



PLANNING COMMISSION Special Meeting Proceedings

**March 30, 2021
1:15 p.m.**

(Zoom Webinar and viewable on City of Greeley YouTube)

I. Call to Order

Chair Yeater called the meeting to order at 1:15 p.m.

II. Roll Call

Chair Yeater, Commissioners Andersen, Franzen, Modlin and Schulte were present.
(Commissioners Briscoe and Romulo were absent.)

III. Worksession: Household Occupancy Standards

Presenter: Caleb Jackson, Planner II

Caleb Jackson addressed the Commission, stating that the item was being brought back for further discussion. Mr. Jackson briefly reviewed the rationale for reevaluating the current occupancy standard as well as the review and vetting process to date. He summarized the feedback received with concerns about parking and traffic, property maintenance, overcrowding, increased noise, trash, crime and reduced property values. Citizens in support have cited increased flexibility, privacy, affordability, changing demographics, housing stability and economic development.

Mr. Jackson presented a draft definition of “family” and asked for feedback from the Commission. Using the family definition, Mr. Jackson presented several scenarios using various zone districts as examples. Further, Mr. Jackson reminded Commissioners of the “U+” notation in the draft referring to the number of unrelated adults, with “U” being yourself and “+[number]” being the number of unrelated adults. He described the next steps of the process including today’s worksession and direction, a possible follow-up worksession with City Council and public hearings before Planning Commission and City Council.

Chair Yeater opened the floor for any questions or comments by Commissioners.

Commissioner Andersen recalled that during a previous worksession, the idea of phasing in the number of unrelated adults and increasing the allowance over a period of time was discussed. She asked whether that approach was addressed in the current draft. Mr. Jackson advised that after discussions with staff and management, a phased-in approach was not being recommended.

Upon question by Chair Yeater, Mr. Jackson confirmed that a cap was set at four bedrooms to avoid owners adding on more bedrooms and otherwise changing the character of a neighborhood. Chair Yeater also asked about any desire to change the code with respect to accessory dwelling units (ADUs) and whether those dwellings would be included in the calculation of unrelated adults. Mr. Jackson advised that staff has not yet gotten deep into ADUs as part of the code update, adding that they are currently only allowed in residential high density zone districts. He noted that ADUs would likely have a separate allowance for occupancy. Mr. Jackson reported that ADUs are typically smaller units such as a studio or one bedroom and are not typically designed to be occupied by a family. Upon further question by Chair Yeater, Mr. Jackson stated that some jurisdictions require occupants of ADUs to be members of the same family as the main house.

Commissioner Modlin asked whether there was a sense of how many households would benefit from the zoning change. Mr. Jackson stated that it was easy to fall into a “worst case scenario” mindset where every homeowner will rent out a bedroom. He noted that this will be a solution for some people and provide additional options, but most individuals will likely continue living as they always have.

Commissioner Franzen asked about enforceability and how staff proposed to enforce any code violations. Mr. Jackson reported that in discussions with the manager for Code Compliance, it was felt that increasing the allowance is enforceable since it is largely complaint based and does not require a lot of additional staff time. He added that sometimes simply having a standard can help set the community expectation.

Commissioner Andersen observed that most of the concerns seem to be about noise, traffic/parking and trash. She added that those are already enforceable issues and it seems to add one more tool to engage Code Compliance to address offenses. Mr. Jackson agreed and added that complaints can be addressed by Code Compliance for trash, Parking Services for on-street parking issues and Greeley Police for noise concerns.

Chair Yeater opened the meeting at 1:35 p.m. to receive comment by members of the public.

The clerk read six emails into the record from citizens, including one from Tannis Bator, two from Carol Burham, two from Michael Harrington and one from Barbara Hampton. Copies of the emails are attached to the Minutes. The clerk also identified a communication in the Zoom Chat from Brad Inholsen, “If there is any change, I’d like to see U+2 but not the bedroom numbers. The R-L people are wanting to keep the property R-L and that is why they are living in the R-L areas and not the R-M or R-H.” Lori Williams added to the Q&A, “So Greeley no longer desires to have single family home districts.”

Chair Yeater turned the discussion back over to the Commission at 1:47 p.m.

