

Mini Bundle - Public Comments

Completion time	Your Name	Your comments and/or questions:
11/16/25 22:44:36	Andy Cushen	I appreciate that expedited review becomes newly possible for projects in the AHRT pipeline, and that avoiding the Design Review boards of the city is a way to expedite them. Especially as the Downtown Area Plan recommends new affordable housing throughout Downtown AND an expansion of the Downtown Design Advisory Board, I think this text amendment is a sensible way not to pit two strategic actions against each other. Additionally, I think it's good that we're lengthening the overall period of time that SDPs stay valid, as market conditions can change and we don't want a good project to die when it's still on the vine just because of a short window of market volatility. Also, removing staff discretion to extend the length of a valid SDP in favor of a longer window for all SDPs is equitable and rewards all parties, not just those who are educated about the SDP process.
11/20/25 8:04:34	Susan Fry	I do not think that the Denver Housing Authority should be the only entity removed from the owner occupancy requirements for building Accessory Dwelling Units. All property owners should be allowed to build an ADU if they meet the other requirements. Why would a City Agency be removed? If building more housing is a goal in Denver then we should be allowing every property owner the same opportunity to add to the inventory. What is the assumption that a private property owner who does not occupy the property and wants to build additional housing is in any way a problem? This leans toward way to much control by the government. How do we add all property owners to this mini-bundle?
11/20/25 11:51:42	Alejandra X. Castañeda	We should be removing the owner-occupancy requirements for all ADUs not just those related to Primary Dwelling Units owned by the Housing Authority of the City and County of Denver. It's a small, more equitable step towards increasing home ownership and support households with lower incomes. Thank you.
11/25/25 12:51:52	Lia Campbell	I would like to encourage the city to reconsider their owner-occupier permit policy for ADUs. Under policy memo Admin 131.3, ISSUANCE OF OWNER-OCCUPIER (HOMEOWNER) PERMITS, ADUs are not considered single unit dwellings, and therefore, owner-occupiers cannot pull building permits for ADUs. I feel that this policy is restrictive and adds to the already burdensome cost of building an ADU. Please consider amending this policy to allow for owner-occupiers to pull ADU permits.
11/25/25 13:08:51	Peter Hufford	Please consider updating Building Permit Admin Policy 131.4 to allow homeowner permits for ADUs. Doing so could make ADUs more affordable and would support Denver's housing affordability goals. Admin Policy 131.4 has the following note in the definition of Single-Unit Dwelling: "Note: For the purposes of this section, accessory dwelling units are not considered single-unit dwellings." this note could simply be updated to remove the word "not".
12/9/25 13:05:34	EJ Lorimer	As an RNO leader, I personally object to exemption from permits, lack of enforcement for old PUD prohibitions. It could lead to integrity of building in Denver affordable or higher. If Denver becomes lax in enforcement of permit requirement and other, we build slums. Slums drive crime. Let's be smarter than that. Affordability doesn't mean shoddy building codes. It's bad enough we have a transit system that is folding in on itself and Denver still pushes no parking in hopes people will ride a bus for an hour v. driving a car for 20 minutes (emissions???). Wireless Telecommunications: Minor facility changes exempt from zoning permits and some design reviews. ADUs: Cleans up PUD language, ensures ADUs are allowed where single-unit homes are allowed, and clarifies that old PUD prohibitions won't be enforced.

12/10/25 16:52:24 Darcy Wilson

If Denver Housing Authority is allow to remove the owner occupancy from the properties they own other single family homeowner's should be allow exemption from the same requirement.

