

Dear Denver City Councilmembers,

As previously expressed, 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. Since the posting of the February ordinance edition and the delivery of our prior letter, CPD has proposed a change to the ordinance that we do not support, and that we see is not supported by the community feedback delivered through the duration of community feedback periods.

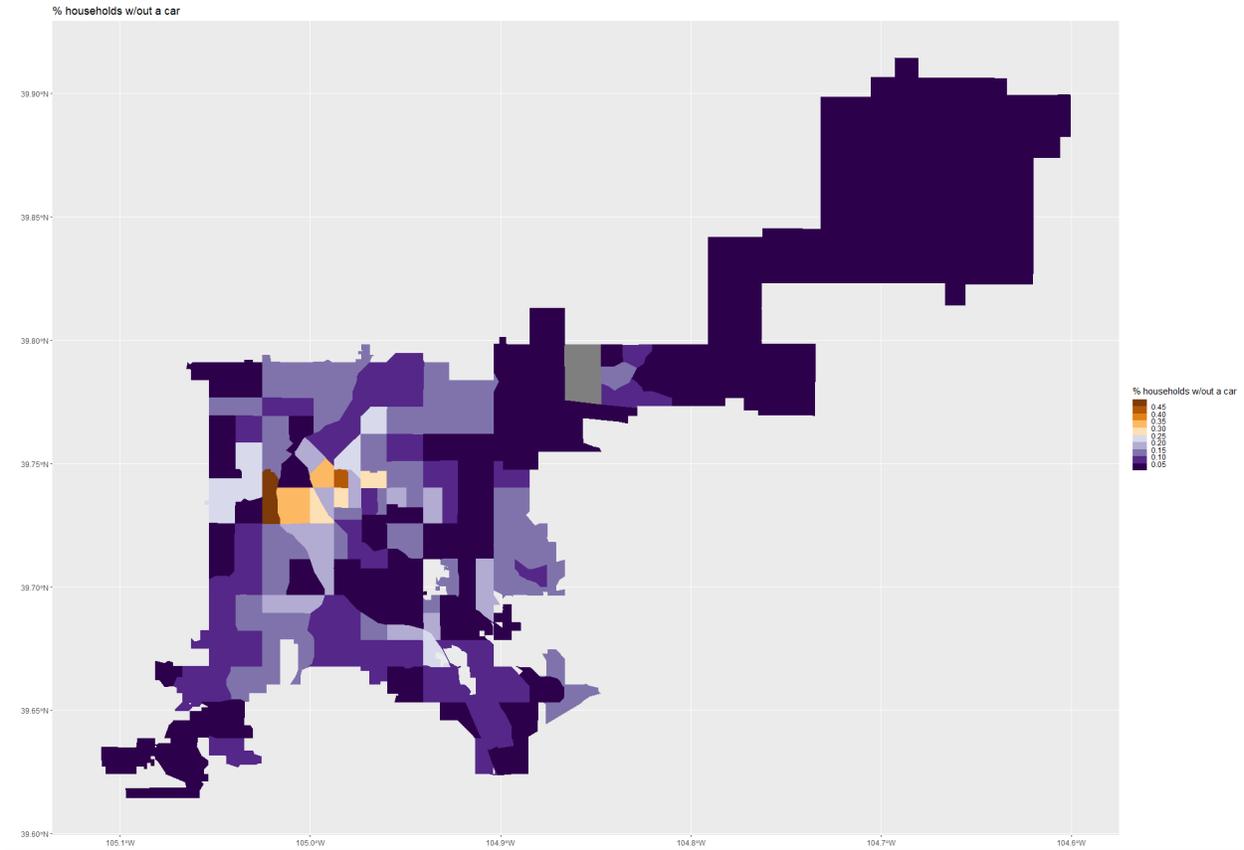
Following CPD's last public comment deadline for the Expanding Housing Affordability proposal, a change was effected that we believe weakens the incentives for developers providing more-than-necessary affordable housing units, only allowing for the deepest parking exemptions to occur within 0.5 miles of a fixed rail transit stop, instead of the original proposal's allowance for these exemptions to be applied within 0.5 miles of Enhanced Transit Corridors. This change reduces the economic incentives Denver can offer developers who go above and beyond minimum requirements, and therefore will result in fewer affordable housing units for moderate and low income Denverites. LUTI and City Council have the opportunity to allow for more affordable housing for more Denverites by rolling back the change.

Parking costs are a large share of the total cost of building affordable housing. Affordable housing without parking requirements can be 20% cheaper in rent for the tenants. In Denver, affordable housing projects are over-parked relative to the needs of people living there.[1] That raises rents for those with the least ability to pay more for housing.

Given the higher use of buses by residents of Denver's affordable units, this late change does not align with either the policy's intent or our city's adopted plans, and its impacts will be felt for years to come.

While some have suggested that change was made to align with the reality of transit access today, the change in definition ignores the value our current and future high-frequency bus networks provide. The presence of high-frequency transit does not rest on the future development of Bus Rapid Transit (BRT) lines along Enhanced Transit Corridors. Today, in current operation, bus lines such as Colfax's 15 provide higher-volume, higher-frequency services than many of our fixed rail lines, and are more likely to be used by those of lower incomes. Bus riders[2], more so than rail riders, are likely to express that they use the bus because they *must*, rather than for sake of convenience.

