# City of Littleton

Littleton Center
2255 West Berry Avenue
Littleton, CO 80120

## Meeting Agenda - Final

## City Council

**Tuesday, November 3, 2026** | **6:30 PM** | **Council Chamber**

**Regular Meeting**

## 1. Roll Call

## 2. Pledge of Allegiance

## 3. Approval of Agenda

## 4. Scheduled Appearances and Presentations - None

## 5. Proclamations - None

## 6. Public Comment

*If you wish to address city council under Public Comment, please sign-in on the public speaker form before the call to order for this meeting. Public Comment is an opportunity to express opinions regarding issues that are not part of public hearings on tonight's agenda; a separate opportunity will be provided for comment for any public hearing. Each speaker is limited to three (3) minutes. We expect comments to be civil. Disrespectful or disruptive behavior will not be tolerated. The city council is not authorized under the Colorado Open Meetings Law to discuss, comment, or take action at this meeting on any issue raised by public comment that is not part of tonight's agenda. The Mayor may refer the matter to the city manager and/or city attorney for immediate comment after Public Comment, or to staff to obtain additional information and report back to council as appropriate.*

## 7. Comments / Reports

a) Council Members

b) Mayor

c) City Manager

d) City Attorney

## 8. Consent Agenda Items

*Consent agenda items can be adopted by a simple motion. All ordinances must be read by title prior to a vote on the motion. Any consent agenda item may be removed at the request of a council member.*

**a)** Ordinance 23-2026 — Ordinance 23-2026: An ordinance on first reading appropriating funds for the 2027 annual budget for all municipal purposes of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, adopting budgets for the enterprise funds of the City of Littleton for the fiscal year beginning January 1, 2027 and ending December 31, 2027, and amending the 2026 budget

***Attachments:*** 1. Ordinance No. 23-2026

**b)** Ordinance 24-2026 — Ordinance 24-2026: An ordinance on first reading establishing the tax levy of 2.0 mills to defray the costs of municipal government of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, for the City's Fiscal Year beginning January 1, 2027, and ending December 31, 2027

***Attachments:*** 1. Ordinance No. 24-2026

**c)** Ordinance 25-2026 — Ordinance 25-2026: An ordinance on first reading establishing the tax levy of 3.0 mills to help defray the costs of government for the Littleton Downtown Development Authority of the county of Arapahoe, State of Colorado, for the calendar year beginning January 1, 2027, and ending on December 31, 2027

***Attachments:*** 1. Ordinance No. 25-2026

**d)** ID# 26-227 — Motion to approve minutes for the October 20, 2026, regular meeting of Littleton City Council

***Attachments:*** 1. 10-20-2026 CC Minutes_DRAFT

## 9. General Business

**a)** Resolution 81-2026 — Resolution 81-2026: Expressing support for and directing staff to take next steps regarding formation of a public authority to operate the city's jointly owned wastewater treatment facility

***Attachments:*** 1. Resolution No. 81-2026

2. Presentation_Res. 81-2026

## 10. Ordinances on Second Reading and Public Hearings

*Speakers wishing to address council as part of a public hearing will be limited to three (3) minutes and will be called upon when the mayor opens the public comment portion of the hearing.*

**a)** Ordinance 19-2026 — Ordinance 19-2026: An ordinance on second reading amending Title 3, Chapter 25, of the Littleton City Code business regulations regarding solid waste and recycling hauler licenses

***Attachments:*** 1. Ordinance No. 19-2026
2. South Metro Waste Diversion Plan 2025
3. Environmental Stewardship Action Plan 2024
4. Presentation_Ord. 19-2026

**b)** Ordinance 22-2026 — Ordinance 22-2026: An ordinance on second reading establishing a Temporary Moratorium on the acceptance, processing, and approval of applications for Data Centers and directing staff to study and recommend land use regulations for data centers

***Attachments:*** 1. Ordinance No. 22-2026
2. Presentation_Ord. 22-2026

## 11. Adjournment

*The public is invited to attend all regular meetings or study sessions of the city council or any city board, commission, or committee. Please call 303-795-3780 at least 48 hours prior to the meeting if you believe you will need special assistance or any reasonable accommodation in order to attend, or participate in, any such meeting. For any additional information concerning city meetings, please call the city clerk's office at the above referenced number.*

## Staff Communication

**File #:** Ordinance 23-2026, **Version:** 2

Agenda Date: 11/03/2026

Subject:
Ordinance 23-2026: An ordinance on first reading appropriating funds for the 2027 annual budget for all municipal purposes of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, adopting budgets for the enterprise funds of the City of Littleton for the fiscal year beginning January 1, 2027 and ending December 31, 2027, and amending the 2026 budget

| | |
|---|---|
| From: | James L. Becklenberg, City Manager |
| Prepared by: | Kevin Orton, Budget Manager |
| Presentations: | N/A |

**PURPOSE:**
Council consideration of the 2027 annual budget for all municipal purposes of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, adopting budgets for the enterprise funds of the City of Littleton for the fiscal year beginning January 1, 2027 and ending December 31, 2027, and amending the 2026 budget.

**LONG-TERM OUTCOME(S) SERVED:**
High-Quality Governance

**DISCUSSION:**
The 2027 Proposed Budget was transmitted to City Council of September 15, 2026 and a City Council Budget Workshop was held on October 9, 2026 at the South Platte Renew Administration Building. City Council received an additional briefing during a City Council Meeting on October 20, 2026. During these meetings, City Council agreed to amend the proposed budget. The proposed budget as amended is being presented for adoption.

**BACKGROUND:**
The Charter of the City of Littleton Article X, Part I, Sec. 70-72 requires the City Manager to present a Proposed Operating and Capital Budget not later than September 15th for the subsequent fiscal year. The Budget is required to be adopted 30 days prior to the start of the fiscal year (December 1st). The State of Colorado requires the budget adopted, and mill level by certified, by December 15th.

The 2027 Proposed Budget was transmitted to City Council of September 15, 2026 and a City Council Budget Workshop was held on October 9, 2026 at the South Platte Renew Administration Building.

During these meetings, City Council agreed to amend the General Fund proposed budget by supporting four additional policy questions, and by reducing the City Council travel budget. The following amendments are included in the 2027 annual budget for consideration

- Funding for the Littleton Leadership Academy
- Municipal Court Level of Service Assessment
- Adding one (1) additional planner in Community Development
- Reducing the Open Rewards program by $30,000 for one year
- Reducing the City Council Budget

The total amendments increased the General Fund proposed budget by $202,707

The 2027 fiscal year is from January 1, 2027 through December 31, 2027 and the total city budget, inclusive of interfund transfers, is $159.0 million and of that amount the total General Fund 2027 proposed budget is $65.1 million. The 2027 Proposed Budget includes funding for 349 full-time positions and 44 part time positions.

The budget is balanced, maintains healthy reserves, and preserves existing service levels while adding resources in alignment with City Council policy direction and the Horizon 2027 strategic plan's strategic outcomes: Vibrant Community with Rich Culture, Sustainable Community with Natural Beauty, Robust and Resilient Economy, Safe Community, and High-Quality Governance.

**2026 Estimate**
As part of the 2027 proposed budget, the 2026 estimates are provided to develop the estimated available funds for the 2027 budget. The following funds will need to revise their 2026 budgets since the estimate is higher than appropriations. All estimates were included in the 2027 proposed budget document.

| Fund | 2026 Budget | Adj. | 2026 Revised Budget |
|---|---|---|---|
| Open Space | $3,759,743 | $305,000 | $4,064,743 |
| Capital Improvement Sales Tax | $29,873,230 | $31,686,894 | $61,560,124 |
| Geneva Village | $61,055 | $11,303 | $72,358 |
| Employee Insurance | $10,053,589 | $313,216 | $10,366,805 |

Prior Actions or Discussions

- A preliminary 2027 budget planning forecast was presented at the June 16, 2026 City Council Meeting
- The 2027 Proposed Budget was discussed at the October 9, 2026 budget workshop.
- A summary of the proposed budget and additional follow up was discussed at the October 20, 2026 City Council meeting.

**FISCAL IMPACTS:**
The policy questions and budget were reviewed by council during two study sessions and information is available at the Bemis Public Library, the City Clerk's Office, and the City of Littleton website for public review.

The following is a 2027 budget summary for all funds in this appropriation ordinance:

| Fund | 2027 Adopted Budget |
|---|---|
| General Fund | $65,079,892 |
| Affordable Housing Fund | 500,000 |

| | |
|---|---|
| Conservation Trust Fund | 375,352 |
| Consolidated Special Revenue Fund | 759,368 |
| Grants Fund | 7,536,710 |
| Open Space Fund | 2,945,099 |
| Impact Fees Fund | 4,543,640 |
| Lodgers Tax Fund | 873,532 |
| Capital Projects Fund | 10,442,495 |
| Capital Improvement Sales Tax Fund | 16,599,472 |
| Employee Insurance Fund | 11,102,702 |
| Fleet Maintenance Fund | 3,283,026 |
| Information Technology/Equipment Fund | 1,620,000 |
| Property & Liability Fund | 1,475,000 |
| Sewer Utility Enterprise Fund | 27,126,710 |
| Storm Drainage Utility Enterprise Fund | 4,768,187 |
| **Total** | **$159,031,185** |

The following 2026 budgets are being adjusted in alignment with the 2026 estimate as included in the 2027 Proposed Budget document:

| **Fund** | **2025 Revised Budget** |
|---|---|
| Open Space | $4,064,743 |
| Capital Improvement Sales Tax | 61,560,124 |
| Geneva Village | 72,358 |
| Employee Insurance | 10,366,805 |
| Open Space | 4,064,743 |

**STAFF RECOMMENDATION:**
Staff recommends approval of this ordinance and to schedule second reading adopting the 2027 budget on November 17, 2026.

**ALTERNATIVES:**
City Council may choose to adjust the proposed budget or reschedule 1st and 2nd reading, however the City Charter requires the budget be adopted 30 days prior to the start of the fiscal year (December 1st). And the State of Colorado requires the budget adopted, and mill level by certified, by December 15th. If the budget is not adopted by certification deadline, then 90 percent of the amounts appropriated in the current year for operations and maintenance expenses shall be deemed re-appropriated for the purposes specified in such last appropriation (CRS 29-1-108(2) and (3)).

**PROPOSED MOTION:**
I move to approve Ordinance 23-2026 on first reading appropriating funds for the 2027 annual budget for all

municipal purposes of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, adopting budgets for the enterprise funds of the City of Littleton for the fiscal year beginning January 1, 2027 and ending December 31, 2027, and amending the 2026 budget, and to set the second reading and public hearing for November 17, 2026.