12/14/25 16:30:22 Susan Fry

I am writing to express my strong opposition to the DHA request to build ADUs on its property without complying with owner occupancy requirements that applies to every other homeowner, landlord and property owner in the City and County of Denver. This proposal is fundamentally inequitable. It creates a privileged class of property owner - DHA- who is permitted to bypass rules that Denver residents must follow. A zoning system that selectively exempts the city's largest landlord while enforcing stricter requirements on families and private homeowners is unjustifiable and undermines public trust in the planning process. If the owner - occupancy rule is unnecessary or outdated then it should amend the rule for everyone through a transparent, citywide process- not through an ad hoc exemption hidden in a bundle for a single institution. DHA should not be granted exclusive rights. Adding housing to the City inventory through ADUs should be allowed for everyone who meets the space to do so. Allowing DHA to build ADUs in scattered neighborhoods that the public were told would only be owner occupied options is in direct opposite of what neighbors were told. Interestingly the Community Planning Department has no idea where these properties are or how many neighborhoods would be impacted. At least that is what I was told. For these and other reasons I urge the Planning Dept, Planning Board and City Council to deny this request from DHA or rewrite the amendment to include all Denver property owners. The request could be postponed until the City provides a broader ADU Policy update that applies to all property owners and until that is complete, require DHA to comply with the same rules that apply to the public. It is not acceptable for zoning privileges to be extended selectively. Rules must be transparent, fair and applied consistently or they cease to be legitimate. This proposed exemption is inconsistent with the values of equity, accountability and zoning fairness that Denver's framework is supposed to uphold. I urge you to reject DHA's request or make the amendment available for all.

Thank you for your attention to this matter.

Planning Board Comments



Submitted on	17 December 2025, 10:45AM
Receipt number	1016
Related form version	3

Your information

Name	Susan E Fry
Address or neighborhood	3081 S Race Street Denver Colorado
ZIP code	80210
Email	denverstreets2020@gmail.com

Agenda item you are commenting on

Zoning Code Text Amendment

Rezoning

Address of rezoning

Case number

Draft plan

Plan area or neighborhood

Proposed text amendment

Project name Bundle - DHA Request for ADU Owner - Occupancy Exemption

Historic district application

Name of proposed historic district

Comprehensive Sign Plan

Address of comprehensive sign plan

Case number

DURA Renewal Plan

Address of renewal project

Name of project

Other

Name of project you would like to comment on

Submit your comments

Would you like to express support or opposition to the project?

Strong opposition

Your comment:

I am writing to strongly oppose The Denver Housing Authority's request to build accessory dwelling units without complying with the owner-occupancy requirement that applies to all other Denver residents, property owners and landlords. The proposal creates an unequal zoning standard by granting a special favor and exemption to a single government landlord while denying the same flexibility to the public. Zoning rules must be applied consistently to remain credible and enforceable. If the owner - occupancy requirement is no longer necessary it should be removed citywide - not waived for DHA. Owner-occupancy was retained to promote stability, accountability and responsible transparent management of much needed additional housing and density in single-family zones. The planning department admittedly has no idea where these dispersed properties are. They are spread across the city. I have requested a list from both Planning and DHA and have not received this list. How can you grant this exemption without even knowing the impact to neighborhoods who were told all ADU's must be owner occupied? Granting DHA an exemption undermines those goals and sets a troubling discriminating precedent for unequal treatment under Denver's land use code. I urge the Planning Board to deny this request, rewrite it to include all Denver property owners or to consider any change to the owner-occupancy requirement only through a uniform, transparent city-wide policy process. We can all provide affordable housing if we work together. Hiding this request in a "Bundle" decreases the trust in City Government and the committees that are tasked with giving sound advice and approval. Please deny this request to give DHA a blanket approval to build ADU's. Respectfully Susan Fry (Sorry I was not available to attend today)

If you have an additional document or image that you would like to add to your comment, you may upload it below. Files may not be larger than 5MB.

From: [Susan Fry](#)
To: [Sandoval, Amanda P. - CC President Denver City Council](#); [Flynn, Kevin J. - CC Member District 2 Denver City Council](#); [Torres, Jamie C. - CC Member District 3 Denver City Council](#); [District 4 City Council](#); [City Council District 5](#); [Kashmann, Paul J. - CC Member District 6 Denver City Council](#); [Alvidrez, Flor C. - CC Member District 7 Denver City Council](#); [City Council District 8](#); [Watson, Darrell - CC Member District 9 Denver City Council](#); [Hinds, Chris - CC Member District 10 Denver City Council](#); [Gilmore, Stacie M. - CC Member District 11 Denver City Council](#); [Office of Councilwoman Serena Gonzales-Gutierrez](#); [Office of Councilwoman Sarah Parady](#); [dencc - City Council](#)
Cc: [Planningboard - CPD](#); [Montgomery, Justin A. - CPD Senior City Planner](#); [Clauson, Fritz - CPD CE0371 City Planner Associate](#); [Susan Fry](#); [Gerritt Koser](#); [Legal Department](#)
Subject: [EXTERNAL] OPPOSITION to DHA exemption for Owner-Occupied ADU Requirement
Date: Monday, January 5, 2026 12:30:10 PM

This Message Is From an External Sender

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To the Members of Denver City Council,

I am writing regarding the proposed approval allowing the Denver Housing Authority to construct accessory dwelling units without the owner-occupancy requirement that applies to all other Denver property owners.

