

Public Comments

Section	Staff Response
Pending Text	
Pay attention to removing minimum parking for projects with high impact, like Aspen Grove. No parking requirements for a SFH would see less impacts on street parking; no parking for a project like Aspen Grove could severely impact businesses and city residents.	Per state legislation, minimum parking requirements are still applied to commercial developments and the commercial portions of mixed-use development
Pending Text	
Revert back to state requirement: 750sqft max. Height for ADU allowed up to avg neighborhood dwelling height (i.e. if 75% of dwellings in the vicinity are ranch, ADU could be 1 story). Leave same setbacks as for primary dwelling unit.	Existing Code permits ADUs up to 700 sq ft (SLR) and 800 sq ft (MLR). Staff believes that it would be regressive to permit less than 800 sq ft. Staff is proposing allowing an increase in height up to the zone district, to better facilitate the construction of ADUs on accessory structures or on small parcels that could not accommodate a single story ADU. The setbacks for an ADU are consistent with the setbacks for a primary dwelling, except for the rear setback, which per state legislation, requires that the setback not be greater than the rear setback for an accessory structure, which in the City of Littleton, is 5 ft
Subsec. 10-1-3.7.A Parking and Loading	

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Insert "measured along a sidewalk or walkway from the nearest pedestrian entrance of the development or building to the nearest parking space" after every occurrence of "1,320 feet" in this and other documents.	This is beyond the scope of this update
Subsec. 10-1-3.6.F Bufferyard Requirements	
Consider establishing a Tree Equivalency system for Required Buffer Plantings. Tree Equivalents - The following tree equivalents are provided to allow design flexibility in applicable situations. One tree equivalent shall be equal to: One 2-inch caliper deciduous shade tree; One 2-inch caliper ornamental tree; One 6-foot tall evergreen tree; Ten 5-gallon shrubs per one 2 inch caliper tree or 6 foot tall evergreen tree.	Staff agrees and has identified an opportunity to pursue changes to landscape requirements and can examine this item then.
Subsec. 10-1-3.6.B Planting Requirements	
1. the link to section 10-1-3.9.C in C.1.2 does not work. 2. Where is section 10-1-3.9.C? 3. Are trees permitted in the sight triangles?	Section 10-1-3.9.C was not a part of this work
Subsec. 10-1-3.6.B Planting Requirements	
artificial turf is also referenced in 10-1-3.6.A. References in different sections should be avoided	Staff has identified all sections that reference artificial turf
Subsec. 10-1-3.6.A Purpose, Applicability, and Design	
Will irrigation plans be required to be submitted for review and approval? consider providing additional irrigation requirements: 1. PERMANENT, UNDERGROUND IRRIGATION IS REQUIRED IN ALL LANDSCAPE AREAS. 2. IRRIGATION SYSTEM TO BE DESIGNED SO THAT EACH ZONE IRRIGATES PLANTS WITH SIMILAR WATER DEMAND.	These comments are beyond the scope of this update

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3. TURF AREAS SHALL BE ZONED SEPARATELY FROM BED AREAS. 4. IRRIGATION CONTROLLER TO INCLUDE RAIN SHUT-OFF	
Subsec. 10-1-3.6.B Planting Requirements	
1. Consider adding Ash to the prohibited tree list. 2. Consider allowing 3-gallon shrubs as 5-gallon have become less available	Staff agrees and has identified an opportunity to pursue changes to landscape requirements and can examine this item then.
Subsec. 10-1-3.7.A Parking and Loading	
Council has already heard numerous public concerns expressed regarding the city's failure to require developers to provide for off-street parking--due to increased street congestion associated safety concerns. Surely planners are not unaware. For these pending parking provisions to be advanced without regard to negative consequences appears unconscionable. Under B-3-a, this convoluted five-line provision would not do that. Please remove the statement, "no off-street parking shall be required" for all uses therein being proposed. The city must not continue ignoring the refusal of developers--be they for mixed use, transit, or residential--to responsibly provide reasonable off-street parking spaces. Public accountability for the adverse effects of off-street parking must not be ignored but addressed. Under "Residential Accessory Uses" on the "Y" axis of Table 10-1-3.7.A.1, no off-street parking spaces are proposed as required minimum and a maximum of +1 for both Attached or Detached ADUs. The Maximum "+ 1/unit" appears nonsensical. Is the city brazen enough to limit off-street parking for ADUs to only one per unit? Without reasonable rationale, this Maximum requirement should be removed. Footnote 1 for ADUs muddies the water, stating, "Refer to Section 10-1-1.7, Accessory Dwelling Unit, for additional restrictions." Because none are there pertaining to parking--only another referral: "Refer to Subsection 10-1-3.7.A, Parking and Loading"--right back to where I started. We're getting nowhere. These pending changes for ADU parking suggest that the city still does not want to have to address off-street parking needs generated by its haste to continue	The removal of minimum parking for ADUs, as well as residential developments located within the Applicable Transit Area Map, which was developed by DOLA, are requirements of the state. Staff removed the "+" from the ADU Parking Maximum Footnote 2 on Table 10-1-3.7.A does detail, in which instances, per state legislation, parking is required. Staff has updated to include this language in 10-1-1.7

