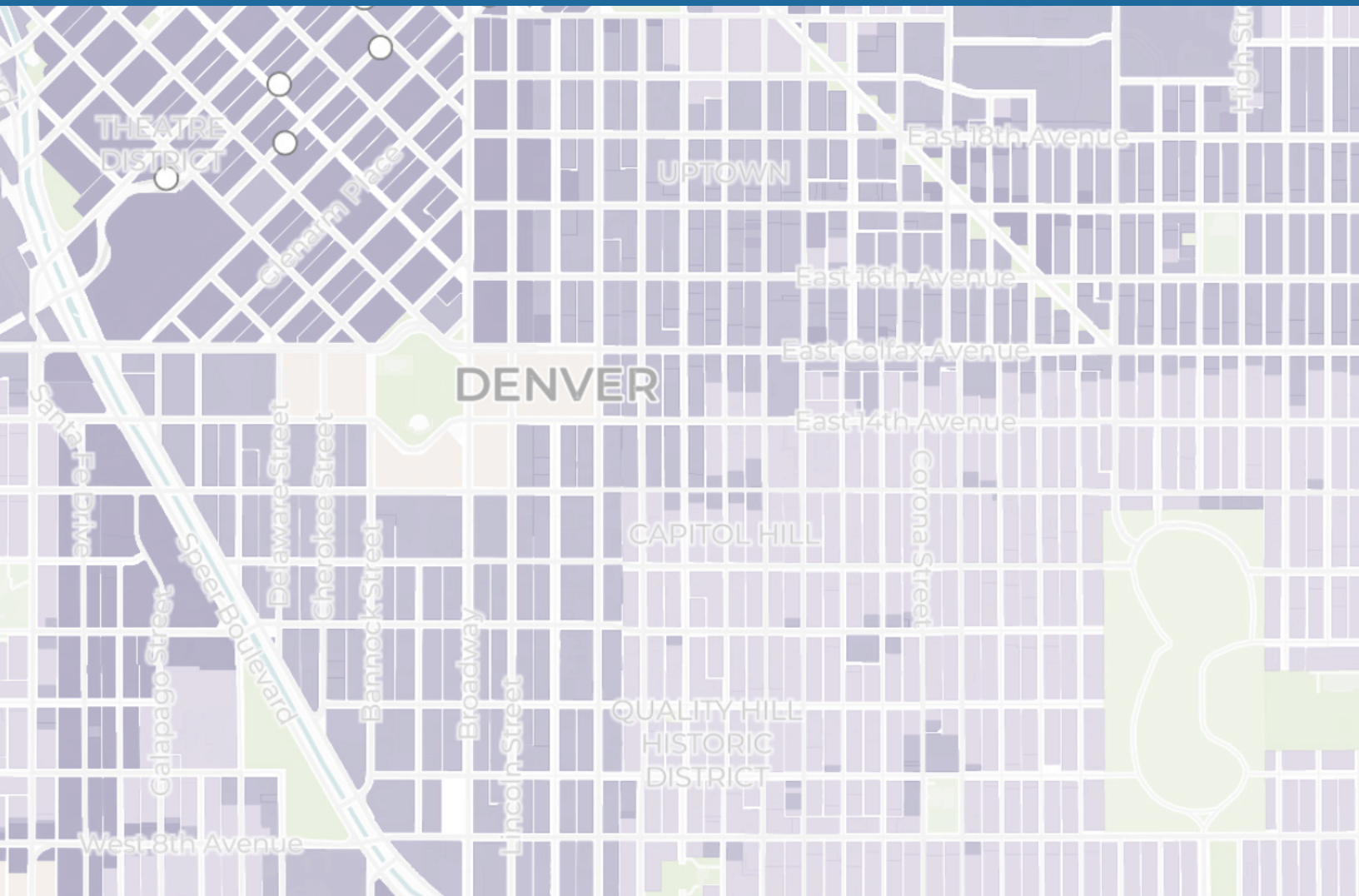


# ZONING REPORT: Colorado

JUNE 2025

by: Sara C. Bronin, Scott Markley, Matthew Harris, Diana Drogaris



# ZONING REPORT: Colorado

## Contents

Statement on Research Approach .....	2
I. Executive Summary.....	3
II. Colorado’s Housing Affordability Gap — and Zoning’s Role in Closing It.....	5
III. How We Analyzed Zoning in Colorado .....	8
IV. How Colorado Zones .....	12
V. How Different Places Within Colorado Zone .....	21
VI. Policy Opportunities .....	32
Appendix A .....	36
Appendix B .....	38
Appendix C .....	39
About the Authors and Acknowledgements .....	40

© Land Use Atlas, Inc., 2025. Permission is granted for reproduction of this file, with attribution to “The National Zoning Atlas, a project of Land Use Atlas, Inc., online at [www.zoningatlas.org](http://www.zoningatlas.org).”

*Cover image:* National Zoning Atlas: Denver, Colorado. Available at [www.zoningatlas.org/atlas](http://www.zoningatlas.org/atlas). *Photos in this report:* Credit Sara C. Bronin.

*Note:* This report was published in June 2025 and updated in July 2025 to incorporate updated statistics for several jurisdictions. The changes are minor, except for changes to the characterization of Aurora, which was erroneously said to require hearings for all multi-family housing and to require two-acre minimum lot sizes for a significant portion of its single-family land.



Founded in 2023, Land Use Atlas, Inc. is a 501(c)(3) nonprofit organization that aims to illuminate critical information about the land use regulations that shape our lives. One of its major projects, the National Zoning Atlas, aims to digitize, demystify, and democratize information about zoning in the United States — empowering advocates, revealing insights, and driving research.

---

## STATEMENT ON RESEARCH APPROACH

Our team seeks to uphold the highest standards of integrity and professionalism in collecting and analyzing data, evaluating and citing outside scholarship, collaborating with third parties, and making recommendations. We do not use artificial intelligence in any part of our work.

Our team members are empowered to make reasoned judgments and insights about the evidence they collect, obtain, or generate — free from the influence of funders, who as a matter of policy are not invited to determine research findings, insights, or recommendations. Accordingly, the views expressed herein are those of the authors and should not be attributed to Land Use Atlas, Inc. or its funders.

# ZONING REPORT: Colorado

---

## I. Executive Summary

Colorado is rapidly growing and transforming. Since 2020, more than 180,000 new residents have decided to call the state home. While housing construction has kept pace with this influx, home types and geographic distribution have not met the changing needs of Colorado’s diverse households. Indeed, housing is being offered at a cost that many Coloradans cannot afford and located in places that are far from jobs and other opportunities. As a result, the state grapples with a housing affordability gap. **Part II** of this report begins with a brief assessment of Colorado’s housing affordability gap and then identifies how zoning might play a role in closing it.

To better understand zoning’s impacts on affordability, Housing Colorado asked the National Zoning Atlas (NZA) to conduct a comprehensive analysis of zoning conditions across all 334 jurisdictions (i.e., counties, cities, and towns) statewide. **Part III** explains the NZA methodology for analyzing and digitizing zoning codes and identifies special issues in Colorado. Our methodology enables collection of zoning data at an unprecedented scale, unlocking our ability to increase public understanding of zoning through reports like this one.

### A. Key Statewide Findings

As **Part IV** details, the NZA reveals five key findings about zoning conditions across the state of Colorado.

#### » Finding #1: Most Colorado jurisdictions have zoning.

Four out of five Colorado jurisdictions — 275 of the 334 jurisdictions that *could* exercise zoning — have adopted a zoning code. This is a higher rate of zoning adoption than in Montana, New Mexico, South Carolina, and Vermont, but lower rate of regulation than Arizona, Idaho, Nevada, and many East Coast states.

#### » Finding #2: Land is predominantly zoned for single-family housing.

Zoning in Colorado overwhelmingly allows single-family housing “as of right,” meaning it can be approved without the property owner having to go through a public hearing or other onerous requirements. In fact, 92% of residential land allows single-family housing as of right. Most residential land (59% of the total) allows only single-family housing and no other type of housing.

People who want to build, or live in, multi-family housing are out of luck in most of Colorado. Just 3% of residential land allows housing with more than four units as of right. One in five jurisdictions with zoning codes do not allow any four-or-more-family housing by right at all.

### » Finding #3: Minimum lot size mandates are widespread and excessive.

A minimum lot size requires housing to sit on a certain acreage of land. Colorado jurisdictions impose the largest lot size mandates of any of the ten states the NZA has analyzed. Over 93% of land allowing single-family housing requires lot sizes of at least one acre. Over 86% of such land requires at least two acres.

These requirements not only make housing scarcer (because land is finite); they also make environmentally destructive sprawl — low-density development that requires people to drive — inevitable.

### » Finding #4: Parking mandates exist on 85% of residential land.

Parking mandates — which require a property owner to build a specific amount of parking for each residential unit constructed — are nearly universal in Colorado. Parking mandates limit the amount of land on a parcel that may be devoted to housing, and drive up the cost of housing.

### » Finding #5: Accessory dwellings are often banned or very difficult to build.

Accessory dwelling units (also called accessory apartments, granny flats, or ADUs) are often impossible or difficult to build. Most land allowing single-family housing (54% of the total) does not allow ADUs to be located by right or without occupancy restrictions. And a full 37% of land allowing single-family housing ban accessory dwelling units altogether. A recent Colorado statute requiring some jurisdictions to take a more welcoming approach to accessory dwelling units is starting to be implemented.

## B. Findings About Different Places in Colorado

Understanding statewide trends is important, but so is understanding how different places within Colorado zone. **Part V** offers three comparative analyses: first, across urban, suburban, small town, and rural areas throughout the state; second, across Denver and five of its suburbs; and third, across seven selected “principal cities” (i.e., cities that anchor their metropolitan areas).

Relevant findings include:

- Urban cores and small towns allow more housing type choices than suburbs and rural areas.
- Land in the Denver metropolitan area and in seven selected principal cities is predominantly zoned for single-family housing.
- Two-acre zoning exists even in the Denver metropolitan area and several principal cities.
- There is wide variation in permissions for accessory dwelling units across studied communities.

Taking all of these findings into account, **Part VI** concludes with actionable recommendations to support zoning reforms that create more accessible and affordable housing in Colorado.

## II. Colorado's Housing Affordability Gap — and Zoning's Role in Closing It

---

Across the nation, the pressures of housing affordability are well-known and growing more urgent. These pressures exist in Colorado, where a gap between the supply and demand for affordable housing persists. Zoning can heavily influence the prices, locations, types, and availability of housing. This Part explains the links between affordability and zoning.

### A. Colorado's Housing Affordability Gap

Over the past decade, housing costs have doubled in Colorado, pressing the finances of families throughout the state. According to the American Community Survey, Colorado had the fifth highest home prices and third highest rents of any state in the nation in 2023.<sup>1</sup>

These housing costs must be considered in light of people's ability to actually pay them. The widely accepted rule of thumb is that a person or household can afford to spend up to 30% of their income on housing — and anything more than that is considered unaffordable to them. Those who spend more than 30% of their incomes on housing are generally deemed “cost burdened.”

Of the 50 states, Colorado has the:

- » 5th-highest home prices
- » 3rd-highest rents

In Colorado, over 420,000 renter households (of about 800,000) across the state are cost burdened.<sup>2</sup> To afford the median rent of \$1,771, households must earn over \$70,000 per year. However, the median renting household only brings in about \$63,000 per year.

For low-income families, the gap is especially severe. The National Low Income Housing Coalition (NLIHC) estimates that Colorado is short more than 175,000 affordable units for households earning less than 50% of the area median income (around \$75,000).<sup>3</sup> These households are more likely to live in multi-family housing, and they tend to be homerenters, not homeowners. A full 87% of these low-income homerenters are considered cost burdened, according to the NLIHC.

In other words, over 175,000 working families — and the vast majority of homerenters — simply cannot find housing within their means.

The impact of this burden goes beyond individual households. According to the Colorado Futures Center, housing burdens cost the state economy an estimated \$5.6 billion in foregone spending.<sup>4</sup> It's no surprise

---

1. U.S. Census Bureau, Selected Housing Characteristics, 2023 American Community Survey 1-Year Estimates (2023).

2. U.S. Census Bureau, Table B25070: Gross Rent as a Percentage of Household Income in the Past 12 Months, 2023 American Community Survey 1-Year Estimates (2023).

3. National Low Income Housing Coalition, The Gap: A Shortage of Affordable Homes (2025).

4. Colorado Futures Center, Housing Affordability Update (2023).





Image: Shops, housing, and accessory dwelling units in Aspen, Colorado. The National Zoning Atlas shows 71% of land in Aspen allows accessory dwelling units as of right.

that the State of Colorado’s housing division has identified as key goals increasing the supply of affordable housing, preserving existing affordable housing, and improving affordability.<sup>5</sup>

Why is housing so unaffordable? Many factors — market conditions, financing rates, developer preferences, tariffs on crucial building supplies — contribute to costs. But one key contributor to cost is totally within the control of local communities: **zoning**.

Where adopted, zoning determines whether affordable housing, including multi-family housing, can be built at all. Zoning says where and how it can be built. And it influences how long it takes to build such housing. Zoning can make housing more expensive by requiring lots and units to be larger, while it can make housing more affordable by encouraging denser development. We turn next to how zoning does all of this.

## B. How Zoning Works

To understand how zoning might address affordability issues, it is important to understand how zoning works. And that starts with understanding the relationship between the state and local governments.

5. Colorado Department of Local Affairs Division of Housing, Annual Action Plan (2024).

The Colorado legislature granted its cities, towns, and counties the authority to enact zoning codes. Local jurisdictions that exercise this authority and adopt a zoning code do so by creating a map that shows where each “zoning district” or “zone” is located, along with a corresponding ordinance that explains how development can occur in each district.

Once adopted, these local codes guide growth within the jurisdiction. They do this through substantive rules that govern uses, lots, and structures, and through procedural requirements for each application.

## » Regulations on Uses

Zoning codes divide land into specific districts and determine which types of uses are permitted within each one — residential, commercial, industrial, open space, and others. While most zoned land is designated for residential use, some districts (like many industrial or open space districts) prohibit housing. Although separating certain uses can prevent obvious conflicts — no one wants to live next to a cement factory — zoning codes can take this separation too far. The typical American zoning code prohibits retail shops, restaurants, and offices from locating in the same areas as residences. That means more people have to get in their cars to drive to the places they need.

Within residential districts, zoning codes specify the number of housing units that may be built on a lot or within a designated area. Zoning codes limit development on most residential land to single-family homes. Other residential land may additionally, or instead, allow for duplexes, triplexes, or apartments.

Zoning can also specify whether the owner of a single-family home may build accessory dwelling units (ADUs), which are smaller units, typically in backyard cottages, converted basements, or former garages.

