ranging between 20-50%* relative to the typical and high-cost submarkets already identified.
- c. Due to the volatility of the commercial market, the parameters for linkage fee exemption should be evaluated regularly.

**Exact numbers should be derived in collaboration with landlords working in this space.*

5. Periodic Review of Expanding Housing Affordability Policy

Concern: As was stated throughout the EHA proposal, for inclusionary housing policies to be effective they need to be finely calibrated to local market conditions. As market conditions change, the inclusionary policy will diminish in effectiveness if not reviewed and revised.

Recommendation: The Expanding Housing Affordability policy should be assessed on a regular schedule to respond to the changing market and to additional lessons that emerge over time. For this assessment to be successful it should:

- a. Incorporate an objective perspective to avoid politicization and balance the realities of development feasibility with the need for affordable options.
- b. Leverage the patterns that emerge from tracking negotiated alternatives and incorporate them into the policy in a way that reduces the need for these alternatives.
- c. Create a transparent review process through which adjustments to the policy incorporate feedback from market rate developers and affordable housing advocates.

Again, NDC would like to acknowledge all of the work and outreach that has gone into shaping this proposal. We appreciate the research, the technical knowledge, as well as the time you spent with us and other groups to create a tool that can help Denver meaningfully advance our collective housing goals. Hopefully, the above recommendations can further strengthen the Expanding Housing Affordability policies, and we look forward to continued engagement with CPD and HOST as this proposal moves forward.

Sincerely,
Jonathan Cappelli



Executive Director,
Neighborhood Development Collaborative



December 22, 2021

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

Re: Expanding Housing Affordability Proposed Policy Approach

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

Dear Ms. Hock,

As members of Denver's local business, residential and commercial development community, we are committed to building diverse housing options that serve all income levels to meet the overwhelming demand and need for housing in our city. We share a common goal: the creation and use of sound market-based tools that address all housing needs in all Denver neighborhoods.

We come to you collaboratively, with a goal to partner with City staff, the Mayor's Office, and City Council in this important endeavor. In that spirit, we believe it is critical to highlight some of the well-intentioned, yet often-times unintended consequences of inclusionary housing programs.

After providing extensive comments during Expanding Housing Affordability (EHA) feedback sessions, participating in EHA Advisory Committee meetings, and sharing an in-depth technical review of the draft proposal, we share four specific areas of concern. These concerns revolve around proposed linkage fee increases, high-cost vs. typical-cost submarkets requirements, proposed offsets/incentives, and current processes and regulations that hinder supply today.

We respectfully ask that you consider the following requests as you finalize the EHA proposal:

A phased approach to the significant linkage fee increases.

The City must understand that fee increases will be passed on to the end user, no matter the asset class, increasing commercial rents to businesses large and small. As proposed, the linkage fees in the draft policy represent 200%+ to 900%+ increases to existing linkage fees depending upon the asset class.

These dramatic fee increases will disproportionately hurt independent, neighborhood-serving retail, and “mom and pop” establishments that make Denver unique and attractive. Increasing the financial barriers to entry for “mom and pop” tenants will result in the homogenization of commercial space by large, corporate tenants who can more easily absorb and pass on the proposed fee increase.

We support staff’s current policy direction to exempt mixed-use retail from the proposed linkage fee. This exemption will avoid additional financial burdens on leasing challenging retail/commercial space in mixed-use buildings that are less attractive to retail/commercial tenants due to inconvenient parking, lack of brand identity and increased operational challenges.

For all asset classes, we respectfully request that the proposal phase in the increases over a minimum of a three years, to allow for the market to absorb and adapt to these significant changes. Reasonable, phased-in increases will generate dollars for the Affordable Housing Fund while moderating detrimental policy outcomes that limit job growth for our city’s residents and increase the cost of doing business for mom-and-pop tenants.

Also of note, we believe that during the phase-in period, the City could use American Rescue Plan Act dollars to bolster the Affordable Housing Fund.

Remove the high-cost vs typical cost submarket requirement differences (mandatory housing and linkage fees).

We understand the intent to subsidize more affordable units through higher rents in high-cost submarkets. However, economics and development project realities demonstrate otherwise. Members of the development community have provided feedback since early in the process that this proposal will have the inverse effect – exacerbating not mitigating affordability in high-cost submarkets. Despite our consistent and clear communication there have been no modifications to reflect these concerns.

Variables such as land price, high-cost construction materials and labor, and other development-related expenses are exponentially higher in high-cost submarkets like Downtown, Golden Triangle and Cherry Creek. Creating more stringent inclusionary standards and higher linkage fee requirements in these areas, serving only to exacerbate the lack of affordable housing in areas that need more affordability.

Strengthen the offset and incentive programs to mitigate loss of market rate units and encourage the development of affordable units.

We see ourselves as important partners in the City's efforts to produce more affordable units in Denver. As such, we are not requesting any changes to the mandated affordable housing requirements or asking for lower fees-in-lieu.

However, the offsets identified in the EHA proposal do not go far enough to mitigate the financial impact to market rate units and overall project feasibility. Proformas run by developers on recently completed and future projects demonstrate that rents on non-subsidized units would need to increase \$50-\$150 a month per unit to accommodate the proposed affordable housing requirements. These are very real housing cost increases for the majority of renters that will require them to either work more hours or sacrifice other spending in their lives.

To offset rent increases for the "missing middle" (those in the 81-100% AMI range), the city should provide direct credits from the Affordable Housing Fund or another source, or access to the existing loan fund to help "bridge the gap" or cover some of the estimated six-figure delta between the required affordable units and market rate units. Leveraging the linkage fees already paid into the Affordable Housing Fund by developers to help bridge this gap can help create more affordable units while mitigating increased housing costs passed onto others. These costs will have an even greater impact when developers chose to build 8% of their units at 60% AMI. In that scenario, residents between 61%-100% AMI will bear the burden of rent increases to account for the city's requirements.

We also request the city explore more robust offsets and incentives to encourage development of affordable units and offset impacts of the program. This includes exploring height incentives that are more consistent with the city's current zoning code districts (i.e., allowing height increase from 5 to 8 stories, rather than the proposed 5 stories to 7 stories to incentivize even more affordable and "missing-middle" units), as well as increasing permit fee waivers on a 1:1 basis for both market rate and affordable units (or essentially doubling the current permit fee waiver proposal).

Streamline development processes and re-examine the city's regulations to increase the supply of housing.

Finally, as noted above, we applaud and support the city in its efforts to create an inclusionary housing program that is grounded in economics and market-based feasibility. That said, any inclusionary zoning program – as a whole – is not a golden ticket to solving the city's housing affordability crisis. As expressed during many EHA forums, EHA advisory committee meetings, and other communications to staff, our city needs to encourage the overall supply of homes at all income levels for all our residents. Our affordable housing issue cannot be solved solely through increased regulations or requirements administered by the city because housing affordability is dictated by the balance (or imbalance in Denver's current case) between supply and demand. The City can facilitate increases in the housing supply by streamlining and accelerating its development and permitting processes, removing inconsistencies between its permit

review and field inspection requirements and examining other regulations that contribute to housing unattainability.

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

Thank you for taking the time to review our concerns and considerations. We look forward to working with you on this important effort. Please do not hesitate to contact us if you have any questions regarding our requests.

Sincerely,

Michael Gifford
President
**Associated General
Contractors of Colorado**

David Foster
Chair
**Cherry Creek Business
Alliance**

J.J. Ament
President & CEO
**Denver Metro Chamber of
Commerce**

Nobu Hata
CEO
**Denver Metro Association
of Realtors®**

Rachel Marion
CEO
**Denver Metro Commercial
Association of Realtors®**

Sarah Rockwell
Chair
**Downtown Denver
Partnership**

Katie Barstnar
Executive Director
NAIOP Colorado

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

Michael Leccese
Executive Director
**Urban Land Institute (ULI)
Colorado**

Michael Gifford
Chair
**Colorado Real Estate
Alliance**

Marc Savelle
VP of Development
Broe Real Estate Group

Celeste Tanner
Chief Development Officer
Confluent Development

Tyler Carlson
Managing Principal
Evergreen Devco

Ian Nichols
Senior Director
Flywheel Capital

Kevin Foltz
Managing Partner
Forum Real Estate Group

Ferd Belz
President
L. C. Fulenwider

Ray Pittman
President & CEO
McWhinney

George Thorn
President
Mile High Development

Dorit Fischer
Partner
NAI Shames Makovsky

Rhys Duggan
*President, CEO & Managing
Partner*
Revesco Properties

Tim Welland
Development Manager
Palisade Partners

Tim Schlichting
Chief Development Officer
Prime West

Bill Mosher
Senior Managing Director
Trammel Crow Company



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November 23, 2021

Via email: analiese.hock@denvergov.org

Analiese Hock
Principal City Planner
Community Planning and Development
City and County of Denver

Re: Feedback on Denver Affordable Housing Expansion Proposal:

Dear Ms. Hock:

Thank you again for presenting the draft work on the Denver Affordable Housing Expansion Proposal to the Joint Legislative Advisory Council for the Apartment Association of Metro Denver and Colorado Apartment Association. It was a well put together presentation and you did a fantastic job of fielding our councilmembers' questions. The Council engaged in a lengthy discussion of the Proposal following the presentation and by resolution provides this feedback.

We share and support the City's goal of increasing the supply of housing to combat the rising cost of housing. However, the Proposal will have the unintended (but unavoidable) consequence of increasing rent rates in Denver.

Low vacancy rates and the corresponding increase in rents are caused by housing supply not being allowed to keep up with the growing demand for housing. Creating additional costs for housing development or limitations on the cashflow derived from that development will slow the creation of new housing. Building new units will be artificially curbed until the resulting unmet demand for housing inflates rent rates sufficiently to offset the increased costs/loss of revenue.

The least costly of the options under the Proposal reduces cashflow from new rental housing developments by 4% in the area defined as the High-Cost Markets and 3.2% in the areas defined as the Other Markets. The impact of the Proposal will be an artificial reduction in housing development until such time as rents inflate by 4% in the High-Cost markets and 3.2% in the Other Markets.

As we have listened to the advocates for the Proposal and tried to understand why their analysis differs from ours, it seems the fundamental difference in approaching the problem is the proponents do not acknowledge that creation of housing in one market segment effects the price of housing in other market segments. Specifically, they maintain that creation of new market rate units won't improve the price and availability of lower priced or "affordable units".

We do not claim building market rate units will make someone who is unable to afford those units suddenly able to afford them.

However, when insufficient housing units are available at the top end of the market, some higher-income households will substitute housing units at the next quality or cost tier down, contributing to higher prices of housing units in that tier. Those households that are outbid for housing in that (second) tier will then substitute to housing at the next quality or cost tier down, outbidding lower income households which would otherwise have been able to afford housing in that (third) tier, and so on. Similarly, as new housing is built in the higher or highest cost tiers, some higher-income households will vacate homes in the second tier, which will free up housing units in the second tier for households that may have substituted to housing in the third tier, and so on. Accordingly, the construction of new homes serving higher income households alleviates price and rent pressure in lower tiers in the ladder of the housing market. New homes at the top of the market will increase supply for middle, moderate and lower income households.

We recommend Denver encourage the production of market-rate housing. Denver will facilitate housing affordability more by encouraging builders and developers to construct new homes and multi-family housing units. Although the homes created may be sold or rented at market rates, their creation promotes affordability by helping to satisfy the demand of higher-income households, which would otherwise compete for (and bid up the price of) existing units.

The crux of our concern with the Proposal is that Denver housing prices will be lower if more total housing units are built (even if all those units are priced at market rates) than they will be if a lower number of total units are built and 10% are rent restricted.

As to your request for input on the most problematic elements of the Proposal and how to fix them, we highlight those issue in descending order of importance:

- The incentives offered by the City (reduction in fee, parking reductions and increased height limitations allowances) are insufficient to offset the 3.2% / 4% decrease in the revenue stream required by the Proposal. Any imbalance between the two will result in fewer new units. The only way to eliminate this chilling impact on development is to increase the value of the incentives offered by the City. The most obvious way to increase the value of the incentives is to increase Permit Fee reduction above the \$7,500.00 proposed. The more impactful way to increase the value is apply the Permit Fee reduction to all the units in the development (not just the rent-controlled units).
- The Option 1 scenarios (requiring only 60% AMR units) are significantly less expensive than the Option 2 scenarios (requiring a blend of 60% and 80% AMR units). This will mean that no 80% units will be built (unless subsidized by some other program). Denver's availability of 60% AMR housing compared to the population that requires it is at a nationally normal level. The missing piece in Denver's market is 80% AMR housing, where there are far more people in need than housing units available. The most impactful thing that could be done to lessen the negative impact of the Proposal would be to target 80% AMR units rather than 60%. Changing the Proposal to require that 8% of the new units be restricted to 80% AMR would only create a 1.6% increase in rents through the Denver markets and would target the most underserved market segment.

- The biggest incentive that can be offered by Denver is allowing development of multifamily units in the vast areas of the city zoned only for single-family structures. This arbitrary limitation on density is at direct odds with housing availability and affordability.
- The proposed fees in lieu (\$311,000 and \$268,000 respectively) represent close to 100% of the current cost of constructing a multifamily housing unit in Denver and are exponentially out of balance with the economic costs of the other options under the Proposal. We realize Denver wants to encourage the construction of affordable units rather than the opting for the Fee in Lieu. However, these fees are so high that they represent only an illusion of choice and don't meet the statutory requirements of HB21-1117.
- The two-tier approach between High Cost Markets and Other Markets should be abandoned. It makes the Proposal more complex than it otherwise needs to be and will have the unintended consequence of subtly shifting the location of development from where it is wanted to where it is artificially less expensive.

Our members and our staff would be delighted to be of any assistance we can in your work. We all want the same thing. We, like you, want our children to be able to afford to live here.

Sincerely,



Andrew C. Hamrick
General Counsel and Sr VP Government Affairs
Apartment Association of Metro Denver
Colorado Apartment Association



HOME BUILDERS
ASSOCIATION
of
METRO DENVER®

December 28, 2021

Analiese Hock
Principal City Planner
Community Planning & Development (CPD)

Brad Weinig
Director of Catalytic Partnerships
Department of Housing Stability (HOST)

Advisory Committee
Expanding Housing Affordability (EHA)

Dear Ms. Hock, Mr. Weinig and Members of the EHA Advisory Committee,

I am writing to share our thoughts, concerns and feedback regarding the City and County of Denver's proposal for mandatory affordable housing requirements.

These comments are being provided on behalf of the Home Builders Association (HBA) of Metro Denver. The HBA of Metro Denver represents nearly 500 homebuilders, developers, remodelers, architects, subcontractors, suppliers and service providers in the eight metro-area counties we serve.

In Denver, the HBA represents 17 different builders with over 600 registered permits just this year.

Our members have taken considerable time to meet with City staff and officials and review the proposed mandatory affordable housing policy released by the City. These comments are focused on the types of homes our members create, which are primarily for-sale, attached, duplex and single-family homes for families and others.

Our concerns fall into the following categories:

- (1) The negative impacts to overall housing affordability and supply caused by shifting higher costs onto newly developed market rate units.
- (2) The disincentive to build for-sale units due to new ownership units having higher percentages of required affordable units. This disincentive is exacerbated by Colorado's construction defect laws.
- (3) The lack of meaningful incentives and/or trade-offs to help create much needed "missing middle" for-sale housing units in the ranges of 80-120% AMI and beyond.

Background:

It should be noted that the housing affordability crisis is due to a severe shortage of units and is reaching a breaking point in many markets across Colorado – including the City of Denver. May 2021 set a record-low number of listings in the Denver Metro Area at just 2,075 compared to the monthly average of 15,563. The 12-month increase in the price of the average single-family detached home sold grew by 29%, and the price of the average condominium grew by almost 12%. However, this is not a new problem in Colorado.

