

Caitlyn Mars

From: Brian Comerford [REDACTED]
Sent: Monday, October 20, 2025 7:48 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

I respectfully request that the County include residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully.

Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Brian Comerford

[REDACTED] Boston Commons

[REDACTED]

--

Brian Comerford

[REDACTED]

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Caitlyn Mars

From: Olga Demi TMLP [REDACTED]
Sent: Monday, October 20, 2025 5:45 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Dear Commissioners and Planning Staff,

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Thank you for your consideration.

Sincerely,

Olga Demidova

[REDACTED] Boston Commons
[REDACTED]

--

Regards,
Olga Demidova
[REDACTED]

Caitlyn Mars

From: Ryan D [REDACTED]
Sent: Sunday, October 19, 2025 7:21 PM
To: Caitlyn Mars
Subject: Comments on Proposed Short-Term Rental Regulations

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the Arapahoe County Planning Commission,

I understand the need for reasonable rules around short-term rentals. I support responsible STRs that are safe, well-managed, and respectful of the neighborhood. My concern is that some of the proposed rules, especially the 500-foot separation between licensed whole-home STRs, might go too far and create problems that weren't intended.

That rule could make it harder for good operators to keep their licenses, which might even hurt local property values. I don't think the issue is how close STRs are to each other—it's how they're managed. A well-run STR can fit in just as smoothly as a long-term rental. It makes more sense to focus on things like noise, parking, safety, and neighborhood complaints rather than setting a strict distance requirement.

I also appreciate having STRs nearby in case I ever need a short-term place to stay—like during a home renovation. And I'd like to keep the option to rent out my own home if life circumstances change. The proposed 500-foot rule could take away that flexibility just because a neighbor already has a license.

Thank you for taking the time to listen. I hope you'll consider focusing on responsible management and fair enforcement instead of broad zoning limits.

Sincerely,

Ryan

Caitlyn Mars

From: Katie Darling [REDACTED]
Sent: Sunday, October 19, 2025 7:21 PM
To: Caitlyn Mars
Subject: Public Comment on Proposed STR Regulations in the Land Development Code
Attachments: STR Arapahoe County.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good evening,
Please see my attached letter regarding the STR regulations.
Thank you,
Katherine Darling

Caitlyn Mars

From: Barak Hamdani [REDACTED]
Sent: Sunday, October 19, 2025 1:38 AM
To: Caitlyn Mars
Subject: RE: Support for Legacy STR Protection - LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you.

Please note I own one more [REDACTED]

All the best,
Barak

From: Caitlyn Mars <CMars2@arapahoegov.com>
Sent: Friday, October 17, 2025 4:25 PM
To: Barak Hamdani [REDACTED]
Subject: RE: Support for Legacy STR Protection - LDC23-001

Hello,

Thank you for your email.

The materials for the October 21st Planning Commission hearing have already been uploaded to the website. This email is to confirm that I have received your email and will add it to the new materials to be provided to the Planning Commission at the hearing.

If you have any questions, please reach out.

Thank you,
Caitlyn



Caitlyn Mars

Zoning & Weed Control Manager
Public Works & Development
6924 S Lima St. | Centennial, CO 80112
Weed Control: 720-874-6713 | Zoning: 720-874-6711
Direct Line: 720-874-6753 - (I may be able to respond quicker by email.)

I value and respect boundaries related to work-life balance and well-being, and I acknowledge that my work hours may not be your work hours. Please do not feel obliged to respond to this email outside of your normal working hours.

Please Note: Under the Colorado Open Records Act (CORA), messages sent by or to me on this Arapahoe County owned e-mail account may be subject to public disclosure.

From: Barak Hamdani [REDACTED]
Sent: Friday, October 17, 2025 4:56 AM
To: Caitlyn Mars <CMars2@arapahoegov.com>
Subject: Support for Legacy STR Protection - LDC23-001

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Thank you for your consideration.

Sincerely,

Barak Hamdani

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Bin Jiang [REDACTED]
Sent: Sunday, October 19, 2025 12:48 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Bin Jiang

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Sassi Inbar [REDACTED]
Sent: Saturday, October 18, 2025 11:17 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Sasson Inbar
Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Nadine Johns [REDACTED]
Sent: Friday, October 17, 2025 5:57 PM
To: Caitlyn Mars
Subject: Boston Commons Master HOA – Legacy STR License Submission (LDC23-001)
Attachments: Board_Submission_Letter_Legacy_STR BCF.pdf; Amendment_Legacy_STR_License (2).pdf; Owner_Email_Instructions_Legacy_STR (1) (1).pdf; Petition Boston Commons.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Mars and Planning Staff,

On behalf of Boston Commons Master HOA, Inc., I am attaching our submission regarding the proposed Short-Term Rental Ordinance (LDC23-001). This request asks that residential condominium communities converted from hotel use, such as Boston Commons, be included within any Legacy Short-Term Rental (STR) licensing provisions adopted by Arapahoe County.

This submission is made by Boston Commons Master HOA, Inc., through its President, with notice to all members of the Board of Directors.

Included Attachments:

1. Board Submission Letter – Legacy STR Request
2. Proposed Amendment – Legacy STR License
3. Petition of Owner Support (initial signatures)
4. Owner Email Instructions (for circulation to individual owners)

Additional petition signatures will be forwarded as received. Thank you for including this submission in the public record for the October 21, 2025 Planning Commission hearing and any subsequent Board of County Commissioners proceedings.

Sincerely,

Nadine Johns

President, Board of Directors

Boston Commons Master HOA, Inc.

6380 S. Boston Street

Unincorporated Arapahoe County, CO 80111



Caitlyn Mars

From: Matt Wickiser [REDACTED]
Sent: Friday, October 17, 2025 4:21 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Matthew Wickiser
Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Ramsey Dickenson [REDACTED]
Sent: Friday, October 17, 2025 3:45 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Ramsey Dickenson

Unit [REDACTED] Boston Commons Email
[REDACTED]

Sent from my iPhone

Caitlyn Mars

From: Lacey Farrell [REDACTED]
Sent: Friday, October 17, 2025 3:28 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Lacey Valenzuela

Unit [REDACTED], Boston Commons
[REDACTED]

--

Lacey Valenzuela
[REDACTED]

Caitlyn Mars

From: Ramsey Dickenson [REDACTED]
Sent: Friday, October 17, 2025 3:24 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Ramsey Dickenson

Unit [REDACTED], Boston Commons

Email: [REDACTED]
Sent from my iPhone

Caitlyn Mars

From: Nadine [REDACTED]
Sent: Friday, October 17, 2025 2:55 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Nadine Johns

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Nadine [REDACTED]
Sent: Friday, October 17, 2025 2:33 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Nadine Johns

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Nadine Johns [REDACTED]
Sent: Friday, October 17, 2025 2:14 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

BCCondos LLC

Unit [REDACTED] Boston Commons

Email: [REDACTED]

Caitlyn Mars

From: Nadine Johns [REDACTED]
Sent: Friday, October 17, 2025 2:07 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection - LDC23-001

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Thank you for your consideration.

Sincerely,

PMRC LLC

Unit [REDACTED] Boston Commons

Caitlyn Mars

From: Nadine Johns [REDACTED]
Sent: Friday, October 17, 2025 2:06 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection - LDC23-001

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Sincerely,

PMRC LLC

Unit [REDACTED] Boston Commons

Email: [REDACTED]

Caitlyn Mars

From: Nadine Johns [REDACTED]
Sent: Friday, October 17, 2025 1:56 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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PMRC LLC

Unit [REDACTED] Boston Commons

Email: [REDACTED]

Caitlyn Mars

From: Nadine Johns [REDACTED]
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before the end of day THIS FRIDAY!!!

Text to Copy / Paste the letter below.

Complete end of the letter with: YOUR NAME, UNIT #, YOUR EMAIL ADDRESS

Please reply to this email to let me know when you have sent the email to CMars2@arapahoegov.com . It will really help in keeping track of community support.