## » Regulations on Lots

Just as zoning codes regulate uses, they also regulate the development of lots. The most common tool for regulating lots is the minimum lot size mandate, which determines how much land must accompany each housing unit. Some jurisdictions require a half-acre, acre, or even two acres or more for a single-family home. For reference, two acres is significantly larger than a football field. Because land is finite, large-lot zoning reduces the number of homes that can be built within a jurisdiction, inflating land and infrastructure costs, and increasing household transportation costs.

In addition to lot sizes, zoning may require expansive front or side yard setbacks, wide streets, and multiple parking spaces per unit. They might also limit the amount of land a home can occupy through a lot-coverage cap. These regulations push development outward, increasing costs, and contributing to sprawl, making it difficult to build compact, affordable housing in areas with existing infrastructure.

## » Regulations on Buildings

Beyond use and lot regulations, zoning codes can set detailed dimensional standards that regulate the size, shape, and structure of buildings. Regulations often include height limits (measured in feet or stories), floor-to-area ratios (which limit a building size relative to its lot size), and minimum unit sizes (measured in square footage per unit). Some codes even limit the number of bedrooms per unit or units per building.



Zoning rules related to building construction may make sense for environmental reasons, or to ensure compatibility with historic places. But unnecessary constraints can make affordable housing infeasible.

## » Procedural Requirements

While zoning regulations may appear to support diverse housing options, additional administrative requirements — such as lengthy permitting processes, discretionary approvals, and neighborhood board referrals — often complicate development.

A common provision in zoning codes, particularly for multi-family housing, is the requirement that a developer present a proposal at a public hearing: a meeting open to the public where community members may provide comments on a proposed zoning change or zoning application. These hearings, often time-intensive and costly, can limit viable projects or deter development altogether.

## C. Zoning, Housing Choice, and Affordability

These standard zoning provisions — regulations on uses, lots, and structures, along with procedural requirements — influence where and how housing can be built. Where the regulations are too onerous, they can be barriers to housing choice and affordability.

Indeed, the most common type of zoning district nationally and, as we will discuss, in Colorado — districts that allow single-family housing only, on large-lots — has been identified in recent years as dampening the supply of affordable housing options and driving up costs. As this common type of district only allows one type of especially expensive housing, it by definition limits more affordable housing options. Because it requires large lots, it limits the number of units that can be built (making land more expensive) and contributes to sprawl.

In some places, state and local policymakers have begun to reconsider this type of zoning — and reform outdated zoning practices to better meet today's housing needs.

# III. How We Analyzed Zoning in Colorado

---

It is within this context that the National Zoning Atlas (NZA) team was asked to investigate zoning conditions across the state. This Part describes who we are and what we do, and outlines our unique methodology for analyzing zoning codes. It also offers some important information about our work in Colorado.

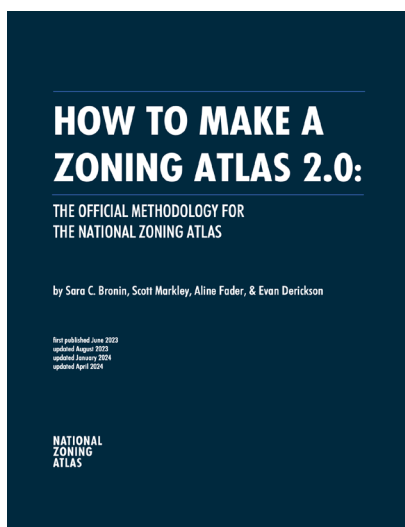
## A. Who We Are and What We Do

The NZA team helps people understand zoning. Important information about zoning is not readily available to the public. Because codes are maintained locally, in a decentralized manner, they are hard to collect and comprehend at scale. When codes are obtained, they are often difficult to understand. The jargon and technical terms can be indecipherable to a layperson, and zoning maps (with their dizzying array of colors) vary significantly from one place to the next, making comparisons difficult.

We use expertise and experience to translate particular regulatory requirements and show the results in an online map ([www.zoningatlas.org/atlas](http://www.zoningatlas.org/atlas)) and reports like this one. So far, our team has read over 800,000 pages of zoning codes nationally. We have completed analysis for nearly seven thousand jurisdictions.

## B. Our Methodology

A fuller description of our methodology is available at [www.zoningatlas.org/how](http://www.zoningatlas.org/how) and our “How to Make a Zoning Atlas 2.0” guide, but we provide a brief summary here.



First, NZA team members located zoning texts and maps for the 275 independent jurisdictions with zoning in Colorado. The texts added up to 53,665 pages, an average of 195 pages per jurisdiction. This figure exceeds the national average of 182 pages per jurisdiction. If the number of pages of a zoning code correlates, at least somewhat, with regulatory complexity, it is possible that Colorado’s zoning codes are more complex than those in other parts of the country.

Next, analysts read every line of the codes and extracted key information about specific zoning districts. They focused on the ways that these districts treated housing. Analysts classified each district based on whether they allowed mostly residential uses (“Primarily Residential”), mixed uses (“Mixed with Residential”), or no residential uses (“Nonresidential”).

Analysts then logged whether the zoning code allowed single-family housing, multi-family housing, and accessory dwelling units. They tracked whether building these housing

types required a public hearing, or merely staff review. NZA analysts also tracked several development regulations, such as requirements that housing be located on a lot of a minimum size or that housing come with parking.

In tandem with the textual analysis, geospatial analysts reviewed all available zoning maps for the 275 jurisdictions with zoning. They cleaned or digitized these maps to enable their integration into the online atlas and to ensure that calculations about zoned land could be made. They divided up land into zoning districts that matched the districts reviewed by the analysts who had read the text. They also “punched out” protected lands, Tribal lands, and rights of way to ensure consistency across jurisdictions. To identify these lands, analysts incorporated geospatial layers provided by the federal government (the U.S. Census Bureau and the U.S. Geological Survey).

**FIGURE A:** Key NZA Land Types in Cortez and Neighboring Jurisdictions.

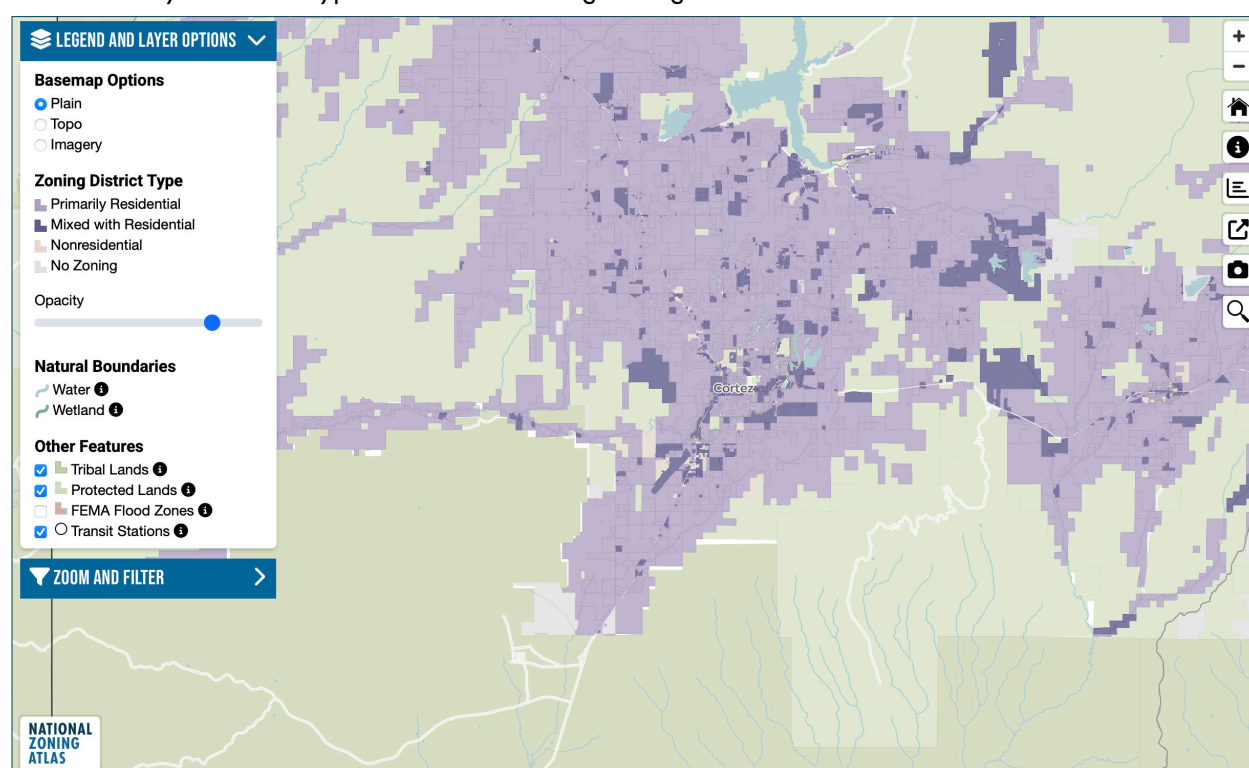


Figure A illustrates how some of this information appears on the online NZA. The “Zoning District Type” legend covers the four classifications for all land that is *eligible* to be zoned. The medium purple that dominates this image shows land zoned as *Primarily Residential*. The darker purple shows *Mixed with Residential* land where both residential uses and other uses (such as offices, shops, or medical facilities) are allowed. The tan color stands for *Nonresidential* land, where housing is not allowed (as a principal use). Finally, the light gray areas show land within the county (Montezuma County) which the county declined to zone.

The “Other Features” legend identifies two features relevant to our discussion in **Part IV**. Protected lands, shown in light green, encircle Cortez and are not counted as zoned land, because they cannot be subject-

ed to local zoning. Tribal lands, shown in beige-green on the bottom part of the image, also sit outside of zoning’s authority. Note that the Transit Stations feature is selected on this map, but the geographic area pictured does not appear to have transit stations as we have defined it here (including fixed stations, like light rail lines or bus rapid transit stops).

All in all, the NZA logged the regulatory characteristics of 4,139 zoning districts in Colorado. For each zoning district, the team collected up to two hundred different data points. Much of the collected information appears on NZA’s online map, including:

- » **Regulations on uses:**
  - Principal housing units (1-family, 2-family, 3-family, 4+-family)
  - Accessory dwelling units (including occupancy restrictions)
  - Planned residential developments
  - Elderly and affordable housing
  - Nonresidential uses (e.g., commercial, industrial)
- » **Regulations on lots:**
  - Minimum lot sizes
  - Minimum parking requirements
  - Requirements that a lot be connected to a sewer, water, or transit system
- » **Regulations on buildings:**
  - Height caps
  - Accessory dwelling unit locations
- » **Procedural requirements**

Additional summary statistics, called Zoning Snapshots, are available at [www.zoningatlas.org/snapshots](http://www.zoningatlas.org/snapshots), and the methods we use to create those (and many of the figures in this report) are explained at [www.zoningatlas.org/snapshots-methods](http://www.zoningatlas.org/snapshots-methods). For now, these statistics sum up the scope of our work:



## C. Notes on Data Timing and Completeness

The NZA team began analyzing zoning in Colorado in April 2024 and completed analysis for Colorado in April 2025. The analysis was conducted on a rolling basis. Analysts first reviewed cities and towns in larger metropolitan areas, and later reviewed rural jurisdictions. With that in mind, we offer several observations about the way the timing of our data collection, and the accessibility of codes in rural areas, may affect the contents of this report.

The rolling nature and year-long duration of our data collection efforts means that some jurisdictions may have amended their zoning code in between our analysis of their zoning regulations and the date this report was published. We are hopeful this will not be a significant issue for the majority of Colorado jurisdictions. That's because when we collected the data, we learned that many codes have not been amended at all, and most not significantly amended, in the last decade.

Still, some jurisdictions have likely amended their zoning text or zoning map (or both) for a variety of reasons. Denver, for example, recently underwent a major code update. Because Denver is the state's largest city, we made a special effort to update our files to reflect these changes. However, we did not perform a comprehensive update for all jurisdictions.

We want to expressly acknowledge that we have not systematically documented changes made by jurisdictions subject to several 2024 state laws. House Bill 24-1304 requires 49 jurisdictions to eliminate minimum parking requirements for certain multi-family developments. House Bill 24-1152 requires 67 jurisdictions to update their zoning code to more easily permit accessory dwelling units (and not require owner occupancy or mandate additional parking). And House Bill 24-1313 requires 32 jurisdictions to rezone areas around transit stations to allow more multi-family homes to increase density. We invite local planners to inform us of any updates, so that we may include them in our database and map.

We also have an important note about the completeness of our data. Of the 275 jurisdictions with zoning, 16 jurisdictions have been confirmed to have zoning but do not make their zoning codes available to the public. Nor have they provided a copy of their zoning text or zoning map (or both) to the NZA, after repeated requests. Thus, information about their regulations has not been included in our database, our map, or this report, and their acreage is excluded from our calculations of zoned land. These jurisdictions include:

Antonito	Conejos County	Logan County	Saguache County
Cheraw	Flagler	Manzanola	San Luis
Cheyenne County	Holyoke	Merino	Sedgwick
Cheyenne Wells	Kiowa County	Rockvale	Swink

These jurisdictions are all relatively lightly populated, with an average population of 1,366 (compared to the other jurisdictions with zoning, which average 22,218 people). These jurisdictions are also predominantly located in rural areas and have large land masses (394,532 acres each, on average — twice that of the other jurisdictions with zoning). All but Holyoke, Logan County, Merino, and Sedgwick are south of Denver.

Even accounting for the jurisdictions' small populations and likely shortfall in staffing, the lack of public access to zoning codes is worthy of concern. Property owners deserve to know, and have access to, the rules to which they will be held accountable. We invite anyone with information about zoning in these jurisdictions to contact us, and we will gladly add them to our database and map.