The average annual number of new homes built every year in Colorado since the 2008 financial crisis is 46% lower than the annual average in the eight years leading up to the recession. If Colorado were to return to the average housing population ratio between 1986 and 2008, it would require an additional 175,000 housing units across the state today. To close that gap and meet future population needs, Colorado will need to develop 54,190 new housing units annually over the next five years.

If Denver had more housing, and more housing types (something we fear this proposal does not adequately address), our affordability challenges would look much different. But currently and for the past 15 years, the amount of available housing supply within the City has fallen drastically short of the amount of demand. While Denver has enabled certain arterial and commercial corridor locations to obtain much higher densities primarily in the form of apartments and mixed-use buildings—the implementation of the Blueprint Denver Plan from 2002 rezoned large swathes of the City from residential multi-unit zoning, down to strictly single unit zoning. This prevented the creation of duplexes, row homes and other higher-density building forms. A review of the City's zone map shows the large inequities and inadequacies throughout the City, which are exacerbated by the shortage of multi-family housing stock.

We do not think Denver's housing policies should be done in a vacuum or without recognition of the State of Colorado's construction defect laws which make it extremely costly and infeasible to develop for-sale condominiums at scale. While we recognize the responsibility to resolve this issue rests largely upon the State Legislature, Denver enacting a policy that puts for-sale condominium and attached housing construction at a further disadvantage will have additional unintended consequences of further limiting this already dreadfully low, much needed housing type. We understand the City's proposal raises the income threshold for affordable units from 60% area median income (AMI) on for-rent projects to 80% AMI (on for-sale); however, ownership housing would have to provide a higher percentage of affordable units than for-rent housing—10% of total ownership units in typical cost markets and 12% of total ownership units in high-cost markets (or 15% and 18% of total units under Option 2 of 80% and 100% AMI). Having these higher percentages of units will undoubtedly serve as another disincentive toward building for sale/ownership housing units as the AMI trade-offs are negated by the increased percentage of units on a housing type that is already more expensive and riskier to build.

A fundamental concern with Denver's proposal is the amount of cost burden that will shift onto market-rate units, which under the City's proposal represents roughly 90% (or 88-92%) of all new housing units in the city. It cannot be stressed enough - this policy will increase in the cost of housing for roughly 90% of new housing units. Whether it is the higher prices of market rate units to make up for the added cost of constructing the percentage of below-market units, or the fee-in-lieu option, both options involve substantial cost increases which will be borne by buyers of market

rate units. It is important to understand that for every dollar increase in costs, a builder needs to raise the price by more than that to cover the corresponding increases in commissions, closing costs, financing costs and other costs. Additionally, banks and investors expect builders to have some return on every dollar of cost.

Unfortunately, the City keeps talking about the need for affordable housing, while at the same time introducing new policies and requirements, such as net-zero construction, which drive up the cost of building housing without adequate offsets. These cost increases on market rate housing will drive people and families further from Denver and into other markets, often meaning people are living farther away from work and core services in order to find attainable homes.

This predicament points to the larger issue of how the City can actually leverage its collective resources to make more of an impact on affordable housing than the “inclusionary” approach of having market rate units cover the cost of the percentage of affordable units. The HBA provided input similar to this back in 2016-2017 when the City repealed the previous Inclusionary Housing Ordinance (IHO) and enacted the linkage fee requirement. We believe a far better way to increase affordability in a more equitable manner would be to leverage a reliable funding source such as the sales tax for housing or additional mills of property tax left over from De-Brucing, combined with other, more equitable funding sources (some already in existence), to purchase, partner and retrofit existing buildings into affordable housing, buy down rents and implement other large unit generation strategies rather than imposing new cost-raising requirements on an already record high level of building costs for new construction.

Before we lay out some of our recommendations, we want to remind City officials that building new housing does not create affordability problems. In actuality, building new housing (especially in a housing supply crisis) does quite the reverse. Building all types of housing creates a pipeline of supply and brings balance in the housing market that currently does not exist in Denver or the greater Metro Area. In contrast, the creation of new commercial space and primary jobs creates demand for housing and Denver and many other markets are at an imbalance of housing vs. the other drivers impacting affordability.

The HBA of Metro Denver recommends the City consider the following suggestions and improvements to the proposed policy:

- (1) **For-sale linkage fee only.** For-sale housing should be subject to a reasonable linkage fee and not a percentage of affordable units, which provides a win-win of helping to create more of a significantly low segment of the Denver housing inventory (for-sale housing), while at the same time, generating additional revenue the city can use in innovative ways to lower housing costs.
 - (a) In lieu of the above, we recommend reconsidering the 8-unit threshold for onsite affordable units. This policy will disincentivize the types of housing projects that are seeking to help the housing market from an affordability perspective. A single home scrape that replaces an existing affordable unit with a much more expensive unit can continue to do this at the linkage fee rate and not help the city’s overall housing shortage, while an infill for-sale project of ~10, 20, or 30+ units would be faced with much higher costs due to having to provide the mandated percentage of onsite affordable units.

(b) Another option worth considering is lowering affordability percentages for sale/ownership projects to 5% of units and/or some staggered tiering of project size and percentage of units and AMI requirement that goes from 80% to 120% AMI (the missing middle), which would provide more opportunities to build this undersupplied type of housing.

- (2) **Single-unit zoning.** The majority of the City that is zoned under a single unit zone district needs to be re-envisioned in ways that allow for a more contextual approach to infill housing redevelopment that provides opportunities for more housing density and supply, diversity of product types such as duplexes, row homes, garden court projects and other approaches that will lead toward more affordable and attainable housing options than the very constrained single unit zoning that covers so much of our City. It seems disingenuous to be enacting mandates on residential development while not addressing how the majority of the city is zoned in a way that discourages affordability. (Note: we support the use of quality infill design standards to help with the neighborhood feel and context elements while at the same time not unreasonably driving up costs)
- (3) **Height incentives only apply to certain types of development.** The current proposal's height incentives apply mainly to certain contexts of the city with existing mixed-use or multi-unit zoning, predominantly along commercial and arterial/collector corridors or the inner city. A simple look at the zoning map shows how limited in size and area these areas are and how large majorities of Council districts are predominantly zoned single unit. Furthermore, the height incentives (3 to 4; 5 to 7; 8 to 12; 12 to 16; 16 to 20) are skewed toward multi-family apartment building forms and offer little to nothing toward the building forms where for-sale product is occurring—duplexes, row houses and townhomes. We encourage the City/EHA team to explore possible incentives for building forms under 3-stories that ensure important segments of the housing market are not left out of any meaningful density bonus or incentive structure.
- (4) **Other incentives.** Offering a permit fee reduction exclusively to affordable units and not all units within a development is a missed opportunity to provide a more meaningful balance and trade off when considering the significant cost increases the policy creates. While the parking reduction does not do enough to move the needle from a project feasibility standpoint, a more meaningful permit fee reduction, or other financial incentive(s), would help provide more balance, recognizing that building costs for housing are at an all-time high and constantly increasing and piling up.
- (5) **Incentives for fee-in-lieu.** Given the extremely high and cost prohibitive nature of the fee in-lieu option, it doesn't make sense to disqualify a fee in-lieu project from benefiting from some of the potential benefits of incentives such as permit fee reductions and/or parking reductions. The incentives won't be near enough to offset the cost increases, but this double whammy doesn't make sense.
- (6) **Flexibility and accountability.** How is this policy expected to change as the housing market evolves or outside forces or factors impact the Denver housing market? We never saw regular reporting or high levels of administrative accountability the last time

Denver had an IHO and the data we've seen from other inclusionary markets does not indicate a reduction in housing costs or a meaningful increase in affordable units. We believe the city should incorporate meaningful standards for reporting, tracking metrics and continual engagement and dialogue of not only the City Council and the Planning Board but also the stakeholders tasked with alleviating the current housing shortage.

In summary, while we recognize why the City and County of Denver is considering a proposal like this, we urge extreme caution and recommend City officials work earnestly with the residential development community to avoid unintended consequences and provide adequate incentives and support. The increased costs from this proposal will be significant, so it is imperative the city do everything possible to minimize these impacts, recognizing that they will be shouldered by roughly 90% of the new market-rate units created under this proposed ordinance.

The HBA of Metro Denver welcomes and encourages additional opportunities to participate in this policy dialogue and we hope revisions from the first round of formal public input will take into account this letter and others received by the development community. While there are many ways to approach affordable housing, an inclusionary ordinance that targets new development needs collaboration with the development community, so it does not end up doing more harm than good.

Thank you for the opportunity to continue to participate and provide meaningful stakeholder input. Please don't hesitate to contact the HBA with questions or for further discussions.

Sincerely,



Ted Leighty
Chief Executive Officer
Home Builders Association of Metro Denver

December 31, 2021

Dear Mayor Hancock, Denver City Council, Ms. Laura Aldrete, Ms. Analiese Hock, and members of the Expanding Housing Affordability Advisory Committee:

As part of the City's Expanding Housing Affordability initiative, we have an opportunity—and in fact, an obligation—to expand the existing Affordable Housing Linkage Fee to create a dedicated funding source for housing-first solutions for our neighbors experiencing homelessness.

“Affordable” housing, while supporting some income brackets of renters, does not provide the support needed to help the city's most vulnerable populations making 30% of the Area Median Income (AMI) or less. Much of our city's affordable housing stock is priced for people making between 80% and 120% AMI. This means that in 2020, much of the city's affordable housing stock was priced for single people making between \$54,950 and \$84,000 per year, or families with children making up to \$139,200 per year. The lower-tier affordable housing stock developed by the Denver Housing Authority, priced at 50% AMI, requires single tenants to make \$35,000, and families to make up to \$58,000.

Working a minimum wage job at \$15.87/hour full-time with no days off¹, a single mother with two children makes \$33,010 each year, and wouldn't qualify for this housing option. She'd have to wait in line for one of the few housing developments priced for “Extremely Low-Income Populations,” filling out required paperwork to verify her income all while she and her children sleep in their car, on a couch, in a shelter, or on the street. And since there is no long-term affordable housing option available in Denver for people making below 30% AMI (\$21,000 per year for a single person, and up to \$35,160 for families), this means that they must leave the city, rely on the shelter system, or live on the street.

The Affordable Housing Linkage Fee is a development impact fee levied upon new development in the City and County of Denver, and it draws its power from the “direct nexus” between new market-rate development and increased demand for affordable to low- and moderate-income households. Gentrification, defined as “the process whereby the character of a poor urban area is changed by wealthier people moving in, improving housing, and attracting new businesses, typically displacing current inhabitants in the process,” is widely recognized as a major catalyst of the displacement of populations, evictions, and homelessness. The “direct nexus”—the clear link between new development and the increases in numbers among our neighbors experiencing homelessness—is immediately recognizable in our own community, and has been proven by multiple published research studies. Brynn Rosell's paper “Gentrification and Homelessness,” published by the National Association for School Psychologists, specifically uses Denver as its sample and representative population.

Despite the City already acknowledging that new development clearly causes an increased need for affordable housing, the City has not yet created a funding mechanism that seeks to

address the cause-and-effect relationship between new market-rate development and the displacement of low-income community members, particularly Black and Brown community members in rapidly gentrifying neighborhoods of Denver. This must change, and our tools must mitigate the disparate outcomes that result from placing new-market rate development in rapidly gentrifying communities.

With the understanding that the City and County of Denver and the State are working to develop and maintain other sources of funding for housing, services, and programs for those experiencing homelessness, it is imperative that developers begin to contribute equitably to the communities they financially benefit from.

We, the undersigned, urge the City to:

1) Raise the Affordable Housing Linkage Fee to better align with the City's Housing & Homelessness goals and to meet the true needs of low-income and no-income community members in gentrifying neighborhoods. An appropriate fee would be the Maximum Legally-Justifiable Nexus Fee per the 2016 Denver Affordable Housing Nexus Study for all land use categories, escalated in an amount equal to the changes in the Consumer Price Index for All Urban Consumers (CPI-U).

2) Eliminate Section 27-157 of the ordinance, which allows for the Executive Director of the Department of Economic Development to “reduce or waive” the total linkage fee if the applicant “demonstrates that the required amount of fees exceeds the amount that would be needed to mitigate the actual demand for affordable housing created by the development.” This reduction/waiver allowance ignores and dismisses the clear causal relationship between gentrification and homelessness, even when developments do not directly generate new residents or employees in need of affordable housing.

3) Dedicate a minimum of 20% of the total annual funds generated by the Linkage Fee directly to housing first solutions to those experiencing homelessness.

Sincerely,

9 to 5 Colorado
Colorado Coalition for the Homeless
Colorado Cross-Disability Coalition
Colorado Homes for All
Colorado Poverty Law Project
Colorado Village Collaborative
Denver Democratic Socialists of America
Denver Homeless Out Loud
GES Coalition for Organizing for Health and Housing Justice
The Reciprocity Collective
The Office of Councilwoman Candi CdeBaca, Denver City Council District 9

From: [Maria Sepulveda](#)
To: [Hock, Analiese M. - CPD City Planner Principal](#); [Weinig, Brad J. - HOST Director of Catalytic Partnerships](#)
Cc: [Stefka](#); [Mary Coddington](#); [Jonathan Cappelli](#)
Subject: [EXTERNAL] Expanding Housing Affordability Proposed Policy Approach
Date: Wednesday, December 22, 2021 5:17:02 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Dear Analiese and Brad,

Thank you for your tireless work on the Expanding Housing Affordability project. This truly is such a tremendous, overwhelming, and important challenge for our city. We are writing to you on behalf of the undersigned affordable housing developers who are currently working in the City of Denver to propose an important revision to the EHA policy to more equitably support affordable housing development throughout the city.

Equity and Inclusion

2040 Comprehensive Plan and 2019 Blueprint Denver are based on the fundamental value of Equity and Inclusion. The plans read: *In 2040, Denver is an equitable city of complete neighborhoods and networks. It is an evolving city where growth complements existing neighborhoods and benefits everyone.*

Blueprint Denver expects low density areas (“all other areas” in the plan) to absorb 20% of growth of housing units.

However, the proposed Expanding Housing Affordability draft exempts the majority of the city from the obligation of providing affordable housing by omitting an affordability requirement for projects smaller than 8 units and not providing incentives to build affordable housing in low density residential areas. Therefore, EHA falls short on allowing access to housing for low-income residents in high-opportunity areas and perpetuates inequities of exclusive, single-family zoning.

To ensure that the EHA program follows the guidelines of the adopted city plans and makes certain that anticipated growth is equitable and inclusive and benefits everyone we are proposing the following revision:

Density Incentive in ALL low-density residential areas to allow 3-story for-sale and for-rent multifamily developments so long as 50% are permanently affordable units for households earning 80% AMI or less. This incentive should be paired with all Base and Enhanced Incentives included in the draft.

To maintain the scale and character of neighborhoods all existing Building Forms in the Zoning Code can remain unchanged with the exception of eliminating the use limitation constraining the allowable number of dwelling units within the Forms.

Three-story multifamily development is the most cost-effective way to build housing as it provides the economy of scale without the burden of more expensive construction methods associated with higher density developments. Furthermore, this construction style and building forms are traditionally associated with for-sale housing. Expanding the EHA program into low density areas and low-rise construction will deepen the impact of the proposal on affordable homeownership in Denver.

Sincerely,

Habitat for Humanity of Metro Denver
Elevation Community Land Trust

Neighborhood Development Collaborative



From: [kniechatlarge](#)
To: [Hock, Analiese M. - CPD City Planner Principal](#); [Showalter, Sarah K. - CPD CE3125 City Planning Director](#)
Subject: FW: [EXTERNAL] Comments on the Expanding Housing Affordability project submitted to the website by a group of Denver residents
Date: Tuesday, December 21, 2021 12:18:15 PM

Didn't see you cc'd on this, so figured I'd pass it along.

Happy holiday season!