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densifying the city. Dare anyone repeat what Daffy Duck liked to say, "That's Despicable!"?	
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
Under "Height and Area (maximum): 1st, For "Attached" ADUs, the second column's allowance of floor area "up to gross area of principal dwelling unit" would in effect authorize construction of another residence of equal size, no matter where it is situated on a lot. Noticeably, the proposed changes do not consider that even a simple walkway connecting the ADU, and primary dwelling unit could readily make that happen. 2nd, ADU size being proposed in the "Gross floor area" row for substantially exceeds even what H.B. 24-1152 requires: 750 square ft. Rationale for these two overreaching proposals is entirely absent. This clearly appears to be the city's attempt to use ADUs as a surreptitious conduit for further densifying single family neighborhoods. Such an attempt to degrade Littleton's single-family neighborhoods was alternatively couched in multiplex verbiage within Resolution 31-2024 which was roundly rejected by a majority of citizens. There appears to be no compelling common-sense rationale for exceeding the 750 square ft verbiage of H.B. 24-1152. And that would even adjust towards current provisions denoted in the ULUC (i.e., "up to maximum building coverage"). Jared Chipman explained to citizens at the 4/23 open house that staff believes the 1,000 square ft. standard is the average size of a two-bedroom apartment. Where is the rationale for turning ADUs into two-bedroom apartments? It cannot be denied that these two elements of the Pending ULUC changes being advanced can reasonably be expected to generate similar adverse effects to single-family neighborhoods and associated homeowners. There is clearly plenty common-sense rationale for a reduction in allowable floor area below what staff is proposing.	All attached ADUs must be attached by a minimum of 8 ft of shared wall. A breezeway could not satisfy this requirement. Staff does not recommend reducing the size currently permitted for an attached ADU The state requirement is that the smallest maximum size that a municipality may impose on an ADU is 750 sq ft, but does not limit the maximum size to 750 sq ft Staff has proposed a maximum of 1,000 sq ft to be able to allow for individual homeowners to meet whatever needs they may have in constructing a detached ADU. However, it is important to note that the Code has maximum building coverages for all zone districts, as well as setback requirements, which may hinder the ability to construct up to 1,000 sq ft
Subsec. 10-1-3.7.A Parking and Loading	

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Same issue: parking is needed for any new residential development.	State legislation requires that certain residential developments that are within the Applicable Transit Area Map, published by DOLA, be exempt from minimum parking requirements. In the City of Littleton, residential development of 5 or more units
Subsec. 10-1-3.7.A Parking and Loading	
Minimum of one parking space needed per ADU	The state legislation prohibits requiring an additional parking space for ADUs, with very narrow exceptions. Staff has included these exceptions in the text amendment
Subsec. 10-1-3.7.A Parking and Loading	
Off-street parking needs to be part of plan of any new residential development.	State legislation requires that certain residential developments that are within the Applicable Transit Area Map, published by DOLA, be exempt from minimum parking requirements. In the City of Littleton, residential development of 5 or more units
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
A minimum of one parking space should be on the ADU property no matter where it is located, even when near a public transit station.	The state legislation prohibits requiring an additional parking space for ADUs, with very narrow exceptions