I want to be clear: **I am not opposed** to reconsidering the owner-occupancy requirement for ADUs. If City Council believes that non-owner-occupied ADUs are appropriate policy, that change should be debated openly and applied **uniformly to all residents and landlords citywide**.

What I strongly oppose is the manner in which this change is being advanced hidden in a bundle - as a **DHA only waiver**, without transparency and without basic information about scope or impact. Neither DHA or the Planning Department has been able or willing to provide the number of city-owned single-family homes affected, the general locations of these properties or how many ADUs DHA intends to build. It appears that they are dispersed throughout all of Denver's neighborhoods but they have not provided that information. I have been told this information cannot be shared due to "resident privacy" despite the fact that these are **publicly owned assets** and I am not requesting any personally identifying information.

It is deeply concerning to approve a city-wide land-use exemption for a single institutional landlord without knowing how many properties it applies to or where those properties are located. That is not sound or fair planning and it does not allow for meaningful public comment or oversight.

Granting special privileges to DHA - while denying the same opportunity to ordinary Denver residents - undermines public trust and sets a troubling precedent. Rules should be changed through transparent, citywide policy updates, not carved out quietly for one entity.

I respectfully urge City Council to **delay or deny approval** unless and until:

- The scope and distribution of affected properties is disclosed in aggregate form, and
- Any change to owner-occupancy requirements is considered and applied equally to all property owners.

I look forward to your response. Thank you for your time and consideration.

Sincerely,
Susan Fry

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Cc: [Planningboard - CPD](#); [Montgomery, Justin A. - CPD Senior City Planner](#); [Clauson, Fritz - CPD CE0371 City Planner Associate](#); [Gerritt Koser](#); [Legal Department](#)
Subject: [EXTERNAL] Re: OPPOSITION to DHA exemption for Owner-Occupied ADU Requirement
Date: Monday, February 2, 2026 9:51:50 AM

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Dear City Council,

I honestly do not expect any response to this email because only one Council Office responded to my previous one; however, I feel compelled to share my opinion one more time. I am not opposed to affordable housing or increasing density in appropriate neighborhoods. I oppose allowing DHA the exclusive right to build ADU's as a non-occupied property owner. This right should extend all to property owners. If you are truly trying to increase housing why are you not considering all options?

This has been an interesting process: requesting information, providing input, and seeing how difficult it can be for the City to provide information. It is certainly enlightening how public requests and input are taken seriously—or not.

After many requests, my process revealed that DHA manages the following city owned single family properties:

District 1 - 22
District 2 - 43
District 3 - 37
District 4 - 10
District 5 - 16
District 6 - 10
District 7 - 25
District 8 - 26
District 9 - 68
District 11- 11

The request went directly to their legal department. They refused to provide addresses or specific time plans for building the ADU's.

CPD said they had no idea how many DHA houses existed or where they were located.

CPD should recommend broad changes, including allowing all property owners to provide affordable properties.

My thought is that if the City would partner with landlords instead of discounting them and work together to solve the housing challenges, Denver would be a much better City. In my case I have no option but to scrape the existing structure and rebuild to allow for an ADU.

One last thought. City agencies need to be more transparent and open regarding public information. They make it hard, draw it out and for the first time I am researching CORA as a first option across the agencies. Parks and Recreation has also presented challenges in getting information regarding plans for Civic Center Park and the removal of healthy, historical, mature crab apple trees. They have still not responded to my questions after a month of inquiry.

Happy Groundhog Day!
Susan Fry

On Mon, Jan 5, 2026 at 12:29 PM Susan Fry <denverstreets2020@gmail.com> wrote:

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Susan Fry