TSP

From: John ferguson <johnfergusonindenv@gmail.com>
Sent: Tuesday, December 21, 2021 11:56 AM
To: Fisher, Britta E. - HOST MA0054 Director of the Denver Office o <Britta.Fisher@denvergov.org>; Laura.Aldrede@denvergov.org; District 1 Comments <District1@denvergov.org>; City Council District 5 <DenverCouncil5@denvergov.org>; District 9 <District9@denvergov.org>; City Council District 10 <District10@denvergov.org>; Herndon, Christopher J. - CC Member District 8 Denver City Coun <Christopher.Herndon@denvergov.org>; Deborah Ortega - Councilwoman At Large <OrtegaAtLarge@Denvergov.org>; District 3 <District3@denvergov.org>; Clark, Jolon M. - CC Member District 7 Denver City Council <Jolon.Clark@denvergov.org>; Black, Kendra A. - CC Member District 4 Denver City Council <Kendra.Black@denvergov.org>; Flynn, Kevin J. - CC Member District 2 Denver City Council <Kevin.Flynn@denvergov.org>; Kashmann, Paul J. - CC Member District 6 Denver City Council <Paul.Kashmann@denvergov.org>; kniechatlarge <kniechatlarge@denvergov.org>; Elenz, Magen M. - CC Senior City Council Aide <Magen.Elenz@denvergov.org>
Subject: [EXTERNAL] Comments on the Expanding Housing Affordability project submitted to the website by a group of Denver residents

Dear Councilors and Dept heads,

We are sending this copy of our comments on EHA to you each to make it easy for you to read them. We are doing this because we care deeply about this important issue. Our signatures are at the end of the email.

Thanks for your attention.

December 21, 2021

We are a group of elders from SE Denver who are concerned about homelessness and affordable housing in Denver. E.g. We have been taking a meal about once a month to one or another of the Safe Outdoor Spaces for the last year.

We are so glad to see the projects the city has been undertaking in the last months to address these issues. The Expanding Housing Affordability initiative seems to offer a substantial step forward in providing critical housing that is affordable to lower-income

working-class people. The HOST 2022 Action Plan includes an encouraging approach to providing a fast response to needed housing using Safe Outdoor Spaces and Tiny Home Villages. We applaud the city agencies who are cooperating in these projects, we're proud our city is moving in a positive responsive way to meet the needs for accessible homes -- with four walls, a door that can be locked, a window for light and air -- a place to be safe and secure.

More broadly, the Expanding Housing Affordability document does nail down the city's responsibility to assure housing for all. It begins with a background for both the city's achievements and its failures of the last 10 or so years. Most importantly, it offers a projection for the whole spectrum of housing needs, by income, the city will face over the next 20 years. Sadly, even disgracefully, it says that 10,500 homes accessible to families in the \$60,000 and under income level (the poorest and most vulnerable of our neighbors) have disappeared, a result of **age, neglect and gentrification**. That critical housing loss has forced those with the least out of Denver, or left to live on their own on the streets.

The richest households with incomes of \$100,000 income or more have increased the most, adding about 45,000 new households. These are the people who have been attracted to Denver and are filling the highest income jobs in Denver, gentrifying neighborhoods and raising overall housing prices, **making neighborhood housing less affordable for the rest**.

Happily, the EHA is aimed at reversing that housing loss, providing assistance to housing directed to mid-level families between these two, with incomes between \$64,000 (50% AMI) and \$80,000 (80%), the so-called workforce groups.

The EHA document says that the need for rental housing over the 20 years going forward is as follows (but somehow omits support for the 12,000 units serving families earning below 50% of average median income (AMI):

2,500 units for families at 51 - 60 AMI

4,500 units for families at 61 - 80 AMI

7,000 units for families at 81 - 120 AMI

9,500 units for families at 121 AMI and above

The EHA program is aimed at that middle group of 7,000 families in the 51 - 80 AMI incomes.

The program design to have affordable homes inclusively incorporated in all developments across the city is, we think, great. The idea of having income (class) integration is admirable.

However, we are concerned that the plan fails to project or forecast specific targets or measures of program success. It just assumes the program will be successful. How will the various needs be met? When and at what cost? We did not find accountability measures defined in the documents, how multiple funding sources will be integrated, and a fairness standard established to protect the interests of renters, homebuyers and the shelter-supported.

However, there was a forecast given during the EHA November 4th virtual Open House and it is on the video of the event we found on the EHA website; at roughly the 1 hour and 2 minute mark of the video. Analiese Hock gives the forecast, with some qualifiers, of 200 homes per year. Extended to 20 years, that's 4,000 units. Of course, that is the roughest sort of linear forecast, but it is better than none, and does mark the scope of the project. Taken for what it is, **4,000 homes amounts to 60% of the need for the income ranges the project is aimed at: 7,000 homes in the 51 - 80 AMI groups.**

We also see nothing in the project to address the long-term needs of the lower range – those living at less than 50% of the city's area median income -- the 12,000 homes/units needed. While completely excluding the city's most vulnerable households, **EHA Project's projected outcome will provide 4,000 homes out of 19,000 homes needed in the next 20 years, just about one-fifth of the need you projected.** Better than in the past perhaps, but it offers no transformation of Denver's housing future.

That is abysmal. After all the work for housing affordability in Denver over the last two decades, we are in a deep hole, with way too many of our neighbors living with severe housing stress of rents at 50% of their incomes or more, and 4,000 or more without homes at all -- 1,500 sleeping in tents in the streets, being swept from one encampment site to another by the DOTI and DPD.

Can we hope, can we expect that we will dig out of this hole with this program? What else is the city going to plan for to remedy the dreadful conditions of those without safe, stable housing? Will we see the city building public housing not just for the below 30% AMI, not just transitional housing for the street dwellers, but for disabled workforce people too? Will we see a breakup of the huge neighborhoods of single family dwelling zoned areas, so that appropriate multi-family affordable housing can be built, in response to high land costs, by allowing homes built on less land?

Denver's HOST and CPD depts apparently discounted the need for a publicly-funded option to serve those whom the market has never served. The tools are there. The Telluride barricade to local rent restrictions has been broken. The city can intervene in directly creating permanently affordable housing. We should also be working with our Congressional delegation to cancel the Faircloth Limit on our public housing supply which would allow the expansion of public-owned and operated housing, locally controlled and managed, based on Denver's resident's needs.

Instead of depending on the leavings of wealthy developers, the city must take direct responsibility to assure adequate and appropriate housing is being developed. Use the power of the people, the public's will and resources, to assure the public interest is served, incorporating all our public resources (finances, land, public supported institutions, etc.). The city should empower the Denver Housing Authority along with qualified nonprofits and land trusts, to directly intervene in the acquisition of appropriate land and buildings for development of diverse housing solutions, for a healthy, intentionally diverse and inclusive city for the future

Working in collaboration with DHA and qualified housing nonprofits, managing their coordination with schools, RTD, and other major city and private corporate investments and institutions, we could create a more inclusive, efficient and livable community, welcoming to all Denver's residents now and into the future.

Please add a section to the EHA Project to set its context in some larger collection of programs, (Or, add a section that points to those other planning and policy tools) so we can see how we in Denver are going to be successful in housing everyone with dignity and prosperity.

We will attend the EHA events in the new year, even into the legislative process at City Council. We hope to see your responses to our comments. We apologize if our recounting of your analysis is tedious; we want to help our neighbors understand what the issues are too.

Thank you for your attention.

Signatures

John Ferguson
901 S Downing St
Denver CO 80209
303-408-3940

Kathryn Smith
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Denver CO 80209
303-514-8498

Carol MacConaugh
429 S Ogden St.
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Denver CO
303-628-1715

D Blake Chambliss FAIA
2800 S. University Blvd, Unit 172
Denver, Colorado 80210
303-521-3412

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
10/01/2021 15:29 PM	<p>This letter with comments is provided by NAIOP Colorado, which represents a diverse network of over 600 developers, owners, investors and related real estate professionals.</p> <p>Instead of piecemeal feedback on the Feasibility Analysis presented to the Committee on July 22, 2021, and to some in the development community in focus groups on September 8 and 9, 2021, NAIOP thought it would be helpful to coordinate our analysis by experts in each industry area and provide them together in this letter.</p> <p>We applaud your efforts on this complicated issue, and affirm the Committee's objective posted on the project website to "establish market-based programs for new development that complement existing tools and resources, enabling the city to address housing needs for households in every neighborhood." NAIOP is committed to this same objective and asks to be a partner at the table as the City and Committee begin the more substantive discussions on the final proposal to be advanced to the public and eventually City Council.</p> <p>While this letter is focused on the Feasibility Analysis comments, we encourage the Committee to spend ample time discussing the following in your upcoming meetings:</p> <ul style="list-style-type: none"> •The need for flexibility and options to meet different market segments; •What the alternatives to constructing units on site should be (as required by House Bill 21-1117); •What an appropriate transition period is to implement these changes, and whether they should be implemented in steps to allow the market time to adjust; and •What incentives should be offered to encourage affordable housing construction. <p>The current costs of construction are in balance with the current rents or sale prices of buildings in Denver. It is an efficient, market-based system. Banks are not willing to lend on projects with lower than required returns and developers and investors are not willing to take the risks of building properties without adequate compensation. As a result any increase in the costs of development results in higher rents and home prices.</p> <p>What this will ultimately lead to is the continued shrinking of the middle class, both in business, and in residential real estate. Raising linkage fees and raising requirements for inclusionary housing at lower income levels will cause rental rates for market-rate units to go up. Put simply, those at 80% or lower AMI gain access to affordable units through Denver's expanded program. And the higher income consumers can afford higher rents and property prices. But the people who are just above the low income threshold (those in the 80-120% of AMI range), who t pay market-based rents, become priced out of home ownership, building ownership, commercial and residential rents, and the ability to live or operate inside the city limits in Denver.</p> <p>One NAIOP member shared this: "When we estimate rough development fee costs, we typically assume \$5-6/sf as an average for Denver fees. The proposed new linkage fee is equal to the assumption we make for all fees, doubling it per square foot." That is a significant overnight change to the real estate market.</p> <p><u>Industrial Assumptions</u></p>	Comment	Male	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
10/12/2021 21:39 PM	<p>I would like to comment on the parking reduction incentive discussed on page 21. I am very disappointed that, even with the incentive, new developments are required to have a minimum amount of parking. That the city mandates parking minimums is problematic for several reasons. Parking takes up valuable land that could be used to address the housing shortages described in this report, especially for those at <80% AMI. If parking is not included at the surface level, it requires costly underground structures that raise construction costs and unnecessarily increase rent. Parking minimums foster a reliance on cars, which leads to avoidable traffic deaths, increased congestion, and contributes to Denver's poor air quality. Furthermore, requiring parking undermines efforts to promote walking, biking, and transit use.</p>	Comment	Male	19-34	White	Rent	\$50,000 - \$99,000
10/13/2021 19:45 PM	<p>I agree that Denver needs more affordable housing. However, if developers are forced to sell or lease some units below market, will the price of remaining units be raised to compensate/ because there are now fewer "non affordable" units available? I do favor this requirement and this is a question, not a statement of belief. I'd really like to see the evidence. My concern is that those just above the affordable income line will then have fewer places to buy or rent. I've tried reading on the subject but find mostly conflicting opinions and not solid evidence.</p>	Question	Male	65-74	White	Own	\$150,000 - \$199,999
10/14/2021 8:10 AM	<p>I fully support the proposed policy and think it is necessary. If anything, I would like to see it be a little more stringent and implemented faster. We need the housing yesterday and delaying any further will mean Denver will continue to be squeezed for at least four more years before the benefits proposal comes to fruition. I do not think the concerns that industries are still recovering from COVID is a valid argument against this. There will always be some reason to push back against initiatives like this and COVID is just the most recent. I am part of the industry as a structural engineer and believe there is room in development budgets</p>	Comment	Male	19-34	White	Own	\$100,000 - \$149,999
10/14/2021 8:57 AM	<p>This is well-intentioned but will likely have the inverse effect than you are expecting.</p> <p>The best way to make housing more affordable is to remove barriers to increasing supply, not add them. These restrictions will result is less housing supply being built in Denver and less dense projects to be favored (also negatively impacting affordability).</p> <p>Studies have shown time and time again that more supply, including "non affordable" supply help to keep prices affordable for all residents. Otherwise buyers at higher ends are priced out as well, and they in turn push up prices of affordable units.</p> <p>Just make it easier to build and approve denser developments!</p> <p>Eric</p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Own	\$100,000 - \$149,999

Response Submission Date/Time	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
10/14/2021 15:49 PM	<p>I like that this policy is an improvement from our current policies, and I like the parking requirement incentive!</p> <p>What is the impact of these changes on the City's ability to negotiate deeper affordability, family sized units, community benefits, etc. on larger developments? Who will be determining which developments are Higher Impact? Will there be any consideration for community voice on what might be higher impact in their neighborhood (especially in neighborhoods most vulnerable to displacement)?</p> <p>How will this positively impact the number of units being built that are at 60 - 80% AMI? What are the projected numbers? What have other cities seen? What need will these potential units fill? (numbers wise)</p> <p>What are possible unintended consequences?</p> <p>Developments of 8 - 9 units would in the majority scenarios not create any full units if so why does the proposal state developments of 8 or more units instead of</p>	Question	Female	19-34	Hispanic, Latino/Latina/Latin x, or Spanish	Own	\$100,000 - \$149,999
10/19/2021 11:16 AM	Denver needs every tool in the toolbox to address our affordable housing shortage. It's wild out here. Rents are way too high and it causes people to forego healthy foods, adequate healthcare, and other essentials that increase quality of life	Comment	Male	19-34	White	Rent	\$50,000 - \$99,000
10/20/2021 6:40 AM	I support this proposal! We need more affordable housing.	Comment	Female	19-34	White	Rent	\$50,000 - \$99,000
10/20/2021 6:51 AM	By forcing developers to add "affordable" units in their projects the rental costs for everyone else will rise. If providing such housing is a civic priority then all Denver residents should shoulder the cost, not just developers and renters.	Comment	Male	75 and older	White	Rent	\$50,000 - \$99,000
10/20/2021 8:00 AM	Since this is a requirement, is the City going to avoid past errors? i.e. the 1st statement in the title of the property is "This is affordable housing and as such subject to City approval for the intended sale price which is governed by _____ document and associated data" There has been several people in the City that have sold their property for a profit and the current owners got screwed because they OVERPAID, because the City failed to identify the sale and allow the initial owner to walk away with a lot of \$\$\$ at the expense of the new owner who is upside down.	Question	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
10/20/2021 8:41 AM	I am in favor of this proposal as a solution to affordable housing in Denver. The part that worries me is parking. I see no evidence that people are opting out of the automobile just now. Our transportation infrastructure is in need of expansion to sustain the influx of new residents who might opt for no- car lifestyles. I would also like to see some % of the fees and profits that developers make or benefit from go into homelessness solutions. If we do not want to see Denver become SF or NYC these policies MUST be a) instituted and b) monitored very closely for compliance. There are huge incentives to chest the system as	Comment	Male	65-74	White	Own	\$100,000 - \$149,999
10/20/2021 10:00 AM	I suspect no one will read this anyway so here are my comments. The solutions are to simple enter reality and stop pandering to developers and political manipulation and invest money in provide safe affordable housing as quickly as possible. I appreciate the data analysis and graphs created by your team but I still don't see how the use of percentages communicates concrete solutions to a growing problem. Your "Key Considerations" seem to be based in reality but there is no coherent plan to address any or all of your own stipulations. Clarity and Communication should be at the fore front of this "project" and I see little evidence here that this creates any where near the numbers required to achieve anything but a fog of statistics and percentages. According to your statistics a maximum 12% of new construction would be "mandated", boy is that a loaded word. You have just encouraged the crazy people to start picketing for "housing freedom"! In the end it is technically not "mandated" because of developer linkage fees will allow developers to get away with the same avoidance they have for the last 25 years, starting with the Stapleton and Lowry projects. Your assessment of the numbers of potential units does not even cover the increased demand	Comment	Other: Contractor/ Landlord/ non profit	45-54	Prefer not to answer	Own	\$25,000 - \$49,999
10/20/2021 10:09 AM	How is this a better solution than just eliminating single family zoning in Denver? Minneapolis and Portland already set the template for this. This proposal assumes affordable housing only comes in big apartment developments but that's not what families want. We want duplexes, triplexes ADUs.	Comment	Male	35-44	Prefer not to answer	Prefer not to answer	Prefer not to answer
10/20/2021 10:11 AM	How are the fees acquired distributed equitably (linkage fees et al) .ie: 500K industrial project in NE Denver will pay \$2,000,000. Do the funds go to improve affordable housing in the NE area? or are they comingled with others and these funds used to build affordable housing in the SW Denver area some 25 miles away for new building?	Question	Male	65-74	White	Own	\$200,000 or more
10/20/2021 10:31 AM	<p>This proposal does not address the root cause of the lack of affordable housing in Denver. It will become a tool for rich existing homeowners to block any new development by making new housing more expensive.</p> <p>Under this proposal a developer could build a multi-million dollar single family home without any affordability requirements, but building an 8-unit condo with an average price of \$500,000 would trigger additional requirements.</p> <p>We need to stop trying to make reverse bank shots for solving affordability. Allow by-right development and stop creating additional hurdles to building housing.</p>	Comment	Male	35-44	White	Rent	\$150,000 - \$199,999
10/20/2021 11:29 AM	<p>The Denverite article includes this argument from those that don't think this plan is enough.</p> <p>"Yet some affordable housing proponents argue the city's proposal doesn't go far enough, arguing that there should be a moratorium on building more market-rate housing until there are enough affordable units that would preserve the working and middle class and ensure the economic and racial diversity of the city."</p> <p>I agree! Until you offer more affordable housing -- and I don't even mean by the official definition, but from affordable based on the fed description and housing even a little above that -- let's call it reasonable housing -- require developers to do much more than what is outlined here to help the situation. This is, honestly, just an opportunity for the city to say they did something without actually having done much at all.</p>	Comment	Female	35-44	White	Rent	\$50,000 - \$99,000