## IV. How Colorado Zones

As we dove deep into Colorado's zoning, a clearer picture began to emerge. In this Part, we identify and explain our five key findings about statewide zoning conditions:

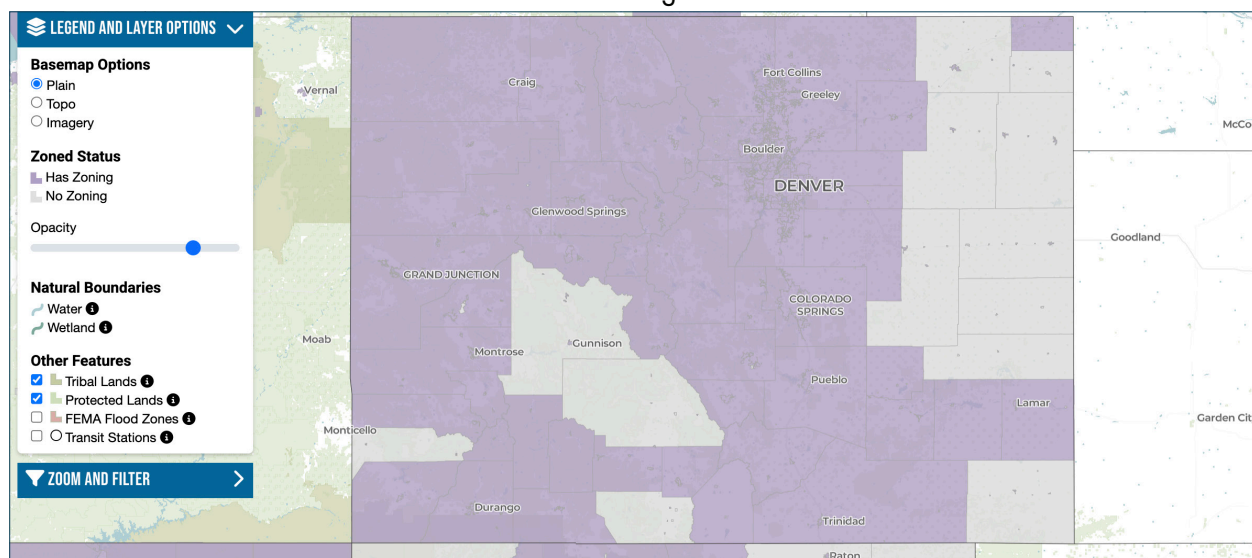
- » Finding #1: Most Colorado jurisdictions have zoning.
- » Finding #2: Land is predominantly zoned for single-family housing.
- » Finding #3: Minimum lot size mandates are widespread and excessive.
- » Finding #4: Parking mandates exist on 85% of residential land.
- » Finding #5: Accessory dwellings are often banned or very difficult to build.

### Finding #1: Most Colorado jurisdictions have zoning.

- 82% of jurisdictions have adopted zoning ordinances.
- Zoning covers 99% of Colorado's population and 99% of housing units.
- 40% of land is protected federal or state land not subject to zoning.
- 15% of land is intentionally unzoned.

Our statewide analysis of 334 zoning jurisdictions in Colorado found that 275 (82%) have adopted zoning ordinances. Figure B shows the locations of jurisdictions with zoning in purple. Jurisdictions without zoning appear in gray and cluster along the Nebraska-Kansas border and in the southern part of the state.

**FIGURE B:** Colorado Jurisdictions With and Without Zoning.





**Appendix A** offers a list of jurisdictions with zoning. They cover 99% of Colorado’s population (over 5.7 million people) and 99% of its housing (over 2.5 million units). This rate of zoning adoption places Colorado near the middle of the pack among states for which the NZA has data. For example, in nearby New Mexico, only 55% of jurisdictions have zoning, while in Nevada and Arizona, over 90% do.

Though most jurisdictions exercise zoning, zoned land constitutes just 41% of Colorado’s 66 million acres. Figure C explains why the amount of zoned land seems relatively limited: 59% of Colorado’s land is either unzoneable or currently unzoned.

**FIGURE C:** Zoned, Unzoneable, and Unzoned Land in Colorado.

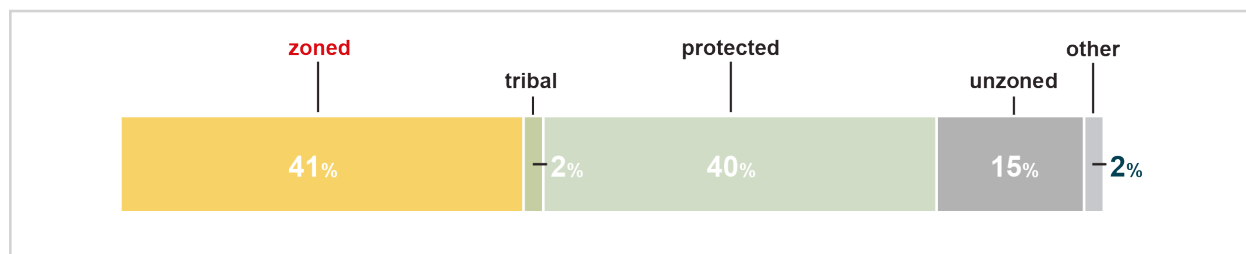


Figure C shows that 40% of Colorado’s land cannot be subjected to local zoning because it is protected federal or state land. Much of this land includes national parks — such as Black Canyon, Great Sand Dunes, Mesa Verde, Rocky Mountain National Parks — as well as state parks, forests, and campgrounds. These areas are largely undeveloped, and unlikely to be home to many full-time residents.

Additionally, Figure C shows that 15% of land is unzoned: it could be subject to zoning but is not. Most of that unzoned land is land contained within the 59 jurisdictions, listed in **Appendix B**, which have declined to exercise their authority to enact zoning. These unzoned jurisdictions cover a seemingly large amount of land: 9.6 million acres (14% of Colorado land). However, they are primarily in rural locations far from principal cities and lacking in infrastructure that could support intensive development. With an average population of 665, they currently house only 39,268 people (1% of Colorado’s population). These 59 unzoned jurisdictions are thus unlikely to see significant future growth. Accordingly, their lack of zoning probably has little consequence for the state’s housing market.

Unzoned land also includes land not assigned to a zoning district (and is thus unzoned) within a jurisdiction that has adopted zoning. NZA data identifies 50 jurisdictions that have a zoning code but leave at least one acre within their boundaries without zoning. Together, this type of unzoned land totals 1% of Colorado land. Decisions to leave land as unzoned can occur for many reasons. In some cases — especially in rural, unincorporated counties — the zoning code applies only to a small area where the majority of people within that county live. In other cases, the jurisdiction may have not zoned an area subject to conservation easements or private land management protocols. (Such protections are not included in our “protected” category.)

Figure C quantifies the proportions of Tribal land and “other” land, each comprising 2% of Colorado land. Though Tribal land can be zoned at the discretion of Indian Tribes, such zoning may or may not be consistent with Colorado’s statutory regime. And in any event, as Tribes are sovereign, the NZA excludes Tribal land from our analysis. The remaining 2% “other” category primarily consists of roadways, railroad

tracks, and rights-of-way. Although some jurisdictions count these in their zoned acreage, as noted in **Part III**, NZA geospatial analysts extract these areas to ensure consistency.

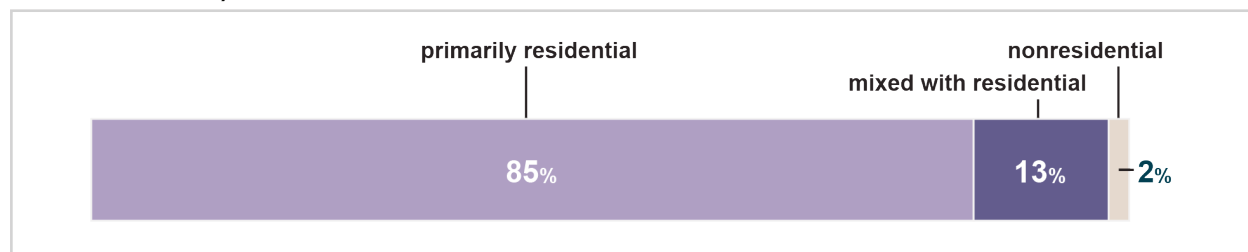
## Finding #2: Land is predominantly zoned for single-family housing.

- 98% of zoned land in Colorado allows residential uses as of right.
- 92% of residentially zoned land allows single-family housing as of right.
- 3% of residentially zoned land allows four-or-more-family housing as of right.
- One in five jurisdictions with zoning declines to allow any four-or-more-family housing as of right.

Like every other state the NZA team has analyzed, Colorado’s zoned land predominantly allows for residential use — especially single-family housing.

An astonishing 98% of zoned land in Colorado is committed to some form of residential use. As shown in Figure D, this proportion includes the 85% of zoned land classified as primarily residential and the 13% classified as mixed with residential. Just 2% of zoned land in Colorado is classified as nonresidential.

**FIGURE D:** Primarily Residential, Mixed with Residential, and Nonresidential Land in Colorado’s Zoned Land.



This residential land heavily favors single-family housing. Figure E summarizes NZA findings for the entire state about the four types of principal uses for which we collect information: single-family, two-family, three-family, and four-or-more family housing.

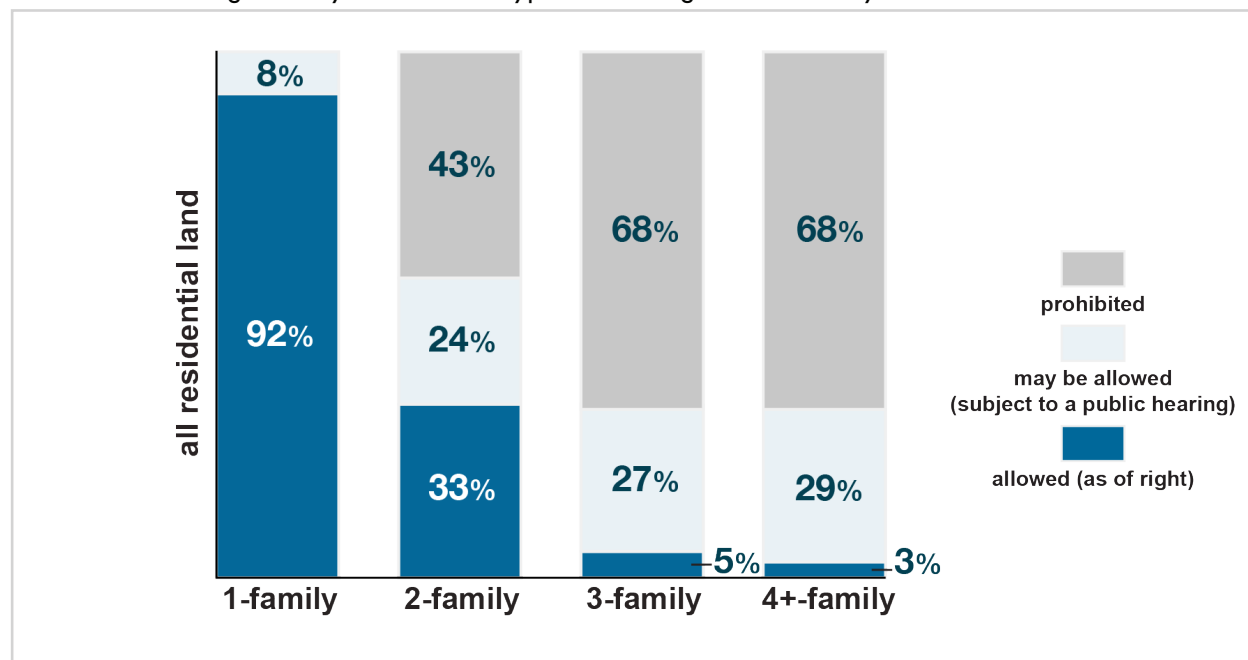
At a basic level, Figure E says how much residential land allows for each type of housing. But it goes further in that it also shows two process pathways to approval documented by the NZA. The deep blue shows the percentage of land allowing such housing as of right (again, with fairly minimal approval processes). The lighter blue shows where the relevant type of housing is allowed, but will require a public hearing or other special review process before it will be approved. The gray indicates the percentage of land where the relevant type of housing is prohibited altogether, meaning that it will not be permitted either as of right or after a public hearing.

Observe that the denominator for this chart is all residentially zoned land, meaning land that is zoned either primarily residential or mixed with residential. As noted above, in Colorado, 98% of zoned land is residentially zoned land.

Perhaps the most striking aspect of Figure E is the bar on the very left. It reveals that 92% of residential land allows single-family housing as of right. By contrast, two-family housing is allowed as of right on only 33% of residential land, and three-family and four-or-more-family housing drops to 5% and 3%, respectively.

Also of interest are the prohibitions on two-or-more-family housing, shown in gray. Housing with three or more units is prohibited entirely on over two-thirds of residential land across the state. The bar on the very left shows that single-family housing is banned almost nowhere.

**FIGURE E:** Permitting Pathways for Different Types of Housing on Residentially Zoned Land.



Now consider the light blue parts of Figure E. They show where the four housing types must undergo a public hearing process. Very little residential land, just 8%, requires single-family housing to undergo a public hearing. Often, this land is zoned for master plan communities or planned residential developments, which the jurisdiction subjects to an overall public hearing.

The picture looks very different for multi-family housing. Public hearings are required for two-family housing on a quarter of residentially zoned land. For three-or-more housing, public hearings are required on five to eight times as much land allowing such housing as of right. This discretionary procedural requirement of ten increases costs, extends timelines, and adds uncertainty that can deter development altogether. In some jurisdictions, requiring a hearing for multi-family development can have the same effect as a prohibition. That's because developers may choose not to proceed with a project at all, because a discretionary approval process can be very uncertain.

Again, approaches vary by jurisdiction. One in five jurisdictions in Colorado decline to allow any four-or-more-family housing to be approved as of right. Of these 54 jurisdictions, 17 allow such housing after a public hearing, and 37 prohibit it altogether. These conditions present a major obstacle for the state to achieve its goal of producing enough affordable housing types to meet the needs of its residents.

### Finding #3: Minimum lot size mandates are widespread and excessive.

- Colorado's lot size mandates are the largest the NZA has documented in any state.
- 98% of land allowing single-family housing has a minimum lot size mandate.
- 86% of such land has a two-acre minimum lot size mandate.
- Just 2% of land has no minimum lot size mandate.

Minimum lot size mandates are a fundamental aspect of American zoning that significantly influence residential development patterns. As noted previously, they require housing to be located on a certain amount of land. The NZA has documented such mandates across the country for each of the four types of housing (single-family, two-family, three-family, four-or-more-family) upon which we focus.