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**CITY OF LITTLETON, COLORADO**

**ORDINANCE NO. 23**

**Series, 2026**

**AN ORDINANCE ON FIRST READING OF THE CITY OF LITTLETON, COLORADO, APPROPRIATING FUNDS FOR THE 2027 ANNUAL BUDGET FOR ALL MUNICIPAL PURPOSES OF THE CITY OF LITTLETON, COUNTIES OF ARAPAHOE, DOUGLAS, AND JEFFERSON, STATE OF COLORADO, ADOPTING BUDGETS FOR THE ENTERPRISE FUNDS OF THE CITY OF LITTLETON FOR THE FISCAL YEAR BEGINNING JANUARY 1, 2027 AND ENDING DECEMBER 31, 2027, AND AMENDING THE 2026 BUDGET**

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LITTLETON, COLORADO, THAT:**

**Section 1:** There shall be and is hereby appropriated from and out of the general revenues derived from taxation in the City of Littleton, Colorado, and from franchises, licenses, fees, fines, grants, surplus and other sources of money or revenue including available fund balances of said City during the fiscal year commencing January 1, 2027, and the following sums of money are deemed necessary to satisfy the expenses and liabilities of said City for said fiscal year. The sum or sums of money so appropriated for the various funds of the City are:

| **FUND** | **EXPENDITURES** |
|---|---:|
| General Fund | $65,079,892 |
| Affordable Housing Fund | 500,000 |
| Conservation Trust Fund | 375,352 |
| Consolidated Special Revenue Fund | 759,368 |
| Grants Fund | 7,536,710 |
| Open Space Fund | 2,945,099 |
| Impact Fees Fund | 4,543,640 |
| Lodgers Tax Fund | 873,532 |
| Capital Projects Fund | 10,442,495 |
| Capital Improvement Sales Tax Fund | 16,599,472 |
| Employee Insurance Fund | 11,102,702 |
| Fleet Maintenance Fund | 3,283,026 |
| Information Technology/Equipment Fund | 1,620,000 |
| Property & Liability Fund | 1,475,000 |
| **Total** | **$127,136,288** |

**Section 2:** The budgeted expenditures for the City of Littleton, Colorado, Sewer Utility Enterprise and Storm Drainage Enterprise Fund for the period of January 1, 2027 to December 31, 2027 shall be.:

| **FUND** | **EXPENSES** |
|---|---|
| Sewer Utility Enterprise Fund | 27,126,710 |
| Storm Drainage Utility Enterprise Fund | 4,768,187 |
| **Total** | **$ 31,894,915** |

**Section 3:** There shall be and is hereby appropriated from and out of the general revenues derived from taxation in the City of Littleton, Colorado, and from franchises, licenses, fees, fines, grants, surplus and other sources of money or revenue including available fund balances of said City during the fiscal year commencing January 1, 2026, and the following sums of money are deemed necessary to satisfy the expenses and liabilities of said City for said fiscal year. The sum or sums of money so appropriated for the various funds of the City are:

| **FUND** | **EXPENDITURES** |
|---|---|
| Open Space Fund | $305,000 |
| Capital Improvement Sales Tax Fund | 31,686,894 |
| Geneva Village Fund | 11,303 |
| Employee Insurance Fund | 313,216 |
| **Total** | **$32,316,413** |

**Section 4:** Severability. If any part, section, subsection, sentence, clause or phrase of this ordinance is for any reason held to be invalid, such invalidity shall not affect the validity of the remaining sections of this ordinance. The City Council hereby declares that it would have passed this ordinance, including each part, section, subsection, sentence, clause or phrase hereof, irrespective of the fact that one or more parts, sections, subsections, sentences, clauses or phrases may be declared invalid.

**Section 5:** Repealer. All ordinances or resolutions, or parts thereof, in conflict with this ordinance are hereby repealed, provided that this repealer shall not repeal the repealer clauses of such ordinance nor revive any ordinance thereby.

INTRODUCED AS A BILL at a regularly scheduled meeting of the City Council of the City of Littleton on the 3 day of November, 2026, passed on first reading by a vote of ___

FOR and ___ AGAINST; and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

PUBLIC HEARING on the Ordinance to take place on the 3 day of November, 2026, in the Council Chamber, Littleton Center, 2255 West Berry Avenue, Littleton, Colorado, at the hour of 6:30 p.m., or as soon thereafter as it may be heard.

PASSED on second and final reading, following public hearing, by a vote of ___ FOR and ___ AGAINST on the 17 day of November, 2026 and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

ATTEST:

_____
Colleen L. Norton
CITY CLERK

_____
Kyle Schlachter
MAYOR

APPROVED AS TO FORM:

_____
Reid Betzing
CITY ATTORNEY

Littleton Center
2255 West Berry Avenue
Littleton, CO 80120

# City of Littleton

## Staff Communication

**File #:** Ordinance 24-2026, **Version:** 1

Agenda Date: 11/03/2026

Subject:
Ordinance 24-2026: An ordinance on first reading establishing the tax levy of 2.0 mills to defray the costs of municipal government of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, for the City's Fiscal Year beginning January 1, 2027, and ending December 31, 2027

| | |
|---|---|
| From: | James L. Becklenberg, City Manager |
| Prepared by: | Kevin Orton, Budget Manager |
| Presentations: | N/A |

**PURPOSE:**
Council consideration for establishing the tax levy of 2.0 mills to defray the costs of municipal government of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, for the City's Fiscal Year beginning January 1, 2027, and ending December 31, 2027.

**LONG-TERM OUTCOME(S) SERVED:**
High-Quality Governance.

**DISCUSSION:**
Property taxes are used to help fund city operations. Property taxes are projected to increase in 2027 by an estimated 2%. With growth in the City of Littleton limited, increases in property tax revenues depend primarily on assessed valuations. The property tax mill levy rate ($1 per $1,000 of assessed value) remains the same as last year at 2.0 mills ($2 per $1,000 of assessed value).

**BACKGROUND:**
The property tax levy remained at 6.662 mills from 1991-2018. In 2019, the property tax levy was reduced to 2.0 mills a result of the fire department transition to South Metro Fire Rescue.

Prior Actions or Discussions
Council reviewed the 2026 Proposed Budget during study sessions held on October 9 and October 20, 2026.

**FISCAL IMPACTS:**
Property taxes represent 4% of General Fund revenues that help fund city operations. The amount estimated in 2027 for property tax revenues is $2,555,220.

**STAFF RECOMMENDATION:**
Staff recommends approval of the ordinance establishing the 2026 tax (mill) levy to be collected in 2027.

**ALTERNATIVES:**

N/A

**PROPOSED MOTION:**
I move to approve Ordinance 24-2026 on first reading establishing the tax levy of 2.0 mills to defray the costs of municipal government of the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, for the City's Fiscal Year beginning January 1, 2027, and ending December 31, 2027, and to set the second reading and public hearing for November 17, 2026.

**CITY OF LITTLETON, COLORADO**

**ORDINANCE NO. 24**

**Series, 2026**

**AN ORDINANCE ON FIRST READING ESTABLISHING THE TAX LEVY OF 2.0 MILLS TO DEFRAY THE COSTS OF MUNICIPAL GOVERNMENT OF THE CITY OF LITTLETON, COUNTIES OF ARAPAHOE, DOUGLAS, AND JEFFERSON, STATE OF COLORADO, FOR THE CITY'S FISCAL YEAR BEGINNING JANUARY 1, 2027 AND ENDING DECEMBER 31, 2027**

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LITTLETON, COLORADO, THAT:**

**Section 1:** For the purposes of defraying expenses of municipal government for the City of Littleton, Colorado for the fiscal year beginning January 1, 2027, and ending December 31, 2027, there is hereby levied a tax of 2.0 mills upon each dollar of total assessed valuation of the taxable property, whether real, personal, or mixed, so situated within the City of Littleton, Counties of Arapahoe, Douglas, and Jefferson, State of Colorado.

**Section 2:** The 2.0 mills are levied for the following purposes:

General Government 2.0 mills

**Section 3:** To the effect and purpose that said levy mentioned herein may be properly apportioned and billed, the city clerk of the City of Littleton is hereby authorized and directed to notify the county commissioners of the Counties of Arapahoe, Douglas, and Jefferson, State of Colorado, of the adoption and passage of this ordinance, and to certify to such officials the levy herein set forth

**Section 4:** Severability. If any part, section, subsection, sentence, clause or phrase of this ordinance is for any reason held to be invalid, such invalidity shall not affect the validity of the remaining sections of this ordinance. The City Council hereby declares that it would have passed this ordinance, including each part, section, subsection, sentence, clause or phrase hereof, irrespective of the fact that one or more parts, sections, subsections, sentences, clauses or phrases may be declared invalid.

**Section 5:** Repealer. All ordinances or resolutions, or parts thereof, in conflict with this ordinance are hereby repealed, provided that this repealer shall not repeal the repealer clauses of such ordinance nor revive any ordinance thereby.

INTRODUCED AS A BILL at a regularly scheduled meeting of the City Council of the City of Littleton on the 3rd day of November, 2026, passed on first reading by a vote of ___ FOR and ___ AGAINST; and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

PUBLIC HEARING on the Ordinance to take place on the 17th day of November, 2026, in the Council Chamber, Littleton Center, 2255 West Berry Avenue, Littleton, Colorado, at the hour of 6:30 p.m., or as soon thereafter as it may be heard.

PASSED on second and final reading, following public hearing, by a vote of ___ FOR and ___ AGAINST on the 17th day of November, 2026 and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

ATTEST:

| | |
|---|---|
| _____ | _____ |
| Colleen L. Norton | Kyle Schlachter |
| CITY CLERK | MAYOR |

APPROVED AS TO FORM:

_____
Reid Betzing
CITY ATTORNEY



## Staff Communication

**File #:** Ordinance 25-2026, **Version:** 1

Agenda Date: 11/03/2026

Subject:
Ordinance 25-2026: An ordinance on first reading establishing the tax levy of 3.0 mills to help defray the costs of government for the Littleton Downtown Development Authority of the county of Arapahoe, State of Colorado, for the calendar year beginning January 1, 2027, and ending on December 31, 2027

| | |
|---|---|
| From: | James L. Becklenberg, City Manager |
| Prepared by: | Kevin Orton, Budget Manager |
| Presentations: | N/A |

**PURPOSE:**
City Council consideration establishing the tax levy of 3.0 mills to help defray the costs of government for the Littleton Downtown Development Authority of the county of Arapahoe, State of Colorado, for the calendar year beginning January 1, 2027, and ending on December 31, 2027.