Subject: Support for Legacy STR Protection – LDC23-001

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PMRC LLC

Unit [REDACTED], Boston Commons

Email: [REDACTED]

Caitlyn Mars

From: Nadine Johns [REDACTED]
Sent: Friday, October 17, 2025 1:52 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Sincerely,

PMRC LLC

Unit [REDACTED], Boston Commons

Email: [REDACTED]

Caitlyn Mars

From: Jason Krischuk [REDACTED]
Sent: Friday, October 17, 2025 1:29 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Sincerely,

Jason Krischuk

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Debbie Aragon [REDACTED]
Sent: Friday, October 17, 2025 11:55 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Deborah and Steven Aragon

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Greg Bartholomew [REDACTED]
Sent: Friday, October 17, 2025 9:58 AM
To: Caitlyn Mars
Subject: Support For Legacy STR Protection-LDC23-001

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I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

I respectfully request that the County include residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully.

Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Gregory Bartholomew

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn



Caitlyn Mars

Zoning & Weed Control Manager

Public Works & Development

6924 S Lima St. | Centennial, CO 80112

Weed Control: 720-874-6713 | Zoning: 720-874-6711

Direct Line: 720-874-6753 - (I may be able to respond quicker by email.)

I value and respect boundaries related to work-life balance and well-being, and I acknowledge that my work hours may not be your work hours. Please do not feel obliged to respond to this email outside of your normal working hours.

Please Note: Under the Colorado Open Records Act (CORA), messages sent by or to me on this Arapahoe County owned e-mail account may be subject to public disclosure.

From: Ben Turner [REDACTED]
Sent: Friday, October 17, 2025 8:27 AM
To: Caitlyn Mars <CMars2@arapahoegov.com>
Subject: Re: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you, Caitlyn. Appreciate your response. I have a total of 12 units in Boston Commons. Is it better to send 12 letters or is there some way you can make a note that my letter represents 12 total units? Want to make sure my voice is hard proportionate to the number of units I have, Thank you again!

Ben Turner

[REDACTED]
Littleton, CO 80123
[REDACTED]

On Fri, Oct 17, 2025 at 8:24 AM Caitlyn Mars <CMars2@arapahoegov.com> wrote:

Hello,

Thank you for your email.

The materials for the October 21st Planning Commission hearing have already been uploaded to the website. This email is to confirm that I have received your email and will add it to the new materials to be provided to the Planning Commission at the hearing.

If you have any questions, please reach out.

Thank you,

Caitlyn



Caitlyn Mars

Zoning & Weed Control Manager

Public Works & Development

[6924 S Lima St. | Centennial, CO 80112](#)

Weed Control: 720-874-6713 | Zoning: 720-874-6711

Direct Line: 720-874-6753 - (I may be able to respond quicker by email.)

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Please Note: Under the Colorado Open Records Act (CORA), messages sent by or to me on this Arapahoe County owned e-mail account may be subject to public disclosure.

From: Ben Turner [REDACTED]
Sent: Thursday, October 16, 2025 7:29 PM
To: Caitlyn Mars <CMars2@arapahoe.gov>
Cc: Chuck Blakeman [REDACTED] Lyric Turner [REDACTED]
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

I respectfully request that the County include residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully.

Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration and please reach out to me For any questions or comments.

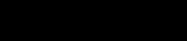
Sincerely,

Ben Turner

Ben Turner

[6380 S Boston St.](#)

[Greenwood Village, CO 80111](#)



Caitlyn Mars

From: Melissa Steiner [REDACTED]
Sent: Friday, October 17, 2025 9:20 AM
To: Caitlyn Mars
Cc: Brent Steiner
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Melissa and Michael Steiner

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Stephen Bass [REDACTED]
Sent: Friday, October 17, 2025 9:12 AM
To: Caitlyn Mars
Subject: Re: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Apologies for the mistype on my unit number above...please see below:

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Stephen Bass

[REDACTED] Boston Commons
[REDACTED]

On Fri, Oct 17, 2025 at 9:08 AM Stephen Bass <smb41385@gmail.com> wrote:

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Stephen Bass

Unit # [REDACTED], Boston Commons

[REDACTED]

Caitlyn Mars

From: Stephen Bass [REDACTED]
Sent: Friday, October 17, 2025 9:10 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Stephen Bass

Unit # [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Stephen Bass [REDACTED]
Sent: Friday, October 17, 2025 9:09 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Stephen Bass

Unit # [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Stephen Bass [REDACTED]
Sent: Friday, October 17, 2025 9:08 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Stephen Bass

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Stephen Bass [REDACTED]
Sent: Friday, October 17, 2025 9:07 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Stephen Bass

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Stephen Bass [REDACTED]
Sent: Friday, October 17, 2025 9:06 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Stephen Bass

Unit # [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Scott Vaughn [REDACTED]
Sent: Friday, October 17, 2025 7:52 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This message needs your attention

- Heads-up: Subject line may be misleading.

Mark Safe

Report

Powered by Mimecast

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Robert Scott Vaughn

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Siming Mu [REDACTED]
Sent: Friday, October 17, 2025 6:24 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,
Siming Mu
Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Barak Hamdani [REDACTED]
Sent: Friday, October 17, 2025 4:56 AM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection - LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Barak Hamdani

[REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Adi Weissman [REDACTED]
Sent: Thursday, October 16, 2025 8:06 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally the Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

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Thank you for your consideration.

Sincerely,

Adi Weissman-Saban

[REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Dina Zamirovna [REDACTED]
Sent: Thursday, October 16, 2025 7:52 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Aiperi Zhumaeva

Unit [REDACTED], Boston Commons

[REDACTED]

Caitlyn Mars

From: Ben Turner [REDACTED]
Sent: Thursday, October 16, 2025 7:29 PM
To: Caitlyn Mars
Cc: Chuck Blakeman; Lyric Turner
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

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Thank you for your consideration and please reach out to me For any questions or comments.

Sincerely,

Ben Turner

Ben Turner
6380 S Boston St.
Greenwood Village, CO 80111
Building #2

[REDACTED]

Caitlyn Mars

From: Mitch Gilbert [REDACTED]
Sent: Thursday, October 16, 2025 6:36 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Subject: Support for Legacy STR Protection – LDC23-001

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

H Mitchell Gilbert

Unit [REDACTED], Boston Commons

[REDACTED]

#57 out of 62,000 RE/MAX agents in the United States from 3/1/21- 3/31/21

In Case you missed me on the news, here is the link:

<http://www.nbcwashington.com/news/local/Man>Returns-10000-136252063.html>

<https://www.youtube.com/watch?v=-7GQfm4q6Z0&authuser=0>

Caitlyn Mars

From: sai patel [REDACTED]
Sent: Thursday, October 16, 2025 5:51 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Shailesh Patel

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: sai patel [REDACTED]
Sent: Thursday, October 16, 2025 5:50 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Shailesh Patel

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Alexey Firsov [REDACTED]
Sent: Thursday, October 16, 2025 5:49 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Support for Legacy STR Protection – LDC23-001

Dear Commissioners and Planning Staff,

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Alexey Firsov

Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Idan Yitzhak [REDACTED]
Sent: Thursday, October 16, 2025 4:35 PM
To: Caitlyn Mars
Subject: Re: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you, I did send 4 emails representing 4 units i own, [REDACTED]

Thank you.

Best Regards.

Idan Yitzhak
[REDACTED]

On Thu, Oct 16, 2025 at 3:33 PM Caitlyn Mars <CMars2@arapahoegov.com> wrote:

Hello,

Thank you for your email.

The materials for the October 21st Planning Commission hearing have already been uploaded to the website. This email is to confirm that I have received your email and will add it to the new materials to be provided to the Planning Commission at the hearing.

If you have any questions, please reach out.