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10/20/2021 11:31 AM	I support the proposal. Mixed income neighborhoods are good for our city, and affordable housing is much needed, both for those living in the units and the community at large.	Comment	Female	65-74	White	Own	\$100,000 - \$149,999
10/20/2021 14:43 PM	What housing options are there and/or being planned in the near future to remove most of the homeless encampments?	Question	Male	75 and older	White	Rent	\$10,000 - \$24,999
10/20/2021 15:54 PM	Where are "High-Cost Markets" and "Typical Markets" defined?	Question	Male	45-54	White	Own	\$150,000 - \$199,999
10/20/2021 22:04 PM	It's about time that affordability was really addressed in this city. I'm all for introducing linkage fees to developers!	Comment	Male	45-54	White	Own	\$100,000 - \$149,999
10/21/2021 6:34 AM	I fully support making affordable housing available so that no US citizen is homeless.	Comment	Male	55-64	White	Own	\$200,000 or more
10/21/2021 6:42 AM	Eliminating zoning rules is the best way to obtain more density and cheaper housing. This plan is a government solution to a government created problem. In the end, by creating more red tape to development this plan will probably make the problem of affordable housing worse. Legalize housing.	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Own	\$100,000 - \$149,999
10/21/2021 7:08 AM	Please move forward with the Expanding Housing Affordability project. The number of jobs in Denver has outstripped the housing supply. This has driven up costs and made housing a luxury item. Housing is not a luxury, it is essential. It is absurd to even say that, so please do your best to make housing affordable to all.	Comment	Male	45-54	White	Own	\$150,000 - \$199,999
10/21/2021 7:17 AM	I support the new proposal that would require developers to include income-restricted units in almost all housing developments.	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Rent	Prefer not to answer
10/21/2021 14:50 PM	There seems to be growing consensus among industry, academia and peer cities that that the most sustainable way to stem housing cost increases is to increase supply. As such, I don't see why a requirement making it harder and more expensive to construct new supply in Denver is a reasonable approach to overall affordability. Will it increase supply of Affordable apartments? yes. But will it also decrease supply of market rate apartments? also yes. Will it also drive more new development outside city boundaries? also yes. This is a paradigm that does not necessarily need to exist if we were just willing to reduce the biggest hurdle to housing development: zoning. It is also expressed in a growing consensus of research that artificially restricting potential supply through single family zoning and other low density areas is a key driver of decreased affordability. I know the city has undertaken some initiatives like ADU legalization and up-zoning small parts of the city or lots at a time, but these are baby steps and have virtually no affect on housing potential when looked at from a metro perspective. If we were to compare the original chapter 59 zoning and total allowable units across the city and total allowable units today, I would be willing to bet that the number has only increased marginally while our population and housing demand has exploded. Why does zoning not keep pace with population growth?	Comment	Male	19-34	White	Own	\$200,000 or more
10/21/2021 14:54 PM	I love this proposal, and I'm very encouraged by both the levels of implementation here (per -cost areas, rentals vs sale) and the speed on this. This is better policy than I expected, and it gives me new hope that I will be one day able to afford to live in this city better than I do today.	Comment	Male	19-34	White	Rent	\$10,000 - \$24,999
10/21/2021 21:34 PM	This will be a step in the right direction but the number of unhoused individuals in the Denver metro region is expected to rise. How will this keep up with that?	Comment	Female	35-44	White	Own	\$100,000 - \$149,999
10/22/2021 7:46 AM	I am fully supportive of this project and commend the city's significant efforts to adapt to our changing demographics and growth while prioritizing equitable and inclusive development. I am excited that this will create opportunities to hopefully diversify and better integrate our socioeconomically and racially segregated city by allowing neighbors of different races, ethnic groups, classes and backgrounds to reside in the same community. I also appreciate the options to allow developers flexibility in how they choose to meet these requirements, and what seems like a reasonable timeline for implementation. I sincerely hope this passes	Comment	Female	19-34	Asian	Own	\$100,000 - \$149,999
10/22/2021 9:33 AM	Unless it's a non-profit, developers don't make homes for free. I would hope that the City of Denver would be cognizant that by increasing the fees on market rate housing, less market rate housing will be built. Less market rate housing means higher prices for all current market rate housing, which is by far the biggest share of housing. It's clear that Denver's increase in home prices is due to the imbalance of people moving here and the construction of new homes. Policies that reduce the incentive to build housing, will result in higher future prices for current housing. That's not to say there is no place for affordable housing in our housing policies. But the best way to slow prices would be to flood the market with new housing, regardless of price. Supply has not kept pace with demand, so prices rise. The City should consider things like density bonuses to increase the total amount of units. Truly Denver needs to look at how many people move here each year and aim to build that many or more housing units. Otherwise we are just creating a trickle of affordable housing, while the market rate housing keeps rising.	Comment	Male	19-34	White	Own	\$150,000 - \$199,999

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10/22/2021 11:09 AM	The new rules will completely stop small residential townhome projects that you define as "large" - at 8 units or more. I am happy to share my #s on a 9 unit project I will soon commence. Under the current costs - the project will generate approximately \$550k in profit. Under the NEW rules you are proposing - the project will generate approximately \$220k in profit. At a total project cost of \$5.8M - I would never do this project with a projected profit of \$220k. Institutional Projects (150 units or more) are better able to absorb these costs. You should also charge a "transfer fee" on all real estate transactions to fund Affordable	Comment	Male	45-54	White	Own	\$200,000 or more
10/22/2021 16:42 PM	First, I think it's great that we're trying to house all people. I want housing for everyone. But this seems like a bad way to go about solving that problem. If I understand this plan correctly, it's going to increase costs for building new market rate housing units. If we're trying to incentivize the building of more housing units, why would we want to make new housing cost more? The document mentions that this plan will raise costs for builders, but we know that builders won't be the ones paying these costs. The purchasers of new market rate housing will be the ones who will be paying this cost. This seems like a tax on people who weren't able to buy housing many years ago. I imagine it will place this burden on our youngest community members. Instead, I think the whole community should be taking on this burden. Many Denverites bought their homes many years ago. They've seen their homes increase in value over the years. They've done very well for themselves, at the expense of newcomers and younger people. And this was no accident. People who bought homes many years ago have generally fought to exclude others from moving into their neighborhoods. Those homeowners have intentionally blocked new	Comment	Male	45-54	White	Own	\$200,000 or more
10/23/2021 8:36 AM	My husband & are native Denverites. We are dismayed watching what were small family middle-income homes either be torn down for McMansions or expanded to same. New builds of condos & apartments are still beyond the budgets of most young couples & families to purchase & owning a home is a pipe dream. We continually ask ourselves how singles, young couples or working class families in Denver are supposed to be able to live in anything other than a cramped space at best, let alone live the American Dream of owning their own home.	Comment	Female	55-64	White	Own	\$50,000 - \$99,000
10/24/2021 20:03 PM	This policy needs to get affordable housing into Denver neighborhoods. Right now it segregates it in the few former industrial areas by highways and on some random defunct campus sights around town. This isn't equity and I don't think this policy will have an impact. We need to allow 4-8 units in all residential neighborhoods, and limit the ability of anti-housing forces to stop those sized projects, especially when it comes to subsidized housing, in our neighborhoods. We should especially focus on getting subsidized units near tools of opportunity like "blue" rated DPS schools. Please rethink this policy, 20 percent of Denver land	Comment	Male	19-34	White	Own	\$50,000 - \$99,000
10/25/2021 9:36 AM	I'm a small home developer in Denver. My last 3 projects built over the last 6 years totaled 24 units all 1/2 block to light rail. When listed for sale, they were all the lowest priced new construction in the City of Denver. I'll never do it again. The city makes it too damn hard to permit and build this product type. Could have built even lower priced condos, but Construction Defect Liability prevented that. It's much easier to build expensive Detached Single Family homes that due to 85% of the land being zoned Detached Single Family, drives the per unit sales price to \$1M+. Here's a quote to take to heart as you weigh it's merits: "You can't	Comment	Male	45-54	White	Own	Prefer not to answer
10/25/2021 12:16 PM	I have reviewed the EHA Financial Feasibility specifically from a Townhome perspective and the assumption are all incorrect. Here are my #s on a project I am presently building: Hard Costs \$230 psf Soft Costs: \$60 psf Land Cost: \$100 psf Here is what your report stated: Hard Costs: \$197 psf Soft Costs: 18% of HC = \$35 Land Cost: \$50 The EHA report also states Market Rate Multi-Family projects averaged 195 units between 2015-2019 so it appears the feasibility analysis was based primarily on	Comment	Male	45-54	White	Own	\$200,000 or more
10/25/2021 20:57 PM	Please stop requiring income restricted, subsidized housing to be constructed as a part of new construction. You are creating welfare cliffs, where Denverites in the income restricted unit end up losing money if their income increases above the threshold. Additionally, you are making the market rate housing more expensive for everyone else to cover the costs, most of whom are also struggling. Lastly, you are increasing the amount of required bureaucracy required to maintain all of these subsidized units. That money should be going towards building more housing. Also, your team should be more focused on mandating new	Comment	Prefer not to answer	19-34	Prefer not to answer	Own	\$200,000 or more
10/26/2021 7:28 AM	Why are we not seeing incentives for housing at higher affordability or rather at AMI rates lower than 60%? If someone works full time at a grocery store making \$17 they make around \$30,000. How do these essential works fit into the affordable housing formula?	Question	Female	35-44	White	Rent	\$50,000 - \$99,000
10/26/2021 19:30 PM	I support this proposal to require affordable homes in large residential developments. I would encourage strengthening it by slightly raising the required percentage as well, especially for the apartments.	Comment	Male	35-44	White	Own	\$200,000 or more
10/26/2021 22:57 PM	Builders and developers should be 'encouraged' to stop building expensive studios and 1-bedrooms and build 2-, 3-, 4-bedroom units. Cheaper to build, and certainly cheaper to rent!	Comment	Male	75 and older	White	Own	\$50,000 - \$99,000
10/27/2021 15:36 PM	As a developer working on a current project for approval in the Denver sub market. It seems that the affordability problem is thrust in developers laps. Affordable requirements on market rate projects are a disincentive for the market to build more capacity because they limit a market rate return and makes it so we must raise rents on non-affordable rate tenants. This creates more unaffordability problems and upward spiraling of rents. when in reality creating more supply would create more price competition and lower materials costs and lower more competitive rents. This is a supply and demand problem! If you want to incentivize more supply why not lead with an incentive like giving more density to builders that agree to put more affordable units in their market rate projects. This enables us to	Question	Male	45-54	American Indian or Alaska Native, White	Own	\$100,000 - \$149,999
11/01/2021 7:14 AM	I read the proposal, and I didn't see that there is any forecast of the impact of the proposal on the ultimate availability of affordable housing over the next 10 or 20 years. Will the mitigations proposed be enough to make the distribution of housing fit the needs of various income families, distributed across Denver in inclusive neighborhoods?	Question	Male	75 and older	White	Own	\$50,000 - \$99,000
11/01/2021 11:18 AM	The additional benefit needed for an off-site agreement should be clearly defined as it is in San Jose and Boston which are both referenced in the study, Leaving full discretion to HOST leaves uncertainty that makes off-site agreements unfeasible. I understand this strategy has not been utilized to date in Denver but there is real potential to maximize the number of affordable units this way. We are currently working on a scalable affordability strategy here in Denver and this is one strategy we would like to utilize. By building units offsite for a primary	Comment	Male	19-34	White	Own	\$150,000 - \$199,999

