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To: [boulderplanningboard](#)
Subject: increasing jobs-housing linkage and transportation fees
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To the Planning Board:

The East Boulder Sub Community Plan's numbers show that the Plan will create a lot of unmet demand for housing affordable to the large number of new workers, as well as significant transportation impacts.

A. You all should recommend to the City Council to increase the jobs-housing linkage fee so that there is adequate money to fund a lot more permanently affordable housing, since market rate housing is simply not affordable to the majority of workers.

The studies done by Keyser Marsden Associates when the linkage fees were put in place some years ago showed that these fees would be legally justifiable up to around \$129/sq. ft. for office space back then, and more now because of price inflation. The City Council cut that number down to an upper limit to around \$75/sq. ft. — the idea was that the fee would only need to accommodate the workers who were expected to live in Boulder, based on the fraction that in-commuted at that point because there wasn't enough housing, a rather circular argument. And then it imposed a fee that increased up to \$30/sq. ft. over the years. Recently Santa Clara county in CA raised their fee to something like twice that number, showing that increasing the fee well above the current numbers can be done.

If you are really going to make a difference in the housing situation, this fee increase is desperately needed. And given that some office development is being discussed at over \$600/sq. ft., doubling the current fees seems quite reasonable.

B. On the transportation side, Boulder needs two things:

1) a transportation impact fee to pay for both road improvements and transit (in various forms) so that there is no net increase in traffic from new development;

2) an "adequate public facilities" requirement for transportation, so that if a new development requires that there be e.g. improvements in a particular intersection so as to maintain Level Of Service (LOS), that the new development pays for the improvements. Then, if future developments benefit from these improvements having created excess capacity, they can be required to pay back their share to the first development. Fort Collins has (or had) such a system, and it was totally legal.

In summary, our planning should not just cover the physical design and layout, but also the full mitigation of the impacts of that new development.

Regards,
Steve Pomerance