Thank you,

Caitlyn



Caitlyn Mars

Zoning & Weed Control Manager

Public Works & Development

6924 S Lima St. | Centennial, CO 80112

Weed Control: 720-874-6713 | Zoning: 720-874-6711

Direct Line: 720-874-6753 - (I may be able to respond quicker by email.)

I value and respect boundaries related to work-life balance and well-being, and I acknowledge that my work hours may not be your work hours. Please do not feel obliged to respond to this email outside of your normal working hours.

Please Note: Under the Colorado Open Records Act (CORA), messages sent by or to me on this Arapahoe County owned e-mail account may be subject to public disclosure.

From: Idan Yitzhak [REDACTED]
Sent: Thursday, October 16, 2025 2:31 PM
To: Caitlyn Mars <CMars2@arapahoegov.com>
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner of Boston Commons, an unincorporated community in Arapahoe County. Our property was originally The Holtze Hotel but has since been converted into condominiums. Our governing documents explicitly permit nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would effectively disqualify almost all owners from obtaining STR licenses. With only about 7% of our 120 units currently owner-occupied, this rule would eliminate lawful STR operations, resulting in significant financial losses for owners and potentially reducing County lodging-tax revenue.

Therefore, I respectfully request that the County include residential condominium communities like Boston Commons, which have historically operated as hotels, within any Legacy STR licensing provisions. This would allow owners who have historically operated STRs to continue doing so lawfully.

Please ensure that this letter is included in the public record for the Planning Commission hearing scheduled for October 21, 2025, and any subsequent BOCC hearings.

Thank you for your consideration.

Sincerely,

Idan Yitzhak

Unit [REDACTED], Boston Commons

[REDACTED]

Best Regards,

Idan Yitzhak

Caitlyn Mars

From: Timothy deVries [REDACTED]
Sent: Thursday, October 16, 2025 4:34 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Tim deVries
6380 S. Boston St. Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Idan Yitzhak [REDACTED]
Sent: Thursday, October 16, 2025 4:29 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

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Please ensure that this letter is included in the public record for the Planning Commission hearing scheduled for October 21, 2025, and any subsequent BOCC hearings.

Thank you for your consideration.

Sincerely,

Idan Yitzhak

Unit [REDACTED], Boston Commons

Caitlyn Mars

From: Idan Yitzhak [REDACTED]
Sent: Thursday, October 16, 2025 4:28 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

I am an owner of Boston Commons, an unincorporated community in Arapahoe County. Our property was originally The Holtze Hotel but has since been converted into condominiums. Our governing documents explicitly permit nightly and weekly rentals.

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Sincerely,

Idan Yitzhak

Unit [REDACTED], Boston Commons

Caitlyn Mars

From: Idan Yitzhak [REDACTED]
Sent: Thursday, October 16, 2025 4:28 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Idan Yitzhak

Unit [REDACTED], Boston Commons

Caitlyn Mars

From: joseph [REDACTED]
Sent: Thursday, October 16, 2025 3:48 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Joseph Wang

Unit [REDACTED] Boston Commons

Email [REDACTED]

Phone: [REDACTED]

Caitlyn Mars

From: Yelena Kaikova [REDACTED]
Sent: Thursday, October 16, 2025 3:07 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Yelena Kaikov
Unit [REDACTED] Boston Commons
[REDACTED]

Caitlyn Mars

From: Eyal Tavor [REDACTED]
Sent: Thursday, October 16, 2025 2:36 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners and Planning Staff,

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Thank you for your consideration.

Sincerely,

Eyal Tavor

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Eyal Tavor [REDACTED] >
Sent: Thursday, October 16, 2025 2:36 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Eyal Tavor

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Idan Yitzhak <[REDACTED]>
Sent: Thursday, October 16, 2025 2:31 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Thank you for your consideration.

Sincerely,

Idan Yitzhak

Unit [REDACTED], Boston Commons



Best Regards,
Idan Yitzhak

Caitlyn Mars

From: Scott Thomas [REDACTED]
Sent: Thursday, October 16, 2025 2:02 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Scott Thomas, JD

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: MICHAEL GALANSKY [REDACTED]
Sent: Thursday, October 16, 2025 1:46 PM
To: Caitlyn Mars
Subject: Legacy STR Protection – LDC23-001

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This message needs your attention

- Heads-up: Subject line may be misleading.

Mark Safe

Report

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Subject: Support for Legacy STR Protection – LDC23-001

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Michael Galansky

Unit [REDACTED] Boston Commons

[REDACTED]

Caitlyn Mars

From: xia li [REDACTED]
Sent: Thursday, October 16, 2025 1:24 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Thank you for your consideration.

Sincerely,

Xia Li

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: nicole.andrex.org [REDACTED]
Sent: Thursday, October 16, 2025 1:23 PM
To: Caitlyn Mars
Cc: Max Jamshidi; max.andrex.org; beata.jamshidi
Subject: Support for Legacy STR Protection – LDC23-001

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This message needs your attention

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Thank you for your consideration.

Sincerely,

Max & Beata Jamshidi

Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Yev Muchnik [REDACTED]
Sent: Thursday, October 16, 2025 1:11 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Dear Commissioners and Planning Staff,

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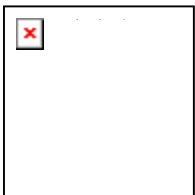
Thank you for your consideration.

Sincerely,

Yevgenya Muchnik

Unit [REDACTED] Boston Commons
[REDACTED]

--



Yev Muchnik
Founding Partner
Launch Legal, LLC

[REDACTED] | yev@launch-legal.com
www.techlawstartup.com
3900 E. Mexico Ave., Suite 300, Denver, CO 80210



IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.



Caitlyn Mars

From: Alon Mor [REDACTED]
Sent: Thursday, October 16, 2025 1:03 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Alon Mor

Unit [REDACTED] Boston Commons
[REDACTED]

Thanks,

Alon Mor

[REDACTED]
Email: [REDACTED]

Office:

3600 S. Yosemite St.

Suite 600

Denver, CO 80237

PLEASE EXCUSE MY TYPOS AND GRAMMAR. SENT FROM MY I-PAD USING DICTATION.

Sent via [Superhuman](#)

Caitlyn Mars

From: Alon Mor [REDACTED]
Sent: Thursday, October 16, 2025 1:01 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Alon Mor

Unit [REDACTED] Boston Commons
[REDACTED]

Thanks,

Alon Mor

Cell: [REDACTED]

Email: [REDACTED]

Office:

3600 S. Yosemite St.

Suite 600

Denver, CO 80237

PLEASE EXCUSE MY TYPOS AND GRAMMAR. SENT FROM MY I-PAD USING DICTATION.

Sent via [Superhuman](#)

Caitlyn Mars

From: dave [REDACTED]
Sent: Thursday, October 16, 2025 12:52 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Support for Legacy STR Protection – LDC23-001

Dear Commissioners and Planning Staff,

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Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Dave and Laura McManus
Boston Commons
Building 10
[REDACTED]

Caitlyn Mars

From: Vincent Incognoli [REDACTED]
Sent: Thursday, October 16, 2025 12:41 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Thank you for your consideration.

Sincerely,

Vincent Incognoli
Unit [REDACTED], Boston Commons
[REDACTED]

Caitlyn Mars

From: Jason Reynolds
Sent: Wednesday, November 12, 2025 10:13 AM
To: Caitlyn Mars
Subject: FW: Request for Reconsideration of STR Ordinance – Need for Grandfathering and Fair Licensing

Another email comment.

-----Original Message-----

From: Jeff Baker <JBaker@arapahoegov.com>
Sent: Wednesday, November 12, 2025 10:12 AM
To: Amy [REDACTED]
Cc: Bryan Weimer <BWeimer@arapahoegov.com>; Jason Reynolds <JReynolds@arapahoegov.com>
Subject: RE: Request for Reconsideration of STR Ordinance – Need for Grandfathering and Fair Licensing

Thanks Amy! Forwarding to PWD for their record.