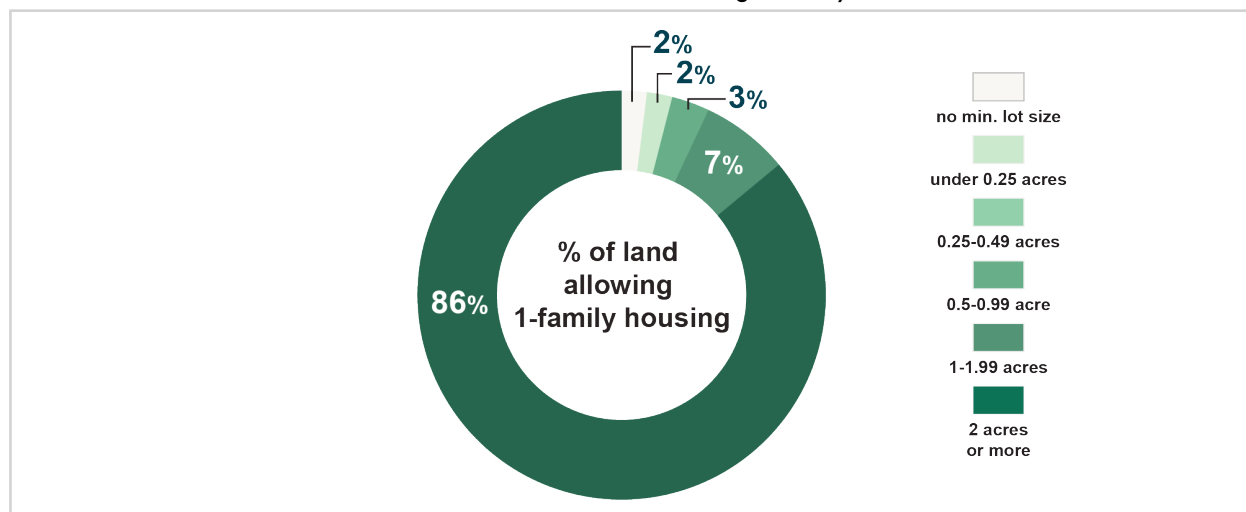
We have observed that minimum lot size mandates are largest and most prevalent in areas zoned for single-family housing. Because single-family zoning dominates Colorado's regulatory landscape, we focus on lot size mandates for single-family housing in this report.



Image: Sprawl in formerly agricultural lands east of Denver. Minimum lot size mandates throughout Colorado, including in the Denver metropolitan area, require this sort of environmentally wasteful land development.

In Colorado, minimum lot sizes are nearly universal — covering 98% of land zoned to allow single-family housing. And they are exceptionally large. Figure F depicts how much land zoned for single-family housing requires different lot sizes, to the extent lot sizes fit into one of these categories. Note that around 3% of such land varied across the categories and was excluded from in Figure F (and other lot-size figures in this report).

**FIGURE F:** The Distribution of Minimum Lot Size Mandates on Single-Family-Zoned Land.



As Figure F shows, the vast majority (86%) of land allowing single-family housing as of right requires minimum lot sizes of two acres or more, which is larger than the size of a NFL football field. An additional 7% of such land requires a one-acre minimum lot. Just 2% has no lot size mandate. Less than 1% of land falls in the 0.25-0.50-acre category.

These expansive standards contribute to sprawl that conflicts with Coloradans' appreciation for their state's natural landscapes. Often justified as a measure to promote community health and open space, in practice, minimum lot sizes squander land, increase costs, and restrict housing choices. As such, they undermine efforts to build more affordable, diverse, and sustainable cities.

#### Finding #4: Parking mandates exist on 85% of residential land.

- Parking mandates are common across all housing types.
- The most common requirement is 2 parking spaces per housing unit.
- 22 jurisdictions have lifted parking mandates altogether.

Parking mandates represent another widespread but unsustainable practice. Across Colorado, 85% of residentially zoned land requires the construction of parking for new housing or residential conversions. To put this figure in perspective, Arizona, Nevada, and New Mexico have higher percentages of residentially zoned land with parking mandates, while Alaska, Massachusetts, and New Hampshire have smaller percentages.

These mandates are common across all four types of housing logged by the NZA. Requirements vary by jurisdiction. Some applying mandates only in select districts and others enforcing them across all residential parcels. The number of spaces required also varies, but most commonly, across all types of housing, jurisdictions require 2 parking spaces per unit of housing.

Parking mandates contribute to sprawl by yielding land to cars when it could be serving community needs. They increase development costs — or even make projects wholly infeasible. Recognizing these unfortunate consequences, 22 Colorado jurisdictions, all noted in Appendix A, have declined to enact, or have eliminated, parking mandates. Four are located in the Denver metropolitan area, two are located in the Cañon City metropolitan area, one is located in the Montrose metropolitan area, and the others are located in more rural settings.

We hasten to emphasize that this report does not account for local rezonings made in the wake of 2024 legislation aimed at reducing parking mandates. One new law prohibits jurisdictions within a metropolitan planning organization (essentially, a local or regional organization that helps to plan and carry out certain transportation projects) to mandate parking for multi-family, mixed-use, or residential conversions. Another new law prohibits parking mandates for multi-family housing near transit stations in 49 jurisdictions. We expect that, as a result of these state laws, local zoning will be modified to remove parking mandates, and the amount of residentially zoned land subject to parking mandates will decrease.

## Finding #5: Accessory dwellings are often banned or very difficult to build.

- 37% of land allowing single-family housing bans accessory dwelling units.
- 77 jurisdictions ban accessory dwelling units entirely.
- A quarter of land allowing accessory dwelling units restricts who can live in them.
- A new recent state law will help legalize accessory dwelling units on more land.

Accessory dwellings units (ADUs) are secondary units added to single-family lots, which are often located in backyard cottages, converted basements, or former garages and carriage houses. ADUs offer a flexible approach to creating affordable housing because they can be situated discretely within single-family neighborhoods. Where ADUs are allowed without onerous process requirements or other restrictions, single-family homeowners can benefit from the extra income.

In Colorado, local ADU policies in place at the time of NZA's initial data collection varied considerably. The NZA team logged where ADUs were allowed, either as of right or after a public hearing, and either with or without occupancy restrictions.

Occupancy restrictions limit who may live in either the principal unit (i.e., the single-family home) or the ADU. Many Colorado jurisdictions require owner occupancy of the principal unit, meaning that the homeowner must actually reside on the premises. Others prohibit homeowners from renting the ADU, barring potential rental income. Some require that the occupants of the ADU be either employees or relatives of the homeowner. A handful limit ADUs to elderly occupants. Any of these restrictions make an ADU less likely to be occupied by someone seeking housing on the open market. Some make an ADU unlikely to be built at all.



**FIGURE G:** Permitting Pathways for Accessory Dwelling Units on Single-Family Zoned Land.

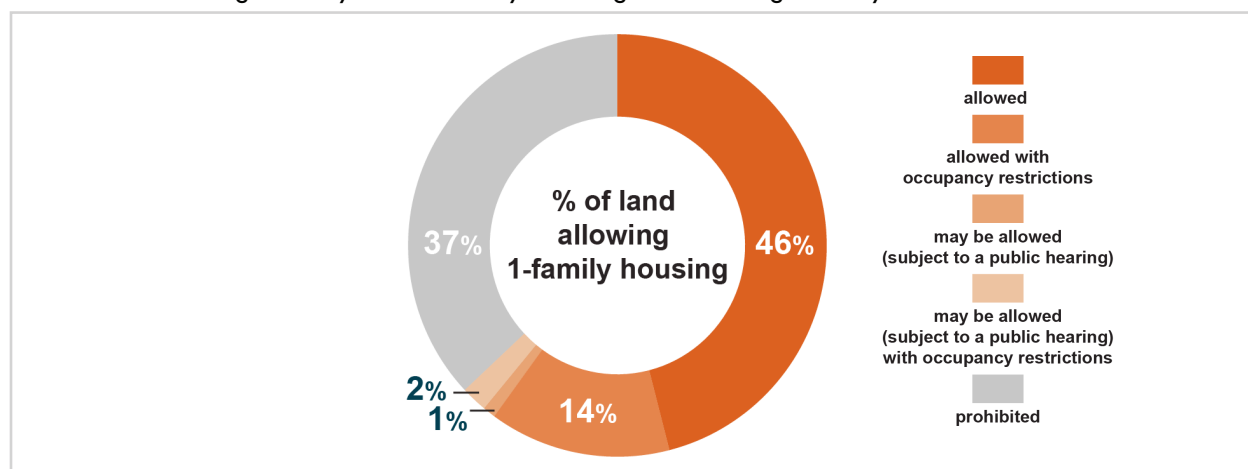


Figure G illustrates these various prohibitions and restrictions. The gray in the chart shows areas that ban ADUs. Fully 37% of such land bans ADUs, either explicitly or implicitly (because they are unmentioned in the zoning code as an allowed use). Seventy-seven of Colorado’s zoned jurisdictions ban ADUs altogether. The four shades of orange show where ADUs are allowed and indicate the process pathways for approval as well as occupancy restrictions. The darker the orange, the more permissive the requirements. NZA analysis shows, as indicated by the darkest orange, that 46% of land zoned for single-family housing also allows ADUs as of right. Within that amount, 46 jurisdictions allow ADUs by right on all land zoned for single-family housing. An additional 14% of land allowing single-family housing allows ADUs as of right but with occupancy restrictions. The most common occupancy restriction is owner occupancy.

Public hearings play a limited role in Colorado’s ADU permitting, as they are required for only 3% of land allowing single-family housing. That is a bright spot in the data, as it suggests that zoning authorities in Colorado have not generally imposed process barriers to production of this relatively affordable housing type.

Recent legislation aimed to expand ADUs, adopted in 2024, requires 65 jurisdictions within metropolitan planning organizations to permit ADUs, without requiring owner occupancy, in all districts allowing single-family housing. Jurisdictions continue to update their zoning codes to comply with that new state statute, and again, we have not necessarily accounted for all of those updates in this report.

In sum, Colorado’s zoning landscape reflects a broader national pattern of land use, in which zoning ordinances — through use restrictions, density controls, lot standards, and administrative processes — prioritize expensive, large-lot single-family development over more affordable multi-family housing.

Despite recent reforms, particularly around parking mandates and accessory dwelling units, the cumulative effect of zoning is that it limits multi-family housing, inflates development costs, and contributes to sprawl in Colorado. Addressing these structural challenges is essential to creating a more affordable, sustainable, and inclusive future for people and communities across the state.

## V. How Different Places Within Colorado Zone

---

Our statewide analysis in **Part IV** provides a high-level summary of Colorado’s zoning landscape. However, the places within Colorado do not all zone equally. To gain a more complete understanding of how zoning differs across the state, we compared the state’s zoning rules across three geographies.

First, we analyzed **zoning across different types of communities** — **urban cores, inner suburbs, outer suburbs, small towns, and rural areas** — to identify broad trends. We found that urban cores and small towns zone more land for multi-family housing than suburbs and rural areas. As noted previously, multi-family housing tends to be more affordable than single-family housing.

Second, we examined **zoning within the Denver metropolitan area** by comparing Denver and five selected suburbs: Arvada, Aurora, Lakewood, Littleton, and Westminster. We found that zoning in Denver’s suburbs tends to be more restrictive than in Denver itself, though zoning in individual suburbs greatly varies.

Third, we compared **seven Census-defined “principal cities”** of Boulder, Colorado Springs, Denver, Fort Collins, Grand Junction, Greeley, and Pueblo. They all offer preferential treatment for single-family housing but vary widely in their minimum lot size requirements and treatment of accessory dwelling units.

Together, these analyses provide a finer-grained view of how zoning influences housing across the state.



Image: Denver allows more multi-family housing than most of its suburbs and most other “principal cities.” Many historic downtown buildings on and around the 16th Street Mall, pictured here, have been successfully converted to residential uses.

## A. Zoning in Different Types of Communities

### Key takeaways:

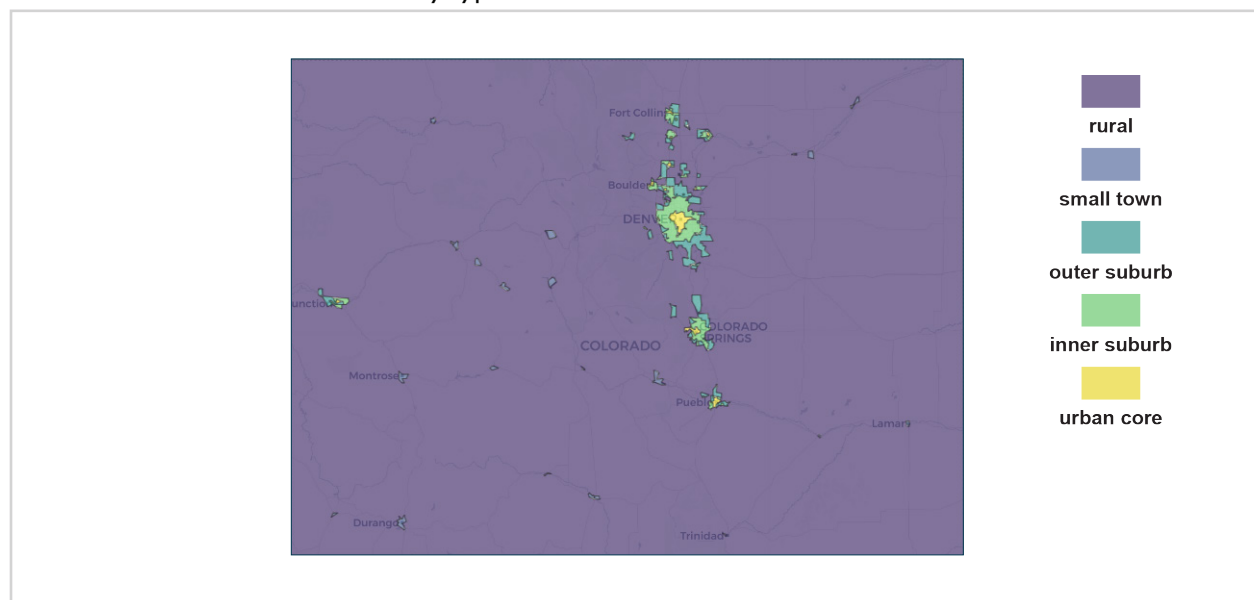
- Urban cores and small towns zone more of their land for multi-family housing than suburbs or rural areas.
- Four-or-more-family housing is prohibited on most land, across all community types.
- Only 2% of land in rural communities is zoned to allow four-or-more-family housing.

The conventional expectation is that urban areas will allow higher density development than suburbs, and suburbs more than small towns or rural areas. But is this case in Colorado?

Analyzing these different types of communities in Colorado provides a unique snapshot of the state's regulatory geography. This analysis is important because the impacts of zoning regulations on housing affordability are not confined to single localities. Stricter, or more exclusionary, zoning in one type of community may push development into another type of community.