**LONG-TERM OUTCOME(S) SERVED:**
High-Quality Governance

**DISCUSSION:**
This ordinance will establish a mill levy of 3.0 mills for the LDDA to be collected in 2027 as approved by voters November 2022.

**BACKGROUND:**
The Littleton Downtown Development authority was approved by voters in November 2022 with a mill levy set at 3.0 mills. The LDDA Board adopted the 2027 budget on September 16, 2026, and is being presented to the council for consideration on November 17.

Prior Actions or Discussions
N/A

**FISCAL IMPACTS:**
The LDDA estimates approximately $193,545 to be collected in property taxes in 2027.

**STAFF RECOMMENDATION:**
Staff recommends approval of the ordinance on second reading establishing the 2026 tax (mill) levy to be collected in 2027.

**ALTERNATIVES:**
N/A

**PROPOSED MOTION:**
I move to approve Ordinance 25-2026 on first reading establishing the tax levy of 3.0 mills to help defray the costs of government for the Littleton Downtown Development Authority of the county of Arapahoe, State of Colorado, for the calendar year beginning January 1, 2027, and ending on December 31, 2027, and to set the second reading and public hearing for November 17, 2026.

**CITY OF LITTLETON, COLORADO**

**ORDINANCE NO. 25**

**Series, 2026**

**AN ORDINANCE ON FIRST READING ESTABLISHING THE TAX LEVY OF 3.0 MILLS TO DEFRAY THE COSTS OF MUNICIPAL GOVERNMENT FOR THE LITTLETON DOWNTOWN DEVELOPMENT AUTHORITY OF THE COUNTY OF ARAPAHOE, STATE OF COLORADO, FOR THE CITY'S FISCAL YEAR BEGINNING JANUARY 1, 2027 AND ENDING DECEMBER 31, 2027**

**WHEREAS,** the Littleton Downtown Development Authority, Littleton, Colorado, (the "LDDA") was created pursuant to Ordinance No. 29, Series 2022 under the provisions of Part 8 of Article 25 of Title 31, C.R.S. (the "DDA statute"); and

**WHEREAS,** voters within the Downtown Development Authority approved the establishment of the Authority and also approved the establishment of a property tax for the Authority not to exceed 3 mills.

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LITTLETON, COLORADO, THAT:**

**Section 1:** The tax levy upon the real and personal property within the boundaries of the Littleton Downtown Development Authority for all purposes to be collected beginning January 1, 2027, and ending December 31, 2027, is hereby levied at three (3.000) mills for the upon each dollar of the total valuation for assessment of all real and personal property within the boundaries of the LDDA.

**Section 2:** The proper officials of the City are hereby authorized and directed to certify to the county commissioners of the County of Arapahoe, Colorado the mill levy for the Littleton Downtown Development Authority as hereinabove determined and fixed and the county assessor to extend the same to the tax rolls.

**Section 3:** Severability. If any part, section, subsection, sentence, clause or phrase of this ordinance is for any reason held to be invalid, such invalidity shall not affect the validity of the remaining sections of this ordinance. The City Council hereby declares that it would have passed this ordinance, including each part, section, subsection, sentence, clause or phrase hereof, irrespective of the fact that one or more parts, sections, subsections, sentences, clauses or phrases may be declared invalid.

**Section 4:** Repealer. All ordinances or resolutions, or parts thereof, in conflict with this ordinance are hereby repealed, provided that this repealer shall not repeal the repealer clauses of such ordinance nor revive any ordinance thereby.

INTRODUCED AS A BILL at a regularly scheduled meeting of the City Council of the City of Littleton on the 3rd day of November, 2026, passed on first reading by a vote of ___ FOR and ___ AGAINST; and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

PUBLIC HEARING on the Ordinance to take place on the 17th day of November, 2026, in the Council Chamber, Littleton Center, 2255 West Berry Avenue, Littleton, Colorado, at the hour of 6:30 p.m., or as soon thereafter as it may be heard.

PASSED on second and final reading, following public hearing, by a vote of ___ FOR and ___ AGAINST on the 17th day of November, 2026 and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

ATTEST:

| | |
|---|---|
| _____ | _____ |
| Colleen L. Norton | Kyle Schlachter |
| CITY CLERK | MAYOR |

APPROVED AS TO FORM:

_____
Reid Betzing
CITY ATTORNEY



## Staff Communication

**File #:** ID# 26-227, **Version:** 1

Agenda Date: 11/03/2026

Subject:
Motion to approve minutes for the October 20, 2026, regular meeting of Littleton City Council

| | |
|---|---|
| Prepared by: | Wendy J. Shea-Tamag, Deputy City Clerk |

**RECORDING SECRETARY'S CERTIFICATION:**
I hereby certify that the attached minutes are an accurate representation of motions made, and action taken at the October 20, 2026, regular meeting of City Council. I have also reviewed the video recording for the October 20, 2026, regular meeting of the Littleton City Council and certify that the video recording is a full, complete, and accurate record of the proceedings and there were no malfunctions in the video.

**PROPOSED MOTION:**
I move to approve the minutes for the October 20, 2026, regular meeting of City Council.

# City of Littleton

Littleton Center
2255 West Berry Avenue
Littleton, CO 80120

## Meeting Minutes - Draft

## City Council

**Tuesday, October 20, 2026** | **6:30 PM** | **Council Chamber**

**Regular Meeting**

## 1. Roll Call

**Present:** 7 - Mayor Schlachter, Mayor Pro-Tem Peters, Council Member Grove, Council Member Henderson, Council Member Reichardt, Council Member Stillwell and Council Member Zink

## 2. Pledge of Allegiance

## 3. Approval of Agenda

## 4. Scheduled Appearances and Presentations - None

## 5. Proclamations

**a)** ID# 26-213 Mayoral Proclamations

## 6. Public Comment

*Pam Chadbourne, Dist. I – Budget / Urban Planning*

*Amy Reichardt, Dist. II – Ketring Lake*

*Daniel Curran, Dist. II – Ketring Lake*

*ennifer Mrachek, Dist. II – Ketring Lake*

*Brooke Wilfan, Dist. II – Ketring Lake*

*David Taussig, Dist. II – Ketring Lake / 4-way stop at Elati & Caley*

*Carol McKinley, Dist. II – Ketring Lake*

*Candice Rutledge, Littleton – Issues in Littleton/RTD buses*

*Sterling Oldemeyer, Dist. II – Ketring Lake / 4-way stop at Elati & Caley and 4-way stop at Datura & Shepperd*

*Andrew Klarecki, Denver – Data Center moratorium*

*Miriam Dunnan, Centennial - Suggestions for Littleton*

## 7. Comments / Reports

a) Council Members

*Council Member Reichardt – No report*

*Council Member Zink – Recap of recent visit to Littleton, New Hampshire. The name is the same, but he's glad to be back home!*

*Council Member Henderson – She and her family voted last week together and reminded people to vote. The State of the City breakfast is tomorrow at 7:15 a.m. at ACC (Arapahoe Community College). The Environmental Stewardship Board discussed hauler licensing at their last meeting; this subject is on Council's agenda for tonight. This weekend is the Littleton Stride on Sunday which is a 5-10K fund-raiser for LPS (Littleton Public Schools). The last cohort of the Littleton Leadership Academy graduated last week. Reflected on Council's recent budget meeting and the progress made.*

*Council Member Stillwell - Thanked everyone who came to the meeting. Citizens talk about code issues a lot so he was glad to hear that the mayor acknowledged Code Compliance Month.*

*Council Member Grove – As an advocate for citizens, was happy to report a couple of success stores. Welcomes continued citizen engagement. Attended Littleton (Blueprint) Boulevard meeting at the Epic Campus, and was enlightened by citizen input. Went to an event regarding data centers in Colorado and learned a lot. The concerns come from hyperscale data centers where use of water is excessive and noise levels are amplified. Saw "Almost Heaven" at the Town Hall Arts Center and encourage citizens to see it.*

*Mayor Pro Tem Peters – No report*

b) Mayor

*Tomorrow ACC (Arapahoe Community College) is hosting a "Conversation with Kyle" event from 1:00-2:00 p.m.; will be discussing topics with students and faculty. Congratulated Carboy Winery for winning 5 of the 2026 Governor's Cup awards last Friday.*

c) City Manager

*Celebrating National Community Planning Month, provided credentials of the city's planning staff and praised their accomplishments.*

d) City Attorney

*Responded to a public comment regarding the temporary moratorium on data centers, explaining that the six (6) month moratorium is what is permitted under statute. The duration can be extended if studies or processes need more time.*

## 8. Consent Agenda Items

**a)** Ordinance 19-2026 — Ordinance 19-2026: An ordinance on second reading amending Title 3, Chapter 25, of the Littleton City Code business regulations regarding solid

waste and recycling hauler licenses

**approved on first reading**

**b)** Resolution 70-2026 — Resolution 70-2026: Approving the 2027 Operating Plan and Budget for Aspen Grove Business Improvement District

**approved**

**c)** Resolution 71-2026 — Resolution 71-2026: Approving the 2027 Operating Plan and Budget for Mineral Business Improvement District

**approved**

**d)** Resolution 78-2026 — Resolution 78-2026: Approving a Professional Services Agreement (PSA) for the Transportation Master Plan (TMP) Update

**approved**

**e)** Resolution 77-2026 — Resolution 77-2026: Approving the Intergovernmental Agreement with Urban Drainage and Flood Control District D/B/A Mile High Flood District regarding development of a district-wide flood risk assessment

**approved**

**f)** Resolution 73-2026 — Resolution 73:2026: Approving the renewal of property/casualty liability insurance coverage through Colorado Intergovernmental Risk Sharing Agency (CIRSA)

**approved**

**g)** Ordinance 22-2026 — Ordinance 22-2026: An ordinance on second reading establishing a Temporary Moratorium on the acceptance, processing, and approval of applications for Data Centers and directing staff to study and recommend land use regulations for data centers

**approved on first reading**

**h)** ID# 26-204 — Motion to approve minutes for the September 29, 2026, special meeting of Littleton City Council

**approved**

**i)** ID# 26-214 — Motion to approve minutes for the October 6, 2026, special meeting of Littleton City Council

**approved**

**j)** ID# 26-215 — Motion to approve minutes for the October 6, 2026, regular meeting of Littleton City Council

**approved**

## Approval of the Consent Agenda

**Mayor Pro Tem Peters moved and Council Member Reichardt seconded to approve the consent agenda items a through j. The vote is 7-0. The motion carries unanimously.**