-Jeff-

Jeff Baker
Arapahoe County
Commissioner, District 3
Jbaker@arapahoegov.com
303-795-4683

-----Original Message-----

From: Amy [REDACTED]
Sent: Tuesday, November 11, 2025 9:01 AM
To: Commissioners <Commissioners@ArapahoeGov.com>
Subject: Request for Reconsideration of STR Ordinance – Need for Grandfathering and Fair Licensing

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners,

I am writing to express my deep concern regarding the proposed short-term rental ordinance. As currently written—with the 500-foot spacing rule and the primary residence requirement—it would effectively put me out of business. I have responsibly hosted my two homes in unincorporated Arapahoe County (one for the past eight years) without a single complaint.

Over the years, my short-term rental has brought real benefits to the neighborhood and local community. I've hosted neighbors from Holly Hills who experienced fires or floods, as well as families attending weddings or funerals nearby—people who otherwise would not have been able to stay together because multiple hotel rooms are expensive and families want to be together. My home has provided a safe, affordable, and comfortable space for local families during meaningful or difficult times.

I want to share a story about a friend who lives in Holly Hills. She is the primary breadwinner for her family of five. If she were to lose her job, one option to maintain stability would be to move her family in with her mother and short-term rent her home, leaving her furniture behind. However, because a neighbor already has a short-term rental, she would be blocked from doing so under the 500-foot spacing rule. The primary residence requirement also lacks clarity—there is no detail on what qualifies as a primary residence. How long can you be away? Can you live a mile away at your parent’s house? If you move out is it still your primary residence? Can you be away for six months and a day (or nine months)? Can you live between two homes that are your primary residence? This ambiguity further complicates the ability of responsible homeowners to plan for unforeseen circumstances.

The 500-foot spacing rule, in particular, does not simply “create distance” between short-term rentals—it effectively eliminates them without explicitly saying so. As soon as the first license is granted, it establishes a 500-foot exclusion zone that prevents neighboring homeowners from ever obtaining a license. This could even allow a neighbor to apply for a license solely to block others from short-term renting, without any intention of renting their home at all. This is not sound land-use policy and could expose the County to claims of unfair or discriminatory treatment among property owners.

This change would be devastating for my family. We depend on the income from our short-term rental to meet our monthly financial obligations, and losing that ability would have a serious impact on our financial stability which is terrifying as a mother of two babies.

I’ve heard discussion suggesting there might be a grandfather clause that would allow current operators to continue renting for one year under a license while we “figure something out.” I respectfully urge you to consider a true grandfather clause without an expiration date. A one-year extension would not come close to offsetting the extreme losses my family—and many others—would face.

Additionally, I understand the county’s goal of protecting affordable housing. However, the homes being used as short-term rentals in unincorporated areas like mine are typically valued at \$700,000 or more. These are not part of the affordable housing stock, nor would restricting their use create affordable housing opportunities. The reality is that young families aren’t moving into these neighborhoods not because of short-term rentals, but because of high home prices and current mortgage rates. It’s misleading to classify homes at this price point as relevant to the affordability issue. A one-size-fits-all approach to licensing short-term rentals does not make sense, as it fails to account for differences in home values, neighborhood characteristics, and the real financial needs of homeowners.

You may not like the idea of homes being used for business purposes, but please consider that many residents in our community operate small businesses from their homes—such as bicycle repair/sales, auto mechanics, dog training, tree removal, or group homes. These activities are part of the fabric of a residential neighborhood. In contrast, well-maintained short-term rentals like mine often improve the look and upkeep of the neighborhood.

I would also urge you to consider what has happened in Jefferson County, which implemented extremely restrictive short-term rental measures that proved difficult to enforce. They are now in the process of loosening those restrictions as a result. Don’t we want to get this right the first time—by adopting fair, enforceable rules that balance community concerns with property rights?

This ordinance, as proposed, is not a pro-small business measure. It penalizes responsible homeowners who have followed the rules and contributed to the local economy. Instead of an outright primary residence ban, I ask that you consider a licensing program similar to the City of Centennial’s, which allows short-term rentals under clear and enforceable guidelines. The key to making this type of program successful is requiring no events and enforcing parking plans—standards that already work well in other jurisdictions. Such a program would enable the County to address nuisance operators while preserving fairness for those of us who operate responsibly.

Please reconsider this proposal and include a permanent grandfather clause or a fair licensing structure that reflects the interests of both residents and the County.

Thank you for your time and for the work you do on behalf of our community.

Sincerely,
Amy Messerich

Caitlyn Mars

From: Bryan Weimer
Sent: Tuesday, November 11, 2025 11:57 AM
To: Caitlyn Mars; Jason Reynolds
Subject: Fwd: Short Term Rentals in Skyline Fire District

FYI

Bryan D. Weimer, PWLF, Director
Public Works and Development Department

Arapahoe County
Public Works and Development Department
6924 South Lima Street
Centennial, Colorado 80112

Ph No: (720) 874-6500
Fax No: (720) 874-6611
e-mail: BWeimer@arapahoegov.com

Begin forwarded message:

From: Carrie Warren-Gully <CWarrenGully@arapahoegov.com>
Date: November 11, 2025 at 10:58:06 AM MST
To: Barry Teeters [REDACTED], Commissioners
<Commissioners@arapahoegov.com>, Ron Carl <RCarl@arapahoegov.com>, Bryan Weimer <BWeimer@arapahoegov.com>
Subject: Re: Short Term Rentals in Skyline Fire District

Good Morning Barry,

Nice to meet with you as well. Thank you for your thoughts and ideas. I have included my colleagues here, as well as our Public Works Director so they are all aware of your concerns.

We are working to address some of the concerns you and others have brought forward which may delay our implementation phase but we want to get this right.

Thanks,
Carrie



ARAPAHOE COUNTY

CARRIE WARREN-GULLY

Commissioner, District 1
5334 South Prince Street
Littleton, Colorado 80120
O: [303-795-4285](tel:303-795-4285)
Arapahoegov.com



ARAPAHOE COUNTY

DEI

I am committed to the journey

From: Barry Teeters [REDACTED]
Sent: Tuesday, November 4, 2025 11:30 AM
To: Carrie Warren-Gully <CWarrenGully@arapahoegov.com>; Glenys Trost <GTrost@arapahoegov.com>
Subject: Fw: Short Term Rentals in Skyline Fire District

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that lodging facilities must follow. This regulatory gap leads to less oversight and enforcement, resulting in host negligence or unawareness about guest safety requirements. The high turnover rate of guests unfamiliar with each property increases the likelihood of accidents. Incidents such as fatal fires without working alarms, child drownings in unprotected pools, and carbon monoxide poisoning highlight the severity of these risks.

Furthermore, liability concerns are significant for property owners, who can be held legally responsible for guest injuries under premises liability laws. Insufficient insurance coverage and lack of compliance with local safety regulations exacerbate financial vulnerabilities. Fire agencies are concerned about these issues because they impact public safety, legal accountability, and community welfare, often pressing for regulatory reforms, mandatory safety standards, and better enforcement to protect renters.

Key safety risks posed by short-term rentals include:

- Short-term occupants who are unfamiliar with the dwelling, its features, and the emergency response community.
- Fire hazards from missing or non-functioning smoke detectors and unsafe cooking or heating appliances.
- A constant goal of Fire Prevention is to reduce the potential of fires through proactive fire prevention techniques. Should a fire occur, good fire prevention practices will help to reduce the severity of the fire, and the threat posed to nearby homes.
- Carbon monoxide poisoning due to lack of detectors.
- Injury risks from slips, falls, and drowning in pools without proper safety measures.
- Unsafe egress in emergencies caused by locked or obstructed exits.
- Property damage from what could be considered transient occupants constantly changing in the dwelling that can also lead to hazardous conditions.
- Liability exposure for injuries and deaths, often leading to lawsuits and financial burdens on owners.