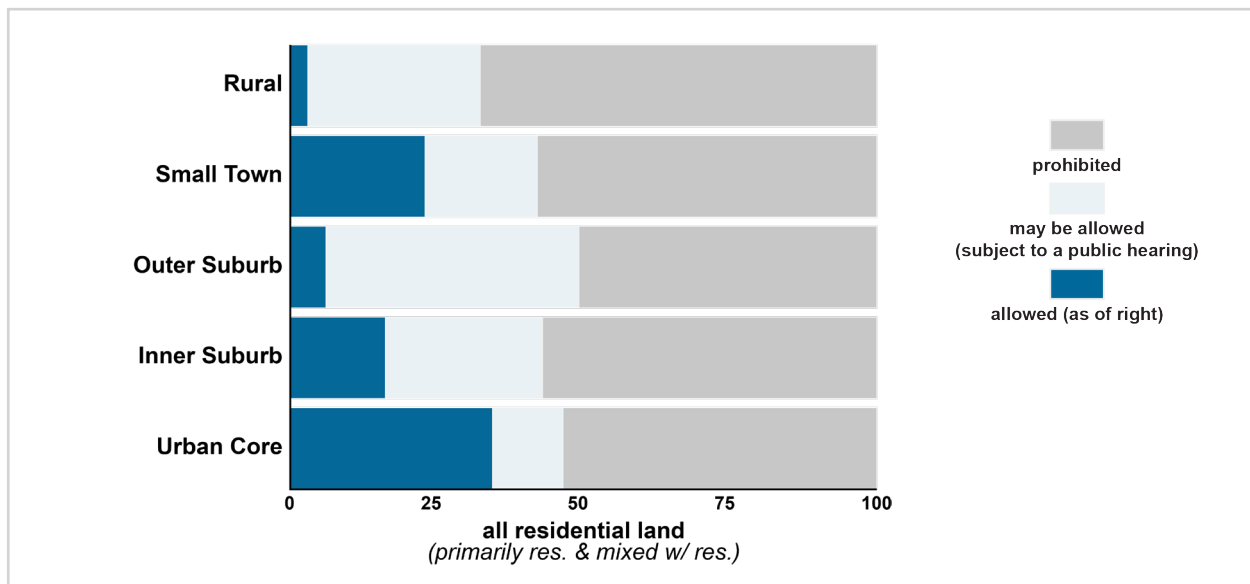
To better understand Colorado's zoning landscape across its community types, we compared four-or-more-family housing allowances across five categories of land based on its location and when it became urbanized. These categories include urban cores, inner suburbs, outer suburbs, small towns, and rural areas, as shown on the map in Figure H. Appendix C describes the methodology used to classify these areas.

**FIGURE H:** Colorado's Five Community Types.



Comparing permitting pathways for four-or-more-family housing across the five community types reveals key patterns in how zoning codes shape housing opportunities statewide. As Figure I shows, prohibitions of such housing dominate on more than 50% of residential land across all community types. Yet there are notable differences in where such housing is allowed by right.

**FIGURE I:** Permitting Pathways for Four-or-More-Family Housing by Community Type on Residentially Zoned Land.



The urban core is the most permissive community type when it comes to multi-family housing development, with four-or-more unit buildings allowed by right on 38% of urban core residential land. This finding is consistent with Coloradans’ lived experience: they are more likely to see multi-family housing in cities than in suburban communities, small towns, or rural areas.

Suburbs, which are communities relatively close to urban cores and within a Census-defined metropolitan region, generally became less permissive the farther away they were from central cores. Inner suburbs, which sit adjacent to urban cores and were mostly built up between the 1940s and 1970s, allow multi-family housing by right on 18% of residential land. Outer suburbs, which were primarily developed between the 1980s and 2010s, have rules that are closer to those in rural areas than in inner suburbs, with multi-family housing being allowed by right on only 8% of their residential land.

In these respects, Colorado’s zoning seems to bear out the general hypothesis that suburban zoning is more restrictive than urban zoning. Exclusionary zoning in American suburbs typically restricts the development of affordable housing, which results in the concentration of affordable housing into central cities. Suburban decisions to exclude diverse housing choices means less housing will be produced across a metropolitan region, and thus housing costs will be higher, in cities and suburbs alike. Housing cost pressures felt in cities are just one of many consequences of suburban exclusionary zoning.

Small towns are perhaps the biggest surprise. They have developed enough to be considered “urbanized,” but they are located outside of metropolitan areas. Because their surroundings are fairly rural in character, small towns may be thought to practice exclusionary zoning. Yet they allow more four-or-more-family development by right — on 21% of residential land — than any other community type except urban cores.

Rural areas are the most restrictive of any community type, with four-or-more-family housing being allowed by right on just 2% of rural residential land.

## B. Zoning within the Denver Metropolitan Area

### Key takeaways:

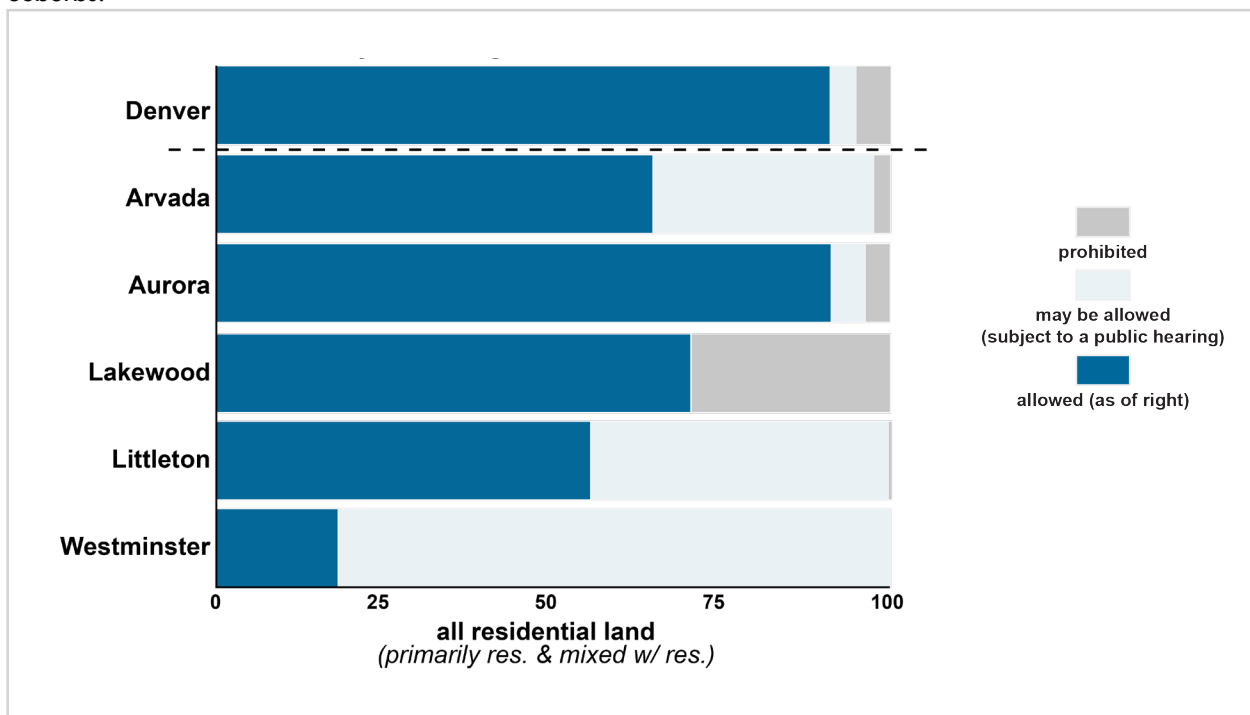
- All six communities zone more of their land for single-family housing than multi-family housing.
- The six communities take very different approaches to permitting accessory dwelling units.
- Across the six communities, the most common minimum lot size is between 0.01-0.25 acres.
- Westminster is an outlier in its regulatory framework.

Understanding how suburbs zone in comparison to the urban areas they surround highlights the regional consequences of local zoning policies. But all suburbs are not the same. To shine light on the nuances of suburban zoning in Colorado, we explored how five of Denver's suburbs zone.

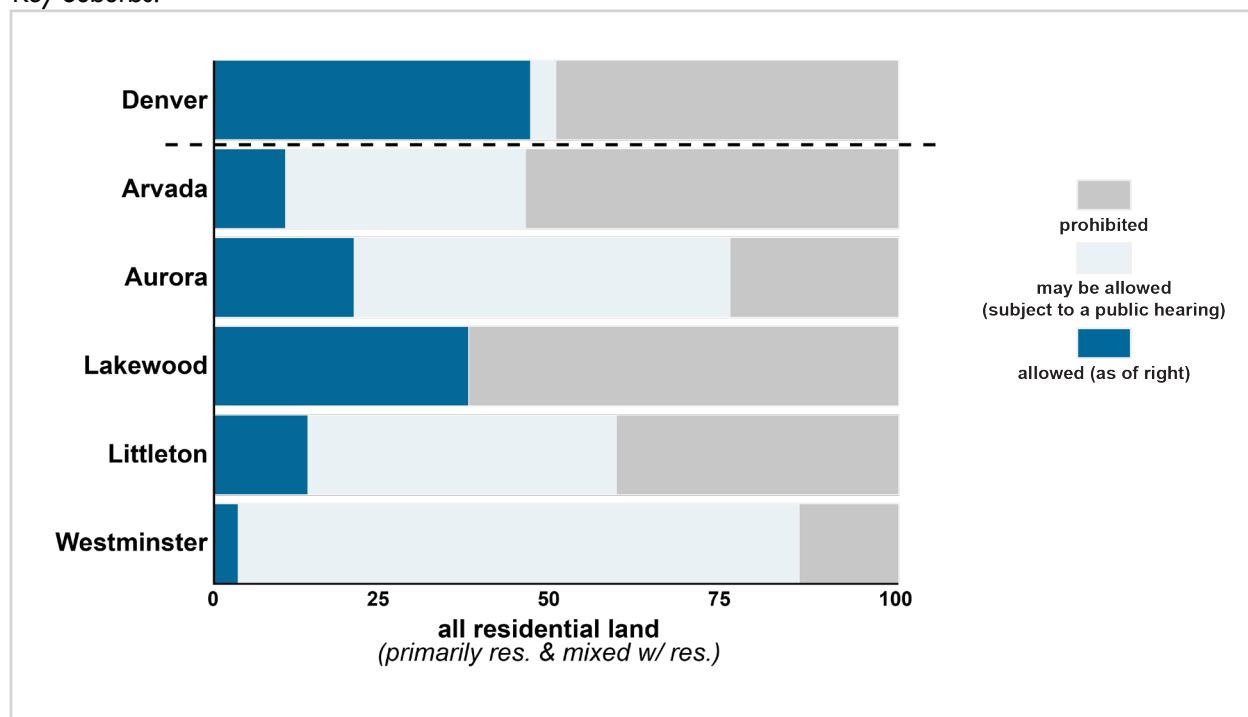
Specifically, we examined number-of-unit (unit density) rules, accessory dwelling unit permissions, and minimum lot size requirements in Arvada, Aurora, Lakewood, Littleton, and Westminster and compared them to those in Denver. While these five suburbs are not necessarily representative of all suburbs across the state, their zoning codes reveal that suburban zoning can take many different forms.

First, comparing number-of-unit rules, we found a strong regulatory preference for single-family homes in Denver and each of the five suburbs. Figure J (which can be interpreted like Figure I) shows the percentage of land where single-family housing is allowed as of right, allowed only after a public hearing, and prohibited by Denver and selected suburbs. Figure K shows the same pathways for four-or-more-family housing.

**FIGURE J:** Permitting Pathways for Single-Family Housing in Residentially Zoned Land in Denver and Key Suburbs.



**FIGURE K:** Permitting Pathways for Four-or-More-Family Housing in Residentially Zoned Land in Denver and Key Suburbs.



Read together, these two figures reveal that for all six jurisdictions, more residential land is designated for single-family homes than four-or-more-family homes. In fact, Denver allows single-family housing construction by right on a higher proportion of its residential land than in any suburb except for Aurora; both allow single-family housing on 91% of their residentially zoned land. Arvada, Lakewood, and Littleton hover at between 55 and 70% of their residentially zoned land allowing single-family housing as of right.

Westminster allows the least single-family housing by right of all suburbs — on only 18% of its residential land — with the remaining 82% requiring a public hearing. But a closer look at Westminster’s zoning code refined our interpretation of these somewhat aberrant statistics. The code assigns most land in Westminster to a “Planned Unit Development” zoning district, which allows various residential and nonresidential uses only if they are approved as part of a master plan, after a public hearing. In practice, most developments in this district have resulted in master planned communities containing predominantly single-family housing.

Only Lakewood has a sizeable amount of residential land (30%) that prohibits single-family housing.

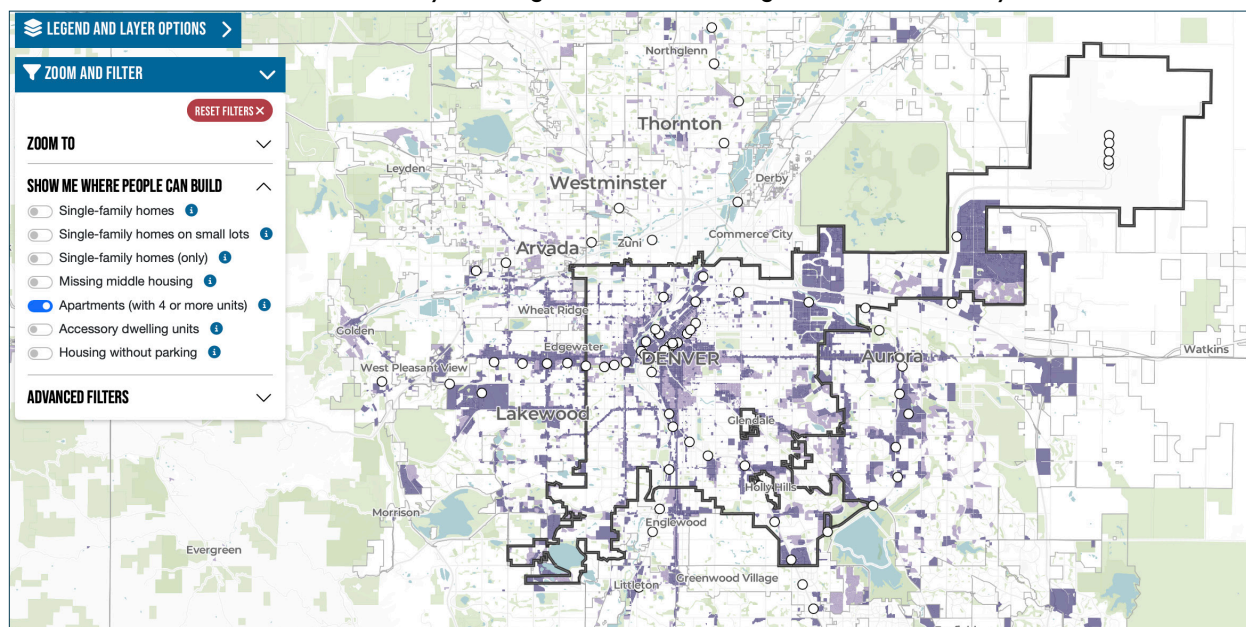
Contrast Figure J with Figure K, which shows how much land these municipalities designate for four-or-more-family homes. Denver allows such homes by right on less than half (46%) of its residentially zoned land, which is a higher proportion than every suburb included in the analysis.

Lakewood has the highest percentage of land allowing four-or-more-family housing by right of any suburb, but that constitutes only 37% of its residentially zoned land. Westminster has the least amount of land devoted to four-or-more-family housing by right.