**Aye:** 7 - Mayor Schlachter, Mayor Pro-Tem Peters, Council Member Grove, Council Member Henderson, Council Member Reichardt, Council Member Stillwell and Council Member Zink

## 9. General Business

**a)** ID# 26-211 2027 Proposed Budget Follow-Up / Summary

**b)** ID# 26-210 Ketring Lake Water Management Strategies and Recommended Planning Direction

*Session in recess 8:26 p.m.*
*Session reconvened 8:32 p.m.*

**c)** Resolution 74-2026 Resolution 74-2026: A Resolution of the Littleton City Council opposing Amendment 81, which would amend the Colorado Constitution to require Law Enforcement to notify federal immigration authorities when certain individuals are charged with crimes, and urges its citizens to vote No on Amendment 81

**Mayor Pro Tem Peters moved and Council Member Zink seconded to approve Resolution 74-2026 opposing Amendment 81, which would amend the Colorado Constitution to require Law Enforcement to notify federal immigration authorities when certain individuals are charged with crimes, and urges its citizens to vote No on Amendment 81. The vote is 6-1, with Council Member Stillwell voting no. The motion carries.**

**Aye:** 6 - Mayor Schlachter, Mayor Pro-Tem Peters, Council Member Grove, Council Member Henderson, Council Member Reichardt and Council Member Zink

**Nay:** 1 - Council Member Stillwell

**d)** Resolution 75-2026 Resolution 75-2026: A Resolution of the Littleton City Council opposing Amendment 84 which would require additional mail ballot information and urging its citizens to vote No on Amendment 84

**Council Member Zink moved and Council Member Henderson seconded to approve Resolution 75-2026 opposing Amendment 84 which would require additional mail ballot information and urging its citizens to vote No on Amendment 84. The vote is 6-1, with Council Member Stillwell voting no. The motion carries.**

**Aye:** 6 - Mayor Schlachter, Mayor Pro-Tem Peters, Council Member Grove, Council Member Henderson, Council Member Reichardt and Council Member Zink

**Nay:** 1 - Council Member Stillwell

**e)** ID# 26-206 Motion to approve an amendment to the city attorney's employment

agreement

**Council Reichardt moved and Council Member Grove seconded to approve the proposed amendment to the city attorney's employment agreement. The vote is 7-0. The motion carries unanimously.**

**Aye:** 7 - Mayor Schlachter, Mayor Pro-Tem Peters, Council Member Grove, Council Member Henderson, Council Member Reichardt, Council Member Stillwell and Council Member Zink

**f)** ID# 26-207 Motion to approve an amendment to the city manager's employment agreement

**Mayor Pro Tem Peters moved and Council Member Grove seconded to approve the proposed amendment to the city manager's employment agreement. The vote is 7-0. The motion carries unanimously.**

**Aye:** 7 - Mayor Schlachter, Mayor Pro-Tem Peters, Council Member Grove, Council Member Henderson, Council Member Reichardt, Council Member Stillwell and Council Member Zink

## 10. Ordinances on Second Reading and Public Hearings

**a)** Ordinance 18-2026 Ordinance 18-2026: An ordinance on second reading, repealing and reenacting Title 3, Chapter 11, of the Littleton City Code regarding massage establishments to comply with recent state legislation governing massage facility licensure and fingerprint-based criminal history record checks

**Council Member Zink moved and Council Member Henderson seconded to approve Ordinance 18-2026 repealing and reenacting Title 3, Chapter 11, of the Littleton City Code regarding massage establishments to comply with recent state legislation governing massage facility licensure and fingerprint-based criminal history record checks.**

**Council Member Zink moved and Council Member Reichardt seconded to amend the main motion as follows: "I move to amend 3-11-8(b)(a) on line 291 to delete, "the Littleton Police Department or"". The vote is 7-0. The motion to amend carries unanimously.**

**The vote on the main motion, as amended, is 7-0. The motion carries unanimously.**

**Aye:** 7 - Mayor Schlachter, Mayor Pro-Tem Peters, Council Member Grove, Council Member Henderson, Council Member Reichardt, Council Member Stillwell and Council Member Zink

## 11. Adjournment

*Mayor Schlachter adjourned the meeting at 9:06 p.m.*

## Staff Communication

**File #:** Resolution 81-2026, **Version:** 1

Agenda Date: 11/03/2026

Subject:
Resolution 81-2026: Expressing support for and directing staff to take next steps regarding formation of a public authority to operate the city's jointly owned wastewater treatment facility

| | |
|---|---|
| From: | James L. Becklenberg, City Manager |
| Prepared by: | James L. Becklenberg, City Manager |
| | Reid Betzing, City Attorney |
| | Pieter Van Ry, South Platte Renew Director |
| Presentations: | Pieter Van Ry, South Platte Renew Director |

**PURPOSE:**
Based on information presented at the August 11, 2026, study session, does the City Council support taking the next steps to form an authority to operate the City's jointly owned wastewater facility?

**LONG-TERM OUTCOME(S) SERVED:**
High-Quality Governance

**DISCUSSION:**
In 2021, the City of Littleton contracted FCS Group to conduct an analysis of potential models of transitioning Littleton's ownership interest of SPR to reduce financial obligations as well as business and regulatory risk. FCS Group presented their analysis and ranking of the identified options to City of Littleton and City of Englewood Councils on March 8, 2022, and November 14, 2022, respectively.

Both cities directed SPR to continue the governance analysis. In January 2024, SPR contracted the engineering firm Hazen to conduct the second phase of the governance analysis, in conjunction with the legal firm Cockrel Ela Glesne Greher & Ruhland, P.C. (CEGR Law) to perform a legal analysis. The results of this work were presented to both City Councils in August 2026 and identified the formation of an Authority as a viable alternative governance model to the current structure. The analysis explored the organizational and financial impacts of creating an Authority and provided a framework for establishing an Authority should the cities choose to move forward.

Study Sessions with both cities were held in August 2026 to discuss the findings of the SPR governance analysis, as well as a Joint Council Study Session in August 2026. At the August 11, 2026, study session, Council provided verbal direction for staff to continue working toward the formation of an authority. This resolution simply documents that support and direction in the same format for both communities.

Consideration of a resolution of support is the first in five identified steps required to transfer operational (and perhaps ownership) of the plant, to respond to and resolve the legal concerns faced by the cities related to

ownership and operation of wastewater treatment facilities. The five formal actions required by City Council are anticipated to be:

1. Adopt a resolution of support
2. Adopt an ordinance approving a contract with the City of Littleton regarding formation of an authority
3. Approve a motion appointing board members to the authority.
4. Adopt an ordinance approving an operating agreement with the City of Littleton and the authority regarding operation of the facility
5. Decide the land usage/ownership issue and take necessary action: the authority will require at least extended possessory rights to the land and improvements in order to secure financing for anticipated capital improvements and unfunded mandates
    a. City Council may enter into a long-term lease
    b. City Council may transfer ownership of its interest in capital equipment.

In addition to the formal steps, staff would also commence public education about this issue with completion of the process and feedback regarding public input at the time Council considers the next formal step, which would likely occur in early 2027.

**BACKGROUND:**
SPR is co-owned by the Cities of Englewood and Littleton (Cities) and is governed by the 1973 and 1982 Agreements between the Cities of Littleton and Englewood, Colorado for Joint-Use Wastewater Treatment Facilities,' also known as the 1973 and 1982 Joint-Use Agreement.

These agreements, written by both Cities, govern the construction, operation, and maintenance of SPR. They clarify how each City should be charged for fixed and variable costs; allocate capital investments for the SPR facility's operation; outline the role of the Supervisory Committee in the daily operational management of the facility; and clarify the City of Englewood's role as the administrative partner that provides SPR with basic business services. The 1973 and 1982 Agreements remain the foundation of the partnership with subsequent signed Memorandum of Understandings further refining how the Cities operate under the 1982 Agreement. Separately, the Cities establish the sewer rates and fees, with input provided by SPR, and manage the agreements and billing for each of the 19 connector districts that are part of SPR's service area.

Prior Actions or Discussions
March 8, 2022: SPR and consultant presentation to City of Littleton Council on preliminary options for alternative governance models.
August 11, 2026: SPR and consultant presentation to City of Littleton Council on subsequent study and recommended authority option.
August 26, 2026: Joint Council Study Session on annual plant operations, 2027 budget, and potential next steps for authority governance model.

**FISCAL IMPACTS:**
N/A for further developing the governance model.

**STAFF RECOMMENDATION:**
Approval of Resolution 81-2026, expressing support for formation of a public authority to operate the City's jointly-owned wastewater treatment facility, with direction to staff to continue developing the model and associated documents and complete appropriate community outreach about the potential change and implications for Littleton.

**ALTERNATIVES:**

1. Decline to approve the resolution, with direction to staff to research additional questions or different governance models.
2. Decline to approve the resolution, with direction to cease discussions with Englewood about alternative governance models at this time and continue status quo operating model.

**PROPOSED MOTION:**

I move to approve Resolution 81-2026 expressing support for and directing staff to take next steps regarding formation of a public authority to operate the city's jointly owned wastewater treatment facility.