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11/01/2021 20:57 PM	Denver needs more affordable housing units for very low income families and moderate income families. I hope these affordable housing units include 30% AMI.	Comment	Female	35-44	Hispanic, Latino/Latina/Latin x, or Spanish	Own	\$100,000 - \$149,999
11/02/2021 11:57 AM	I feel that the fee-in-lieu should not be offered at all or the fees have to be prohibitive. I fear that the multimillion dollar developments would find this an easy out.	Comment	Female	65-74	White	Own	\$25,000 - \$49,999
11/02/2021 13:15 PM	Not sure how much it will help to add additional costs to construction of new housing when we already have a shortage of housing. We need Affordable Housing (income restricted, subsidized) yes, but we also need the market rate housing to stop going up in price so dramatically. If we don't stop that, more and more of us will require Affordable Housing because we can no longer afford housing at market rates. We'll never be able to keep up with the increasing demand for Affordable Housing if the market prices keep going up and up and up. I'd like to see polices that make it easier to build more housing in the city, multi-family housing, in all neighborhoods. We need flexibility in our zoning that allows more housing to be built as there is demand, and it's clear that there is a lot of demand. Instead of trying to get someone else to (hopefully) build the Affordable Housing we need, why don't we allow housing to be built to keep up with demand, then	Comment	Male	35-44	White	Own	\$50,000 - \$99,000
11/02/2021 17:57 PM	I think the City of Denver needs to stop with the obsession with "affordable housing." How about open spaces, mature trees, and unpolluted air? How about walkable neighborhoods instead of cramming multiple households in a single lot all with cars? How about a tree canopy in every neighborhood instead of covering every foot of the lot with housing and concrete? Every city has its limits and Denver is past its ability to support more people using more water, polluting the air, increasing the density in formerly affordable single family housing neighborhoods, and clogging the roads. Trying to artificially manage housing costs just	Comment	Female	45-54	White	Own	\$200,000 or more
11/02/2021 18:16 PM	I fear the costs will be passed on to tenants, raising rents and creating only greater demand for affordable housing. Additionally, it does not address the fact that the majority of land area in Denver is zone for single family, so developers and renters are shouldering most of the burden of the whole City's affordable housing crisis. Should there also be linkage fees for scrapes, that take an affordable home and replace it with something far more unaffordable? Can this be paired with zoning	Comment	Male	19-34	White	Rent	\$25,000 - \$49,999
11/03/2021 12:13 PM	I AM VERY CONCERNED ABOUT THE PRE-/POST-POLICY IMPACTS OF APARTMENT PROJECTS AS THERE WILL BE A CLEAR VALUE/RENT/DESIRABILITY(?) DISTINCTION BETWEEN THE TWO CATEGORIES. EXISTING BUILDINGS (ESPECIALLY BUILT IN THE LAST DECADE SINCE THE GFC) SHOULD ALSO CONTRIBUTE TO THE SOLUTION OF AFFORDABILITY.	Comment	Male	55-64	White	Own	\$200,000 or more
11/04/2021 15:25 PM	How would these proposed changes ensure that any housing development is near service needs (grocery, transportation, etc.)?	Question	Female	19-34	White	Own	\$200,000 or more
11/04/2021 15:39 PM	Do these changes go far enough? I do not mean to question your engagement process, because I'm sure it was very well done, but I see that these changes would bring us "in line" with other areas. Why not lead? Let's make a big impact! I strongly support vigorous work on housing affordability. And I would like to voice strong support for reduced parking requirements and increased density in	Comment	Female	19-34	White	Own	\$200,000 or more
11/04/2021 20:01 PM	We are currently looking for a townhouse or house or condo. Our combined income is around the upper limit for low income but our realtor and lender are strongly discouraging us saying the regulations fluctuate and make it difficult to sell, and also they get poor commission. Also, I wonder if it would be more effective to hire a construction team directly onto city staff whose job is to take developer tax and build housing that is not tied	Comment	Female	35-44	Asian,White	Rent	\$50,000 - \$99,000
11/05/2021 8:57 AM	I'm concerned that the policy document mentions transportation only twice. Shouldn't housing strategies be based on integrated transportation and housing? I'm not the target of affordable housing but I'm very supportive. I live in a 4 person family with one car and I don't really drive. That's just my lens and anecdotal, but I'd like to make sure assumptions about car ownership, need, and preferences are challenged and that housing is based on access to a mobility grid that doesn't prioritize cars (in fact, it must actively deprioritize them for people to safely and comfortably use other options). I recognize you're probably trying to be targeted	Comment	Female	19-34	White	Own	\$200,000 or more
11/09/2021 12:00 PM	I love the details of the proposal as written (what AMI% it covers, the linkage fees, the incentives, starting at devs of 8 units) but I'm starting to get concerned about the window for SDP review after this ordinance would be adopted by council. I think it should be a shorter window for folks getting their final SDP approved, just because the number of new, tall buildings going up around the city is incredible, and I worry we'll lose out on the maximum number of affordable units this cycle can produce if implementation is too generous to the developer. I know this seems like futzing on the margins, but if the window were even 10 months to a	Comment	Male	19-34	White	Rent	\$25,000 - \$49,999
11/10/2021 19:17 PM	Affordable housing should be extended everywhere in Colorado not just primarily in neighborhoods that are already suffering or considered to be low income. Also the hoops that aka paperwork that many have to go throw just to be considered is problematic	Comment	Female	35-44	Black or African American	Own	\$50,000 - \$99,000
11/11/2021 18:54 PM	How long it takes to qualified for affordable housing, for senior citizens, one is disabled and also her son. WHOM takes priority in the waiting list. In the City of Denver, ones opens a affordable housing building, some times for the same place are over 3,000 applicants.	Question	Female	65-74	Hispanic, Latino/Latina/Latin x, or Spanish ,White	Rent	\$25,000 - \$49,999
11/11/2021 21:20 PM	With many American Citizens displaced from what was their revenue source. How can it be housing can not be accessible and affordable? Supply and demand can not apply in times Americans are experiencing. Have we lost our ability to think and come together as a nation to get through this time with little to no more fallout.	Comment	Female	Prefer not to answer	White	Own	\$10,000 - \$24,999

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11/15/2021 14:22 PM	I think you need to address short-term rentals (AirBnB's) that are related to this problem and regulate those more. Investors are buying up properties and turning them into AirBnBs which take away affordable housing options for people who actually live here every day. A home or part of a home that may have rented for \$1500/month for a long term local renter, now on AirBnB someone can rent that night for \$200/night as a short term rental for visitors out of state and take away housing for locals. I think this is a huge problem mountain communities are noticing now, locals can't afford to live there anymore because of the greedy short	Comment	Male	45-54	White	Own	\$100,000 - \$149,999
11/17/2021 8:39 AM	I am in favor of doing whatever it takes to reduce barriers and costs to building affordable housing. Including removing parking requirements and input from neighbors.	Comment	Male	19-34	White	Own	\$100,000 - \$149,999
11/17/2021 20:34 PM	I'm interested to see if the South City Park Neighborhood Association, of which I'm a member, would be willing to endorse any proposal.	Comment	Male	35-44	White	Own	\$200,000 or more
11/18/2021 10:09 AM	Why are there no provisions to help current homeowners in working-class neighborhoods? I live in Globeville, and many families here own their homes. With home values surging, managing property tax payments is more and more challenging. Hard working people, and many retired workers, risk being priced out of the homes they already own. Please consider freezing property tax rates for folks who are longtime homeowners. For example, if residents have owned their homes since 2015 or earlier, then freeze their property value assessments at the assessed 2015 levels for the next 10 years. This would help keep good, hard	Comment	Male	19-34	Prefer not to answer	Own	\$150,000 - \$199,999
11/22/2021 3:46 AM	Thank you for addressing the housing crisis by creating better public policy. As a registered nurse, I cannot afford to live in Denver. The working class is what makes this city great, and its time to help us.	Comment	Female	19-34	White	Rent	\$100,000 - \$149,999
11/23/2021 17:53 PM	I am appalled that the project will only require building at the 60-80% AMI level. What we really need is more housing for people who make less than 50% AMI. At the 80% AMI level there are already 94 available units for every 100 renters, but below 50% AMI, there are only 49 units for every 100 renters, and below 30% there are less than 30/100	Comment	Female	65-74	Middle Eastern or North African	Own	\$50,000 - \$99,000
11/24/2021 15:31 PM	I am a resident of Berkeley, in Council District 1 in Denver. I am writing to register my strong support for the Expanding Affordable Housing proposal. I think this is a very important issue in Denver and this is a reasonable and well-thought-out approach.	Comment	Female	55-64	White	Own	\$100,000 - \$149,999
11/26/2021 15:48 PM	I support a project to expand housing affordability in Denver, but I am concerned that the proposal being considered does not go far enough. The large number of people experiencing homelessness and those in low-wage jobs are not able to benefit from the proposal as written. A recent study found that there are only 30 units available for every 100 renter (households(https://nihc.org/housing-needs-by-state/colorado) with incomes of 30% AMI. I would like to see 10% of the new housing for 30%-50% AMI households.	Comment	Female	65-74	White	Own	\$50,000 - \$99,000
12/06/2021 2:40 AM	I am a resident in northwest Denver (district 1) and I am highly in favor of this project. Denver's housing crisis can only be addressed by forcing rampaging developers to provide affordable housing, and this project is one strong step in the right direction. Please keep the pressure on developers to behave like responsible members of our Denver community. Thank you!	Comment	Female	35-44	White	Own	Prefer not to answer
12/06/2021 13:28 PM	Make it more accessible not only to single parents, but families struggling to make it. This should also be done with background checks and rules and regulations about keeping properties clean inside/ outside, noise ordinance, and guest guidelines.	Comment	Female	45-54	Black or African American	Own	\$50,000 - \$99,000
12/06/2021 14:46 PM	What in the plan prevents a city-wide decrease in housing units thus exacerbating the affordability crisis? What in the plan prevents a switch from apartment/condo buildings to more luxury single-family homes which are exempt from affordability requirements?	Question	Male	35-44	White	Rent	\$150,000 - \$199,999
12/14/2021 10:28 AM	I think this is a much needed change. Rent in this city has sky-rocketed and has pushed out a lot of generational families from their housing units, typically along racial lines. This city desperately needs affordable housing for all. It will help with the homeless population and help an the economy as people have more money to spend elsewhere instead of on rent. This proposal has my full support!	Comment	Male	19-34	White	Rent	\$50,000 - \$99,000
12/15/2021 13:28 PM	Expanding Affordable Housing is great BUT affordable housing is NOT affordable in Colorado. It would be a great opportunity to consider what the average joe makes an hour. My patients cannot afford a one bedroom for \$1500 per month when they ONLY make \$15 per hour. And now landlords want tenants to make 3x that in rent - STILL NOT AFFORDABLE HOUSING.	Comment	Female	55-64	Black or African American	Own	Prefer not to answer
12/15/2021 13:40 PM	At this time, is there a layout or idea of what some of the ADUs would look like or how many would be built in West Barnum behind the Salavation Army Building off of Alamada ? Can you send any information or design for that lot at this time?	Question	Female	19-34	White	Own	\$50,000 - \$99,000

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
12/15/2021 13:53 PM	Making new development more expensive will only exacerbate our housing affordability issue. Create higher & denser zoning, remove barriers to new construction, make it easier & faster to move a new housing project through planning/building dept. Do everything you can to make it as easy as possible for developers to build new projects! They will build, rents & prices will come down into equilibrium and we'll get past the housing affordability crisis. And add at least 3-5 more stories available to build to every zoning area & remove all single-family zoning districts in Denver. It's Common-Sense, Basic Economics.	Comment	Prefer not to answer	Prefer not to answer	American Indian or Alaska Native,Asian,Black or African American ,Hispanic, Latino/Latina/Latin x, or Spanish ,Middle Eastern or North African ,Native Hawaiian	Prefer not to answer	Prefer not to answer
12/15/2021 15:26 PM	I endorse the plan for affordable housing.	Comment	Female	65-74	White	Own	\$100,000 - \$149,999
12/15/2021 15:52 PM	Looks like a good start but just scratches the surface of the problem. Appreciate the research and evidence-based decision making regarding the various "in-lieu" options but ultimately it shouldn't be a choice for developers to not build some an even higher number of affordable units. Funding for support services ideally would come from somewhere else and builders can learn to be responsible corporate citizens.	Comment	Male	65-74	White	Own	\$200,000 or more
12/16/2021 6:12 AM	This project completely misses the mark for NEST neighborhoods, and there should be a higher threshold of affordable units required in neighborhoods that are at risk of displacement. 60-80% Thresholds are above what those in East Colfax can afford...so bringing this program will be a net displacement of our community. This is not a bold solution, it is a solidification of the status quo. In meetings with the City pre this proposal CPD mentioned that they consider it a win when we can get 15% affordability and now this extremely low threshold is being touted as a victory. Saying this is acceptable it saying that it is ok for 85% of our neighborhood to be displaced. We need to have bolder policies that create higher requirements in NEST neighborhoods. The committee that formed these recommendations was in no way equitable, and there was not adequate representation of groups in NEST neighborhoods who are supporting community making	Comment	Male	35-44	Hispanic, Latino/Latina/Latin x, or Spanish ,White ,Other: Chicano	Own	\$50,000 - \$99,000
12/16/2021 9:55 AM	Hello, we wanted to bring forward the perspective of a small developer as we feel the math implied by the current draft disproportionately adversely impacts small local developers in favor of large developers, which we do not believe is the intent of the legislation. We support increasing affordable housing available in Denver; our hope is only to compete at least on a level playing field with better capitalized competitors so we can keep small projects economic. We have two main thoughts that we wanted to highlight: •Rounding Hurts Small Local Developers-In the last draft covenanted units kick in at a variety of levels (for for-sale: 10% or 15% (8%+7%) in "typical" markets/ 12% or 18% (9%+9%) in "high cost" markets, and then for-rent 8% or 12% (6%+6%) in "typical markets/ 10% or 15% (8%+7%) in "High Cost" markets). As small developers, typically developing in the range of 7-18 units, which this legislation as written is intended to apply. As you'll see applying these thresholds will typically require us to do some rounding-which I believe in our last discussion implies us needing to round up. If we are building 7 units and 10% is to be affordable, we'd have to make 1 unit in 7 affordable, which would actually place a 14% affordability requirement on us- 40% more. As you'll see applying these % to small number of units disadvantage us at every level contemplated. oWe highlight this because as you know as small developers we are always facing an uphill battle versus larger, better capitalized competitors. We wanted to highlight that the legislation seems to further disadvantage the little guys versus bigger developers who can build to a number of units which allow them to naturally meet the requirement without rounding. •Historic Districts- If you were to pull the SDP map for Denver and overlay the historic districts, you would see that there is a dearth of development that occurs in	Comment	Male	19-34	Prefer not to answer	Prefer not to answer	Prefer not to answer
12/16/2021 11:23 AM	In all new housing, I agree that a certain amount of all the units should be made as affordable housing for lower income people.	Comment	Male	65-74	White	Own	\$25,000 - \$49,999
12/16/2021 11:38 AM	1. Mandatory Affording Housing for New Resideintial Developments >= 8 Units. I would like to know what prompted the threshold of 8 units? Most slot homes are 7 units - it would be great to have one of the units in each slot home project dedicated to affordable housing to try to address economic diversificaiton within neighborhoods. 2. Do the proposed options improve economic diversification within neighborhoods? If so, how?	Question	Female	55-64	White	Own	Prefer not to answer
12/16/2021 13:06 PM	Wanting to stay up to date on this issue.	Comment	Female	45-54	Prefer not to answer	Prefer not to answer	Less than \$10,000
12/16/2021 15:38 PM	Parking is awful to begin with across Denver. There shouldn't be any concessions around yhis issue. Not planning for the amount of cars puts more of a burden on neighbothoods/street parking which leads to more accidents.	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Own	Prefer not to answer
12/16/2021 17:25 PM	Change zoning across the entire city to allow duplexes and ADU's.	Comment	Male	35-44	Prefer not to answer	Rent	\$50,000 - \$99,000
12/17/2021 13:39 PM	With more and more students graduating with college degrees funded by student loans it is important to recognize that even if the student has a higher than average paying career, they should be considered for low or moderate income programs because between paying for rent (\$1,600) and a monthly loan payment (\$1,500) there is little left over to save for retirement, invest, or save up to buy a home. This particularly impacts income ranges \$65,000-\$100,000 (middle income earners) and is a hidden economic constraint that hinders upward mobility and creates greater inequality. Most programs focus on the very poor or the very	Comment	Female	45-54	Asian	Rent	\$50,000 - \$99,000

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12/17/2021 15:30 PM	Hi, I wanted to see if you had additional information that you could share regarding how the new legislation will impact the golden triangle and RiNo neighborhoods. Specifically, the incentive zoning that already exists in those two neighborhoods. Additionally, I wanted to confirm my understanding of the incentive zoning policy as currently proposed. If I was building a building and wanted to utilize the	Question	Female	35-44	White	Prefer not to answer	Prefer not to answer
12/18/2021 10:30 AM	These proposed policies continue to use a 'trickle down' theory for funding below 50% AMI. Income restricted unit creation should match the need not the easiest to afford and politically accept. The number of units required to be affordable will never meet up with the need. Especially when only for new construction.	Comment	Female	35-44	White	Rent	Less than \$10,000
12/21/2021 11:37 AM	December 21, 2021 We are a group of elders from SE Denver who are concerned about homelessness and affordable housing in Denver. E.g. We have been taking a meal about once a month to one or another of the Safe Outdoor Spaces for the last year. We are so glad to see the projects the city has been undertaking in the last months to address these issues. The Expanding Housing Affordability initiative seems to offer a substantial step forward in providing critical housing that is affordable to lower-income working-class people. The HOST 2022 Action Plan includes an encouraging approach to providing a fast response to needed housing using Safe Outdoor Spaces and Tiny Home Villages. We applaud the city agencies who are cooperating in these projects, we're proud our city is moving in a positive responsive way to meet the needs for accessible homes -- with four walls, a door that can be locked, a window for light and air -- a place to be safe and secure. More broadly, the Expanding Housing Affordability document does nail down the city's responsibility to assure housing for all. It begins with a background for both the city's achievements and its failures of the last 10 or so years. Most importantly, it offers a projection for the whole spectrum of housing needs, by income, the city will face over the next 20 years. Sadly, even disgracefully, it says that 10,500 homes accessible to families in the \$60,000 and under income level (the poorest and most vulnerable of our neighbors) have disappeared, a result of age, neglect and gentrification. That critical housing loss has forced those with the least out of Denver, or left to live on their own on the streets. The richest households with incomes of \$100,000 income or more have increased the most, adding about 45,000 new households. These are the people who have been attracted to Denver and are filling the highest income jobs in Denver, gentrifying neighborhoods and raising overall housing prices, making neighborhood housing less affordable for the rest. Happily, the EHA is aimed at reversing that housing loss, providing assistance to housing directed to mid-level families between these two, with incomes between \$64,000 (50% AMI) and \$80,000 (80%), the so-called workforce groups. The EHA document says that the need for rental housing over the 20 years going forward is as follows (but somehow omits support for the 12,000 units serving families earning below 50% of average median income (AMI): 2,500 units for families at 51 - 60 AMI 4,500 units for families at 61 - 80 AMI 7,000 units for families at 81 - 120 AMI 9,500 units for families at 121 AMI and above The EHA program is aimed at that middle group of 7,000 families in the 51 - 80 AMI incomes. The program design to have affordable homes inclusively incorporated in all developments across the city is we think great. The idea of having income (class)	Comment	Male	75 and older	White	Own	\$50,000 - \$99,000