Commissioner Franzen indicated that he was originally in favor of the bedroom count, but at this time favors the U+2 scenario in R-L (residential low) areas to preserve those neighborhoods. Chair Yeater agreed and expressed that a challenge remained about how to handle occupancy limits in homes with four or more bedrooms. He understood that this might not be something that every homeowner will consider, but was hesitant to use the bedroom count to measure as it could create a scenario where an owner plus three unrelated adults occupy a four-bedroom home. Chair Yeater expressed that this could be problematic and was in favor of capping the number of unrelated adults in a residential district at U+2.

Commissioner Schulte asked whether Chair Yeater was referring only to R-L areas. Chair Yeater stated that he was including R-E (residential estate) and R-MH (mobile homes), adding that in R-M (residential medium), there is already a different expectation as to the number of unrelated adults. Commissioner Schulte observed that this seemed to mostly impact older parts of Greeley that do not have restrictive covenants as well as some newer neighborhoods that may not have a homeowner's association or covenants. Chair Yeater agreed. Commissioner Andersen pointed out that limiting the standard to U+2 in R-L zones would help protect older neighborhoods and prevent the temptation to purchase a house near the university and rent out every room. She agreed with limiting to U+2 in R-L. Commissioner Modlin asked whether U+2 would work for R-MH zoning as well and asked whether that might make sense. Commissioner Franzen agreed that parking could be an issue in an R-MH zone.

Chair Yeater asked whether there might be some sort of compromise or middle ground with regard to the number of bedrooms and wondered whether there could be a situation where a 2-bedroom home could be U+2. Chair Yeater suggested scenarios where a 2-bedroom home might be U+1 or, alternatively, go with U+2 across the board for all residential. He asked for feedback to get a sense of where the Commission might want to go. Commissioner Franzen observed that it could create confusion to have different standards in the same district based upon the number of bedrooms and gave an example of two houses across the street from each other, one smaller with a U+1 standard and the other larger with U+2. He added that enforcement would become an issue. Commissioner Schulte observed that there are already stricter controls in place than what is being proposed, adding that the enforcement problem already exists regardless of the number of bedrooms. He understood that having two sets of limits that work with each other, one based on bedrooms and one based on an absolute maximum, was to prevent the kind of overcrowding that could result if you just had U+3 regardless of the number of bedrooms. Commissioner Andersen noted that City Council had expressed this as a concern and that having bedrooms somehow related would control more of the overcrowding, especially with mobile homes.

Chair Yeater appreciated the idea of basing occupancy on the size of a house, which should be proportional to the amount of parking and accessibility that was originally intended. However, he was not in favor of moving to U+3. He liked the idea of creating a number of bedrooms and defining a maximum that is one less number than what is currently being proposed in the R-L, R-MH and R-E zones. Mr. Jackson clarified that Chair Yeater proposed reducing each residential category by one unrelated adult. Chair Yeater stated that regardless of a 4-bedroom, he proposed that the standard would still be U+2.

Mr. Jackson asked if he was also recommending to change the last piece of the chart to three or more bedrooms and Chair Yeater confirmed that was his proposal. Upon question by Commissioner Schulte as to whether this would be limited to R-L, Chair Yeater advised that he felt R-E and R-MH would also fall within that standard.

Chair Yeater recognized the clerk who advised that Lori Williams, who had previously provided input in the Q&A, had requested permission to speak to the Commission. Chair Yeater asked that the Commission be allowed to finish the current discussion and then she would be invited to speak for three minutes.

Commissioner Andersen agreed that R-E, R-L and R-MH should be similarly grouped and counted as they were established to be single-family according to the definition of “family” as proposed. Commissioner Schulte asked whether it meant leaving R-M in the proposal, but reducing limits in the section that describes R-E, R-L and R-MH. Chair Yeater confirmed that was the proposal he was bringing forward. Referring to the current Code, Commissioner Schulte asked whether that changed from U+1 to U+2. Chair Yeater stated that it changed the way “family” was defined. Mr. Jackson summarized that the proposal would keep R-E, R-L and R-MH in one regimen, change “3-bedroom” to “3 or more” and strike “4-bedroom,” adding that a smaller home (2-bedroom or less) would allow U+1 and 3-bedroom or larger home would allow U+2. Commissioners Andersen and Franzen supported the revision.