**CITY OF LITTLETON, COLORADO**

**Resolution No. 81**
**Series, 2026**

**A RESOLUTION OF THE LITTLETON CITY COUNCIL EXPRESSING SUPPORT FOR AND DIRECTING STAFF TO TAKE NEXT STEPS REGARDING FORMATION OF A PUBLIC AUTHORITY TO OPERATE THE CITY'S JOINTLY OWNED WASTEWATER TREATMENT FACILITY**

**WHEREAS**, the City of Littleton and the City of Englewood (the "Cities") jointly own South Platte Renew ("SPR"), a wastewater treatment facility that serves the Cities and 19 connector districts; and

**WHEREAS**, SPR is governed by the 1973 and 1982 Agreements between the Cities of Littleton and Englewood, Colorado for Joint-Use Wastewater Treatment Facilities (the "Joint-Use Agreements"), as further refined by subsequent memoranda of understanding, which govern the construction, operation, and maintenance of SPR, the allocation of costs and capital investments, the role of the Supervisory Committee in the daily operational management of the facility, and the role of the City of Englewood as administrative partner; and

**WHEREAS**, in 2021, the City of Littleton contracted with FCS Group to analyze potential models for transitioning the City's ownership interest in SPR in order to reduce the City's financial obligations and its business and regulatory risk, and FCS Group presented its analysis to the Littleton City Council on March 8, 2022, and to the Englewood City Council on November 14, 2022; and

**WHEREAS**, both Cities directed SPR to continue the governance analysis, and in January 2024 SPR contracted with the engineering firm Hazen, in conjunction with the law firm Cockrel Ela Glesne Greher & Ruhland, P.C., to conduct a second phase of the governance analysis and a related legal analysis; and

**WHEREAS**, the results of the second phase, presented to both City Councils in August 2026, identified the formation of an authority as a viable alternative to the current governance structure, explored the organizational and financial impacts of creating an authority, and provided a framework for establishing an authority should the Cities choose to move forward; and

**WHEREAS**, at its August 11, 2026 study session, the Littleton City Council received a presentation from SPR and its consultants on the governance analysis and recommended authority option and provided verbal direction for staff to continue working toward the formation of an authority; and

**WHEREAS**, on August 26, 2026, the Littleton and Englewood City Councils held a joint study session that included discussion of potential next steps for the authority governance model; and

**WHEREAS**, the formation of an authority is intended to respond to and resolve legal concerns faced by the Cities related to the ownership and operation of wastewater treatment facilities; and

**WHEREAS**, the transition to an authority is anticipated to require potentially five formal actions by the City Council: (1) adoption of a resolution of support; (2) adoption of an ordinance approving a contract with the City of Englewood regarding formation of an authority; (3) approval of a motion appointing board members to the authority; (4) adoption of an ordinance approving an operating agreement among the City, the City of Englewood, and the authority regarding operation of the facility; and (5) a decision on, and any necessary action regarding, asset ownership; and

**WHEREAS**, the authority will require at least extended possessory rights to the land and improvements in order to secure financing for anticipated capital improvements and unfunded mandates, which the City Council may provide through a long-term lease or a transfer of the City's ownership interest in capital equipment; and

**WHEREAS**, this resolution is the first of the formal actions described above and documents the City Council's support and direction in the same format to be used by both Cities; and

**WHEREAS**, the City Council finds that continuing to pursue the formation of a public authority to operate SPR is in the best interest of the City of Littleton and its residents.

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF LITTLETON, COLORADO, THAT:**

**Section 1.** The City Council expresses its support for the formation of a public authority to operate the City's jointly owned wastewater treatment facility, South Platte Renew.

**Section 2.** The City Council directs staff to continue developing the authority governance model in coordination with the City of Englewood and South Platte Renew, and to prepare the associated documents, including a contract regarding formation of the authority and an operating agreement, for future consideration by the City Council.

**Section 3.** The City Council directs staff to conduct public education and community outreach regarding the potential change in governance and its implications for Littleton, and to report on the public input received when the City Council considers the next formal step in the process, anticipated in early 2027.

**Section 4.** Nothing in this resolution approves the formation of an authority or any contract, agreement, lease, or transfer of property. Each such action shall be brought to the City Council for separate consideration.

INTRODUCED, READ AND ADOPTED at a regularly scheduled meeting of the City Council of the City of Littleton, Colorado, on the 3rd day of November 2026, at 6:30 p.m. at the Littleton Center, 2255 West Berry Avenue, Littleton, Colorado.

ATTEST:

_____
Colleen L. Norton
CITY CLERK

_____
Kyle Schlachter
MAYOR

APPROVED AS TO FORM:

_____
Reid Betzing
CITY ATTORNEY

SOUTH PLATTE RENEW

# Resolution Regarding SPR Governance

Pieter Van Ry,
Director

Reid Betzing,
City Attorney



# Timeline & Actions

**2021**

*Littleton initiates SPR Governance Analysis & Contracts FCS Group*

**2022**

*Presentation to both City Councils*

*Cities direct SPR to continue analysis*

**January 2024 – August 2026**

*SPR contracts Hazen and CEGR to perform Governance Analysis*

**August 10, 2026**

*Study Session with Englewood Council*

**August 11, 2026**

*Study Session with Littleton Council*

*Littleton provides direction to move forward with Authority establishment*

**August 14, 2026**

*Englewood Legal provides memo to Council regarding establishment of Authority*

**August 19, 2026**

*SPR responds to Council Request regarding SPR Administrative Costs*

**August 26, 2026**

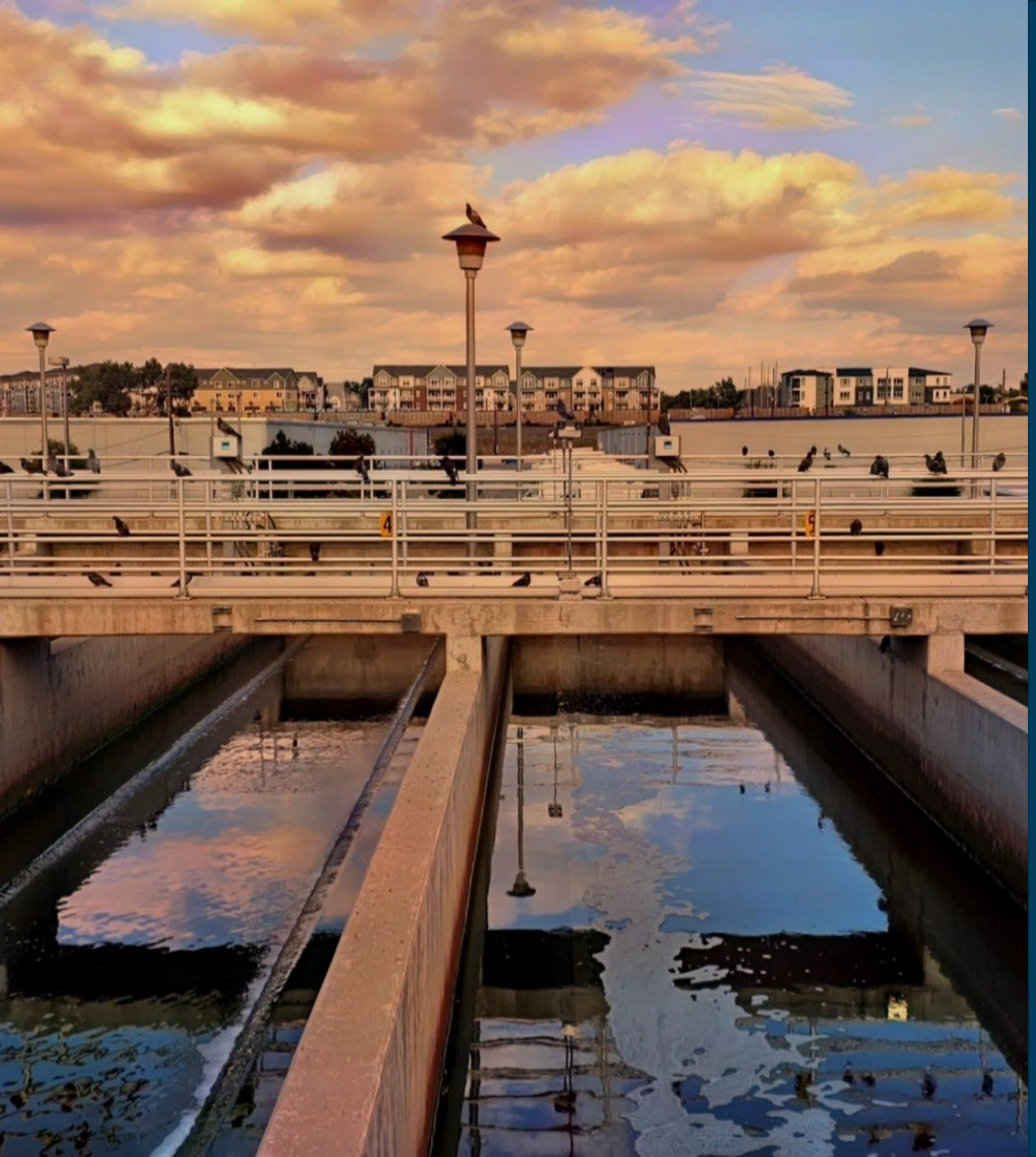
*Joint Council Study Session*

*Review and discussion as Joint Council*

**November 2 and 3, 2026**

*Englewood & Littleton Council meetings*

*Proposed Resolutions to move forward with Authority establishment*



# Assumptions for Creating an Authority

**SPR Impact:**

- Financials, operations, & capital
- 88 existing employees
- New employee additions
- SPR wholesale bills to Cities

SOUTH PLATTE RENEW



# Assumptions for Creating an Authority

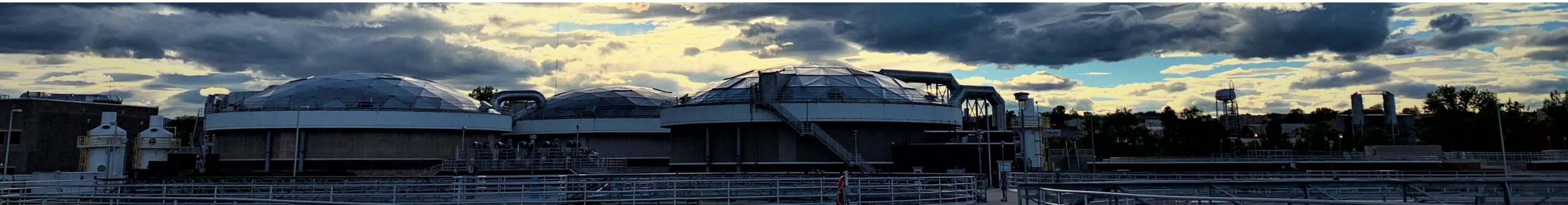
## Littleton & Englewood Impact:

- New board make up – recommend consistency, 50/50
- Collection systems remain
- Connector contracts remain
- Customer billing remain
- Existing SPR assets

SOUTH PLATTE RENEW

# Authority Model: Comparable Organizations

| What this is similar to: | What this is not: |
| --- | --- |
| Downtown Development Authority | South Suburban Park and Recreation District |



# Council Involvement in Governance

| Governance Model | City Council Involvement | Reporting |
|---|---|---|
| Completely Independent | None | None |
| Authority | Board appointments | Annual (Flexible based on Council preference) |
| Current 50/50 Ownership | Joint Council Study Session<br>Budget approval<br>Ordinance approval<br>Easement approval | Annual |