Because of these risks, fire agencies emphasize the need for safety audits, mandatory safety equipment, clear communication of safety rules to guests, compliance with local regulations, and adequate insurance coverage for hosts and platforms alike.

FIRE REQUIREMENTS:

Since Denver Fire Department provides fire and medical response to the Skyline community, their personnel should have confidence that the Short-term rental properties in Skyline meet the same standards as they do in Denver. Denver Fire has adopted short-term rental fire inspection requirements to include a minimum of:

1. One functional smoke detector per level and in or near each bedroom, carbon monoxide detectors on each level and near bedrooms, and accessible fire extinguishers.
2. The dwelling must also have clearly marked exit routes and post emergency contact information for guests.
3. All detectors and extinguishers must be in good working order.

4. Any applicable fire, building, zoning, and life safety systems require inspection by the Skyline Fire Marshal.

Required equipment:

- **Smoke detectors:** One on each level and within every bedroom.
- **Carbon monoxide (CO) detectors:** On each level and near any bedrooms. A CO detector is also required if there is a fuel-burning appliance (like a furnace, water heater, or fireplace) in or attached to a bedroom area.
- **Fire extinguishers:** At least one on each floor, with an accessible one in or near the kitchen.
- **Emergency exits:** Clearly marked, unobstructed, and in proper working order.
- **Emergency contacts:** A list of emergency contact information must be posted for guests.

Inspection and compliance:

- **Inspection:** Skyline Fire would require verification of life safety systems with a site inspection.
- **Fire Prevention inspection:** For new rental properties or installations of systems, the Skyline Fire Marshal must inspect and approve the systems.
- **Detector and extinguisher inspection:** All detectors must be current (smoke and CO detectors have a 10-year lifespan) and extinguishers must be functioning properly.
- **Qualified inspector:** All inspections must be completed by a fire inspector certified with the [International Code Council \(ICC\)](#).
- **License requirement:** A short-term rental permit is required, and a key part of the application is affirming the presence of these safety features.

EXAMPLE GUIDEBOOK:

Denver Fire Department provides a guidebook at the following web address that can be used as a reference.

<https://www.denvergov.org/files/assets/public/v/23/business-licensing/documents/residential-rental-program-checklist-guidebook.pdf>

For additional information please feel free to contact the Skyline Fire Marshal:

-Rick L Young

-Fire Marshal, Skyline Fire Protection

Rick L. Young

"You have succeeded in life when all you really want is only what you really need." -Vernon Howard

Caitlyn Mars

From: Carrie Warren-Gully
Sent: Tuesday, November 11, 2025 12:19 PM
To: Casey Christensen
Cc: Commissioners; Bryan Weimer; Ron Carl; Caitlyn Mars
Subject: Re: Feedback on Short-Term Rental Regulations

Good Morning Ms Christensen,

Thank you for sharing you thoughts with me regarding our work on short term rentals. We have had many people reach out to us both from community members and short term rental owners.

I have shared your email with my fellow Commissioners and the Director of Public Works for their consideration of your concerns.

Thank you,
Carrie



CARRIE WARREN-GULLY

Commissioner, District 1
5334 South Prince Street
Littleton, Colorado 80120
O: [303-795-4285](tel:303-795-4285)
Arapahoegov.com



From: Casey Christensen [REDACTED]@com>
Sent: Friday, November 7, 2025 2:13 PM
To: Carrie Warren-Gully <CWarrenGully@arapahoegov.com>
Subject: Feedback on Short-Term Rental Regulations

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Dear Commissioner Warren-Gully,
Thank you for taking the time to listen to residents and property owners as you consider how to move forward with short-term rental (STR) regulations. I appreciate the effort the County has put into this

process, and I believe we all share the same goal, to keep neighborhoods quiet, safe, and well-maintained. I want to share our feedback with you on the proposed regulations. We do support having regulations in place, but have issues with the primary residence rule and 500 foot buffer.

1. The primary-residence rule and 500-foot buffer don't solve noise, parking, or affordability

According to County data, there are roughly 250 STRs out of about 37,500 homes, less than 1% of the housing stock. At that scale, research from the University of Colorado and national studies (such as Barron et al., 2021) show that STRs have no measurable impact on home prices or rent levels. Restricting this small number of homes will not improve affordability—but it will limit property-owner flexibility and local tourism revenue.

The proposed primary-residence requirement and 500-foot separation rule also don't directly address the County's two main concerns, noise and parking:

- If the owner lives there, guest parking becomes limited because the owner's vehicles occupy the driveway or garage.
- If the owner rents the home while away, they aren't present when guests are there, so noise and parking issues can still occur.
- Most guests prefer entire homes, when booking on major platforms, travelers typically filter listings to only show "Entire home" options. Requiring STRs to be part of an occupied residence doesn't match real demand and would effectively eliminate the type of stay most visitors are looking for. I don't know if you have ever booked an STR through Airbnb or VRBO but if you have what would you look for, a home shared with the owner, or your own space for your group?
- Full-time hosts are often more proactive: we use noise monitors, maintain local response plans, and depend on positive reviews and neighbor satisfaction to succeed.

A better approach would be to regulate behavior, not ownership type, through a required Good Neighbor notice, a Local Responsible Agent reachable within 15 minutes, a clear parking plan, and clearly defined penalties for repeat offenders. These measures directly address the problems everyone agrees on.

2. Well-run STRs are a net positive for neighborhoods

Responsible STR owners are highly motivated to keep our homes and yards in top condition. Our success depends on cleanliness, curb appeal, and positive reviews, so we consistently invest in maintenance, landscaping, and improvements. A well-managed STR often enhances the look and value of a neighborhood far more than a long-term rental or vacant home would.

We carefully screen guests, use monitoring technology to prevent disturbances, and communicate regularly with nearby residents. We are also highly motivated to maintain a safe place for our guests to stay, having multiple fire extinguishers in the home, smoke and carbon monoxide detectors are just a few examples. In practice, a professionally managed STR adds accountability, reliability, and pride of ownership—not disruption.

3. Grandfather existing lawful STRs under non-conforming use protections

If the County proceeds with a primary-residence rule and separation limits, please grandfather existing lawful STRs under non-conforming use protections. Colorado law supports this principle: *Anderson v. Board of Adjustment* and *City of Greeley v. Ells* confirm that previously lawful uses may continue when regulations change. The Vested Property Rights Act also protects good-faith investment-backed expectations.

Without that protection, responsible operators face difficult financial realities. Selling would mean losing a significant portion of our investment, and the only alternative to make the property sustainable would be converting it into a sober-living group home, a far less desirable use for nearby residents, with more cars, higher occupancy, and less control over who lives there. None of us want that outcome; we simply want to continue operating a clean, well-run home that benefits the neighborhood.

We share the same goals—quiet, safe neighborhoods and fair, effective regulation. We just ask that the County focus on tools that actually reduce noise and parking issues, and protect those who have operated responsibly and in good faith under the current rules.

Thank you for your time and thoughtful consideration.

Regards,

Casey Christensen

Caitlyn Mars

From: Eun KIM [REDACTED] >
Sent: Wednesday, October 22, 2025 6:10 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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This message needs your attention

- Heads-up: Subject line may be misleading.

Mark Safe

Report

Powered by Mimecast

Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

I respectfully request that the County include residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully.

Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

Eun Kim

Unit [REDACTED], Boston Commons
[REDACTED]

From: [Steven McCrate](#)
To: [Caitlyn Mars](#)
Subject: I'm supporting less government
Date: Wednesday, April 22, 2026 7:34:06 AM

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Why must the County of Arapahoe feel the need to tell us how to rent our property. Let's leave our HOA to determine what's best for the community.

I've needed STR twice last year and both times booked in Arapahoe county for my parents to stay while visiting.

