

DENVER EAST NEIGHBORHOODS

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Fact Sheet Regarding East Area Plan

Walkability, affordability, bike lanes, green space!! Those all sound great! Who doesn't want those in their neighborhood? But the devil is in the details, and unfortunately, the East Area Plan is long on promises, but really delivers on only one: increased density, which benefits developers at the expense of current residents. Residents deserve a better plan for a sustainable, affordable, inclusive future.

We at Denver East Neighborhoods First ("DENF") have reviewed the East Area Plan, and wish to share the following concerns about the Plan with our neighbors:*

- **Significant Added Density and Effective Elimination of Single-Family Zoning.** The East Area Plan proposes to add 4,200-4,800 new housing units to the East Area, primarily to the area between 13th and 17th Avenues and along Colfax.ⁱ The entire East Area is home to 31,173 residents and contains 15,434 housing units.ⁱⁱ The area between 13th and 17th is about 20% of the total land area of the East Area, which means that the 13th to 17th area has about 6,200 residents. Adding 4,500 housing units to that area, with an average of 2 residents each, would **increase the population of those blocks to 245% of the current population**. Adding 4,500 homes, with an average of 3 residents each, would **increase the population of those blocks to 317% of the current population**. **Even as it adds density to our neighborhoods, the Plan does not guarantee that any community benefits will be realized by the East Area.**ⁱⁱⁱ
- **No New Infrastructure to Support Proposed Density.** The East Area Plan does not require that additional parking be provided where residential units are added and, in fact, proposes to reduce off-street parking requirements on Colfax.^{iv} It does not address the need for additional sewer, water, or electrical infrastructure. Further, the East Area Plan encourages building in areas where there is currently permeable ground, the loss of which will exacerbate flood plain issues in the East Area.
- **The Plan Adds More Cars to the Streets while Reducing Traffic Lanes.** At the same time that the East Area Plan proposes to cram more people into the neighborhoods, the Bus Rapid Transit plan proposes to eliminate two lanes of traffic on Colfax.^v This means that car traffic that currently travels on Colfax will be diverted through neighborhoods to other avenues, increasing traffic on side streets and congestion on 6th, 8th, 13th, 14th, 17th, 23rd, 26th, and Martin Luther King Boulevard.

- **Bus Rapid Transit Will Not Offset Increased Density.** First, the Bus Rapid Transit plan is not fully funded. The mayor’s budget for next year provides *no funding* for Bus Rapid Transit. But even if it were funded, Bus Rapid Transit has very limited reach, covering only certain Denver streets. This means that people who might use bus rapid transit for their commutes will *still need to have cars* if they want to go anywhere that bus lines do not reach. This means that our neighborhood streets will find themselves host to a lot more cars than they were built to handle. Further, the people of Denver did not vote for the elimination of traffic lanes on Colfax, nor did they vote for a bus-based transit system.^{vi}
- **Bus Rapid Transit is Not a Solution to Existing Problems with Transit.** The “Colfax Corridor Connections Alternatives Analysis” commissioned by RTD projects that, even with dedicated bus lanes, travel time for riders who travel the entire 10-mile length of Colfax (from I-225 to I-125) is reduced by between 11 and 22 minutes, but since most riders ride only a fraction of the corridor, their time savings would not be expected to be significant. Bus Rapid Transit stations will be placed farther apart than current bus stops and centered in the middle of Colfax, which will make it harder for disabled and elderly bus patrons to get to the stops even in good weather. Importantly, the Bus Rapid Transit plan does not address the need for better security and cleaner buses. Since Bus Rapid Transit does not promise to be faster, safer, cleaner, more convenient, or most cost-efficient, there seems to be little to draw people use currently drive cars to shift to bus transit. In addition, the analysis does not provide any information about how neighboring streets will be affected with automobile traffic when the Bus Rapid Transit plan eliminates two lanes of traffic on Colfax.^{vii}

DENF supports the development of rapid transit, but does not believe the benefits to be realized from *this* bus rapid transit plan outweigh its potential detrimental effects.