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Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
It looks like the yeses are crossed out for the setbacks to be the same. The setbacks should be the same restriction as the primary residence	ADUs are held to the same setback requirements as a primary residence and detached units must be placed behind the front façade of the home; state legislation requires that rear setback for ADUs be the same as accessory structures
Section 10-1-1.3 Land Use Matrix	
Numeric entries (e.g., A, S, etc.) in Table 10-1-1.3.1 are inadequately explained under "A. Key". □ Subheading 3 says "A" means accessory use is subject to standards in Section 1-1-1.6. But therein Section D-1 states "Refer to Section 10-1-1.7, Accessory Dwelling Units." Looks like the city's dog is chasing his or her own tail. Because Section 10-1-1.7 doesn't explain either. □ Subsection 4 says "S" means the use is subject to the special standards cited in the 'Standards' column of Table 10-1-1.3 Land Use Matrix." And for the ADU rows, these go back to 10-1-1.7. More of the dog chasing its tail Footnote "1" in the ADU rows only states "Reserved". Reserved for what? How is anyone to make sense of this? Is staff as confused as citizens are attempting to make sense of this?	The sections that refer to 10-1-1.7 specify that there are specific standards for ADUs "Reserved" is simply a placeholder; there are no other contemplated updates to this section
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
The question of ADU set-back distances remains puzzling. First, at last Wednesday's 4/23 Open House, a number of people queried Jared Chipman for answers. Jared appeared questionably uncertain, but seemed to defer to this Table and the Code's Buffer Yard requirements. Yet neither directly answer the question: 1st, I've commented elsewhere on the confusing content of that section of the ULUC (Section 10-1-3.6F). There buffer yards may be 10, 15 or 25 ft. wide with no fence (for A, B, and C)--and 7.5, 10 or 15 ft. wide with a fence (according to Table 10-1-3.6.F.1.	The required buffer yard is prescribed for all residential development that meet or exceed certain parameters, as defined in 10-1-3.6.F Per state legislation, rear setbacks for ADUs are required be the same

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Reasoning behind shorter setbacks with the presence of a six-ft-high fence is faulty if not altogether missing. A six-foot fence cannot screen any ADU. Yet Table 10-1-3.6.F.2's confusing arrangement makes it impossible to find out which of those three (A, B or C) apply within each zoning district. I couldn't find the term searching in the approved ULUC to find clarification. Is it a new concept planning has devised? If so, the greater clarity is needed wrst/ADUs. 2nd, The only numeric limit appearing in Table 10-1-1.7.1 is a five foot minimum rear set-back. Yikes! That would allow a 30' tall home to be set within five feet of the back fence. That appears to be an absurd intrusion onto neighboring property--no matter what configuration of buffering trees, shrubs and fences might elsewhere be prescribed. In fact, planners need to revisit horticulture, because no tree can get close to maturity within those tight confines. 3rd, References to only corner unit setbacks are unnecessarily vague. 4th, There was considerable public concern addressed to Jared on 4/23 about other set-back dimensions unaddressed in this section--inadequately clarified in the "Buffer Yard" section (10-1-36.F). This section needs a lot of work to have adequate objective content that ordinary citizens can understand. For one cannot readily page back and forth through the entire ULUC to find answers that don't yet appear there. ADUs do not have to be this obfuscating.	for all accessory structures; accessory structures in the City of Littleton have a rear setback of 5 ft
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
This won't prevent the property sale to a business entity (LLP or similar) that can be owned by multiple people who are effectively owning each residence (main and ADU) both jointly and separately thereby also effectively allowing duplexes and sidestepping the communities desire to keep these out of established residential neighborhoods. Re: B.3.d - Lots containing both a principal dwelling and an ADU may not be subdivided so that the ADU occupies a different platted lot than the primary dwelling	Staff cannot determine who may own property within the City. The Code not only indicates that the ADU may not be subdivided and further requires that there is a deed restriction stating that the unit may not be parceled off to be sold separately from the primary unit
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	

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D-b-5's allowance of ADUs aligning with primary dwelling units appears to need further clarification. Double garages not infrequently do that, and if converted to ADUs would be far less visually objectionable than detached or even L-shaped structures jutting out that far. For the latter would appear as new homes inserted between two existing homes. This is precisely the kind of densification about which so many of Littleton's homeowners are concerned. And it appears to be another attempt at shoe-horning into the code a kind of home construction that does not have to be allowed and indeed should not be--unless the Community Development and Council remains fixed on further densifying single-family neighborhoods and degrading their character.	Per state legislation, municipalities may not regulate the appearance of an ADU in ways that are not regulated for a single family detached home. In addition, staff believes that this provision is consistent with the standards for all other accessory structures
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
D-a-1, D-a-2, D-b-3 all state "Reserved." Reserved for what? Is the section not yet complete finished and ready for public review and comment?	"Reserved" is simply a placeholder; there are no other contemplated updates to this section
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
How is it that the pending requirements to be retroactively imposed on previously approved PL-Os is considered appropriate and not an overreach local governance? Is that legal?	This language is taken directly from the state legislation
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
In Table 1-1-1-7.1's height restrictions is an 18' floor-to-ceiling height restriction with footnote #2. Two observations: Footnote #2 appears to instead reference building height, not ceiling height. Secondly, why is the city prescribing interior design dimensions if the ADU's exterior dimensions are elsewhere limited? This appears to be unnecessary and unjustified regulatory overreach. Why? Because in the relatively small confines of small homes, spaciousness is not infrequently highly-valued.	The provision limiting the floor-to-ceiling height is intended to limit the visual impacts from massing of the building; these regulations are not intended to be applied to the interior of building.
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	