Referring to an earlier question by Commissioner Schulte, Mr. Jackson asked whether the Commission was comfortable with R-M (residential medium) as it is currently being proposed. Commissioner Andersen noted that from earlier citizen comments, R-M is different since there is an expectation that there would be more than one family living together. She added that it makes sense to place limitations on R-E, R-L and R-MH. Commissioner Schulte indicated that with respect to R-E, R-L and R-MH, he was personally comfortable with a higher allowance, but was also comfortable with the scaled back version being proposed today.

Chair Yeater invited Lori Williams to speak to the Commission.

Lori Williams, 508 56th Avenue, Greeley stated that she is a long-time resident of Greeley. She expressed concern that every time someone builds or purchases a home, they should be aware that the City might change zoning after the fact. Ms. Williams added that she had spent her lifetime planning carefully to purchase a home in a secure and safe community and made sure that surrounding homes were similar. She felt like the rug was ripped from underneath and she has no choice. Ms. Williams pointed out that there is a lot of available multi-family housing for unrelated adults to live in the dwelling and that changing the code was not necessary and was unfair to homeowners.

Chair Yeater asked Commissioners for any had additional comments. Commissioner Andersen observed that the Commission has refined what has been discussed in previous meetings and taken into account different opinions and expectations of those who have purchased homes in R-L and R-E zones. She noted her own experience living near the university with homes that have four or five bedrooms and liked the idea of dialing the allowance back. Commissioner Andersen stated that Ms. Bator’s letter was well thought through and that many investors purchase homes in an area with the intent of receiving

increased rent. She felt that the revisions proposed provide a nice balance, noting that enforcement of issues such as traffic, trash and noise are already addressed in the code.

Commissioner Franzen agreed and stated that dialing back to U+2 is a nice common ground and supported U+2 for R-E, R-L and R-MH. Commissioner Schulte felt that a phased-in approach might still allow for long-term planning, but recognized the complexity and was also in favor of simplicity. Commissioner Modlin stated that going to U+2 for R-E, R-L and R-MH seemed to resolve the dilemma over the number of bedrooms.

Referring to a previous worksession about small format housing and infill strategy, Chair Yeater asked whether today's discussion supports that intent and wanted to make sure that both efforts coincide. Carol Kuhn, Chief Planner, addressed the Commission and advised that the intent is to look at any ADUs as an independent unit so U+2 would carry over to secondary units as well. Mr. Jackson added that most ADUs are smaller and probably would not exceed U+2, and in an R-L zone would likely be U+1. Upon question by Chair Yeater, Ms. Kuhn advised that both primary and secondary (accessory) dwelling units could be occupied by separate families. Mr. Jackson added that staff would be looking into additional parking requirements for ADUs in R-L areas. In response to a question by Commission Andersen, Ms. Kuhn stated that in the case of an ADU, two units (primary and secondary) would be allowed on a single lot; the lot would not be subdivided.

Mr. Jackson thanked the Commission for their discussion and feedback.

IV. Worksession: Code Update – Downtown Placemaking & Urban Design

Presenters: Carol Kuhn, Chief Planner and Chris Brewster, Gould Evans

Carol Kuhn addressed the Commission and introduced Chris Brewster from Gould Evans who described Placemaking and Urban Design and their relationship to the update of the development code. Mr. Brewster noted that placemaking policies include creating unique destinations, walkability, mixed use, and village development patterns. He pointed out areas on the Land Use Guidance Map where placemaking strategies are most applicable.

Mr. Brewster stated that some of the options and expectations in the development code are not clear and that, while staff has the discretion to provide options, there is not a lot of consistency and clarity to those approaches at the current time. He described the code chapters that are being reviewed and proposed for revisions and summarized the approach considered to improve the language. Mr. Brewster advised that many of the approaches are taken from a book, *City Comforts: How to Build an Urban Village* by David Sucher, that suggests things such as building to the sidewalk, making a building front “permeable,” and prohibiting parking in front of a building. He provide illustrations and photo examples of a well-designed public realm, adding that it only requires one or two blocks of this treatment to create a valuable place in a community.

Mr. Brewster described the placemaking rules on the private and public sides that become the framework for regulation. The public side includes 1) connect and design for people (small block sizes, generous sidewalks, shade and enclosure), 2) reasons to linger (includes

formal social spaces and informal gathering places), and 3) slow traffic (maximizes on-street parking, buffers pedestrian from moving traffic and allows more efficient site design). The private side includes 1) build to the sidewalk (building placement, extent of front building line), 2) create “permeable” facades (frequent windows, doors, details that break down building; interesting things to see; activity; make streetscape lively space), and 3) hide/minimize the parking (employ strategies to hide or minimize parking). According to Mr. Brewster, the goal is to recalibrate the standards to the private and public placemaking rules to reach a desired outcome that will add more nuance and context to the things that are currently regulated by the development code.