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
12/22/2021 19:39 PM	<p>12/22/2021 Subject: Expanding Housing Affordability Policy- Recommendations to Ensure Equitable Outcomes</p> <p>On behalf of Mile High Connects (MHC), a broad partnership of nonprofits, community organizers, philanthropic organizations, and private and public sector partners working to advance racial equity and prioritize equitable investment into community driven solutions, we are writing to commend the City and County of Denver for its ongoing work and commitment to creating new, mixed-income communities within reach for those that need it the most.</p> <p>The Expanding Housing Affordability (EHA) proposed policy is a critical step to provide housing opportunity and stability for Denver residents, particularly those that continue to be disproportionately impacted by lack of housing affordability and displacement. This moment is an opportunity to institutionalize policy shifts that will enhance the long-term impact of housing affordability and accessibility.</p> <p>MHC recognizes that this policy is just one piece of a larger housing strategy to create and preserve affordable housing. We greatly appreciate the following components listed in the EHA proposed policy:</p> <ul style="list-style-type: none"> •The City and County's acknowledgement of the cost burden of housing and that new housing tends to only serve higher income households. •Creation of a mandatory affordable housing requirement sets a precedent that affordable and mixed-income developments are crucial for a more equitable and inclusive Denver. •Requirement of developer-built affordable units to remain affordable for 99 years is an effective way to ensure longer-term affordability. •Increased incentives around development of affordable housing, including waiving of municipal fees for developers. •Inclusion of additional financial and zoning incentives for projects that create all-affordable developments, not solely the minimum percentage. <p>Nevertheless, MHC believes that further measures should be addressed within the policy to ensure that it meets the needs of those who are most disproportionately impacted by Denver's housing environment and provides deeper opportunities for equitable investment and programs within our most vulnerable neighborhoods.</p> <p>As MHC, we urge you to consider the following recommendations that seek to create a more equitable process and outcome for new, affordable housing developments in Denver:</p> <p>1.Prioritize Disproportionately Impacted Communities and Center Racial Equity: For too long Black, Brown, Indigenous, and People of Color (BIPOC), low-income, immigrant and refugee communities have received the brunt of lack of affordable housing, gentrification, and displacement. While the proposed policy focuses on providing housing options for those with lower average median income levels, it fails to provide explicit measures for community benefit and does not emphasize the need to center racial equity. To prioritize community benefit and advance racial equity, the policy should result in the creation and implementation of a Racial Equity Scorecard to assess the community impact of new developments prior to a project's approval. Assessment criteria should be vetted by community and address community-voiced needs and priorities. Furthermore, the City and County of Denver should increase opportunities for community engagement and outreach to identify housing disparities among community. Continued data collection and analvzation of project metrics is also imperative to</p>	Comment	Female	19-34	Black or African American	Rent	\$50,000 - \$99,000
12/28/2021 8:09 AM	<p>Please ensure the application and each step of the process to apply is simple and accessible for all our community members.</p>	Comment	Female	45-54	American Indian or Alaska Native,White	Other	\$50,000 - \$99,000

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
12/28/2021 8:34 AM	<p>Dear Ms. Hock, Mr. Weinig and Members of the EHA Advisory Committee,</p> <p>I am writing to share our thoughts, concerns and feedback regarding the City and County of Denver's proposal for mandatory affordable housing requirements.</p> <p>These comments are being provided on behalf of the Home Builders Association (HBA) of Metro Denver. The HBA of Metro Denver represents nearly 500 homebuilders, developers, remodelers, architects, subcontractors, suppliers and service providers in the eight metro-area counties we serve.</p> <p>In Denver, the HBA represents 17 different builders with over 600 registered permits just this year.</p> <p>Our members have taken considerable time to meet with City staff and officials and review the proposed mandatory affordable housing policy released by the City. These comments are focused on the types of homes our members create, which are primarily for-sale, attached, duplex and single-family homes for families and others.</p> <p>Our concerns fall into the following categories:</p> <p>(1)The negative impacts to overall housing affordability and supply caused by shifting higher costs onto newly developed market rate units.</p> <p>(2)The disincentive to build for-sale units due to new ownership units having higher percentages of required affordable units. This disincentive is exacerbated by Colorado's construction defect laws.</p> <p>(3)The lack of meaningful incentives and/or trade-offs to help create much needed "missing middle" for-sale housing units in the ranges of 80-120% AMI and beyond.</p> <p>Background: It should be noted that the housing affordability crisis is due to a severe shortage of units and is reaching a breaking point in many markets across Colorado – including the City of Denver. May 2021 set a record-low number of listings in the Denver Metro Area at just 2,075 compared to the monthly average of 15,563. The 12-month increase in the price of the average single-family detached home sold grew by 29%, and the price of the average condominium grew by almost 12%. However, this is not a new problem in Colorado.</p> <p>The average annual number of new homes built every year in Colorado since the 2008 financial crisis is 46% lower than the annual average in the eight years leading up to the recession. If Colorado were to return to the average housing population ratio between 1986 and 2008, it would require an additional 175,000 housing units across the state today. To close that gap and meet future population needs, Colorado will need to develop 54,190 new housing units annually over the next five years.</p>	Comment	Male	35-44	White	Own	Prefer not to answer
12/29/2021 10:10 AM	<p>As a real estate developer who strongly believes in the need for more housing affordability in Denver, we are very appreciative of your work on creating a new approach to increasing the number of affordable units in Denver. The increasing lack of housing affordability in Denver is one of the greatest threats to our economy.</p> <p>The Expanding Housing Affordability approach as laid out in the October 1 draft falls short of the HB21-1117 desire to promote the construction of new affordable housing units. It also shows little commitment to increase the overall density and number of housing units in the City of Denver. The proposed incentives provided for the construction of affordable housing units are too small to create a market-based tool for the increase of affordable housing units in mixed-income developments.</p> <p>These issues are exacerbated in the FAR districts and especially in Golden Triangle that recently went through a rezoning. The projects we are working on under the current zoning will not be possible in this new EHA approach.</p> <p>Specific comments:</p> <ul style="list-style-type: none"> -The staff recommended linkage fee change to incentivize smaller unit sizes may have the unintended and undesired consequence of even fewer multi-bedroom units. The market is already overbuilding studio and 1-bedroom units – there is a large need for more family housing. -Commercial space especially in downtown, a high-cost market has seen a major hit from the pandemic. Placing a larger price per sf on commercial space in high-cost markets will only serve to lower the supply of space in the very areas where we want and need commercial space. -Placing a higher burden on high-cost markets will only serve to put high-cost areas out of reach to moderate incomes. I agree on the high desire for more affordability in the high-cost areas so consider raising AMI levels along with raising the number of units or simply do not treat them differently. If you create too high of a burden, we will see fewer not more units in the places where we want to see more housing and more housing affordability. -Small grammatical error: throughout the document the word "cities" is used when "City's" is meant with a capital C and apostrophe s. -Based on your fee-in-lieu development costs estimates, you agree that it costs more to build in high-cost areas. This is why we think it is not prudent to again increase the burden on housing construction in high-cost areas as this will only serve to continue and exacerbate the housing prices in these areas and pushing up the rents out of reach beyond the reach of even high-income renters. High costs areas in our represent some of the most livable places and the closest we have to the "15-minute city" in Denver. This proposal places a larger tax (fee) on housing therefore disincentivizes housing construction there. Instead, greater incentives should be created for all high-cost areas. -Consider providing incentives for commercial space too so as not repeat the over-emphasis of residential incentives in the 1994 Golden Triangle Zoning. -Limiting building permit fee reduction to only the 60% AMI units and only up to 50% of the fee will have no impact on the proforma decisions and therefore will not function as a market incentive. Greater incentives are needed for a market based tool to encourage affordable housing construction. -AHRT fast review should be available to all projects building units on site. -Height incentives should have at least a 50% increase at all levels. Why is the incentive less for 12 and 16 story districts? -The burden to achieve the enhanced benefits is far too great to achieve and the incentives are not strong enough to overcome the costs especially in high cost markets. -All enhanced incentives should be available in high-costs markets due to the desire for more housing and affordability in these areas. 	Question	Male	35-44	White	Own	\$100,000 - \$149,999

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12/29/2021 17:06 PM	what is considered affordable housing here in colorado?? AND HOW DOES A LIFETIME RESIDENT OF COLORADO get housing since it costs 3 X's what the government is paying for disability.?	Question	Female	65-74	White	Other	Less than \$10,000
12/30/2021 10:41 AM	<p>Enterprise Community Partners appreciates the opportunity to share feedback on the Expanding Housing Affordability (EHA) project proposed policy approach published October 1, 2021. I was pleased to have been an active member of Advisory Committee that was integral to creating the draft proposal; we value the thoughtful, evidence-driven process of the Committee, Community Planning and Development (CPD), the Department of Housing Stability (HOST), and Root Policy Research.</p> <p>Enterprise fundamentally supports the EHA proposal. It is critical for the City to enact such market-driven policies to further the production of much-needed affordable housing. Based on the extensive research and justifications assembled by Root Policy Research and CPD, we back the proposal as a logical and realistic way forward that has the potential to meaningfully advance the availability of desperately needed affordable homes throughout Denver.</p> <p>At the same time, Enterprise hears and agrees with community concerns that the EHA proposal should go further to help prevent involuntary displacement and should include clearer guidelines for the City's capacity to negotiate alternatives to the standard mandatory housing requirements. We urge CPD and HOST to proactively address these areas of concern before moving to finalize the policy.</p> <p>The EHA policy should more directly serve Denver's neighborhoods that are particularly prone to involuntary displacement. Specifically, we urge:</p> <ul style="list-style-type: none"> •directing linkage fee revenue to the development of affordable units in these geographic areas and providing for a process for meaningful community input for projects funded through this mechanism. •increasing the fees associated with development of single-family homes larger than 1,400 square feet to partially offset the impact that scrape-offs and development of large homes have on affordability, causing displacement of long-time residents and contributing to increasing home prices. •intentionally advancing this policy in tandem with HOST's forthcoming housing prioritization policy to ensure those who have experienced or are at greatest risk of displacement benefit from production enabled by the EHA proposal. <p>The EHA policy should also articulate guidelines on when and to what community benefit the City will negotiate alternatives. We understand there are and will continue to be instances in which the City's ability to negotiate with a developer will allow for creative outcomes benefitting unique communities, and appreciate the examples detailed in the draft proposal. However, we urge greater detail be provided, particularly on the HOST Executive Director's ability to negotiate discretionary agreements. The final policy should include clearer parameters on when HOST would deem such negotiations appropriate and what types of outcomes would be desirable, as well as offer ways for community to be involved in those determinations. Doing so would help ensure CPD and HOST's intent for negotiated alternatives long-term, as well as promote community accountability and the adoption of community-identified priorities.</p>	Comment	Female	35-44	White	Own	Prefer not to answer

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
12/30/2021 19:20 PM	<p>ATTN: Ms. Amanda Sandoval, District 1 Council Representative To: Whom It May Concern From: United Families Date: December 29, 2021 Re: Denver Seeks Input on New Affordable Housing Proposal</p> <p>Notes: Reference article; Denver North Star community newspaper article volume 3, Issue 2, November 2021</p> <p>In our experience as Denver Housing Authority Residents, VOICE is oftentimes, negated in early stages of "equitable planning for our best interest." Especially with ongoing changes in: Program and Housing Redevelopment, staff shortages, covid-19, buget cuts; due government election shifts etc, we find ourselves, more than mere "spectators," once again.</p> <p>As past current, and projected Housing Re development builds, our resident councils have been silenced. This can often feel powerless, and even censored.</p> <p>The question in regard to input, how many DHA residents have been involved in the quitable plan that addresses housing needs and families with low moderate income(s)?</p> <p>We have been involved in resident council, community organizing, and ongoing grassroots advocacy. Our mission as United families organization has been in the long-term vision of upward mobility and homeownership. In 20 years of research and personal experience, we need to continue to engineer the communication, inclusivity, and paradigm shift. Specifically, DHA residents should be valued as stakeholders. Our greatest barrier as public housing residents is not only "affordable" housing, rather affordable home ownership. The paradox simply remains: Denver rites cannot afford the cost of living. Consequently, there is no such thing as affordable housing.</p> <p>With all the melee around Thanksgiving Christmas and New years... In addition to the ongoing spread of the new Omnicron Delta and Corona covid-19 virus(es)/ pandemic, here are a few proposed ideas for community input regarding our future and the future of our families. It should be noted that we have provided this input within a one month window.</p> <p>1. Include the voice of stakeholders in the initial stage of your planning process. How many members of your committee are people that this proposal is directly going to impact ?</p> <p>2. How did you outreach to these stakeholders? Open up the window of opportunity for input. You should not conduct a deadline that limits low income families the opportunity to respond. This can be perceived as disenfranchisement. As a DHA residents we became aware of this proposal Mid-November. The article states we have until the end of this year 2021 for innput</p>	Comment	Female	45-54	American Indian or Alaska Native	Rent	Less than \$10,000
12/31/2021 11:24 AM	<p>•If 14 months is the average timeline right now to get an SDP, and there are going to be a lot of SDP's submitted prior to the new legislation (more than the current average), then it will likely be difficult to keep that timeline. I think the City of Denver should consider a 20 month timeline so that projects don't delay indefinitely, but aren't penalized because they have a difficult project, difficult reviewers, or because SDP review timelines increase. It still puts an end date on having an approved SDP that doesn't allow a developer to drag their feet indefinitely, but allows for a reasonable amount of time for projects to complete their SDP regardless of the specific project/issues/review timelines.</p> <p>•It would likely cause less disruption to development in the City if the affordable housing could be phased in so that the hit didn't come all at once and land sellers had more time to adjust what they now accept for a land value. Like 5%, 8%, then 10%.•□</p> <p>•Potential unintended consequences: oHas the City looked into the impact that this will have on the ability to convert a project to condominiums? Very few condominiums have been built in Denver in the last decade as compared to apartments. A major way to create more long-term affordable housing for people (so they wouldn't be subject to annual rent increases etc..) would be home owners ship. Condos often homes at lower price points than are often otherwise available in the market, and condominium conversions even more so. Hopefully this legislation doesn't impact the ability to do this in the future. oIt is likely that there is not enough differentiation between the affordable housing requirements in different areas of Denver, based on the rents in those areas and that hard and soft costs (except land) are equal no matter where you build. The approximate cost per unit with today's rent for affordable housing is \$18,000.</p>	Comment	Female	35-44	Prefer not to answer	Own	\$100,000 - \$149,999
01/01/2022 10:18 AM	<p>If one of the goals of this project is to help create mixed income housing, then why are we allowing there to be exceptions made if the developer builds affordable housing somewhere else in the city?</p> <p>For instance, what is to prevent a developer from building expensive new apartments in Cherry Creek and then meeting their affordable housing requirement by</p>	Question	Male	19-34	White	Own	\$200,000 or more
01/06/2022 9:47 AM	<p>If a large number of affordable units are demolished (Quigg Newton, example) and the residential affordable requirement is way below 100% of units to be built, aren't we DECREASING affordable housing, instead of adding to it?</p>	Question	Female	65-74	White	Own	\$25,000 - \$49,999
02/02/2022 12:10 PM	<p>I do not see this as an "expansion" of Housing Affordability, if low income housing is torn down (example: Quigg Newton) in order to build 1294 mixed units with possibly 12% "affordable" (about 155 units) replacing 380 units of low-income housing. This does not make sense to me. This is a reduction in housing affordability.</p>	Comment	Female	65-74	White	Own	\$25,000 - \$49,999
02/02/2022 12:40 PM	<p>We agree with the principle behind this (belated) initiative, but existing buildings built during the past decades boom in MF apartments (say since 20010) are excluded, and our prior feedback to the initial draft ordinance on this has not been addressed.</p> <p>Why are you creating a two-tier market, and why is the burden on creating all new affordable housing placed 100% on new projects under this ordinance? This makes new projects less affordable and differentiates them from the non-inclusive projects!</p>	Question	Male	55-64	White	Own	\$200,000 or more
02/02/2022 16:45 PM	<p>While the idea is very much appreciate and well intentioned. I'm concerned that this will not help those who have a lower or higher AMI that the 70-80%. Also, based on market economy associated with supply and demand, this will disincentivizes developers and builders from building further exacerbating the housing shortage in Denver for a year or two. I am not convinced this will provide the more instantaneous response to affordable housing that is so desperately needed. I would ask you to consider a more scalable approach and perhaps a more incentive based approach for reduced plan review times, tax incentives, or density</p>	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer

**Written Comments Received
Prior to Release of Draft Policy
Proposal**
(prior to October 1, 2021)



Denver Expanding Housing Affordability Advisory Committee
c/o Analiese Hock, Principal City Planner
201 W. Colfax Avenue
Denver, CO 80202

September 30, 2021,

RE: Feasibility Analysis Comments

Dear Advisory Committee and City Staff,

This letter is provided by NAIOP Colorado, which represents a diverse network of over 600 developers, owners, investors and related real estate professionals.