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B-3-c uses the term "manufactured homes." Nowadays, many well-constructed homes are modularly manufactured within weather-proof indoor facilities that permit year-round manufacturing. One should not have to search for the ULUC glossary to find out what that term means. I did, and that definition does not fit "manufactured." Instead it has to do with transportability. The error should be corrected. Because as defined in the glossary, the term "manufactured" prohibits several kinds of transportable homes, including "Tiny Homes" which are now being built in all kinds of shapes and sizes. Some are built explicitly to be placed on foundations (not the typical mini-home) which--when constrained by other proposed ADU parameters--would appear to fit within ULUC criteria. Some less than ambiguous qualifying verbiage appears needful.	Manufactured homes are defined by the department of Housing and Urban Development. Tiny homes are not on fixed foundations and would not be permitted. However, modular homes, that are constructed offsite and assembled onsite, would be permitted, assuming there is a permanent foundation and meets Building Code
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
B-1 refers to Table 10-1-1.3, Land Use Matrix. At that page, the Land Use matrix. But 1.3, A-3 there refers to 1.6 Accessory Uses. However, Section 10.1-1.6 is not hyperlinked for comment on the city's Pending ULUC Changes webpage. I'm only attempting to find out were ADUs are permitted "in certain districts and locations as set out under "Residential Accessory Uses inTable 10-1-1.3, Land Use Matrix". But that table is unintelligible, and so I've left comments to that effect there. And apparently the tertiary reference to Section 10-1-1.6 is a mistake or surely that section would have been hyperlinked in this response website. So the question remains unanswered, "Where are ADUS permitted?"	Hyperlinks are finalized and will work when published upon final adoption by City Council
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
Conspicuously absent from "A. Purpose" is any consideration being given to maintenance of the character of neighborhoods in which ADUs are proposed. This looks like a major oversight, especially in view of the loud outcry of citizens against any kind of densification would degrade the character of single-family neighborhoods especially. Please add that missing purpose, for elsewhere, the ULUC and city officials affirm it wants to do that. Thank you.	The ULUC does not have a definition of "neighborhood character", but per 10-4-3.2.C, Contextual Development, there are standards that are applicable to all residential development that take into consideration the surrounding context
Subsec. 10-1-3.6.F Bufferyard Requirements	

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Tables 10-1-3.6F.1 & 10-1-26.F.2: The verbiage between these tables is unduly obfuscating. But apparently, one is to read F.2 to determine which of the three buffer yard requirements listed in F.1 apply. But the blacked out cells where the same zoning districts intersect makes no sense...Table F.2 would only make sense then where the "Zoning of Proposed Development" (Y axis) differs from the Zoning District under consideration (X axis). Which appears to make these tables useless for determining buffer yard requirements for ADUs--Mr. Chipman seemed to speak otherwise last Wednesday, though his display screen did not display these.	The required buffer yard is determined according to the "Contextual Standards", which requires a Type A buffer yard
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
This issue should not be decided by the City Council but rather a vote of Littleton Residents. This is just another mans of creating additional housing/rental units within Littleton - an issue which was voted down in past ballot. The city already has infrastructure issues caused by a growing residential population. Increasing the density does nothing more than appease those trying to garner greater tax dollars to offset infrastructure costs.	State legislation has set the requirements for many of the changes in this section
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
Why are Detached ADUs limited to 1,000 square feet? If the principal dwelling unit is 5,000 square feet, they're only allowed the same size ADU as a 1,000 square foot home - how does that make sense? Why not a rule like "80% of the square footage for principal dwellings larger than 1,250 sf"?	A set limit is consistent with the ULUC and provides the opportunity for homeowners to be flexible with their own needs, while balancing the potential impacts to neighboring properties. Staff has previously sought feedback on this size restriction and received consensus to move forward with
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
Why can't lots containing ADUs ever be sub-divided? Are there any use cases where it might be necessary to allow sub-dividing lots? Should you leave yourself the	Staff has determined that in order to ensure that ADUs remain