Mr. Brewster described a Downtown Conditions Assessment that was performed to analyze which downtown blocks or streets meet these attributes and presented a map with the results. He highlighted some of the areas that might be considered for improvement and described an approach to improve the current code. Some items to consider are whether this approach is valid for form and urban design, how to better coordinate with zoning districts, the context of place and a particular street or block, how to apply the standards to the downtown area and block, how to apply to the downtown area and Greeley Improvement District, and whether the provisions should be advisory or regulatory.

Upon question by Chair Yeater as to whether the current code hinders development or just needs to be more concise and cleaned up, Mr. Brewster responded that it was a bit of both. He stated that all placemaking strategies could be accomplished with current code, but one goal is to create clear and consistent standards. Chair Yeater asked whether implementation of some of the placement strategies would be somewhat regulatory. Mr. Brewster advised that the criteria will improve what is currently being done in Commercial Low Intensity (C-L) and Commercial High Intensity (C-H), but would not necessarily become regulatory and described various development strategies. Chair Yeater asked how a city might incentivize or find developers interested in creating these types of spaces and whether it would increase development costs. Mr. Brewster agreed that many cities are wrestling with this issue and that these types of places cannot be regulated into existence, adding that there is still a place for them. He advised that the code should make it as easy as possible to build these types of areas, adding that they could possibly be required in areas that the city wants to protect or expand upon what is already in place, or if a developer has already invested and the desire is to maintain it to a certain degree. Mr. Brewster stated development costs are not necessarily always increased by employing some placemaking strategies.

Commissioner Schulte commented that some of the places on the map identified as targets for this type of approach are already developed and asked about a plan moving forward. Mr. Brewster advised that if an area is zoned C-L or C-H now, the current criteria could be refined toward this type of approach, recognizing that there are gradients of more pedestrian quality the closer building is to street. He added that it might allow more options beyond the current performance options.

Using the example of the Centerplace shopping area, Commissioner Andersen stated that it is already completely developed and remains a “new” development in the eyes of many citizens. She asked how one might encourage changes in that regard. Mr. Brewster agreed that every community has similar areas and it would not be wise to require placemaking.

He added that because there is a market for placemaking and a commercial benefit to have places to hang out and walk, there is no prohibition from shopping centers internalizing some of these concepts.

Chair Yeater referenced the St. Michael's development that embodies many of the characteristics described, but was somewhat troubled from the start. He asked what Greeley could learn to do better in the future. Mr. Brewster provided a few examples of potential problems, including the location and whether the property was right for that area or whether the density was not there at the beginning. He suggested one thing to try to do better in the future is to coordinate an interface between major streets and residential and commercial areas. Chair Yeater asked whether this was something measureable that should be included in the code.

Commissioner Andersen commented that she would prefer to see more mixed use development going forward rather than a lot of C-H and C-L with planned unit developments or development concept master plans. Ms. Kuhn agreed and said that updating the code should help. Commissioner Andersen was also in favor of more language in the code to "allow" rather than "require" as it increased creativity and allowed staff to work with applicants on project design.

Commissioner Schulte described some nice neighborhoods in Denver and stated that he always thought they came about organically based upon the histories of the community. He expressed a concern that if the city tries to make something happen, developers might find their own shortcuts with the result being a less than desirable development that technically complies with the code. He asked about the long-term thinking as far as updating the development code. Mr. Brewster suggested that the areas described might have been done organically due to the public realm context in which they were built. He noted that a good local example is Rigden Farms in Fort Collins that is connected well to the neighborhood and is dictated by street and block patterns and the relationship to surrounding residential areas. Upon question by Chair Yeater as to whether Rigden Farm was a planned community or whether it occurred organically, Mr. Brewster stated that he believed it was planned. Chair Yeater asked whether the plan was brought to the city by a developer or whether city staff made suggestions to enhance a developer's plan. Ms. Kuhn advised that the Fort Collins code is strong on some of the elements described by Mr. Brewster and it took staff working with a developer to reach the final plan. She added that with regard to planned unit developments, the hope is to help developers look at underlying zone districts and suggest options.