If you limit the amount of STR then you create unfair competition and price increases due to supply/demand.

Steven mccrate.
Littleton co 80123

Caitlyn Mars

From: Jason Reynolds
Sent: Wednesday, October 29, 2025 12:37 PM
To: Caitlyn Mars
Subject: FW: Prep for November 18 County Commissioners meeting
Attachments: short_term_rental_signed_rules_01.25.19.pdf; LDC23-001_Short-Term Rental Licensing Ordinance Draft_Primary Residence lcg rl 1.docx

Here's the feedback from Lynn!

From: Lynn Greene (NatureNet) <[REDACTED]>
Sent: Wednesday, October 29, 2025 12:36 PM
To: Jason Reynolds <JReynolds@arapahoegov.com>
Subject: Prep for November 18 County Commissioners meeting

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon, Jason

1. Denver's Short Term Rental (STR) ordinance [Art III, Sec 33-46 to 33-56] can be found here:

https://library.municode.com/co/denver/codes/code_of_ordinances?nodeId=TITIIREMUCO_CH33LO_ARTIIISHRMRE

Centennial also has a good ordinance. Both have lower occupancy than what Holly Hills STR owners are negotiating for. My red-line attached has an 8 person cap, like Centennial.

Denver's Rules aiding enforcement are attached, just FYI.

2. Local Responsible Agent (LRA)

*Overview: <https://creschool.com/do-property-managers-need-a-real-estate-license-in-colorado/>
<https://www.allpropertymanagement.com/resources/property-management-laws/colorado/>

My red-line, attached, takes out LRA references. There is a limited exception for full-time salaried employees who are on-site managers of apartments or condos, which I have not seen until researching this morning. Could apply to Boston Commons, but not to single family homes being used as a place of business.

Colorado real estate licensing law is already controlling without being in the new Ordinance. The general rule requiring a real estate license is applicable law in most cases. Since a County Ordinance cannot change the State law, you could omit that LRA language, not determining, in this Ordinance, who is a lawful LRA. Let it remain as a State issue to determine when someone is a lawful LRA.

3. What I mentioned about the discussion of the proposed Ordinance between certain Fire Board members I have been asked to omit, due to the fact it was informal conversation outside of a meeting or resolution of the Board. Glad I checked with my contact this morning.

4. We do want a good ordinance to pass quickly, which is why I red-lined the attached in an effort to help. We do not have an HOA, nor the protection of being a Town. Only our County's officials can protect us from the current problems we are having with the many STRs already in Holly Hills. The Planning Commission was worried about the buffer in the draft Ordinance hurting the previously unregulated existing STRs, so I also red-lined a simple grandfathering clause into my red-line attached. I think most of us are willing to compromise.

Thanks for speaking with me last night about the traffic concerns in Holly Hills.

We are excited to have our beautiful new school to help Holly Hills continue to be a haven for a stable population of families with kids, who care about great education.

Thank you for your attention to this matter.

Best regards,

Lynn Greene, attorney # 10204
303 596 4821



Lynn Greene, CEO/Manager
NatureNet Energy, LLC

Cell: [REDACTED]

www.naturenetenergy.com

From: Jason Reynolds <JReynolds@arapahogov.com>

Sent: Tuesday, October 28, 2025 8:47 PM

To: Lynn Greene (NatureNet) [REDACTED]

Subject: Email address

Here's my email!



Jason Reynolds AICP | he/him

Planning Division Manager

Department of Public Works and Development

6924 S. Lima St. | Centennial, CO 80112

O: 720-874-6664

Arapahoeco.gov

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Caitlyn Mars

From: Michelle Levy <[REDACTED]>
Sent: Tuesday, October 21, 2025 2:32 PM
To: Caitlyn Mars
Subject: Support for Legacy STR Protection – LDC23-001

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Dear Commissioners and Planning Staff,

I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals.

I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue.

I respectfully request that the County include residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully.

Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing.

Thank you for your consideration.

Sincerely,

[Michelle Levy]

Unit # [REDACTED], Boston Commons
[REDACTED]

From: [Bryan Weimer](#)
To: [Caitlyn Mars](#)
Subject: FW: Opposition to Proposed Short-Term Rental Regulations Under Land Development Code Amendment LDC23-001 – Representation of Cooper Property Group, LLC; Recommendation to Adopt City of Centennial Model
Date: Tuesday, November 4, 2025 12:52:30 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

FYI



Bryan D. Weimer, PWLF

Director

Department of Public Works & Development

6924 S. Lima St. | Centennial, CO 80112

O: 720-874-6500

Arapahoeco.gov

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From: Jeff Baker <JBaker@arapahoegov.com>

Sent: Tuesday, November 4, 2025 12:47 PM

To: Michelle Halstead <MHalstead@arapahoegov.com>; Bryan Weimer <BWeimer@arapahoegov.com>; Ron Carl <RCarl@arapahoegov.com>; John Christofferson <JChristofferson@arapahoegov.com>; Matt Hader <MHader@arapahoegov.com>; Jason Reynolds <JReynolds@arapahoegov.com>

Subject: FW: Opposition to Proposed Short-Term Rental Regulations Under Land Development Code Amendment LDC23-001 – Representation of Cooper Property Group, LLC; Recommendation to Adopt City of Centennial Model

FYI...

From: jeff denverlawfighters.com <[REDACTED]>

Sent: Tuesday, November 4, 2025 12:40 PM

To: Carrie Warren-Gully <CWarrenGully@arapahoegov.com>; Jeff Baker

<JBaker@arapahoegov.com>; Jessica Campbell <JCampbell@arapahoegov.com>; Leslie Summey <LSummey@arapahoegov.com>; Rhonda Fields <RFields2@arapahoegov.com>

Cc: hello@coloradostra.org

Subject: Opposition to Proposed Short-Term Rental Regulations Under Land Development Code Amendment LDC23-001 – Representation of Cooper Property Group, LLC; Recommendation to Adopt City of Centennial Model

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Dear Commissioners:

I write on behalf of my client, Cooper Property Group, LLC (CPG), a Colorado-based business owning and operating several short-term rental (“STR”) properties in unincorporated Arapahoe County. CPG has made substantial investments in these properties, procurement and renovation were targeted for STR use via platforms such as Airbnb and VRBO and based on the County’s existing Land Development Code, which has never explicitly prohibited STR operations in residential zones. Since 2020, those properties have generated millions of dollars in revenue supporting local tourism, property taxes, and neighborhood vitality, and have operated without any enforcement action.

As you consider final approval of the STR licensing program under LDC23-001, especially the variants limiting rentals to 180 days per year or restricting licensing to primary residents only, we urge you to reject those measures in their current form. Enactment would (i) decimate CPG’s business model (a projected 60-80% reduction in revenue), (ii) trigger foreclosure risk on leveraged properties with little or no equity cushion, and (iii) harm the County’s tax base and neighborhood stability. More critically, the proposals expose the County to serious legal risk, including claims under the Takings Clause, Due Process Clause, Dormant Commerce Clause, and Colorado’s prohibition on laws “retrospective in operation” (Colo. Const. art. II, § 11).

Restricting or banning short-term rentals (STRs) does not meaningfully expand affordable housing. The Commission’s main argument for regulation is that it helps affordable housing. According to one commissioned study in Colorado, STRs generated substantial visitor spending with only a minimal effect on housing supply, suggesting that limiting STRs would not free units for long-term, affordable housing. Moreover, Airbnb’s own policy commentary notes that across its 50 largest markets, entire-home STR listings accounted for only 0.5 % of housing stock and that harsh caps on STRs did *not* lead to lower housing costs and in some cases coincided with rents rising. Simply put: “token” regulations on STRs are unlikely to solve the housing-affordability crisis, which is driven by structural factors like insufficient new housing construction, rising materials and labor costs, and regulatory burdens, not primarily STR inventory. If affordable housing is the basis for this regulation, it is incumbent upon the Commission to do a study and know the actual facts, statistics and impacts of such regulations. Please provide any evidence you have that your

proposed regulations will substantially or marginally increase affordable housing inventory.