Instead of piecemeal feedback on the Feasibility Analysis presented to the Committee on July 22, 2021, and to some in the development community in focus groups on September 8 and 9, 2021, NAIOP thought it would be helpful to coordinate our analysis by experts in each industry area and provide them together in this letter.

We applaud your efforts on this complicated issue, and affirm the Committee's objective posted on the project website to "establish market-based programs for new development that complement existing tools and resources, enabling the city to address housing needs for households in every neighborhood." NAIOP is committed to this same objective and asks to be a partner at the table as the City and Committee begin the more substantive discussions on the final proposal to be advanced to the public and eventually City Council.

While this letter is focused on the Feasibility Analysis comments, we encourage the Committee to spend ample time discussing the following in your upcoming meetings:

- The need for flexibility and options to meet different market segments;
- What the alternatives to constructing units on site should be (as required by House Bill 21-1117);
- What an appropriate transition period is to implement these changes, and whether they should be implemented in steps to allow the market time to adjust; and
- What incentives should be offered to encourage affordable housing construction.

The current costs of construction are in balance with the current rents or sale prices of buildings in Denver. It is an efficient, market-based system. Banks are not willing to lend on projects with lower than required returns and developers and investors are not willing to take the risks of building properties without adequate compensation. As a result any increase in the costs of development results in higher rents and home prices.

What this will ultimately lead to is the continued shrinking of the middle class, both in business, and in residential real estate. Raising linkage fees and raising requirements for inclusionary housing at lower income levels will cause rental rates for market-rate units to go up. Put simply, those at 80% or lower AMI gain access to affordable units through Denver's expanded program. And the higher income consumers can afford higher rents and property prices. But the people who are just above the low income threshold (those in the 80-120% of AMI range), who t pay market-based rents, become priced out of home ownership, building ownership, commercial and residential rents, and the ability to live or operate inside the city limits in Denver.

One NAIOP member shared this: "When we estimate rough development fee costs, we typically assume \$5-6/sf as an average for Denver fees. The proposed new linkage fee is equal to the assumption we make for all fees, doubling it per square foot." That is a significant overnight change to the real estate market.

Industrial Assumptions

1. The assumption of cost is actually a bit on the high side. Feasibility Analysis has \$215/sf, but a 100,000 sf building would be closer to \$185/sf.
2. Rent assumption of \$16.75/sf is incorrect. Rents are much closer to \$9-11/sf for a 100,000 sf building. Rates vary quite a bit from NE/I-70 (\$6.00 psf), to the Central Submarket (\$10 psf), to the NW submarket (\$13 psf), etc. Market rates at this level can only be found in the NW submarket, a submarket that only comprises 7% of the entire industrial base of the Denver Metro area.
3. Page 7 - Central Denver Industrial land prices are \$8.50 - \$20 per land foot, not \$6-\$18 per sf used in study.
4. Developers target a 7.0% unlevered IRR and a 5.0% going in yield on cost, and are having difficulty penciling that in today's environment in all Denver submarkets. If increase the linkage fee to \$6.00 psf the going in yield drops to 2.8%, which is a level that no developer would find feasible.
5. A linkage fee that would increase cost by \$6.00 psf is completely infeasible. We are in the midst of an incredibly competitive expansion of industrial development both locally and nationally. In recent years deliveries of new industrial product has far outpaced net absorption in Denver. This has had a moderating effect on rental rate growth. At the same time construction pricing and land pricing have both been increasing at an alarming rate, impairing the underwriting of new industrial development projects in Denver.

Retail Assumptions

1. Retail will benefit less from any density incentives that are considered by the Committee as retail projects are more sensitive to the nuances of site planning and typically are not multi-story projects.
2. The City economy depends on sales taxes. The burden on retail projects should be moderated at a minimum in order to bolster our retailer attraction and the associated sales tax revenue that finances the city's budget.
3. Floor Area Ratio is at least 50% too high. Assumption is that the FAR of a one-acre property is 0.25 / 10,500 sf. With various land use regulations, detention requirements,

landscape setbacks, and retail parking ratios, a one-acre property will realistically have a FAR of 0.15, not 0.25. See example depiction in the enclosed analysis.

4. Land Cost - \$8psf is way too low. One can't buy a retail pad site in Denver for less than \$15 psf in the suburbs and it's generally \$20 psf to \$50 psf depending upon the location.
5. Building Cost - \$197 psf is low. As this is an aggregate of shell and TI costs it should be closer to \$210psf. These numbers do not include accounting for the City's upcoming Net Zero requirements for new construction.
6. Site/Parking – \$8.67 psf is too low. Should be at least \$10psf, and if you want an amenitized plaza area, this goes to \$15 psf. This estimate includes accounting for the City's new EV parking requirements.
7. Soft Costs – These numbers are way too low. A&E plus all city/utility fees plus leasing commissions for a deal of this size will be around \$900,000. If you add property tax carry during entitlements/construction/lease up you'll be over \$1M without any overhead loaded into the deal.
8. Linkage Fee - Adding the \$73,000 linkage fee at a 8-9% ROC means rent is going up about \$6,000 annually or \$0.56 to \$0.63 psf, which is meaningful. Financing – Assumption is low, probably more like \$130,000, and assumptions are only typical for a very select high credit retail development. A small business would encounter very different financing. An assumption of 30% equity is atypical, 40% to 50% is typically required.
9. Contingency – needs to be at least 10% given rapid construction inflation.
10. Rents – Retail rents are always triple net, so the Analysis should dispense with the Gross/Expenses and just insert the \$20.26 pdf. This is really close to the CBRE average market rents from Q2 2021, which also factors in vacancy.
11. Cap rate assumption for retail of 5.5% is unrealistically low. Even in the hyper inflated seller's market we currently have, this is at least 1% too low. If this was a single tenant Starbucks or Chick-fil-A, the cap rates would be in the 4.5% range, but when the tenant mix includes a sandwich shop, a nail salon, a hair cutter, or a pizza shop in the multitenant building, the credit of the nail salon causes the cap rate to rise significantly and should be 6.5% for this type of building.
12. ROC – when the math is re-run with the above inputs, a 4.2% ROC results that is well below the 8-9% ROC hurdle needed to build retail shops with an exit cap at 6.5%.
13. New construction retail already requires 2x average market rents to hit lender and investor financial requirements and adding another \$0.56 - \$0.63 psf on top of that due to linkage fee increases only further eliminates small businesses from being able to lease spaces in new shopping centers – only the large corporate groups can afford it – and puts further pressure on their topline sales to pay rents.

Residential Assumptions

1. Commercial buildings and development would take on much more burden than single family development. Commercial building already subsidize municipal budgets through a much higher property tax rate of 29%, even though residential is a more direct user of municipal services.
2. Both single and multifamily residential properties have seen massive increases in valuations. Given this perceived risk this is true even given comparable NOI.

3. Density numbers need to be re-evaluated. For example, a surface parked garden deal on 1 acre would net you ~25 units at best (not 65). The rule of thumb for garden is 30 units per acre. The only one of these that is close to accurate is the 20-story version.
4. Page 7 - Parking Cost per Space - for structured parking both underground and above ground, parking spaces are \$45,000+ per space. We have received data from contractors that cost for a below-grade parking is around \$60k per space.
5. Page 8 Land Costs - High density is \$350 - \$500 per land foot, Mid density in high cost \$225-\$300 per land foot.
6. Page 11 and 13 - Operating Expenses - should include taxes, insurance, marketing, payroll, G&A, make ready, R&M, Contracts, Utilities and MGMT fee. Assume MGMT fee is 3.0% of EGR for all product types. Multifamily is \$7,200 - \$8,000 / per unit. Marketing assumption should be included in OpEx number, not calculated as % of revenue.
7. Page 13 – Parking Revenue for Multifamily - \$75-150 per space per month.
8. Page 13 - Rental Residential Replacement Reserves: Assume \$250 per unit regardless of construction type for new product.

Office Assumptions

1. Retail and office have more risk and uncertainty, especially in the current environment. Feasibility of office projects will be more difficult and this program will have a heightened impact on these projects.
2. Tenant Improvements - Regardless of building height, Office TI's for new construction in high density areas within Denver is \$100-\$120 PSF.
3. Acceptable ROC at 6% is too low. For office, this should be 7 to 7.5% ROC (YOC).
4. Generally costs are under estimated for today's environment. The costs for low rise should be 10% to 15% higher than they show, and for high rise, should be 20% to 25% higher than they show. Also, suburban buildings are much different than core buildings as they require a lot more parking.
5. Rents are overstated. This looks like they are indicating NNN rates, and if so, are 20% too high across the board. New construction rates for office are \$52-\$60 PSF Gross.
6. Page 11 - Operating Expenses - Are real estate taxes included in the OpEx assumption? If not, office is \$18.50 - \$24 per sf, including RE Taxes and Insurance.
7. Page 13 – Parking revenue for office downtown - \$200-\$250 per space per month.
8. Cap rates are generally shown at 5.5%. While they vary significantly based on tenant mix, term, location, etc., this would range between 5.5% and 7.0%. I would suggest that using a blend of 6% is not out of line.
9. The resulting IRR's around 22% are overstated. Rarely does one see a proforma that hits or exceeds that unless we are very fortunate in timing/cost savings, lease credit, etc.
10. The conclusion that a larger linkage fee of \$9.00/SF to \$11.00/SF (lower for low rise) would have very little impact on projects is simply not true. Every extra dollar of cost makes each new deal that much more difficult. This will definitely have a negative impact on office development, particularly in today's environment where tenants are unsure about how much space they need and whether or not to ever fully occupy their space again.

11. Reality is costs are much higher than a year ago, and new construction still must compete with existing lease rates, which are not rising nearly as fast as costs. The only solution is for new projects is to raise lease rates, which makes the City less affordable.
12. The idea that taller buildings can support a higher fee is not accurate. It is just as difficult to make a taller building financially feasible, and in many cases, even harder.
13. If an increase is inevitable, moving from \$1.83 to \$9-11/sf is way too much of an increase in one step. Would suggest a much smaller increase initially (like to \$3/sf), and then raising it over time so that the market can predict and absorb it.

Financing Assumptions

1. Site Cost as a % of building costs - need to see a breakdown of what goes into "Site Costs" as 5% of building costs per this chart. Site Costs as a % of Building Costs is 8%-10% for an urban office development. For industrial, this number could be even higher due to infrastructure development.
2. Soft Costs as a % of Hard Costs: this is an inaccurate method of estimating soft costs. On our calculations, this approach to calculate Soft Costs would yield closer to 25% - 40% of Hard Costs depending on building type and location. Soft costs should include permit and tap fees, all legal fees, FF&E, A&E, leasing commissions, marketing costs, Development fee, vacancy costs, and RE taxes, and G&A (general & administrative) costs.
3. Construction Debt Assumptions: 4.00%, I/O – Generally in-line with rates today, floating rate debt actually lower, but since the Feasibility Analysis would assume a construction start in 2022 and beyond with a 15-30 month construction period for a variety of product types, 4% is low for a broad assumption, an additional 25-50 basis points would be more prudent.
4. Total Construction Financing Costs: Assumptions include a 1% loan fee plus interest cost at full funding for 10-22 months depending on product type. Appears generally reasonable considering some interest draw models calculate reserve on a funding over time.
5. Construction Contingency modeled at 5%. Feedback from construction lenders is that 5%-7.5% is what they are looking for in the current environment.
6. Development Financing Assumptions (defined as debt service paid upon stabilization). The assumptions include a 4.15% interest rate and a 30 year amortization. Interest rate on stabilized assumption is low considering analysis covers multiple product types with different risk profiles and considerable time between today and stabilization. A more prudent approach would be to add more cushion for rate movement between now and stabilization (talked with two banks who are currently stressing perm loan underwriting to north of 5% for loan sizing). 30 year amortizations on newly constructed stabilized commercial product is available, but depending on the financing source, some lenders will require a 25 year amortization particularly on office and hotel product (some lenders want a 20 year amortization on hotel). Stressing the debt constant to 6.5% (4.25%/25yr am) reduces COC to <5% for office and retail, <12% for hotel and 5% for warehouse.
7. Observation from Base-Case Figure I-10; the NOI used to calculate ROC assumes a 7.5% vacancy rate for office product. To size debt, lenders underwrite to a 10-15% vacancy rate. When you model a 15% vacancy rate, the NOI reduction drops Base-Case ROC to 5.3% from 6% (below the 5.5% cap rate assumptions they assume by prototype). While a

developer proforma might not model a 15% vacancy on an office development for ROC purposes, it may impact loan sizing to something less than 70% of cost.

8. The Base-Case assumption assumes Development Financing of 70% of development costs and at an implied 1.45x-1.95x DSCR based on product type at a 5.83% constant. This appears reasonable so long as you have value creation (the NOI assumptions would need to hit spot on for that to be the case), because perm debt today is more generally available at 60-65% LTV from permanent markets and bank financing sources (yes, there are outliers and you could get more aggressive financing terms with 65%-70% leverage, but generally speaking). DSCR ranges today on commercial would be in the 1.35x - 1.65x range depending on product type (Hotels up to 2x), this is based on lender underwriting, not necessarily actuals. So the governor on loan sizing isn't just LTC/LTV, it's also underwritten DSCR or Debt Yield (DY). Debt Yields in today's market may be as low as 8% on industrial and as high as 12% on hotel.
9. Page 13 - Debt Service: 30% equity is low. Equity amount depends on product type and location as well.
 - Multifamily: 40% equity, 3.75% rate, 5 year term
 - Office: 45% equity, 4.25% interest rate, 7 year term
 - Industrial: 40% equity, 3.50% rate, 5 year term
10. Pages 14-15 - Return on Costs: Target ROC for respective product types:
 - 7.25% for office
 - 6.00% for Warehouse
 - 6.0% for multifamily
11. Pages 14-15 - Cash on Cash Return: CoC for a development for all products should be 7.50%-12% (NOI-debt service/Equity Invested).