Mr. Brewster summarized some of the proposed recommendations. Commissioner Andersen expressed that she was excited to see the encouragement of mixed use, especially in infill areas, and was excited to provide more opportunities for development. She also appreciated the map showing areas that were good targets of this type of development and felt it would be helpful for developers.

V. Adjournment

The meeting adjourned at 3:35 p.m.

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Justin Yeater

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Justin Yeater, Chair

DocuSigned by:

Mike Garrott

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Mike Garrott, Acting Secretary

From: Tannis <tanbat@comcast.net>
Sent: Thursday, March 25, 2021 8:34 PM
To: Caleb Jackson <Caleb.Jackson@Greeleygov.com>
Subject: [EXTERNAL] Household Occupancy Standards

Dear members of the Planning Commission,

It has come to my attention that you may feel that a solution to the affordable housing problem is to relax the regulation of how many unrelated persons may rent a house.

I realize this is an attempt to help alleviate Greeley's housing crisis. Since there doesn't seem to be a cap on the amount of rent charged, or the price of a house, this will still be difficult. I recognize that this is the beginning of a long process.

However, I am against a total relaxation of the you + one regulation for the following reasons. (I am using a family of four and four unrelated adults as an example and am often using the complaints raised by having **rentals owned by absentee landlords.**)

Families need affordable housing for their children to thrive emotionally and physically. A house in well maintained condition is much better for a family than an apartment. If such a regulation is relaxed too much, families will go to the bottom of the list since it will be more profitable for investors and landlords to rent to four unrelated people rather than a family of four. I recently read a Saturday, March 20 article, regarding a new Habitat for Humanity homeowner. The new owner, Franky Rodriguez is quoted as saying: "We're going to have our own space. Our kids are going to have their own yard and safety."

Those looking to buy a starter home are priced out by those eager to invest in real estate, and this would make it even more difficult.

Four unrelated people would no doubt have four vehicles. Therefore, parking in the neighborhood becomes more difficult, particularly if each of these four decide to invite others over. We live near the University of Northern Colorado which would be prime real estate for investors/landlords to make money from college students who are not too mindful of neighbors and not interested in keeping up the house and yard.

There is less of an incentive for four unrelated people to continue living together. One or two might lose their jobs or move on, and then what?

I know it is difficult to monitor those who are not keeping to the current regulation of two unrelated persons in a house, but this seems just an easy way not to have to deal with that problem. There are houses now where there are more people than are legal,(usually owned by absentee landlords as an investment) but, unless the neighbors complain, and even if they do, not much is done.

Neighborhoods that have a mix of owned and rented homes under the current set of regulations have a much better record of maintaining the appearance and the ethos of the neighborhood. A

neighborhood with completely relaxed restrictions makes it more unlikely that neighbors will know and care about each other. **However, I could see how “You + two” could work in certain, more controlled situations.**

I have spoken to those whose neighborhoods have changed drastically by houses rented by absentee landlords. This seems to be the root of the problem. On the other hand, if a person owns the home, resides there, and then wants to rent to others to share expenses and keep company, that is a different situation. Perhaps three educators are looking to rent together and a local landlord is careful with their selection. These situations are almost a case-by-case basis. **But restrictions should be placed on absentee landlords who take no care of their rentals and spend no time monitoring the safety and well-being of the neighborhood.**

If you are truly concerned about affordable housing, perhaps you should also investigate tiny home neighborhoods, sliding scales for rent, more property for Habitat for Humanity, and see how other cities are working on their challenge of affordable housing, an example being intentional coliving communities. Architectural plans should also include allowances for disabled people with wider entrances for wheelchair use.

A total relaxation of regulations concerning the number of unrelated persons residing in a rental home would just be a band-aid on a larger problem, make it easier for the City of Greeley to look the other way and be a boon for investors/landlords. I’m not sure how such a decision would “maintain and improve Greeley’s quality of life” or “thoughtfully manage its human and natural resources in a manner that creates and sustains a safe, unique, vibrant and rewarding community in which to live, work and play.” (quoted from the City of Greeley Comprehensive Plan)

I know updating the zoning ordinances will be arduous work and I appreciate the opportunity to air my concerns.