Link to the Airbnb Colorado STR Impact Study: [Airbnb | Colorado Short-Term Rental Impact Study \(2022\) Airbnb Newsroom](#)

Economic Consequences: A Counter-productive Blow to Local Investment

CPG's portfolio of multiple residential properties was financed with the expectation that STR income would service debt and sustain property upkeep. The proposed restrictions would render operations unviable, forcing distressed sales or foreclosures whose ripple effects include depressed property values, lower tax revenue, and increased risk of neighborhood blight. Rather than advancing the public welfare, such outcomes would undermine the County's fiscal stability and discourage future housing and tourism investment.

Legal Risks: Excessive Overreach and Constitutional Exposure

While the County enjoys broad authority under C.R.S. § 30-28-115 and the seminal zoning case *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365 (1926), those powers are not unlimited. Courts increasingly scrutinize STR regulations that retroactively affect established operations or discriminate against interstate commerce.

Retrospective Application and Impairment of Vested Rights

Colorado law prohibits a statute or ordinance that is retrospective in its operation (Colo. Const. art. II, § 11). Under the common-law and statutory vesting doctrines, rights may vest when landowners reasonably rely on government action and suffer detriment if that reliance is eliminated. See *Ficarra v. Dep't of Regul. Agencies*, 849 P.2d 6 (Colo. 1993) (discussing retrospective laws) and commentary recognizing that a vested property right may exist when a government approval is acted on in good faith. In CPG's case, years of compliant STR operations, reputation, and investment create a strong basis for reliance and expectation. Comparable precedent exists in Texas (e.g., *Village of Tiki Island v. Ronquille*, 463 S.W.3d 562 (Tex.App. 2015); *Zaatari v. City of Austin*, 615 S.W.3d 172 (Tex.App. 2019)), where courts enjoined STR bans that impaired long-standing uses.

Dormant Commerce Clause – Primary Residence Requirement

The variant of LDC23-001 that would limit STR licensing to primary residents raises serious Dormant Commerce Clause issues because it facially discriminates against out-of-state owners and investors. In *Hignell-Stark v. City of New Orleans*, 46 F.4th 317 (5th Cir. 2022), the Fifth Circuit held that a primary-residence requirement was discriminatory and invalid under the Dormant Commerce Clause because nondiscriminatory alternatives existed. The County's proposal would similarly burden interstate investment in Colorado's tourism economy and invite challenge.

Regulatory Takings and Substantive Due Process

A regulatory takings claim under the three-factor *Penn Cent. Trans. Co., v. N.Y.C.*,

438 U.S. 104 (1978) test remains in effect and if there is significant loss of revenue, investment-backed expectations, and broad nature of the ordinance may make the risk substantial. Moreover, depriving property owners of legitimate uses without a rational basis may support substantive due process or equal protection claims if operators are treated differently than comparable properties.

Recommendation: Adopt a Proven, Balanced Model

To achieve neighborhood goals without constitutional exposure, we respectfully recommend you adopt the STR regulatory framework successfully used by the City of Centennial: modest licensing fees, occupancy limits (e.g., two persons per bedroom, max eight), prompt local contact requirements, no rigid day-caps or mandatory primary-resident mandates, and enforcement focused on nuisance behaviors. Alternatively, exempt pre-2025 STR operators like CPG by grandfathering them for at least five years with renewal options.

In Summary:

1. Grandfather existing STR operators (pre-2025) like CPG.
2. Adopt a licensing/fee/occupancy regulatory structure (Centennial model) rather than rigid days-capped or primary-resident restrictions.
3. Defer final adoption of LDC23-001 until an economic impact analysis is completed and stakeholder consultation occurs.

CPG remains available to provide home-market revenue data, sample ordinance language, or to meet with staff and the Board for constructive dialogue. If the ordinance proceeds unchanged, CPG will be compelled to pursue declaratory and injunctive relief in Arapahoe County District Court (and federal court if necessary) to protect its property rights, but it prefers cooperation and a reasoned solution.

Thank you for your leadership in balancing community integrity with economic vitality. I look forward to your response and a constructive meeting.

Sincerely,

Jeff Corporon, Esq.
Corporon & Associates, LLC
Attorney at Law

[REDACTED]
Denver, Colorado 80222
[REDACTED]

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From: [Scott Thomas](#)
To: [STR Zoning](#)
Subject: Re: Fees
Date: Monday, April 20, 2026 11:20:24 AM
Attachments: [image001.png](#)

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Yes please add it.

Thanks,



On Mon, Apr 20, 2026 at 10:46 AM STR Zoning <STR@arapahoegov.com> wrote:

Good Morning Scott,

Thank you for reaching out with your question and for sharing your feedback. Would you like this email to be included in the record for the upcoming public hearing? If so, I can add it to the staff materials.

The draft ordinance and associated fees were developed using a combination of other jurisdictions' fee structures, along with the projected costs of establishing and maintaining this licensing program. The fees are set to ensure the program remains self-sustaining.

Thank you,

Caitlyn



Caitlyn Mars

Zoning & Weed Control Manager

Public Works & Development

6924 S Lima St. | Centennial, CO 80112

Weed Control: 720-874-6713 | Zoning: 720-874-6711

Direct Line: 720-874-6753 - (I may be able to respond quicker by email.)

I value and respect boundaries related to work-life balance and well-being, and I acknowledge that my work hours may not be your work hours. Please do not feel obliged to respond to this email outside of your normal working hours.

Please Note: Under the Colorado Open Records Act (CORA), messages sent by or to me on this Arapahoe County owned e-mail account may be subject to public disclosure.

From: Scott Thomas [REDACTED]

Sent: Monday, April 20, 2026 10:13 AM

To: STR Zoning <STR@arapahoegov.com>

Subject: Fees

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- Proposed fees include a \$200 application fee and a \$350 annual license fee.

How do you all feel these fees are reasonable? These fees are excessive.

Thanks,



From: [Carrie Warren-Gully](#)
To: [Sarah Cardenas](#)
Cc: [Caitlyn Mars](#); [Ceila Rethamel](#)
Subject: RE: Public Comment – Proposed Short-Term Rental Ordinance – Mile High Hosts
Date: Thursday, March 19, 2026 12:22:25 PM
Attachments: [image001.png](#)
[image002.png](#)

Thank you very much Sarah for your comments. I have received and shared with our Public Works Department for the record.

Carrie



CARRIE WARREN-GULLY

Commissioner, District 1
5334 South Prince Street
Littleton, Colorado 80120
O: [303-795-4285](tel:303-795-4285)
Arapahoegov.com



From: Sarah Cardenas [REDACTED]
Sent: Monday, March 16, 2026 2:27 PM
To: Carrie Warren-Gully <cwarrenGully@arapahoegov.com>
Subject: Public Comment – Proposed Short-Term Rental Ordinance – Mile High Hosts

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioner Warren-Gully,

On behalf of Mile High Hosts, which represents more than 900 short-term rental hosts throughout the Denver metro area, I am submitting the attached public comment regarding the proposed short-term rental ordinance for unincorporated Arapahoe County. I've also pasted it below the signature line.

Our members include local homeowners, small operators, and housing providers who care deeply about maintaining positive relationships with their neighbors while operating responsibly. We support

thoughtful policies that address nuisance behavior while preserving fair opportunities for responsible homeowners to participate in the legal short-term rental market.

We appreciate the County's work on this issue and hope the perspectives shared in the attached letter are helpful as you evaluate the ordinance.

Thank you for your time and consideration.

Sincerely,

Sarah Cardenas

On behalf of Mile High Hosts

Public Comment Letter – Arapahoe County STR Ordinance

Submitted by:

Sarah Cardenas

Mile High Hosts

Mile High Hosts represents more than 900 short-term rental hosts throughout the Denver metro area and appreciates the opportunity to provide feedback on the proposed short-term rental ordinance for unincorporated Arapahoe County.