We all have a part to play in addressing Denver's housing crisis, but NAIOP needs to have a strong voice in this process as we represent many of those who build the much-needed housing in our great City.

Please feel free to reach out to me, Tyler Carlson, at tcarlson@evgre.com or 303-757-0462, or the Chair of our Public Policy Committee Caitlin Quander, at cquander@bhfs.com or 303-223-1233. We would be happy to flesh out any comments that there are follow-up questions on.

Sincerely,



Tyler Carlson
President
NAIOP Colorado

July 22, 2021

Denver Expanding Housing Affordability Advisory Committee
c/o Analiese Hock, Principal City Planner
201 W. Colfax Avenue
Denver, CO 80202

Re: Expanding Housing Affordability Solutions

Dear Advisory Committee,

We represent Denver housing developers and real estate professionals who are greatly impacted by the work of your committee. As those who build housing units in our city, we share a common goal of yours to expand affordable housing options for all Denverites. More importantly, we appreciate the Committee's commitment to the objective posted on the EHA website, which is to "establish market-based programs for new development that complement existing tools and resources, enabling the city to address housing needs for households in every neighborhood."

As the industry who will be significantly impacted by the recommendations of this committee, we want to express our concerns regarding the potential negative impacts certain policy considerations may have on Denver's housing market in a time of significant challenges. As such, we are writing you this letter to outline our concerns and recommendations for your consideration:

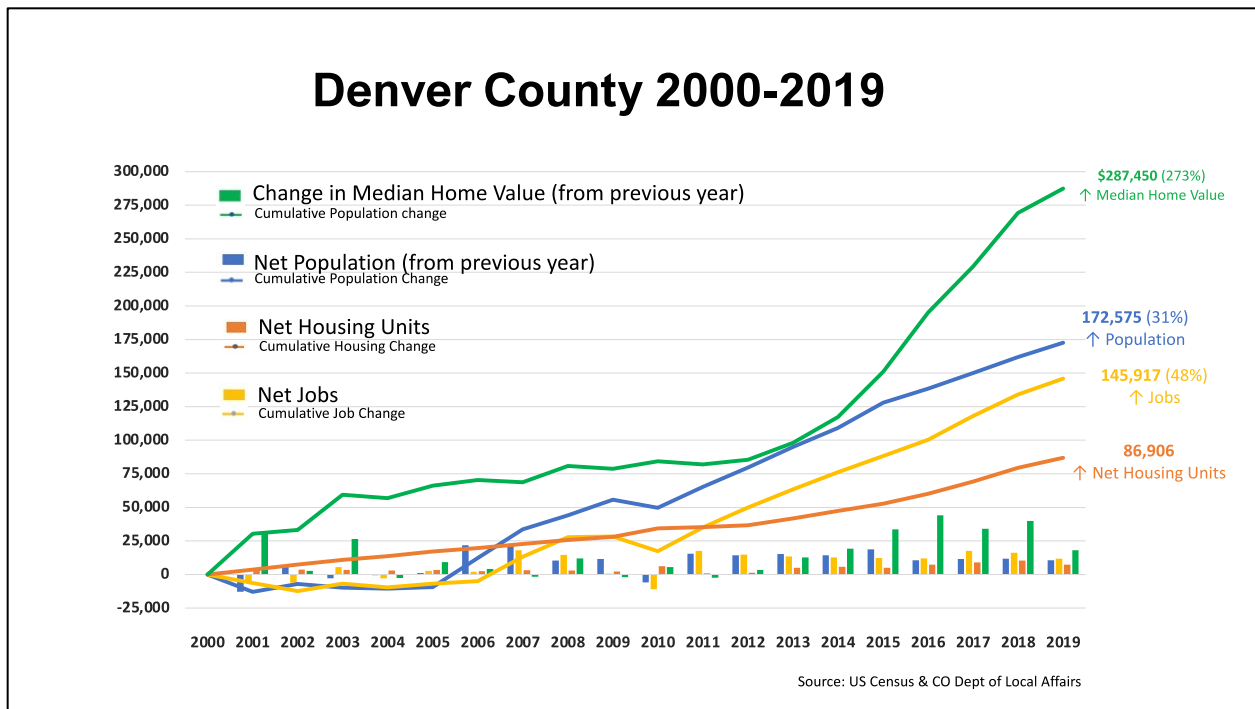
I. Increasing costs and regulations decreases development activity and makes housing even less affordable

As your committee explores raising linkage fees and raising requirements for inclusionary housing at lower income levels, it is important to understand the ramifications these options will have on our local housing market. Like any other marketplace, housing developers need to recover costs and make a return on investment – otherwise they simply cannot do business. If new rules are overly restrictive and cost-prohibitive, many developers not only will not be able to build options for those most housing cost-burdened, but it will also be exceedingly difficult to build housing in Denver in general. It is also important to note that increased costs will likely be passed on directly to the consumer, moving more housing out of reach for Denverites.

While this committee has discussed examples of other cities absorbing and adapting to new inclusionary housing requirements, there is little evidence these policies have reduced prices¹, significantly increased supply, or reduced the overall cost of housing².

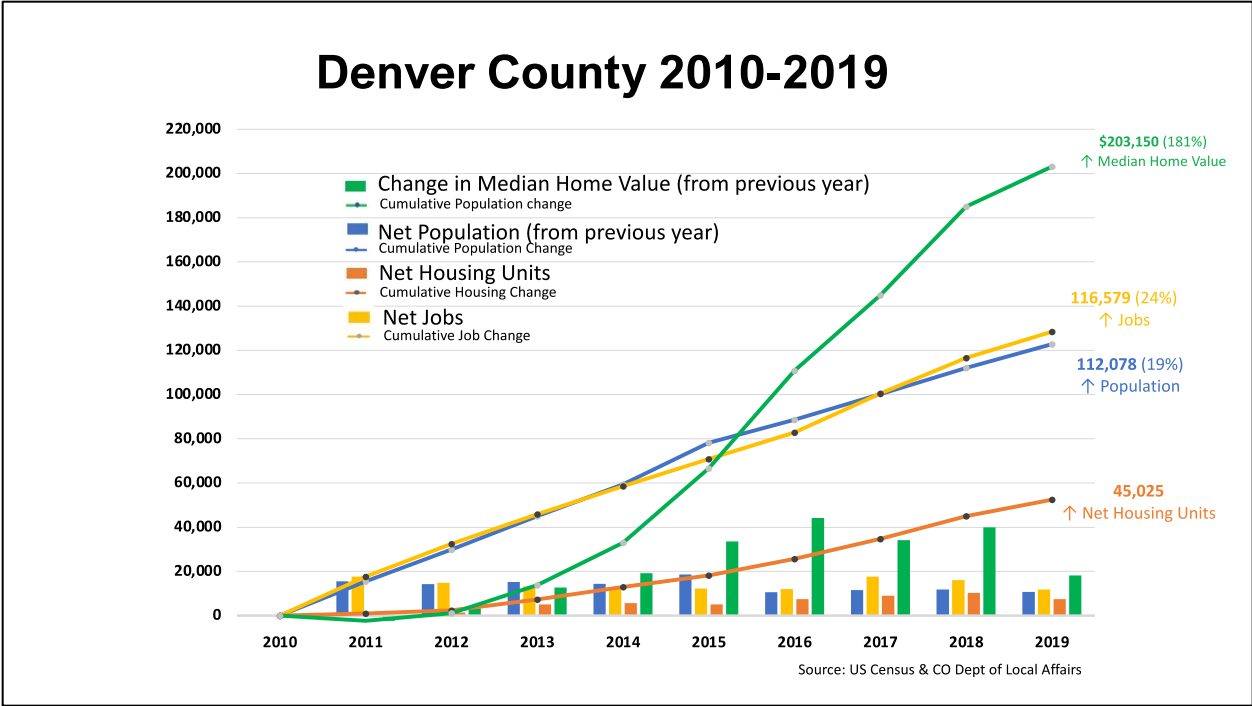
II. Increase supply to address overwhelming demand:

While we recognize the committee will look at a variety of tools to promote affordable housing, we believe one important tool overlooked to date is to focus on the supply side of the equation. As you can see from the charts below, data shows a direct correlation between decreased supply and increased cost of housing. There are several factors that have played out in Denver over the past few decades to get us to the incredibly diminished supply we have now. The bottom line is that housing supply has not kept up with job/population growth. We need to reverse this course if we hope to regain a semblance of affordable housing in Denver.



¹ Hamilton, Emily “Inclusionary Zoning and Housing Market Outcomes” Mercatus Center, May 4, 2021, <https://www.mercatus.org/publications/housing-affordability/inclusionary-zoning-and-housing-market-outcomes>

² See Bento, et al., “Housing Market Effects of Inclusionary Zoning” 2009



The committee should take a serious look at increasing Denver’s woefully low supply of housing for all income levels through encouraging more density throughout the city, removing red tape that makes permitting processes long and cumbersome, and focusing on encouraging residential development rather than placing new burdensome rules and regulations discouraging development in Denver. This is especially important at a time when Colorado is facing rising construction costs associated with labor shortages and increased material costs which have made building homes even more difficult than before. We need to be focusing on tools to offset costs and inject critically needed housing supply, such as waiving unnecessary fees, expediting permits and reducing entitlement requirements.

According to the most recent Common Sense Institute report, Colorado will need to add more than 54,000 new housing units annually over the next five years in order to return to a more stable housing market³. To do this, not only should all options be on the table to increase housing supply in Denver but doing so should be the city’s top priority.

III. Provide direct financial assistance to developers for creation of affordable housing units

As housing developers pay directly into the affordable housing fund through linkage fees, they should have easy, direct access to this fund in order to “bridge the gap” for any new inclusionary housing requirements. For example, requiring units to be built at 60% AMI will be incredibly difficult for the private marketplace to absorb without financial assistance. For these

³ Common Sense Institute Report “From Conflict to Compassion: A Colorado Housing Development Blueprint for Transformational Change” June 24, 2021.

types of units to be built, the development community needs financial assistance, and we believe the proper place to find this is from the already existing affordable housing fund.

IV. Explore more robust, diverse affordable housing funding

We recognize that affordable housing resources are finite and that increased demand for the affordable housing fund must be offset. The city's affordable housing fund is funded largely through linkage fees, property tax mills, and retail marijuana revenue. If the city is serious about increasing affordable housing units, it should look closely at expanding and diversifying its revenue source through different channels. This would create a more fair and more equitable funding scheme that is not contingent on just a handful of revenue sources. Funding should be more representative and distributive across many different industries and private sectors, such as large-scale employers and other entities who have a direct impact on the supply and demand of Denver's housing stock as shown in the city's nexus study.

V. Transparency moving forward

We appreciate the work you are doing on this advisory committee, and for your consideration of the concerns and recommendations outlined in this letter. We all have a part to play in addressing Denver's housing crisis, but our industry needs to have a strong voice in this process as we represent many of those who build the much-needed housing in our city. In that vein, we appreciate this committee allowing for public participation at your next advisory committee meeting. Previously, there has been no posted public comment period on agendas and there has been limited information dispersed to the real estate community about the work of the committee. We highly recommend that an industry break out group be created to work alongside the current advisory committee so that more voices may be heard in the process.

Thank you for your time and consideration of these important issues. We are confident the EHA Advisory Committee will continue to explore these critically important policy considerations so we can expand affordable housing options for all Denverites through innovative and dynamic marketplace solutions.

Sincerely,

John R. Lucero
Chase Hill
Mike Zoellner
Marc Savelle
Bobby Hutchinson
Drew Hamrick
Cherry Creek Area Business Alliance

Response Submission DateTime	We want to hear from you. General questions or comments about the Expanding Housing Affordability project can be shared in the text box below.	Please select if you are submitting a question or a comment.	What is your gender?	How old are you?	What is your race or ethnicity? Please select all that apply. You may report more	Do you rent or own your home?	Please estimate your total household income, before taxes, in the last
07/27/2021 11:33 AM	I would like to see Denver offer and even mandate financial education classes for any recipient of subsidized housing. In my line of work I run into plenty of college educated adults that barely know how to balance a checkbook let alone know how to calculate interest on a loan. This world will be in a far better place if everyone understood a bite better about balancing their checkbook, the power and pitfalls or compound interest, etc. I'm sure local banks would be happy to assist in education.	Comment	Male	35-44	White	Own	Prefer not to answer
07/27/2021 11:36 AM	I keep hearing about Inclusionary Housing. Typically this means housing inclusive of affordability, mixed housing, etc. Nowhere do I hear the word inclusive of accessible housing, housing for those with disabilities, housing that incorporates universal design so that it is accessible for more people with physical disabilities, those aging with various needs, fewer stairs, include those with wheelchairs, walkers, and strollers.	Comment	Female	65-74	White	Own	\$200,000 or more
07/27/2021 12:49 PM	What about establishing a separate expedited process for developers of affordable housing? In other words, those developers could go through the city approval processes much more quickly than a developer who is building market rate apartments, retail or office. This could further incentivize developers.	Comment	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer	Prefer not to answer
07/27/2021 14:42 PM	Specifically relating to housing rental costs, why are numbers configured with an individual's gross income? This method minimizes the damaging effects of the rising costs and ability to afford housing and other living expenses (internet, student loans, car payments, insurance and so on). Paying 30% of gross income toward housing is very different than 30% of net income. Even those with a single income in the 61-80% AMI range aren't able to save money or have hobbies (which is imperative to work/life balance and overall wellbeing). Looking at net income provides a more accurate view of this housing and financial crisis.	Comment	Female	35-44	White	Rent	\$50,000 - \$99,000
07/28/2021 4:56 AM	How can Denver become more walkable, green, and equitable when exclusionary single family zoning makes up so much of the city?	Question	Prefer not to answer	19-34	Prefer not to answer	Prefer not to answer	\$100,000 - \$149,999
08/19/2021 16:59 PM	<p>Firstly, thank you for undertaking this analysis. It seems well considered and well executed. We do have a few questions after reviewing the analysis:</p> <p>Upon conducting a word search of the document, we could not find anything related to the developer fee. This sparks the following questions: Is another term used to reference this? Do these models rely on a minimum developer fee guaranteed rate? If so, what was it set at? What was the rationale for setting it at that rate? We ask the above because in the last Inclusionary Housing update conducted years ago by the city, there was significant debate about what that level should be.</p> <p>The prototypes for this analysis were created by the same company that did the 38th and Blake analysis, we know that project did not create the affordability levels that were projected. Was the discrepancy between projected affordability and actual affordability due to underlying financial assumptions they modeled, or, was it related to the affordability upper limit decided by the city?</p> <p>While the document discusses the relative advantages and disadvantages of high and low fees in lieu - it leaves open the question of what level of fee in lieu the</p>	Question	Female	35-44	White	Rent	\$150,000 - \$199,999
09/05/2021 6:11 AM	<p>The focus needs to be on reducing cost for property owners versus increasing cost. By continuing to add to the cost burden through fees and/or other requirements, it requires owners to push rent/pricing higher on the balance of the market rate units to offset the increased cost. Spread across a bunch of owners this lifts rents in the market as a whole thus continuing to exacerbate the affordability problem.</p> <p>If they brought the cost structure down, it would allow developers/owners to lower the rent while preserving returns. We, as a property owner of over 5,000 rental apartment in Denver and the metro area, would be happy to cap rent to a % AMI level if we got corresponding incentive cost breaks.</p>	Comment	Male	35-44	White	Own	\$150,000 - \$199,999
09/30/2021 9:12 AM	<p>1. Has the city considered allowing developers to build affordable housing projects and allowing those units to be used to offset affordable housing requirements for future projects? This approach may result in more units actually getting delivered versus putting fees in a piggy bank hoping that they be used at some point in the future.</p> <p>2. Will the city consider waiving Tap/Permit/Entitlement fees for affordable/attainable housing projects? Anything below 80% AMI will likely require the city to</p>	Question	Male	35-44	White	Own	\$200,000 or more