# Authority Model Provides Key Benefits to Community

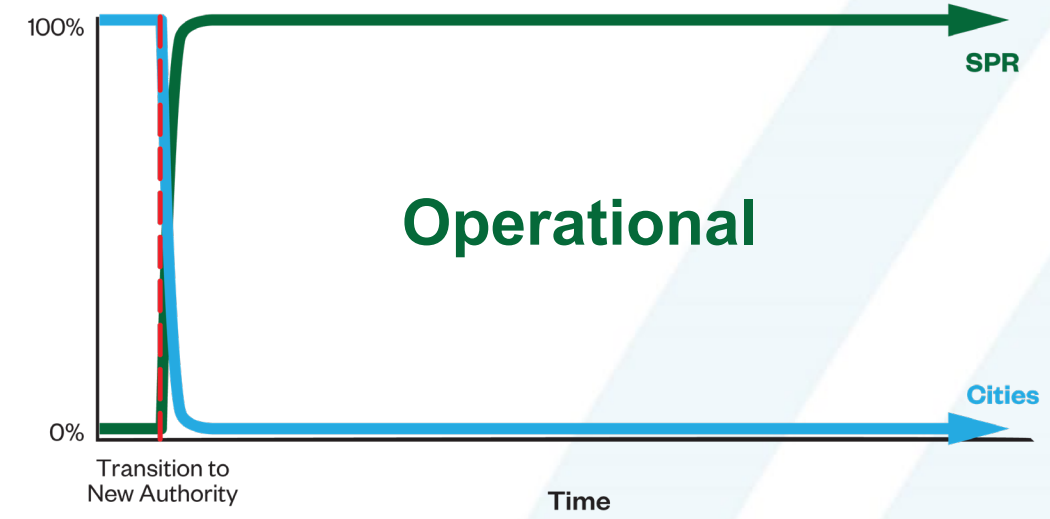
- Formation efficiency
- Financial & operational improvements
- Liability mitigation
  - Short-term – immediate transfer
  - Long-term – with asset transfer
- Proactive approach
- Brings better value to customers

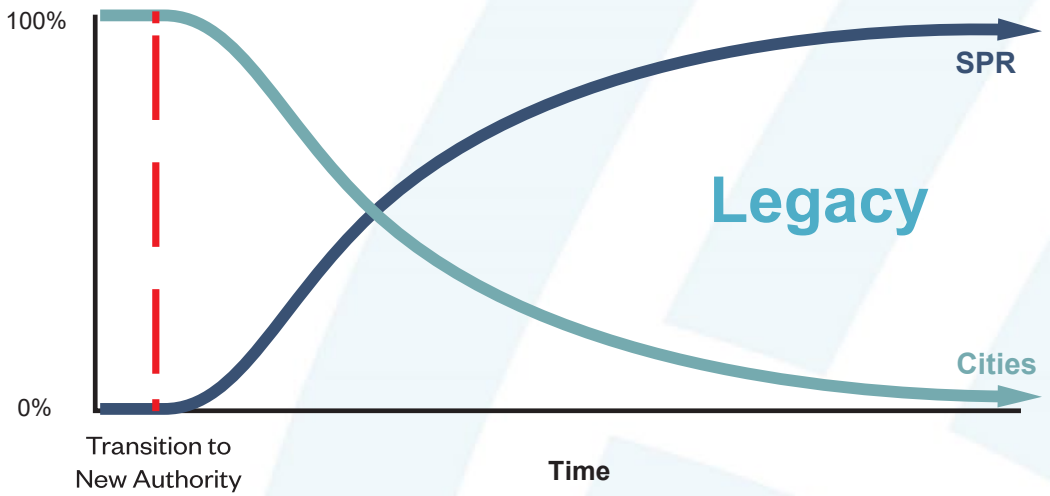


SOUTH PLATTE RENEW

# Distribution of Liability for Cities & SPR

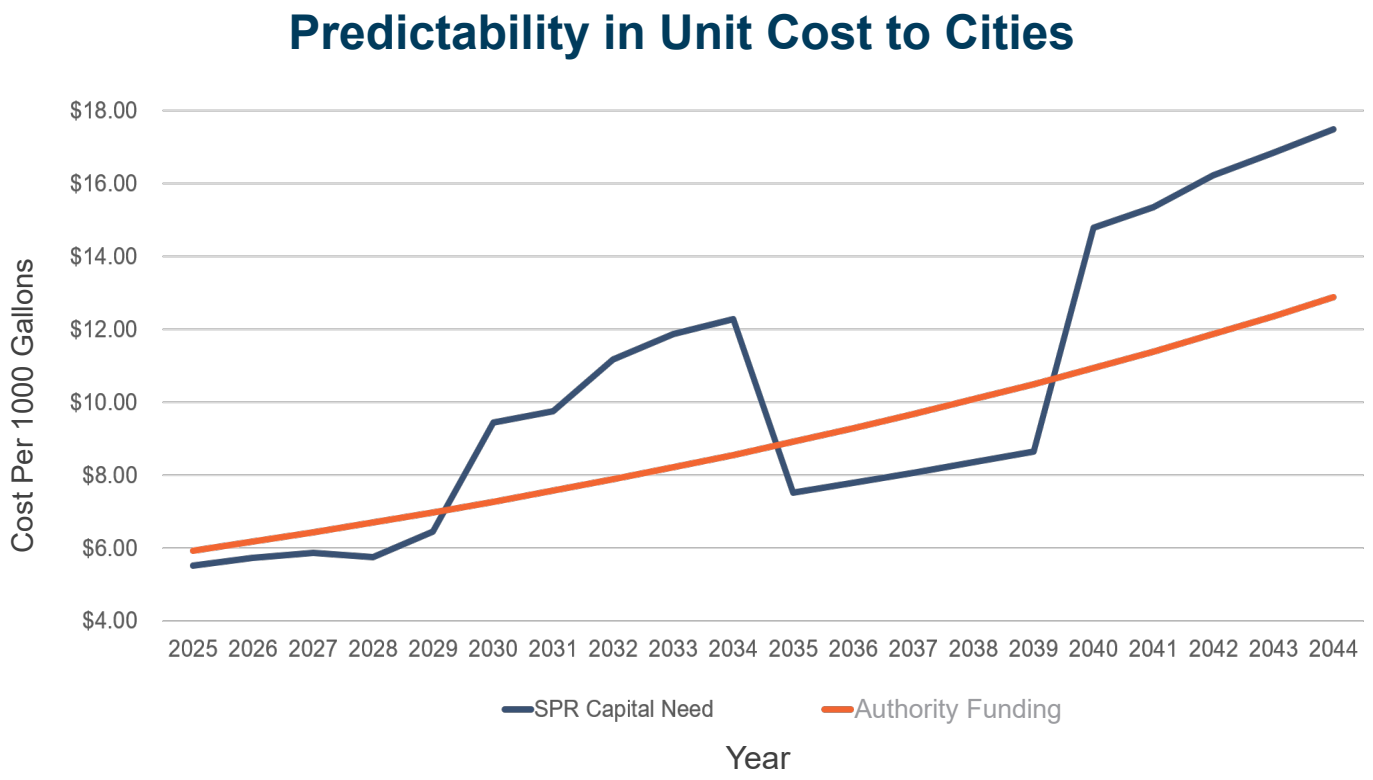
- Segregates past & future liability
- Operational liability transfers immediately
- Cities' legacy liability diminishes over time
- Some legacy liability remains



# Bonding & Debt Sculpting Impacts

- Debt & rate smoothing
- Potential rate savings (0.5%)
- Decreased transaction costs
- Possible improved interest rate
- SPR debt separation
- Utility-specific financing focus
- Rate predictability for Cities



# Legal: Current Risk to City

1. **Legal**
   Environmental, Claims, Lawsuits
2. **Operational**
   Unfunded Mandates, Capital Improvements
3. **Financial**
   Taxpayer Burden, City General Funds

**Addressed Through:**

(1) OPERATIONS AGREEMENT/ DEFENSE AND INDEMNITY

(2) TRANSFER OF OWNERSHIP

# Legal: 5 Required Council Actions

1. **Adopt a resolution of support**
   Authorize moving forward with the proposed approach.

2. **Approve a contract with Littleton**
   Form a Authority.

3. **Approve the operating contract**
   Agreement among Englewood, Littleton and the Authority.

4. **Approve the land contract**
   Set out each city's authority over lease and sale decisions.

   LITTLETON
   **May lease or sell**

   ENGLEWOOD
   **May lease; sale requires a ballot**

5. **Appoint half of the board members**
   Englewood appoints ½ of the Authority board.



# Recommendation

Recommendation to approve Resolution expressing support for formation of a public authority to operate the city's jointly-owned wastewater treatment facility.

SOUTH PLATTE RENEW


Questions?



# Proposed Motion

**I move to approve a Resolution expressing support for and directing staff to take next steps regarding formation of a public authority to operate the city's jointly-owned wastewater treatment facility.**

SOUTH PLATTE
RENEW

## Staff Communication

**File #:** Ordinance 19-2026, **Version:** 2

Agenda Date: 11/03/2026

Subject:
Ordinance 19-2026: An ordinance on second reading amending Title 3, Chapter 25, of the Littleton City Code business regulations regarding solid waste and recycling hauler licenses

| | |
|---|---|
| From: | James L. Becklenberg, City Manager |
| Prepared by: | Brent Soderlin, Director of Public Works & Utilities |
| | Laura Rosenbaum, Sustainability Coordinator |
| Presentations: | N/A |

**PURPOSE:**
Council has consistently prioritized public safety, sustainability, and overall public health matters in the City of Littleton ("City"). This Ordinance is intended to: i) Ensure safe, reliable, and consistent collection of solid waste; ii) Increase access to recycling and other diversion services; iii) Provide the City with accurate information regarding waste generation and diversion; iv) Reduce environmental impacts associated with waste collection; v) Support long term waste reduction and sustainability goals adopted by the City; vi) Establish equitable access to waste diversion services across all customer types; and vii) Support data-driven decision-making and future policy development.

**LONG-TERM OUTCOME(S) SERVED:**
Sustainable Community with Natural Beauty; Safe Community

**DISCUSSION:**
The City of Littleton ("City") is a home-rule municipality in Colorado that possesses full authority to regulate matters of local and municipal concern, including the collection, transportation, and disposal of solid waste, recyclable, and organic materials within the City. The collection and hauling of solid waste, recyclable, and organic materials within the City is a matter directly impacting the public health, safety, and welfare of Littleton residents and businesses. A Waste Hauler Licensing Ordinance Program will allow the City to help to reduce landfill waste, increase access to recycling services, and ensure a higher level of collection customer service.

**BACKGROUND:**
The South Metro Waste Diversion Plan is a culmination of regional and city-specific strategies based on months of research, including a baseline assessment of waste and recycling, a waste composition study, and an action plan of strategic initiatives to improve individual cities' and the region's waste diversion rates. The South Metro Waste Division Plan was adopted by resolution in October 2025.