Figure L shows what this looks like on the map. Land where apartments are allowed by right appears in a shade of purple. Light purple indicates land zoned for primarily residential uses, while dark purple shows land where residential and non-residential uses are both allowed. As this figure indicates, land zoned for multi-family housing in the region clusters in Denver. There are a few pockets of land zoned for such housing east and west of the city, but very little of it is found to the north and south.

**FIGURE L:** Where Four-or-More-Family Housing is Allowed as of Right in Denver and Key Suburbs.

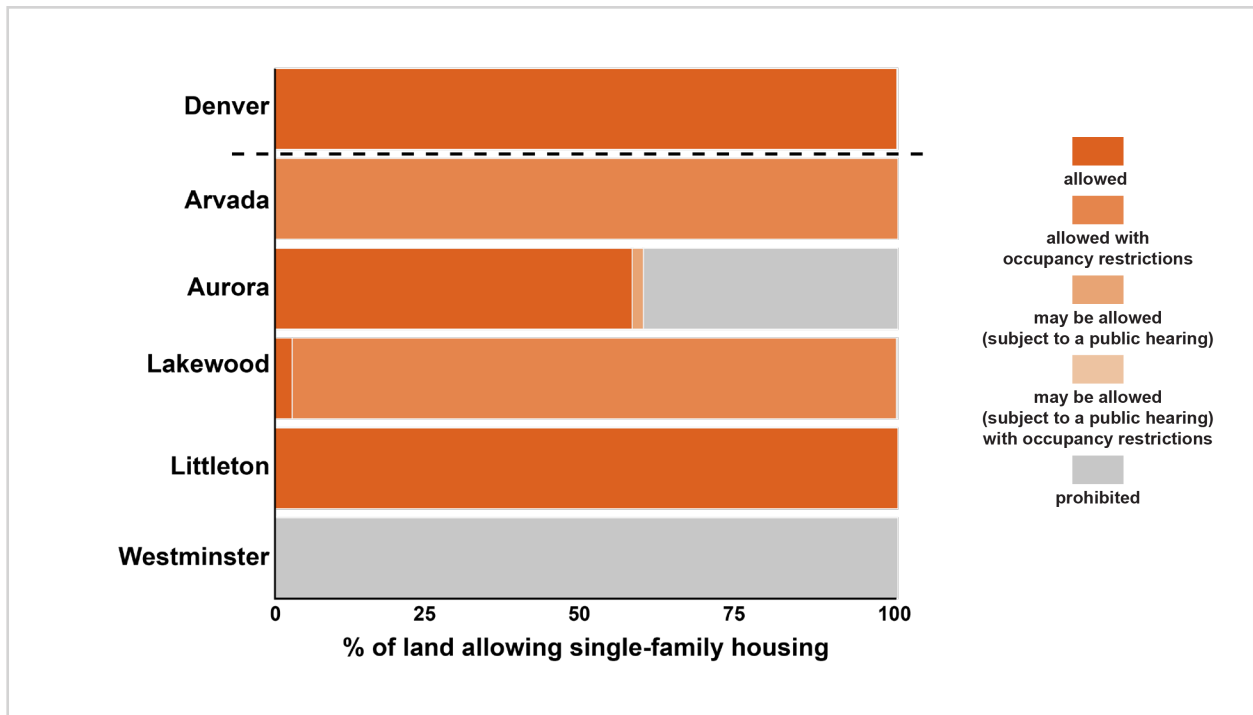


Second, reviewing accessory dwelling unit (ADU) permissions, we found significant variation across suburbs. As shown in Figure M, Denver and Littleton allow ADUs by right, without occupancy restrictions, on all land allowing single-family homes. Arvada and Lakewood also allow ADUs by right but impose occupancy restrictions on nearly all such land (100% and 97%, respectively). Westminster prohibits ADUs entirely, while Aurora stands out as having a bifurcated approach. It allows ADUs without occupancy restrictions on 57% of its single-family land and prohibits them on 41%.

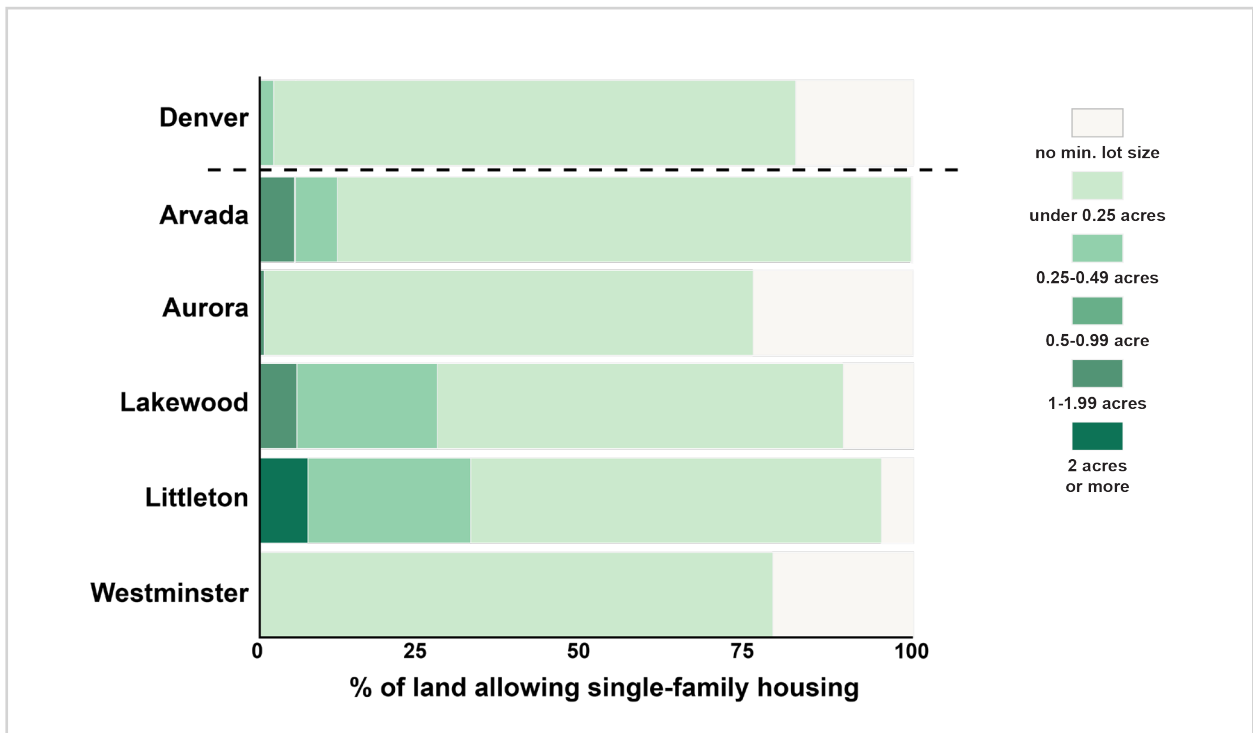
It is important to note that these findings represent conditions prior to the full implementation of a House Bill 24-1152, the 2024 statute mentioned above. It mandates that jurisdictions within a metropolitan planning organization — including Denver and these five suburbs — permit ADUs as of right without owner occupancy restrictions. While some communities have indicated they may not comply with this mandate, the bill is expected to expand ADUs statewide.

Finally, in our exploration of minimum lot requirements, we found slightly less variability between suburbs. As Figure N indicates, the majority of land where single-family homes are allowed by right for which a numerical minimum lot size can be calculated requires a minimum lot size of a quarter acre or less in all suburbs. Littleton is the only suburb with a noticeable proportion of its single-family land requiring lots be at least two acres (5%).

**FIGURE M:** Permitting Pathways for Accessory Dwelling Units on Single-Family Zoned Land in Denver and Key Suburbs.



**FIGURE N:** The Distribution of Minimum Lot Size Mandates on Single-Family-Zoned Land in Denver and Key Suburbs.



Aurora and Westminster have the largest portion of their single-family land (24% and 22%) that does not require a minimum lot size at all, even more than Denver (18%). However, Westminster’s residential zoning is unusual. Only a small portion of Westminster’s residential land allows single-family homes by right.

In addition, note that a large share of single-family land is excluded from Figure N for Aurora (46%) — in addition to Arvada (16%), and Littleton (35%) — due to their minimum lot size rules having too many conditions to be captured in a single number.

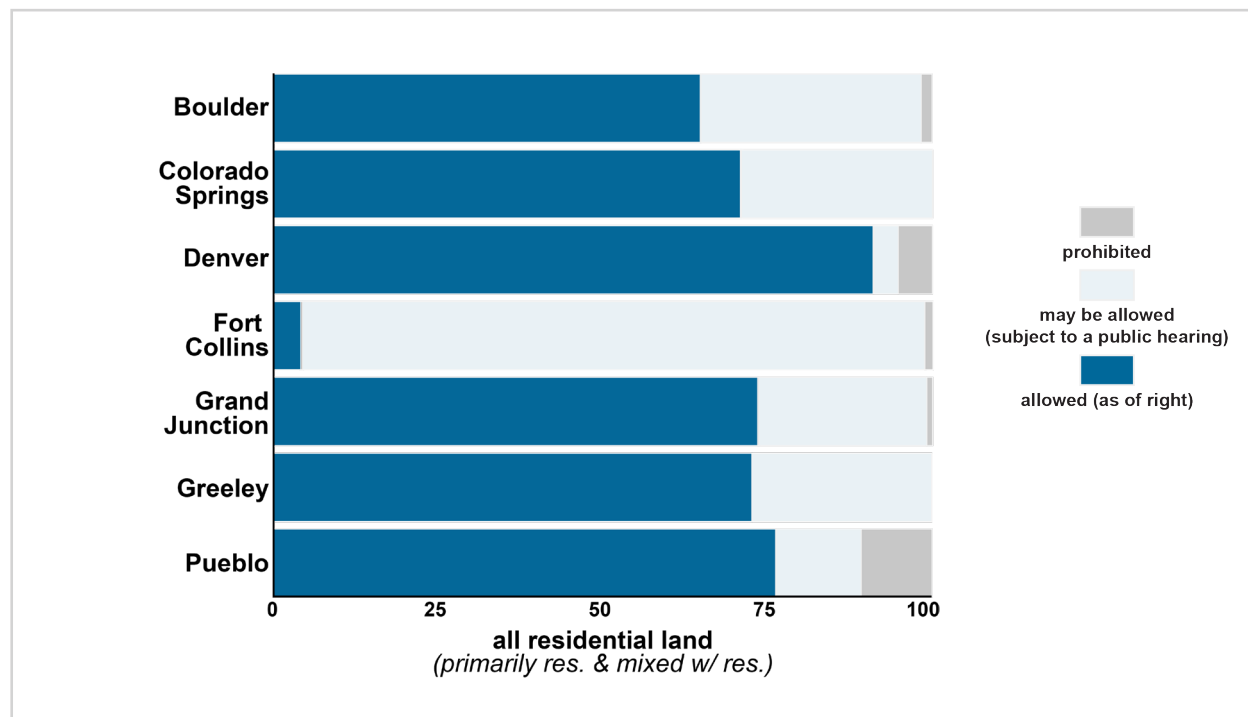
## C. Zoning in Seven Principal Cities

### Key takeaways:

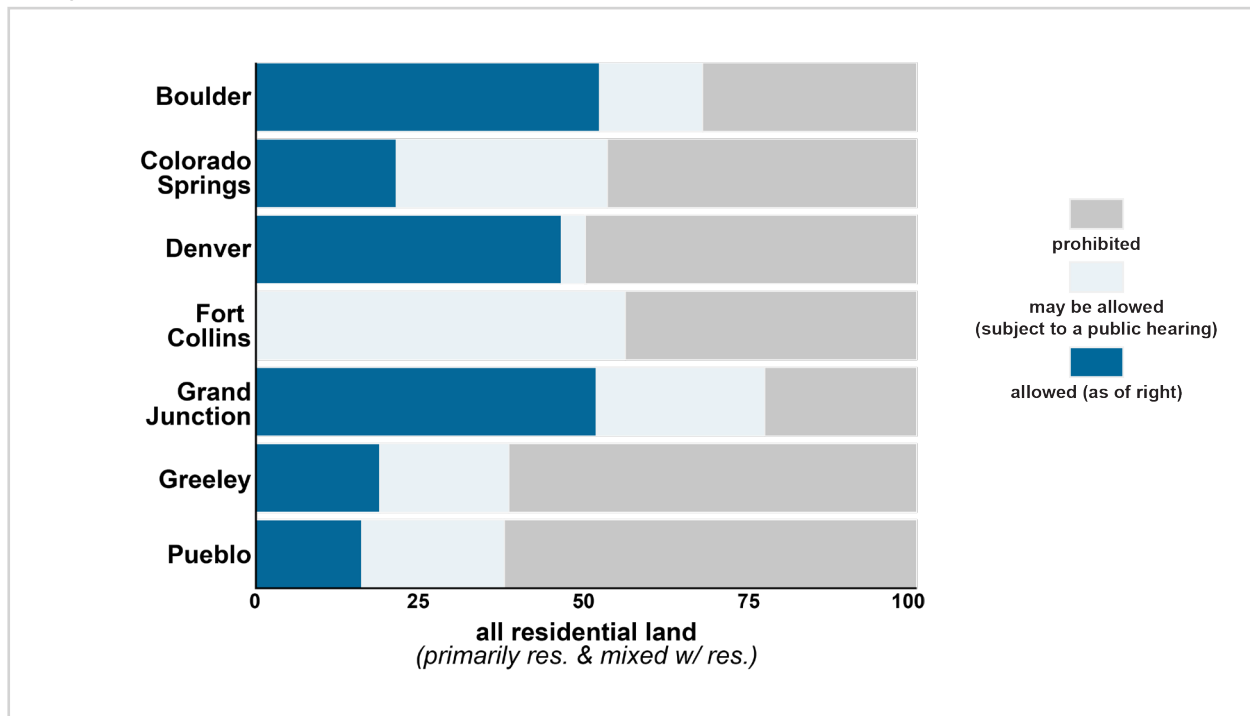
- Denver and six other principal cities all zone more of their land for single-family housing than multi-family housing.
- Boulder and Grand Junction allow four-or-more-family housing by right on most residential land.
- Greeley and Pueblo require 43% and 32% of single-family zoned land to sit on two acres or more.

In addition to analyzing how Denver’s zoning compares to its suburbs, we also wanted to see how Denver’s zoning compared to zoning in other large cities. So we analyzed zoning conditions in seven “principal cities,” which the Census defines as the largest incorporated place with a metropolitan statistical area, namely: Boulder, Colorado Springs, Fort Collins, Grand Junction, Greeley, and Pueblo.