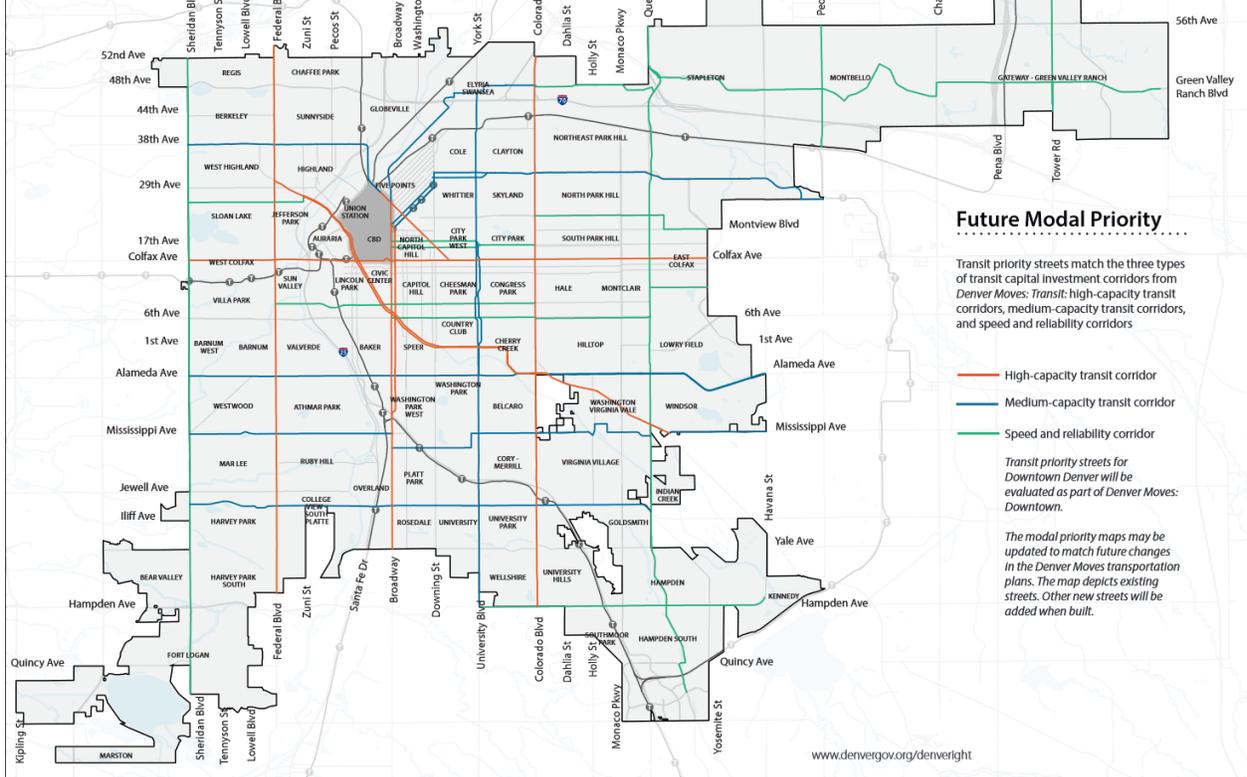
In fact, even the proposal's initial definition of permitted zones for exemption was not as reflective of the reality of Denver's current and future transportation networks as it should be. Walking, biking, and buses count for mobility for many already, as evidenced by how Denver residents move today. Census data shows that a significant proportion of people who do not own a car live far outside of the 0.5 mile radius of fixed rail stops.



These modes of transportation receive no credit in either the former or the current EHA proposal before LUTI/City Council. Rather, Blueprint Denver's Transit Priority Plans are better suited to representing how Denverites live and move today, and how we expect Denver to evolve going forward.

Transit Priority

Implementing the future transit priority streets will result in a complete transit network for Denver that complements the existing regional rail system.



The change of definition for the parking exemption was made between public feedback sessions despite consistent, documented community feedback asking for greater parking exemptions inside and outside of this ordinance, not fewer. To be sure, not every housing builder will take advantage of this deeper affordability option, but Denver’s diversity of neighborhoods and economic opportunities provides plenty of locations to pilot housing with it, if City Council allows the option. Not every building needs to provide every possible amenity. A diversity of options allows for people to choose the housing they need, with the amenities they desire, at the price they are willing to pay for it. Parking is a popular amenity, but it is not a necessity for everyone.

For all of these reasons and more, City Council can demonstrate a commitment to housing affordability in Denver by reinstating the earlier, more expansive definition of this parking exemption incentive. We look forward to continuing to work with you to meet Denver where we are as a city to advance the best policies, programs, and resources Denver needs to ensure that every person can obtain a healthy, safe, high-quality home connected to community and opportunity.

Regards,

- YIMBY Denver
- Healthier Colorado
- Enterprise Community Partners
- Denver Streets Partnership



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Selected references:

[1] https://shopworksarc.com/wp-content/uploads/2021/02/2021_Parking_Study.pdf

[2]

<https://www.apta.com/wp-content/uploads/Resources/resources/reportsandpublications/Documents/APTA-Who-Rides-Public-Transportation-2017.pdf>