- **Neighborhood character will be lost.** Though the plan says that it includes a program to preserve character homes, the program is ill-defined and has no teeth. While the plan proposes to “clarify” the definition of “voluntary demolition” to “encourage” saving the “majority” of a structure, this means that there is ***no requirement that a historic home be retained***, and that a developer could avoid costs associated with total demolition of a home by keeping only 50.1% of the exterior walls and adding a substantial, sizeable addition to the home. Under the Plan, property owners who wanted to do more than upsize a single-family home to two units, or a duplex to three units, could also add an accessory dwelling unit (ADU) to their property. So, a lot that currently has one single-family home on it could be renovated and built on to host three housing units, and a lot that currently has a duplex could be renovated and built on to host four units.^{viii}

The East Area Plan has no design requirements, no requirements to provide for parking for new residents, and no plans to require that green space lost to an addition be added elsewhere in the neighborhood. Further, in order to maximize the number of residents on a property, the East Area Plan proposes to increase the portion of a lot that can be covered by a structure; to allow taller additions behind single-family homes; to increase the length of side walls and side setbacks; and to allow roof elements to penetrate the bulk plane while avoiding costs.^{ix}

- **Affordability is not required, and current affordable units could be lost.** Nothing in the East Area Plan ensures that any unit that is added to a single-family home be affordable. A developer who buys an affordable home currently within the area stretching from 13th to 17th Avenues would have many building choices, including demolishing a substantial portion of the home and replacing it with a large single unit, as is the case today. But if the upzoning proposed in East Area Plan is allowed, the developer could instead demolish 49.9% of the home and expand it to add *both* a second unit and an accessory dwelling unit on the same property without ensuring that any of the units would be affordable to someone who could have afforded to rent or own the home prior to new development.^x **No community benefits will be required** where units are added to lots that are not on Colfax or Colorado Boulevard.^{xi}

There is also no requirement that a developer who builds on Colfax provide affordable units. Instead, the East Area Plan provides for possible upzoning by offering as an incentive the ability to build beyond current zoning. So, a developer who wants to build a taller building can get there by providing a “community benefit.” **That community benefit *could be, but does not have to be, affordable housing.*** It could instead be providing publicly accessible open space (where?), preserving an existing building, or some other as-of-yet undefined benefit.^{xii} Further, under current law, developers can evade the requirement to provide affordable housing by paying into a fund to put affordable units *in some other part of the city.* **The East Area Plan proposes no changes to the law to ensure affordability goals are met.** As a result, the East Area Plan allows developers to turn existing single-family homes into luxury multi-unit dwellings and to turn buildings on Colfax into luxury apartments without the addition of any affordable housing to the East Area. ***Developers make money while housing costs increase and low- and middle-income residents are displaced.***

DENF supports and encourages the building of affordable housing on Colfax corridor within current zoning.

- **The Plan Does Nothing to Address the Lack of Park Access in the East Area.** Compared with other urban areas, Denver is lacking in park space. Currently, only 8.3% of land in Denver is devoted to park space. compared with 22% in New York City, 21% in Washington D.C., and 20% in San Francisco. In Denver, there are only 8.9 acres of park space per 1,000 residents; however, residents the East Area enjoy even less – only 1 acre of park space per 1,000 residents. In his “Game Plan for a Healthy City,” Mayor Hancock seeks to increase park space in Denver to reach the national norm of 13 acres per 1,000 residents. However, in the East Area, we are already short 372 acres of park space needed to achieve the goal established by the Game Plan — and this is without the addition of another 8,400-14,400 residents. If we fail to add park space now, we will never be able to increase the park access necessary for the mental and physical wellbeing of East Area Residents.^{xiii}

* *This Fact Sheet was produced by Denver East Neighborhoods First, a grassroots organization composed of residents of each neighborhood included in the East Area Plan. Updated October 10, 2019.*

ⁱ City Planners have stated that the East Area Plan will result in the addition of approximately 4,200-4,800 additional housing units to the East Area. See https://www.denvergov.org/content/dam/denvergov/Portals/646/documents/planning/Plans/East_Area_Plan/East_Area_Plan_FAQs.pdf at page 3.

ⁱⁱ Maps previously available on the city’s website showed that the blocks between 13th and 17th Avenues were to be the primary areas where single-unit homes could be developed into two-unit homes (and allow ADUs, in addition); and where

two-unit homes could become, and where two-unit homes could be developed into three-unit homes (and allow ADUs, in addition). These maps have been removed from the city's website.