**FIGURE O:** Permitting Pathways for Single-Family Housing in Residentially Zoned Land in Seven Principal Cities.



**FIGURE P:** Permitting Pathways for Four-or-More-Family Housing in Residentially Zoned Land in Seven Principal Cities.



These cities play a significant role in shaping statewide housing dynamics due to their population size and economic influence as the urban center of their regions. Although covering only 1% of Colorado’s zoned land, they collectively house 30% of the state’s population, over 1.7 million people.

Even across these large urban centers — which we would expect to be more friendly to multi-family housing — zoning codes consistently favor single-family homes. Every one of Colorado’s principal cities designates more land to single-family homes than multi-family homes. As Figure O shows, the vast majority of residentially zoned land in these cities allows single-family homes by right. The one exception is Fort Collins, which like suburban Westminster, requires public hearings for single-family homes on nearly all (95%) of its residential land.<sup>6</sup>

The story for multi-family housing across these places is nearly the opposite. As Figure P illustrates, Boulder and Grand Junction are the only two principal cities studied that allow four-or-more-family homes by right on a majority of their residentially zoned land. For every other city, a larger share of residential land prohibits multi-family homes altogether. In Fort Collins, no multi-family housing is allowed by right anywhere in the city. Although we would expect these principal cities to host an outsized share of their region’s apartments, their unit density rules do not appear to differ dramatically from those of the suburbs.

Accessory dwelling unit (ADU) permissions across the seven principal cities also resemble the variability seen in Denver’s suburbs. Figure Q outlines permitting pathways for ADUs for each of these cities. Besides

6. Fort Collins updated its zoning code in 2024. Our analysts found several internal contradictions in the new code but noted the requirement that single-family housing generally undergo reviews requiring a public hearing.

Denver, the only principal city that currently allows ADUs by right without occupancy restrictions on a majority of its single-family zoned land is Grand Junction. In Greeley and Pueblo, ADUs are outright prohibited on most single-family land. And while zoning rules are nominally more favorable to ADUs in Boulder, Colorado Springs, and Fort Collins, public hearing requirements and various occupancy restrictions in these places limit ADU construction in practice.

While these rules will become more permissive as a result of the Colorado legislature’s passage of House Bill 24-1152, Figure Q demonstrates why action at the state level was warranted.

Last, we reviewed minimum lot size mandates, and our findings are depicted in Figure R. We were surprised to find two central cities had significant portions of land zoned for single-family housing requiring lots of at least two acres. A full 43% of Greeley’s single-family zoned land and 32% of such land in Pueblo have a two-acre minimum. In the other five principal cities, quarter-acre minimums dominate, though both Colorado Springs and Grand Junction have small amounts of land requiring two-acre minimums for single-family homes.

Though Colorado has exceptionally high minimum lot requirements compared to other states, it is still surprising to see such a large proportion of urban land requiring lots larger than a football field. Mandating new homes to sit on such expansive lots directly drives up housing, energy, and transportation costs in these populated areas and reduces the amount of land that can be dedicated to parks, trails, recreational facilities, and more affordable housing types.

While the seven principal cities selected for study are some of the most densely populated places in the state, our analysis of several key zoning provisions demonstrates that there is still room to improve permissions for more affordable housing options, including single-family homes on small lots, multi-family housing, and accessory dwellings.

---

As the three analyses in this Part suggest, there is a disappointing level of exclusion across all types of communities in the state. Suburbs may, on average, have stricter rules on affordable housing options and require larger lots than cities, but that does not mean that cities cannot improve. Indeed, the bar is not particularly high. Small towns, a potential bright spot, deserve closer study to assess the location and utility of multi-family housing within their boundaries; as-of-right multi-family housing near historic Main Streets, for example, may boost economic development.

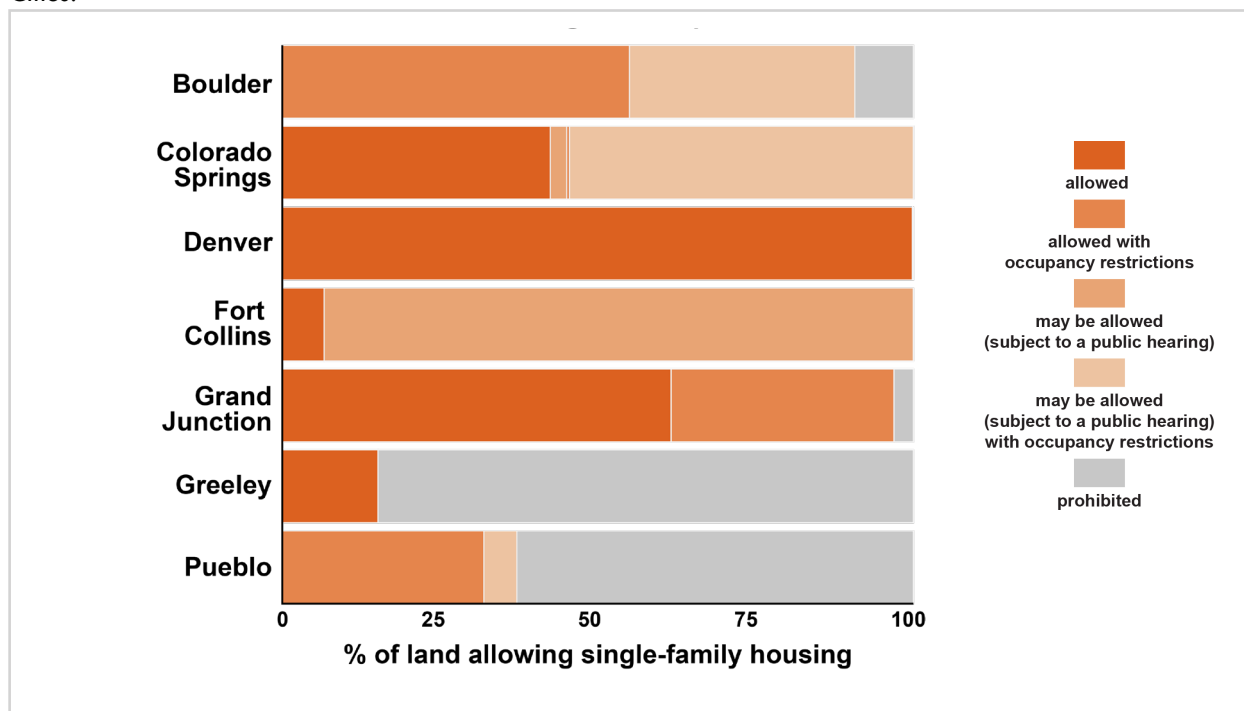
As noted in **Part III**, the NZA has gathered an unprecedented amount of data about many aspects of zoning regulations: “elderly only” provisions, utility connection requirements, height caps, manufactured housing permissions, and much more. Many communities “zone by a thousand cuts,” deploying much more than number-of-unit restrictions and lot sizes to constrain housing development.<sup>7</sup>

We consider this report an initial look at the data in Colorado and look forward to continuing analysis in the coming months and years.

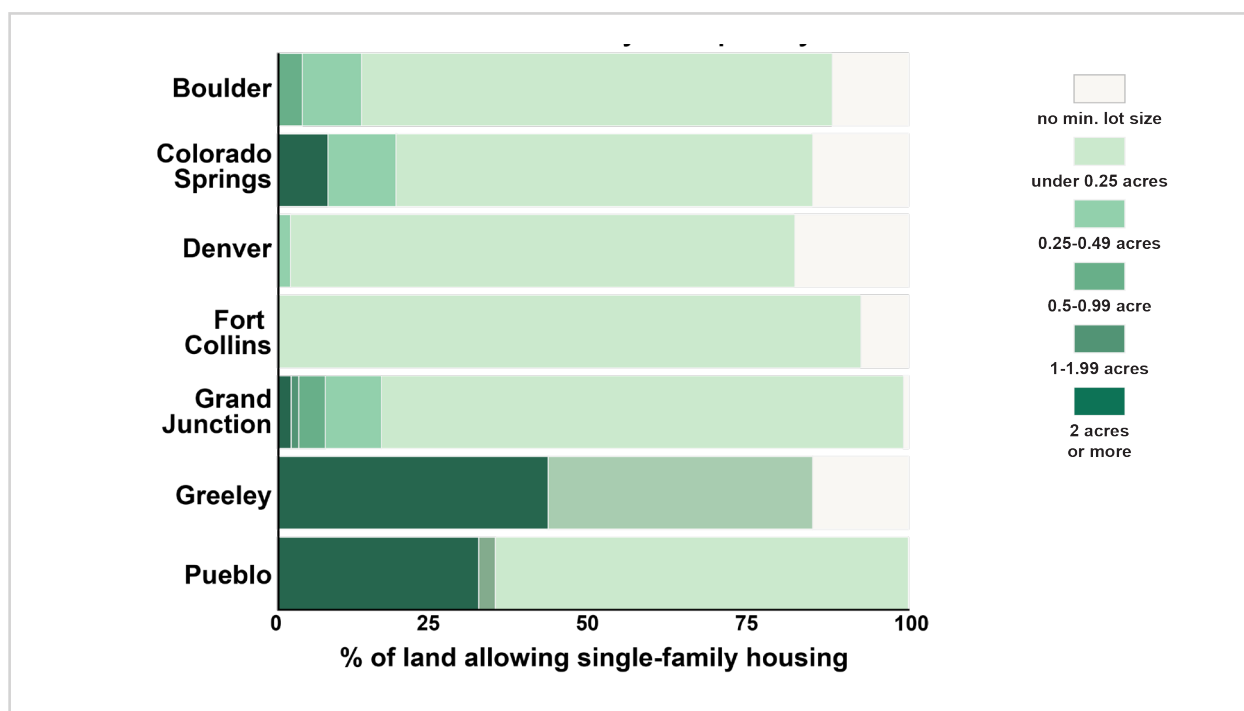
---

7. Sara C. Bronin, “Zoning by a Thousand Cuts,” 50 *Pepperdine Law Review* 719 (2023). The Colorado legislature has cited this publication in recent legislation, including House Bill 24-1152, adopted in 2024.

**FIGURE Q:** Permitting Pathways for Accessory Dwelling Units on Single-Family Zoned Land in Seven Principal Cities.



**FIGURE R:** The Distribution of Minimum Lot Size Mandates on Single-Family-Zoned Land in Seven Principal Cities.





## VI. Policy Opportunities

---

As **Parts IV and V** reveal, on the whole, Colorado’s zoning codes make affordable and accessible housing out of reach for too many Coloradans. They readily permit detached, single-family homes on excessively large lots, but they make other types of housing difficult or impossible to build. Without change, new housing development will be the expensive kind — exacerbating sprawl that eats up Colorado’s natural environment and drives up energy and transportation costs.

The good news is that adjusting zoning codes is within Coloradans’ power, and consensus around best practices in zoning have begun to emerge. But, as we highlight in **Part V**, the effects of zoning rules on housing costs and choice in one locality are not confined to its boundaries, suggesting a need for regional or statewide approaches.

In this Part, we suggest 8 reforms that could be adopted to make Colorado more welcoming and more affordable. While this Part focuses on state-level reforms, local governments may certainly act independently to put these recommendations into action.

### » Recommendation #1: Legalize small lots.

The amount of residential land in Colorado requiring one- and two-acre minimum lot sizes is deeply concerning: 93% and 86% of land allowing single-family housing, respectively (Figure F). Our strongest suggestion is for the Colorado legislature to curb this expensive and environment-destroying practice.

At a minimum, Colorado communities classified as urban cores and suburbs should have no land requiring more than an acre, much less two. There is little need for single-family lots in these places — places that are comparatively accessible to employment and retail — to be larger than a quarter acre, or at most a half acre. In communities classified as small towns, small lot sizes should be the norm in historic downtowns and near commercial cores.

Especially if most new homes in Colorado will continue to be single-family housing, legalizing small lots and subdivision of existing lots could make a difference for housing supply and affordability.

### » Recommendation #2: Loosen restrictions on multi-family housing.

NZA analysis shows that two-thirds of residential land (Figure E) bans any multi-family housing over three units. And very little residential land, just 3%, allows four-or-more-family housing to be located as of right, compared to 92% for single-family housing. That’s just not enough to meet Coloradans’ growing housing needs.

More needs to be done to loosen restrictions on multi-family housing. The legislature has taken the first step of requiring some jurisdictions to allow multi-family housing around transit. We suggest continuing in this vein. Guiding urban cores and inner suburbs to rezone some percentage of land to allow four-or-more family housing as of right, whether in transit areas or otherwise, could facilitate affordable housing in places

closest to jobs and other opportunities. Modest-scale multi-family housing can also be a huge enhancement to small-town Main Streets.

Be aware, though, that number-of-unit zoning is not the only provision in a zoning code that must change to facilitate such housing. Two-family housing, for example, is allowed on 33% of residential land, but just 1.5% of housing units across the state are located in two-family configurations. The relatively low proportion of two-family housing may be a result of consumer or developer preferences, but it could also be a result of other zoning restrictions on the development of the lot or the size or configuration of the building. The NZA could assist with a more thorough analysis of these other factors in the future.

### » Recommendation #3: Simplify permitting processes for multi-family housing.

About a quarter of land across Colorado requires that multi-family housing over two units undergo a public hearing prior to approval (Figure E). For three-or-more-family housing, more than five times the amount of land permitting such housing requires a public hearing than not. Yet by allowing the *possibility* of multi-family housing, Colorado jurisdictions have shown they are willing to open the door to diverse housing options.

It's time to open that door a little wider. Eliminating public hearings for individual multi-family applications could greatly improve the chances that multi-family housing gets built. That's because public hearings can be costly and time-consuming for applicants and create uncertainty for existing residents. Sometimes decisions made at public hearings can be swayed by the loudest voices in the room on a particular night. That's a haphazard way to implement policy.

Instead of hearings on individual applications, jurisdictions should be encouraged to gather public input, through hearings and otherwise, to develop clear pathways for as-of-right approvals of multi-family housing. If an individual application for a development satisfies the clear criteria, it should be approved. A form-based code that pre-approves the shape, size, and design buildings is one way to establish expectations for both builders and neighbors alike. Communities as diverse as Boulder, Castle Rock, Colorado Springs, Cripple Creek, Denver, and Durango have adopted form-based codes that prove their utility in many settings.

### » Recommendation #4: Expand accessory dwelling unit protections statewide.

NZA analysis shows that most land in the state either prohibits accessory dwelling units (37% of land zoned for single-family housing) or makes it difficult to build (17%) (Figure G). Recent legislation in Colorado has legalized accessory dwellings in certain populated areas, so some of the statistics contained in this report may improve.

In the meantime, why not go ahead and amend this statute so it applies statewide? Doing so would eliminate inconsistencies across jurisdictions. And small towns are already relatively permissive when it comes to housing diversity. Meanwhile, rural areas, which according to our map are highly restrictive for this and other types of affordable housing, also have some catching up to do.