Sincerely,
Mrs. Tannis Bator
1920 12th Ave
Greeley, CO 80631

From: Carol <cjburham@msn.com>
Sent: Saturday, March 27, 2021 9:37 AM
To: Caleb Jackson <Caleb.Jackson@Greeleygov.com>
Subject: [EXTERNAL] Household occupancy

I cannot attend this meeting. But I need to plead the case for leaving our neighborhoods alone. One non relative is more then generous. You keep your neighborhood family orientated. B&Bs and extra non related people do not belong in the family orientated neighborhoods. They do not care about where they park. Loud mufflers, party's and keeping the yards nice. They just are not family oriented and do not care about being neighborly. This would be a very bad move for Greeley.

I am a Farr Park resident of 45 years. I have seen a lot. You need to enforce current laws and let well enough alone. Thank you for your time to read this. Carol J. Burham

From: Carol <cjburham@msn.com>
Sent: Tuesday, March 30, 2021 8:06 AM
To: Caleb Jackson <Caleb.Jackson@Greeleygov.com>
Subject: [EXTERNAL] Re: Household Occupancy Standards | March 30 Planning Commission Worksession

Please leave the ordinance alone to keep family neighborhoods just that. The city has a hard enough time enforcing present codes. It will be a free fall if you let it turn into more unrelated people living together. I have turned in code violators with the current codes and it takes months to correct and some never. The code officers say it is hard to prove so it takes so long. Please keep them family orientated neighborhoods just that! We have children at risk and many problems to avoid. Thank you Carol J Burham

From: Michael Harrington <harringtonmichaelv@gmail.com>
Sent: Monday, March 29, 2021 10:42 AM
To: CD Admin Team <CD_Admin_Team@Greeleygov.com>
Subject: [EXTERNAL] Housing Occupancy Standards

Good morning,

My name is Michael Harrington and I would like to give input on the occupancy standards. I believe its great that the city is finally addressing this code update since it has not been updated in decades. The housing pricing has gotten so expensive and current demographics of young professionals have dramatically changed since that time. Young professionals are having a hard time affording housing in Greeley and are even not getting married until way later in life. That being said there are many people that cannot afford a house and it helps many individuals afford a place to live with room mates. I know most people renting are having to spend upwards of 60% on their housing leaving little money to go out to restaurants, leisure, etc. They also even have a hard time getting the needed groceries they need. The concerns of having multiple people in a home have city ordinances in place to address loud music, trash, etc. I hope council is well educated on why most all of the surrounding areas have increased their housing capacity as they have also given much thought to this as well. It would be a great burden put off of many people and would stimulate the economy of Greeley. It would also keep great people in Greeley and attract more people as well. I know many people move to Windsor or Loveland so they can live together as Greeley doesn't allow it. Let me know if you have questions. Thank you for your time.

Michael Harrington

From: Michael Harrington <harringtonmichaelv@gmail.com>
Sent: Monday, March 29, 2021 10:49 AM
To: CD Admin Team <CD_Admin_Team@Greeleygov.com>
Subject: [EXTERNAL] Re: Housing Occupancy Standards

In addition to the thoughts above, I do believe the solution of allowing however many bedrooms in a home, would allow how many unrelated individuals. I think that suits the need and creates a simple solution.

From: Hampton, Barbara <barbara.hampton@medtronic.com>
Sent: Monday, March 29, 2021 4:10 PM
To: CD Admin Team <CD_Admin_Team@Greeleygov.com>
Subject: [EXTERNAL] Household Occupancy Standards | March 30 Planning Commission Worksession

I just wanted to submit my thoughts for your meeting tomorrow –

I understand why there are limits and household occupancy standards. However, in Greeley the laws seem old and antiquated. Surrounding communities allow one non-related person per bedroom in a rental home. It is very reasonable to allow unrelated adults in a home, one per bedroom. There are so many young professional people now, waiting to get married later in life. Comradely is important and so is reasonably priced housing in nice neighborhoods. Many are moving out of Greeley because of affordability.

Some may also argue the current code is racist and discriminatory. I don't even want to begin that discussion. If not that, it's just rather "snooty." Not at all what Greeley wants to be about.

Frankly, I don't even understand why this needs to be debated again and again. It's really a "no brainer" to change the housing occupancy law.

Thank you for letting send in my comments. I hope the code is changed.

Best,
Barbara Hampton