Following the adoption of the South Metro Waste Diversion Plan, Littleton, in conjunction with the City of Centennial, went back through the state technical assistance program called "STEPS" or "Strategic Technical Expertise for the Public Sector." Through the Colorado Department of Public Health and Environment

(CDPHE)'s Colorado Circular Communities Enterprise (C3), the cities worked with an external consultant on hauler outreach and engagement as the program is co-implemented and developed.
The ordinance reflects feedback from City Council. Staff highlights the following provisions.

When staff first brought this ordinance forward, the goal was to guarantee free curbside recycling for all residential customers, using funding from Colorado's Extended Producer Responsibility program (HB 22-1355). Under that program, companies that sell packaging and paper products in Colorado pay into a statewide organization, Circular Action Alliance (CAA), which reimburses haulers for providing recycling service.

During legal review and staff's discussion with other municipalities, the City Attorney's Office advised that the City can require licensed haulers to offer recycling but cannot require them to provide it at no charge without a guaranteed funding source. The funding under the Producer Responsibility Program is **not** guaranteed for every hauler. Participation in the state program is voluntary, reimbursement is available only to haulers that have signed a service agreement with CAA, and CAA is not obligated to contract with every hauler that applies.

The revised ordinance addresses this with three requirements:

1. A hauler that has a service agreement with CAA may not charge customers covered by that agreement for recycling, including residential customers billed through a homeowners' association (HOA) or other group account.
2. No hauler may both charge customers for recycling and collect reimbursement from CAA for the same service.
3. A hauler without a CAA agreement must still offer recycling and may charge a reasonable fee, but that fee is capped, must be disclosed to customers in writing, and must end once the hauler signs an agreement with the CAA. The ordinance also requires every licensed hauler that provides recycling to residential or multifamily customers to apply to CAA and to maintain its participation if accepted. A hauler that applies in good faith and is declined, or whose application is still pending, remains in compliance.

Because the state program is designed to cover haulers' recycling costs, staff expects most haulers to participate. The practical result should be free recycling for the large majority of Littleton residents, with the paid option serving only as a temporary fallback.

The ordinance also anticipates expansion of the state program. As of 2026, the program does not extend to commercial entities. If CAA extends reimbursement to additional customer classes, the ordinance's participation and no-charge requirements will apply to those classes.

**Changes from First to Second Reading**

Following first reading, staff and the City Attorney's office reviewed the ordinance against feedback from Eco-Cycle and staff representatives from Denver, Golden, Lakewood, and Fort Collins. The second-reading version, attached to the packet, includes the following revisions:

1. **Flat Monthly Fee (Section 3-25-14(d)):** A hauler with a CAA service agreement may not recover reimbursable recycling costs through its flat monthly fee. The flat fee is also capped at 75% of the monthly rate for the hauler's smallest trash container, so that it does not offset the pay-as-you-throw-price.
2. **HOA Exemptions (Section 3-25-14(e)):** Exemptions from the volume-based pricing are limited to HOAs whose group accounts were in effect on December 31, 2026, consistent with practices seen at other municipalities (Golden, Arvada). HOAs that form after that date must provide volume-based

pricing to each household.

3. **CAA Negotiations (Section 3-25-12(b))**: A Hauler that declines the terms that CAA offers must notify the City of its reasons and must reapply or resume negotiations at least once a year. Until it holds an agreement, the Hauler remains subject to the ordinance's fee cap and disclosure requirements.
4. **Reporting (Section 3-25-18)**. An open-ended reporting item is replaced with authority for the Director to request additional data by administrative rule, with at least 90 days' notice to Haulers.
5. **License Appeals (Section 3-25-5)**. An application that is denied a license or renewal may appeal to the City Manager. The City Manager's decision is final and subject to judicial review.
6. **Other Technical Additions/Revisions.** The second-reading version includes technical corrections that do not impact policy. These revisions correct statutory citations, cross-references, conform titles, clarify that the no-charge requirement applies to any customer class reimbursed under the state program, and confirms that decisions on HOA exemption appeals are final for purposes of judicial review.

Prior Actions or Discussions

April 23, 2024, council study session, Environmental Stewardship Board (ESB) presented their finalized Environmental Stewardship Action Plan.

June 4, 2024, council study session, council supported and endorsed the Horizon 2027 Strategic Plan, which includes implementing ESB's Environmental Stewardship Action Plan. A key milestone identified in the plan was for the city to complete a baseline greenhouse gas inventory, which is now completed. Section 3.0 of the Environmental Stewardship Action Plan focuses on "Consumption and Waste Diversion." The Environmental Stewardship Action Plan is attached for reference.

July 22, 2025, council study session, council heard a presentation on the South Metro Waste Diversion preliminary draft final plan.

October 21, 2025, council meeting, council adopted the South Metro Waste Diversion Plan by resolution, and in doing so, allowed staff to explore an equal space ordinance, hauler licensing, and outreach and education efforts moving into 2026. The South Metro Waste Diversion Plan is attached for reference.

April 14, 2026, council meeting, council heard a comprehensive sustainability update, including progress on a hauler licensing ordinance.

August 18, 2026, council meeting, council heard a presentation on the details of the waste hauler licensing ordinance and provided input for this draft ordinance.

This ordinance passed on first reading on October 20, 2026.

**FISCAL IMPACTS:**

Program cost recovery for the City from hauler licensing fees. The exact amount will depend on the number of waste haulers participating in the program and the fee set by council, which will live outside of this ordinance in the fee schedule.

**STAFF RECOMMENDATION:**

Staff recommends approval on second reading, as amended.

**ALTERNATIVES:**

1. Council may adopt the ordinance as introduced on first reading, without the second-reading amendments.
2. Council may further amend the ordinance on second-reading.
3. Council may decline to adopt the ordinance. This alternative is not recommended: haulers would continue to operate in Littleton without City licensing, reporting, or service standards.

**PROPOSED MOTION:**

I move to approve Ordinance 19-2026 on second reading, as amended, amending Title 3, Chapter 25, of the Littleton City Code business regulations regarding solid waste and recycling hauler licenses.

**CITY OF LITTLETON, COLORADO**

**ORDINANCE NO. 19**

**Series, 2026**

**AN ORDINANCE OF THE CITY OF LITTLETON, COLORADO, AMENDING TITLE 3, BUSINESS REGULATIONS REGARDING SOLID WASTE AND RECYCLING HAULER LICENSES**

**WHEREAS**, the City of Littleton ("City") is a home-rule municipality in Colorado that possesses full authority to regulate matters of local and municipal concern, including the collection, transportation, and disposal of solid waste, recyclable, and organic materials within the City pursuant to Colo. Const. Art. XX and C.R.S. § 31-15-401; and

**WHEREAS**, the collection and hauling of solid waste and recyclable materials within the City is a matter directly impacting the public health, safety, and welfare of Littleton residents and businesses; and

**WHEREAS**, the City Council finds that a hauler licensing program may reduce landfill waste, increase access to recycling services, and ensure a higher level of collection customer service; and

**WHEREAS**, the City Council further finds that establishing consistent licensing and reporting requirements will support the City's ability to track diversion rates, promote recycling and waste reduction, and work toward local and state solid waste diversion and sustainability goals; and

**WHEREAS**, a hauler licensing program will also allow the City to maintain accurate records of haulers operating within its jurisdiction, facilitate enforcement of applicable local, state, and federal regulations, and provide residents with a reliable means of identifying authorized haulers; and

**WHEREAS**, the City Council has determined that it is in the best interest of the City and its residents to adopt a new chapter of the Littleton Municipal Code within Title 3 and to establish a hauler licensing program applicable to all persons and entities engaged in the business of collecting, transporting, or hauling solid waste and/or recyclable materials within the City; and

**WHEREAS**, the City reviewed the proposed ordinance on October 20, 2026and finds that its adoption is necessary and appropriate to protect the public health, safety, and welfare, and to promote orderly and efficient collection and disposal of solid waste and recyclable materials within the City.

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LITTLETON, COLORADO, THAT:**

**Section 1:** Title 3, *Business Regulations*, is hereby amended to add the following:

**Chapter 25 Solid Waste and Recycling Hauler Licenses**

**3-25-1 TITLE AND PURPOSE**
**3-25-2 DEFINITIONS**
**3-25-3 LICENSE REQUIRED**
**3-25-4 LICENSE APPLICATION AND ADMINISTRATION**
**3-25-5 DETERMINATION**
**3-25-6 INSURANCE**
**3-25-7 LICENSE FEES**
**3-25-8 LICENSE TERMS AND RENEWAL**
**3-25-9 LICENSE DENIAL, CANCELLATION, SUSPENSION, REVOCATION**
**3-25-10 VEHICLE REQUIREMENTS**
**3-25-11 LABELING REQUIREMENTS**
**3-25-12 RECYCLING COLLECTION SERVICES REQUIREMENTS**
**3-25-13 DESIGNATION OF RECYCLABLE MATERIALS**
**3-25-14 PAY-AS-YOU THROW (VOLUME BASED) RATE STRUCTURE**
**3-25-15 DISPOSAL OF SOLID WASTE, RECYCLABLE MATERIALS AND ORGANIC MATERIALS**
**3-25-16 ELECTRONIC DEVICES**
**3-25-17 HOURS OF OPERATION**
**3-25-18 RECORDS AND REPORTS**
**3-25-19 ENFORCEMENT AND PENALTIES**
**3-25-20 CONTINUITY OF SERVICE**
**3-25-21 EFFECTIVE DATE AND TRANSITION**

**3-25-1 TITLE AND PURPOSE**

This ordinance shall be known as the "Waste Hauler Licensing Ordinance." Its purpose is to promote the public health, safety, and welfare of the residents of the City of Littleton by establishing a uniform system for the licensing and regulation of waste haulers operating within the City. This Ordinance is intended to: i) Ensure safe, reliable, and consistent collection of solid waste; ii) Increase access to recycling and other diversion services; iii) Provide the City with accurate information regarding waste generation and diversion; iv) Reduce environmental impacts associated with waste collection; v) Support long term waste reduction and sustainability goals adopted by the City; vi) Establish equitable access to waste diversion services across all customer types; and vii) Support data-driven decision-making and future policy development.

**3-25-2 DEFINITIONS**

Except as otherwise indicated by context, the following words, terms, and phrases shall have the

following meanings for the purposes of this Chapter:

*"Association"* means a unit owners' association, homeowners' association, common interest community association, or similar entity under a covenant-controlled community containing two (2) or more residential property owners, which has a lawfully constituted and operational board or other similar body empowered to enforce the community's recorded covenants and to impose assessments.

"*City*" means the City of Littleton, Colorado.

"*Collection Vehicle*" means any truck, trailer, or other vehicle used for the collection or transportation of solid waste, recyclables, organics, or yard waste.