Though the Plan itself cannot change zoning in the East Area to permit more height, if the East Area Plan is adopted, a developer will be able to check a box on a rezoning request indicating that a proposed higher-rise development is within the East Area Plan guidelines in order to fast-track approval of the request. See also Carroll: Will Blueprint Denver be the demise of single family housing? No one can say for sure," by Vincent Carroll, *Denver Post*, May 13, 2019, at <https://www.denverpost.com/2019/05/13/carroll-will-blueprint-denver-be-the-demise-of-single-family-housing-no-one-can-say-for-sure/>.

iii While the Plan provides "incentives" for developers who want to develop areas on Colfax and Colorado Boulevard, it does not require developers to avail themselves of incentives, and does not provide any incentives for development in other sections of the East Area where increased density is proposed. See East Area Plan, [https://www.denvergov.org/content/denvergov/en/community-planning-and-development/planning-and-design/Neighborhood_Planning_Initiative/Planning-Areas/East_Area_Plan.html](https://www.denvergov.org/content/dam/denvergov/Portals/705/documents/projects/ColfaxCorridor/ColfaxCorridor-AlternativeAnalysis-2018.pdf), at "Land Use and Urban Design Recommendations."

iv See East Area Plan, https://www.denvergov.org/content/denvergov/en/community-planning-and-development/planning-and-design/Neighborhood_Planning_Initiative/Planning-Areas/East_Area_Plan.html, at "Land Use and Urban Design Recommendations" (not discussing infrastructure while stating that the plan will "[r]educe off-street parking requirements and offer flexibility in public improvement requirements to reduce barriers to development").

v See Bus Rapid Transit (BRT), <https://www.denvergov.org/content/denvergov/en/denver-department-of-public-works/projects/current/colfax-corridor-connections.html>.

vi See 2017 ballot measure at [https://ballotpedia.org/Denver,_Colorado,_Streets_and_Transportation_Bond_Issue,_Referred_Question_2A_\(November_2_017\)](https://ballotpedia.org/Denver,_Colorado,_Streets_and_Transportation_Bond_Issue,_Referred_Question_2A_(November_2_017)).

vii See Colfax Corridor Alternatives Analysis, <https://www.denvergov.org/content/dam/denvergov/Portals/705/documents/projects/ColfaxCorridor/ColfaxCorridor-AlternativeAnalysis-2018.pdf> at page 131 (noting community concern about vehicle traffic diversion into neighborhoods but not analyzing effects of traffic diversion through neighborhood streets) and pages 144-46 (discussing projected reduction of per-person auto trips on Colfax with BRT but not analyzing on adjacent streets).

viii See Denver Zoning Code, Art. 13, https://www.denvergov.org/content/dam/denvergov/Portals/646/documents/Zoning/DZC/Denver_Zoning_Code_Article13_ROM_Definitions.pdf.

ix See East Area Plan, https://www.denvergov.org/content/denvergov/en/community-planning-and-development/planning-and-design/Neighborhood_Planning_Initiative/Planning-Areas/East_Area_Plan.html, at "Land Use and Urban Design Recommendations" tab.

x See East Area Plan, https://www.denvergov.org/content/denvergov/en/community-planning-and-development/planning-and-design/Neighborhood_Planning_Initiative/Planning-Areas/East_Area_Plan.html, under "Land Use and Urban Design Recommendations" under "Require Design Guidelines . . ." tab (providing "guidance" and "flexibility" to developments but not "requiring" that buildings retain neighborhood character; not providing any requirements for building in areas outside of "key locations adjacent to transit stations and neighborhood commercial nodes").

xi See East Area Plan, https://www.denvergov.org/content/denvergov/en/community-planning-and-development/planning-and-design/Neighborhood_Planning_Initiative/Planning-Areas/East_Area_Plan.html, under "Land Use and Urban Design Recommendations" under "Centers, Corridors and Districts" (limiting opportunity to gain community benefits to developments on Colfax and Colorado Boulevard).

xii See East Area Plan, https://www.denvergov.org/content/denvergov/en/community-planning-and-development/planning-and-design/Neighborhood_Planning_Initiative/Planning-Areas/East_Area_Plan.html, under "Land Use and Urban Design Recommendations" under "Centers, Corridors and Districts" (discussing community benefits as flowing from increased density and intensity on corridors).

xiii See East Area Plan Steering Committee Presentation, https://www.denvergov.org/content/dam/denvergov/Portals/646/documents/planning/Plans/East_Area_Plan/East_Plan_Steering_Committee_Meeting1_Presentation.pdf. See also "Living near Trees, Not just Green Space, Improves Wellbeing," by Tom Jacobs, *Pacific Standard*, Jul. 30, 2019, <https://flipboard.com/@citylab/living-near-trees-not-just-green-space-improves-w%20ellbeing/f-2a7d694dc9/citylab.com>; "A fairway to fight," by Bruce Finley, *Denver Post*, Aug. 4, 2019, at <http://digital.olivesoftware.com/Olive/ODN/DenverPost/shared/ShowArticle.aspx?doc=TDP%2F2019%2F08%2F04&entity=A02501&sk=F87E514E&mode=text>.