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flexibility with a clause that sets up a procedure to appeal under extraordinary circumstances?	accessory, it cannot be subdivided from the primary unit
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
I do not agree with allowing for this type of plan in Littleton. This will only bring housing costs up due to companies and corporations buying up houses/land to create more confined living areas. As a young native living in Colorado, this will not help with housing cost but will only hurt it. We have seen how this type of policy hurt CA, so not sure why anyone would even suggest something that so terrible hurt everyday citizens before. I think you all need to learn from the mistakes of other states and as badly as CO politicians want us to be CA we cannot! Do not vote for this as it will ruin Littleton and not help anyone besides the greedy politicians, corporations and businesses.	State legislation has set the requirements for many of the changes in this section.
Pending Text	
The proposal to allow more smaller units to be built on smaller lots is dangerous and ill advised. Lack of parking is a concern. Impact to property values is a concern. We have worked too hard to be able to live in a nice safe neighborhood. This proposed change would affect our safety and property value. We are strongly against it. Littleton does not need cheap housing. There are other areas of the metro area that are being developed. If you want to build small affordable housing, let a developer plan an entire area for cheap housing.	State legislation has set the requirements for many of the changes in the ADU and Vehicular Mobility sections
Pending Text	
Putting up 'little' houses has not worked well in other locations. We need more specific places around allowing this so it's purpose is protected as well as the neighborhoods. Therefore I am not in favor of this currently.	State legislation has set the requirements for many of the changes as they relate to ADUs
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	

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Please keep the requirements to the bare minimums set by the state. I attended the open house and it appears you are increasing the allowed square footage of the ADU. I would also like to see a greater buffer for the neighbors that will be affected by the ADU. thank you.	Staff has proposed a maximum of 1,000 sq ft to be able to allow for individual homeowners to meet whatever needs they may have in constructing a detached ADU. However, it is important to note that the Code has maximum building coverages for all zone districts, as well as setback requirements, which may hinder the ability to construct up to 1,000 sq ft
[REDACTED]	
Section 10-9-3.5 Public Notice	
I agree with the red line on this section. What needs to be addressed is the 700 ft notification. It needs to be based on the size of the project and the number of people affected. Building a garage addition in a neighborhood doesn't require 700 ft but building a development that will affect thousands of people needs more people notified.	This is beyond the scope of this update
[REDACTED]	
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
ADU should not be allowed in single family home lots. Long term this will devalue the community with low income housing that attracts crime. This change not about providing housing but about short term profits. Let other cities do this first and then we can determine the real results at that point. There is not reason to do this now.	State legislation has set the requirements for many of the changes as they relate to ADUs
[REDACTED]	
Subsec. 10-1-3.6.A Purpose, Applicability, and Design	
add functional and nonfunctional turf to definitions	Staff has added these definitions
[REDACTED]	
Subsec. 10-1-3.6.A Purpose, Applicability, and Design	
strike "bluegrass is prohibited". This is confusing we are allowing it and prohibiting it in the same section. IMO all types of turfgrasses should be permitted within the 75%	Currently, the bluegrass prohibition is applied to all development types.

Section	Staff Response
of landscaped area, but code should encourage use of low water varieties such as Tahoma 31 Bermudagrass, Colorado Bluegrass or Tall Fescue	Staff believes it would be regressive to now permit bluegrass for residential developments. Staff has made adjustments to the proposed text amendment to make clear that this is only applicable when a landscape plan is required and is proposing to keep the exemption on well-trafficked areas
[REDACTED]	
Section 10-1-1.7 Accessory Dwelling Units (ADUs)	
Regarding detached ADU setback: indication is it would need to meet the setback requirements of the primary dwelling unit. Does this allow for a pop top ADU over a garage that meets the setback requirements of an accessory structure?	Staff is proposing that the permitted height of detached ADUs be increased to the height of the zone district, so that a single-story home may be able to construct an ADU on top of an accessory structure
[REDACTED]	
Section 10-1-1.3 Land Use Matrix	
It seems like we'd still need the "contained" ADU unless it could be considered an "attached" ADU. If the latter the definitions would need to change.	The ADU definitions have been updated
[REDACTED]	
Pending Text	
With the current staff, how do you propose to enforce this? As an example, my neighbor keeps chickens. He does not follow the code requirements for setback from property lines. I am concerned about bird flu, and my own pets, my own health. I have contacted code enforcement, and I think they have spoken to him but nothing has changed. So if code enforcement is inefficient now, I can't see that things will improve with a population increase. Will you hire more code enforcement officers?	This is beyond the scope of this update.
[REDACTED]	