Accessory dwellings are a straightforward way to create new housing, and they have significant financial benefits for the owners of single-family homes. They are the most popular type of new housing in California, which has refined its statewide approach over the years to ensure that they can be easily built.

## » Recommendation #5: Further lift accessory dwelling unit occupancy rules.

A quarter of land allowing accessory dwelling units restricts who can live in them (Figure G), at least before recent legislation barring owner occupancy. (Again, changes resulting from this legislation may not yet be reflected in NZA data.) Still, we tracked many instances of jurisdictions imposing occupancy requirements beyond owner occupancy. For example, some jurisdictions require that the occupant of an accessory dwelling be a family member, employee, or elderly person; others ban homerenters.

Lifting all such occupancy requirements will create greater flexibility for homeowners, while encouraging construction of accessory dwelling units. Legislators should consider an amendment to the existing statute to ensure it works as intended.

## » Recommendation #6: Lift all minimum parking mandates for residential uses.

Colorado imposes costly parking mandates on 85% of residentially zoned land. These mandates drive up housing costs and deter development, particularly in denser locations where land is at a premium.

Colorado has taken steps to lift these unnecessary requirements in certain larger jurisdictions, including jurisdictions with transit stations. However, the state could do more. For example, it could look to current Connecticut law, which caps local parking mandates at one space per accessory dwelling unit, one space per studio or one-bedroom unit, and two spaces for two-or-more-bedroom units.

Better yet, Colorado could become the first state to eliminate parking mandates. The 22 diverse jurisdictions in Colorado that already lack parking mandates have not seen negative effects. Colorado could benefit from policies that prioritize people over cars.

## » Recommendation #7: Require zoning codes to be electronically available.

Sixteen of the 275 jurisdictions (Appendix A) known to have zoning did not make their zoning codes available to the NZA in electronic or paper copy, despite repeated requests and offers to pay for staff time in accordance with Colorado freedom of information act requirements. These requests came not only from NZA analysts but from Housing Colorado staff and affiliates we enlisted to assist, to no avail.

We do not believe it is fair or appropriate for jurisdictions to hide their laws. Requiring the text and map of all duly adopted zoning codes be made available online seems to be the bare minimum requirement for people to access the laws that bind them.

## » Recommendation #8: Require jurisdictions to file zoning code amendments in a central repository.

With several statewide bills passed in 2024 and more on the horizon, as well as nation-leading activity in Denver and other places, Colorado is a hotbed of activity when it comes to zoning reform. Colorado would do well to become the first state in the nation to develop an organized system to track all of these regulatory changes, enabling further study and ensuring substantive compliance.

In tracking zoning changes in several states, our NZA team has found that it is extremely difficult to discern when localities have amended their codes — much less whether localities have amended their codes to comply with new state laws. That’s because in most cases, amendments are proposed as agenda items to specific city council or zoning board meetings, and they can take time to be included in the publicly available zoning code.

One state has recently required centralized filing, and substantive review, of local amendments adopted to comply with a new state law. Massachusetts requires jurisdictions that rezone to comply with the MBTA Communities Act (a law promoting multi-family housing around transit) to deposit a copy of their amended code with the Massachusetts Attorney General’s office, which reviews amendments for compliance and approves jurisdictions’ efforts. Even with this requirement, the NZA has found that many communities subject to the MBTA Communities Act have failed to meet the statutory deadline to file their amendments. But starting the search with a centralized repository is at least an improvement.

At a minimum, the Colorado legislature should create a centralized repository for code changes. Going further, the legislature may want to institute a review process, like Massachusetts’, to confirm local amendments substantively comply with new state statutes.

---

These recommendations are not exhaustive. Colorado has many other opportunities to improve housing choice and housing affordability through zoning reform. But we hope they provide a starting point for discussion as legislators, local officials, and community members work together to improve zoning, a critical force shaping our lives.

# Appendix A:

## Colorado Jurisdictions With Zoning

---

The following jurisdictions exercise zoning. The 16 jurisdictions marked with “°” are known to have zoning but do not provide sufficient information to the public about their zoning code and/or zoning map for the jurisdictions to be included in the online National Zoning Atlas. The 54 jurisdictions marked with “x” do not allow any multi-family housing (four or more units) by right anywhere within their boundaries. The 22 jurisdictions marked with “p” have no parking mandates for residential uses.

Adams County	Castle Rock	Dinosaur	Fruita
Akron	Cedaredge	Dolores	Garden City
Alamosa	Centennial	Douglas County	Garfield County
Alamosa County	Center <sup>p</sup>	Dove Creek <sup>p</sup>	Georgetown
Alma <sup>x</sup>	Central City	Durango	Gilcrest
Antonito <sup>°</sup>	Chaffee County <sup>x</sup>	Eagle	Gilpin County <sup>x</sup>
Arapahoe County	Cheraw <sup>°</sup>	Eagle County	Glendale <sup>x</sup>
Archuleta County	Cherry Hills Village <sup>x</sup>	Eaton	Glenwood Springs
Arvada	Cheyenne County <sup>°</sup>	Eckley	Golden
Aspen	Cheyenne Wells <sup>°</sup>	Edgewater <sup>x</sup>	Granby
Ault	City of Creede <sup>p</sup>	El Paso County	Grand County
Aurora	Clear Creek County	Elbert County <sup>x</sup>	Grand Junction
Avon	Coal Creek	Elizabeth	Grand Lake
Basalt	Cokedale <sup>x</sup>	Empire	Greeley
Bayfield	Collbran	Englewood	Green Mountain Falls <sup>x</sup>
Bennett	Colorado Springs	Erie	Greenwood Village
Bent County <sup>xp</sup>	Columbine Valley <sup>p</sup>	Estes Park	Gunnison
Berthoud	Commerce City	Evans	Gypsum
Black Hawk <sup>x</sup>	Conejos County <sup>°</sup>	Fairplay	Haxtun <sup>p</sup>
Blanca	Cortez	Federal Heights	Hayden
Blue River <sup>x</sup>	Costilla County <sup>x</sup>	Firestone	Hillrose <sup>x</sup>
Boulder	Craig	Flagler <sup>°</sup>	Hinsdale County <sup>xp</sup>
Boulder County	Crested Butte	Fleming <sup>x</sup>	Holyoke <sup>°</sup>
Bow Mar <sup>xp</sup>	Crestone	Florence	Hot Sulphur Springs
Breckenridge <sup>x</sup>	Cripple Creek	Fort Collins <sup>x</sup>	Hotchkiss
Brighton	Crowley County <sup>x</sup>	Fort Lupton	Hudson <sup>x</sup>
Brookside <sup>xp</sup>	Custer County <sup>x</sup>	Fort Morgan	Huerfano County
Broomfield	Dacono	Fountain	Hugo
Brush	De Beque <sup>x</sup>	Fowler <sup>p</sup>	Idaho Springs
Buena Vista	Del Norte	Foxfield <sup>x</sup>	Ignacio
Burlington <sup>x</sup>	Delta	Fraser <sup>x</sup>	Jackson County
Cañon City	Delta County <sup>x</sup>	Frederick	Jefferson County
Carbondale	Denver	Fremont County	Johnstown
Castle Pines <sup>x</sup>	Dillon <sup>x</sup>	Frisco	

Julesburg	Montrose	Rocky Ford <sup>x</sup>	Yampa
Keenesburg	Montrose County <sup>x</sup>	Routt County	Yuma <sup>p</sup>
Kersey	Monument	Saguache County <sup>o</sup>	
Kiowa	Morgan County	Salida	
Kiowa County <sup>o</sup>	Morrison	San Juan County <sup>xp</sup>	
Kremmling	Mount Crested Butte	San Luis <sup>o</sup>	
La Jara	Mountain View	San Miguel County	
La Junta <sup>x</sup>	Mountain Village	Sedgwick County <sup>p</sup>	
La Plata County <sup>x</sup>	Naturita <sup>xp</sup>	Sedgwick <sup>o</sup>	
La Salle <sup>x</sup>	Nederland	Severance	
La Veta <sup>xp</sup>	New Castle	Sheridan	
Lafayette	Northglenn	Silt <sup>x</sup>	
Lake City	Norwood	Silver Cliff	
Lake County	Nucla	Silver Plume <sup>x</sup>	
Lakewood	Nunn	Silverthorne	
Lamar	Oak Creek <sup>x</sup>	Silverton <sup>p</sup>	
Larimer County	Olathe	Simla <sup>p</sup>	
Larkspur <sup>x</sup>	Ophir <sup>x</sup>	Snowmass Village	
Las Animas	Ordway	South Fork	
Las Animas County <sup>x</sup>	Otero County	Springfield	
Leadville	Ouray	Steamboat Springs	
Limon	Ouray County <sup>xp</sup>	Sterling	
Littleton	Ovid	Stratton	
Lochbuie	Pagosa Springs	Summit County <sup>x</sup>	
Log Lane Village	Palisade	Superior	
Logan County <sup>o</sup>	Palmer Lake <sup>x</sup>	Swink <sup>o</sup>	
Lone Tree	Paonia	Teller County	
Longmont	Parachute	Telluride	
Louisville	Park County <sup>p</sup>	Thornton	
Loveland	Parker	Timnath	
Lyons	Pierce	Trinidad	
Mancos	Pitkin	Vail	
Manitou Springs	Pitkin County	Victor	
Manzanola <sup>o</sup>	Platteville	Walsenburg	
Marble <sup>x</sup>	Poncha Springs	Weld County <sup>x</sup>	
Mead	Prowers County	Wellington	
Meeker	Pueblo	Westcliffe	
Merino <sup>o</sup>	Pueblo County	Westminster	
Mesa County	Rangely <sup>p</sup>	Wheat Ridge	
Milliken	Red Cliff	Wiggins	
Mineral County	Rico	Wiley	
Minturn <sup>x</sup>	Ridgway	Williamsburg <sup>xp</sup>	
Moffat County	Rifle	Windsor	
Monte Vista	Rio Blanco County	Winter Park	
Montezuma <sup>x</sup>	Rio Grande County	Woodland Park <sup>x</sup>	
Montezuma County <sup>p</sup>	Rockvale <sup>o</sup>	Wray	



# Appendix B:

## Colorado Jurisdictions Without Zoning

---

The following jurisdictions are granted authority from the state legislature to exercise zoning but have declined to do so. Their status as jurisdictions lacking zoning means that they are depicted in gray on the National Zoning Atlas.

Aguilar	Hooper
Arriba	Iliff
Baca County	Jamestown
Bethune	Pritchett
Bonanza	Ramah
Boone	Raymer (New Raymer)
Branson	Romeo
Calhan	Rye
Campo	Saguache
Carbonate	Sanford
Crawford	Sawpit
Crook	Seibert
Crowley	Sheridan Lake
Deer Trail	Starkville
Dolores County	Sugar City
Eads	Two Buttes
Genoa	Vilas
Granada	Vona
Grover	Walden
Gunnison County	Walsh
Kim	Ward
Kit Carson	Washington County
Kit Carson County	Yuma County
Lakeside	
Lincoln County	
Manassa	
Moffat	
Olney Springs	
Orchard City	
Otis	
Paoli	
Peetz	
Phillips County	
Hartman	
Haswell	
Holly	

# Appendix C:

## Community Type Methodology

---

The five types of communities reported in Figure F were created using Urbanization Year data from the Historical Housing Unit and Urbanization Database (HHUUD10) and 2023 Metropolitan Statistical Area (MSA) designations from the U.S. Census Bureau.<sup>1</sup> By HHUUD10’s methodology, a tract becomes urbanized when its inhabitable land either surpasses a density of 200 housing units per square mile or is over 50 percent covered by urban land uses according to historical National Land Cover Database (NLCD) data.

HHUUD10 estimates the decade between 1940 and 2019 in which 2010-vintage census tracts became urbanized by combining historical housing density data from the Census with a series of ancillary land-use datasets. Due to urbanization patterns in the United States, tracts that became urbanized by this method by 1940 are typically more centrally located within metropolitan areas, while those that urbanized in later decades tend to be more suburban in character. Smaller towns outside of metropolitan regions also often have one or a few tracts that surpassed HHUUD10’s urbanization at some point before 2019 even though they typically would not be considered urban or suburban.

To account for this, we differentiated tracts within MSAs from those that are outside of them. The five categories and their definitions are provided in the table below.

Community Type	Urbanization Year (HHUUD10)	MSA Status (U.S. Census)
Urban Core	1940 or earlier	In MSA
Inner Suburb	1950-1980	In MSA
Outer Suburb	1990-2019	In MSA
Small Town	2019 or earlier	Not in MSA
Rural	None	Disregarded

---

1. U.S. Census Bureau, Delineation Files: Core Based Statistical Areas (CBSAs), Metropolitan Divisions, and Combined Statistical Areas (CSAs) (2023); Scott N. Markley et al., “Housing Unit and Urbanization Estimates for the Continental U.S. in Consistent Tract Boundaries, 1940 – 2019,” 9 *Scientific Data* 1 (2022).

## ABOUT THE AUTHORS

Sara C. Bronin is an architect, attorney, and tenured Cornell University professor who serves as founder and CEO of Land Use Atlas, Inc. She wrote *Key to the City: How Zoning Shapes Our World* and is recognized as one of the country's foremost land use law experts.

Scott Markley is the research director for the National Zoning Atlas and award-winning scholar who has a track record of producing and analyzing large-scale geospatial datasets. He holds a Ph.D. in Geography from the University of Georgia.

Matthew Harris is a zoning analyst for the National Zoning Atlas and an experienced researcher and community development professional working on housing issues. He holds a Ph.D. in Geography from the University of Georgia.

Diana Drogaris is the engagement director for the National Zoning Atlas, with experience in a variety of economic development, planning, and outreach roles. She holds a master's degree in urban planning from the University of Pennsylvania.

## ACKNOWLEDGEMENTS

We gratefully acknowledge the support of Housing Colorado!, a nonprofit statewide membership organization committed to providing advocacy, professional development and issue expertise for the affordable housing community in Colorado, and the support of Arnold Ventures.

We also appreciate the contributions of Carrie Makarewicz, associate professor and chair of the Department of Urban and Regional Planning at CU Denver, and her student researchers, to initial data collection in the Denver metropolitan area.

Finally, we have relied heavily on contributions of our National Zoning Atlas colleagues, including: data collection on Colorado zoning provided by Devon Chodzin, Joanna Kaufman, Olivia Ranseen, Tara Safavian, and Samantha Yee; data analysis provided by Aidan Antonienko and Saatvik Amravathi; and editorial comments provided by Jonah Pellicchia.

**LAND  
USE  
ATLAS**

**NATIONAL  
ZONING  
ATLAS**

3100 N Street NW  
Unit 6A  
Washington, DC 20007

[www.zoningatlas.org](http://www.zoningatlas.org)