Short-term rentals support the local economy by generating lodging and sales tax revenue while supporting a wide network of small businesses, including housekeepers, property managers, landscapers, maintenance providers, and local retailers. For many homeowners, including teachers, retirees, and healthcare workers, occasional rental income helps offset rising housing costs and allows them to remain in their communities.

We support thoughtful policies that protect neighborhood quality of life while allowing responsible homeowners to operate legally. However, several provisions in the proposed ordinance appear unusually restrictive compared with other Colorado jurisdictions and may significantly limit responsible participation without effectively addressing nuisance behavior.

Summary of Key Concerns

As currently drafted, several provisions could unintentionally restrict responsible homeowners while doing little to address nuisance activity. These provisions may significantly limit participation in the legal STR market while not directly targeting the behaviors most commonly associated with neighborhood complaints.

- A 100-license cap combined with a 500-foot separation requirement could drastically reduce eligible properties and create a permanent first-come, first-served licensing system.
- A primary residence requirement may exclude responsible part-time residents and second-home owners who rely on occasional rentals to offset housing costs.
- Prohibiting short-term rentals in accessory dwelling units (ADUs) removes a flexible housing option even where properties can safely accommodate guests.

- Operational requirements, including strict response standards and renewal timelines, may create unnecessary administrative burdens for responsible operators.

We encourage the County to focus regulations on nuisance behavior while maintaining fair opportunities for responsible homeowners.

Key Issues

Primary Residence Requirement

Restricting licenses to primary residences eliminates responsible second-home and part-time residents who rely on short-term rentals to offset ownership costs.

License Cap and Separation Requirements

A cap of 100 licenses combined with a 500-foot separation requirement could drastically limit eligible properties and create a first-come, first-served system that permanently excludes neighboring homeowners. Similar spacing rules in other jurisdictions have proven difficult to administer and often lead to disputes between neighbors.

Restrictions on Property Types and ADUs

Prohibiting short-term rentals in accessory dwelling units removes a valuable option for homeowners, particularly in rural or semi-rural areas where secondary structures may be well suited to accommodate guests.

Ownership and Licensing Structure

Limiting licenses only to individual property owners may unintentionally restrict legitimate operators who use common ownership structures such as LLCs for liability protection and property management.

Operational and Administrative Requirements

Certain provisions exceed typical residential expectations, including a 15-minute response requirement for complaints and strict renewal timelines that could result in the loss of a license due to administrative oversight.

Constructive Alternatives

To support both neighborhood protections and responsible hosting, we encourage the County to consider:

- Focusing enforcement on nuisance behavior such as noise, parking, and occupancy violations rather than limiting supply through caps or separation requirements
- Adopting practical response standards that are achievable for responsible operators
- Allowing a broader range of licensed property types with appropriate safety and occupancy standards
- Permitting ADUs where properties can safely accommodate guests
- Maintaining reasonable licensing costs and administrative requirements

Most short-term rental hosts in our community are local homeowners who care deeply about maintaining positive relationships with their neighbors and operating responsibly.

As the ordinance moves toward first reading, Mile High Hosts welcomes the opportunity to provide additional input from local hosts and collaborate with county staff and elected officials as the County evaluates its approach to short-term rental regulation.

Thank you for your consideration.

Sincerely,

Sarah Cardenas

On behalf of Mile High Hosts

[REDACTED]

[REDACTED]

From: [Carrie Warren-Gully](#)
To: [Sarie Christensen](#)
Cc: [Commissioners](#); [Bryan Weimer](#); [Ron Carl](#); [Caitlyn Mars](#)
Subject: RE: Supporting STR Regulations & Requesting Grandfathering Existing STRs
Date: Tuesday, November 18, 2025 5:07:58 PM
Attachments: [image001.png](#)
[image002.png](#)

Hi Sarie,

Thank you for your time meeting the other day and sharing your insights. I am forwarding your comments to our Public Works department, legal team and my fellow County Commissioners.

Have a wonderful thanksgiving season,
Carrie



CARRIE WARREN-GULLY

Commissioner, District 1
5334 South Prince Street
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O: [303-795-4285](tel:303-795-4285)
Arapahoegov.com



From: Sarie Christensen [REDACTED]
Sent: Monday, November 17, 2025 1:25 PM
To: Carrie Warren-Gully <CWarrenGully@arapahoegov.com>
Subject: Supporting STR Regulations & Requesting Grandfathering Existing STRs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioner Warren-Gully,

Thank you again for meeting with me and my husband the other day. I put my thoughts down on "paper" and am sending this email to all the country commissioners. I understand the meeting

on the 9th of December to vote on the proposed regulations has been postponed. I'm sure your communication and insights helped to show the need to revisit some of the items. THANK YOU!
:) We look forward to hearing from the county soon.

Dear Commissioner,

I hope this email finds you well. My husband and I own a home in the Holly Hills area that we operate as a short-term rental. I am reaching out to you with respect for the work you, your colleagues, and the County are doing to introduce and enact STR regulations. We understand how complex these decisions are. We appreciate the effort to create thoughtful and effective rules and regulations that hold bad actors accountable and protect neighborhoods.

We fully support the regulations that have been presented. We currently operate our home responsibly and in line with the standards now being discussed. We are available within minutes and have a designated local contact to address issues. (We have never needed to use them) We maintain clear communication with our neighbors. While we share a fence with only one neighbor, several neighbors have our contact info, and they know they can reach us with any concern. We monitor noise proactively and enforce quiet hours. We acted immediately when we were notified of an issue. We have ample on-site parking, follow sanitation capacity limits, and have made significant safety upgrades including multiple fire extinguishers, maintained smoke alarms, trimmed overgrown trees and bushes, and removed any potential fire hazards.

We feel very strongly that the good neighbor initiative is an important component of the regulations. We have worked hard to build positive relationships with the families around us. We introduced ourselves early, exchanged contact information, and have tried to be helpful whenever possible by sharing contractor referrals for yard care, A/C service and more. I have included our closest neighbor in our snow-removal service to say thank you for letting me know when the water and the electricity have gone out and for various other things. We commissioned a neighbor, an emerging local artist, to create a Denver fall landscape that will be hanging in the home soon. Our neighbors have truly been wonderful, and we have made a real effort to be good stewards of both our home and the neighborhood.

The two elements of the proposed regulations we cannot meet are the primary residence requirement and the 500ft spacing rule. For this reason, we sincerely and respectfully ask that you consider grandfathering existing, well-run STRs like ours. Being allowed to continue operating would mean more to us than we can express. We would gladly comply with licensing fees and all other requirements moving forward.

Unincorporated Arapahoe County has roughly 37,000 homes and an estimated 250 STRs—less

than 1% of the housing supply. Our home is not an entry-level or affordable-housing unit. Removing it from the STR inventory would not meaningfully impact housing availability. However, losing the ability to operate it as an STR would be a significant financial hardship for us. We would not be able to convert it to a long-term rental. We would lose the ability to maintain the same standards of safety, cleanliness, curb appeal and oversight that frequent turnover and guest communication allows.

We would very much appreciate the opportunity to continue providing a comfortable and safe space for visiting families, DU parents, groups attending weddings, people traveling for medical reasons, locals gathering for holidays, and employees connecting on work trips. Our home has become a meaningful place for many different people and situations. We have worked very hard to be in the top 5% of homes in the Dever area on Airbnb, and we hope to continue contributing positively to the local community and economy.

Thank you for your time and thoughtful consideration as you have the difficult responsibility of shaping these regulations. We know these decisions are complex and appreciate all your effort. If you allow us the opportunity to continue to operate responsibly by being grandfathered in, we would be deeply grateful for your consideration. Thank you again for all you do.

Sarie Christensen