



**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 analyzation 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.