"*Commercial Customer"* refers to services performed at or for any premises where a commercial, industrial, or institutional enterprise is carried on, including, but not limited to, retail establishments, restaurants, hospitals, schools, Multifamily Customers, as defined herein, office buildings, nursing homes, clubs, and churches.

"*Contamination*" means non-acceptable materials in recycling or organics.

"*Diversion*" means reduction of waste sent to landfill.

"*Electronic Device"* has the meaning set forth in C.R.S. § 25-17-302, as amended, including any electronic device specified by rule of the Colorado Solid and Hazardous Waste Commission, and includes any component of an Electronic Device.

*"Generator-Transporter"* means the entity that produced (generated) the waste is also the one moving (transporting) it.

"*Group Account*" means a customer account for collection services that provides for the collection of Solid Waste, Recyclable Materials, or Organic Materials from multiple Residential Customers, regardless of the method by which such services are contracted for or arranged. An account for service arranged by a single property owner for collection, whether at one location or multiple locations owned by that property owner does not constitute a Group Account.

*"Hauler"* means any person or entity that, for a fee or not, provides collection, transportation, or disposal services for Solid Waste, Recyclable Materials, or Organic Materials.

*"Landfill Materials"* means discarded materials from household, community, commercial, and industrial sources, excluding Recyclable Materials and Organic Materials, that are collected separately for the purpose of such materials being landfilled. Landfill Materials are a subset of Solid Waste and consist of the residual material remaining after Source Separation.

"*Micro-Hauler*" means a Hauler that collects only Organic Materials or Compostable Materials, and uses no more than two Collection Vehicles within the City.

"*Minimum Recyclables List*" refers to the minimum grouping of material required to be collected as part of the recycling collection service.

"*Multifamily Customer*" refers to services performed at and for residential premises with dwellings of five (5) or more units. Multifamily Customers are considered Commercial Customers and are serviced differently than Residential Customers.

"*Organics*" or "*Compostable Materials*" means organic material that has been separated from non-organic material at the point of generation, such as food scraps, yard waste, and biosolids, for the purpose of composting or processing such materials into soil amendment, fertilizer, mulch, sludge, biogas, fuel, or electricity.

*"Private Waste Transporter"* means a non-commercial entity carrying their own waste.

*"Producer Responsibility Organization" or "PRO"* means the nonprofit organization designated by the Colorado Department of Public Health and Environment to implement the Producer Responsibility Program for Statewide Recycling Act, and any successor organization so designated.

"*Producer Responsibility Program"* means the statewide recycling program established under Colorado House Bill 22-1355, the Producer Responsibility Program for Statewide Recycling Act, as amended.

*"Recyclable Materials"* means discarded materials from household, community, commercial, and industrial sources that are collected separately for the purpose of such materials being reused, remanufactured, reclaimed, or repurposed into new or different products or packaging materials, provided that such materials have been designated as recyclable under the Minimum Recyclables List.

*"Residential Customers"* refers to services performed at and for residential premises, which include single-family dwelling units of four (4) or fewer dwelling units. Each individual dwelling unit is a separate Residential Customer for purposes of this Chapter, regardless of whether collection service for that unit is arranged for, contracted for, or paid for by an Association or under a Group Account.

*"Self-Hauler"* means a person or entity that transports their own solid waste to a disposal facility or landfill.

*"Service Agreement"* means a written reimbursement, funding, or service agreement executed between the Hauler and the Producer Responsibility Organization, under which the Hauler is

eligible to receive reimbursement for Recyclable Materials collection services provided within the City.

*"Solid Waste"* means any abandoned or discarded object or semi-solid, liquid, or contained gaseous material generated from residential, community, commercial, and industrial sources, excluding the following:

i. Any solid or dissolved material in domestic sewage;
ii. Hazardous wastes;
iii. Biosolids, agricultural waste;
iv. Solid or dissolved materials in irrigation return flows;
v. Industrial process waste, which are point sources subject to permits under the Colorado Water Quality Control Act, Article 8 of Title 25, C.R.S.;
vi. Material handled at facilities licensed pursuant to provisions on radiation control in Article 11 of Title 25, C.R.S.;
vii. Excluded scrap metal that is being recycled.

Solid Waste is the broadest category of material regulated by this Chapter and includes Landfill Materials, Recyclable Materials, and Organic Materials. Where a provision of this Chapter is intended to apply only to material destined for landfill disposal, the term "Landfill Materials" is used.

*Source Separation* means to separate Recyclable Materials or Organic Materials from Solid Waste at the source of waste generation.

**3-25-3 LICENSE REQUIRED**

a. No person or entity, unless subject to an exemption listed in subsection (b) below, shall operate any Solid Waste, Recyclable Materials or Organic Materials collections within the City without first securing a valid license for such operations.
b. Exemptions. The following person(s) or entity(ies) are exempt from obtaining a Hauler license:

i. Private Waste Transporter; Self-Hauler; or Generator-Transporter.
ii. Micro-Haulers (Compost only or organics only)
iii. On-Demand/Non-Recurring Junk Removal Services (Haulers that provide on-demand, nonrecurring, by request collection services, and that do not provide regularly scheduled curbside collection routes within the City.)
iv. A civic, community, benevolent, or charitable organization that collects, transports, and markets materials for resource recovery solely for the purpose of raising funds for a charitable, benevolent, or civic activity.
v. A property owner or representative thereof, who transports Solid Waste left by a tenant on such owner's property, provided that such person or entity does not regularly provide Solid Waste collection services for compensation.

vi. Government agencies operating collection services, with their own employees, solely in connection with governmental functions.

vii. A contractor or landscaper who transports Solid Waste or Organic Materials in the course of such work, where the Solid Waste produced is incidental to the contracted work being performed by such person or entity, provided that such person or entity does not collect or transport materials generated by others.

viii. An Association that arranges for, contracts for, or administers collection services on behalf of the owners or occupants of dwelling units within the Association, provided that the Association does not, itself, collect or transport Solid Waste, Recyclable Materials, or Organic Materials.

**3-25-4 LICENSE APPLICATION AND ADMINISTRATION**

a. Applications for a license shall be submitted to the Director of Public Works, or the assigned designee, and shall include, at a minimum:

i. Business name, address, ownership, and contact information;

ii. Proof of commercial general liability insurance and automobile liability insurance in amounts established by the City in Section 3-25-6 herein;

iii. A complete list of Collection Vehicles to be used within the City;

iv. A description of services offered, including trash, recycling, organics, and yard waste;

v. A schedule of rates and fees;

vi. Any previous license violations, Occupational Safety and Health Administration (OSHA) violations, civil convictions or criminal convictions.

vii. A certification of the Hauler's status with respect to the Producer Responsibility Program, stating whether the Hauler is a party to a Service Agreement and if so, the customer classes and service areas covered; or if not, the date on which the Hauler applied, the current status of that application, and whether the Producer Responsibility Organization has declined to enter into an agreement and the stated reason.

viii. A list of Group Accounts under which a Hauler provides or proposes to provide collection services within the City, identifying the Association, if any, and the approximate number of dwelling units served under each account. For each Group Account, a description in sufficient detail to allow the City to determine the means by which volume-based rates are applied to the individual Residential Customers served under that account, including the formula used to set volume-based rates and the methods used to offer and account for volume-based charges.

b. Renewal applications must be submitted in accordance with Section 3-25-8.

c. Change in Ownership or Relocation. The licensee shall report any relocation or change in ownership to the City within thirty (30) days of the change.

d. Public List of Licensed Haulers. The City shall maintain and publish on its website a current list of all Haulers licensed under this Chapter, updated at least annually.

e. Change in Producer Responsibility Program Status. A licensee shall notify the Director of Public Works, or the Director's designee, in writing within thirty (30) days of any execution, amendment, expiration, termination, or denial of a Service Agreement impacting service within the City.

**3-25-5 DETERMINATION**

a. In determining whether to grant or deny a Hauler license, the Director of Public Works, or assigned designee, shall consider the following:

i. Any previous license violations, Occupational Safety and Health Administration (OSHA) violations, civil convictions, or criminal convictions.
ii. If the applicant has previously done business in the City, the number of complaints received from residents of the City regarding the applicant's operations.
iii. If the applicant has falsified information on the application, lapsed insurance, has unpaid fees, failed to report, and previous violations of this Article.

b. The Director of Public Works, or the Director's designee, upon making a determination of whether a Hauler license shall be issued, shall provide written notice to the applicant of the decision, including the reasons for any denial, within thirty (30) days after the date the application is deemed complete.
c. An applicant whose application for a license or for the renewal of a license is denied may appeal the decision by filing a written notice of appeal with the City Manager within fifteen (15) days after the date of the written notice of denial. The notice shall state the grounds for the appeal and may include supporting documentation. The City Manager may request additional information from the applicant or the Director and may, but is not required to, hold an informal hearing. The City Manager may affirm, reverse, or modify the Director's decision and shall issue a written decision within thirty (30) calendar days after receipt of the notice of appeal. The City Manager's decision is the final decision for the City for purposes of review under Rule 106(a)(4) of the Colorado Rules of Civil Procedure.

**3-25-6 INSURANCE**

a. Before a license may be issued, the Hauler shall file with the City evidence of the following insurance coverage, listing the City as an additional insured, as follows:

i. Commercial general liability, including coverage for bodily injury, wrongful death, and property damage in a minimum amount of $1,000,000 per occurrence and $2,000,000 per aggregate.
ii. Automobile liability, for bodily injury, property damage, and wrongful death in a minimum amount of $1,000,000 per occurrence and $2,000,000 per aggregate.
iii. Workers' compensation as specified by the State of Colorado.
iv. Pollution liability, including coverage for third-party bodily injury, property damage, and clean-up/remediation costs arising from the discharge, dispersal, release, or escape

of pollutants during collection, transportation, loading, or unloading of waste in a minimum amount of $1,000,000 per occurrence and $2,000,000 per aggregate. For haulers collecting hazardous waste, waste oil, or industrial byproducts, minimum coverage shall be $5,000,000 per occurrence.

No Hauler license shall be issued without proof of insurance in the types and amounts set forth in the application. No application shall be deemed complete without the required certificates of insurance listing the City of Littleton, CO as an additional insured.

**3-25-7 LICENSE FEES**

Waste hauler license fees shall be established and from time to time revised by resolution of the city council.

**3-25-8 LICENSE TERMS AND RENEWAL**

a. All hauler licenses issued shall expire on December 31 each year following issuance, unless cancelled or revoked, and may be renewed upon submission of a completed application for renewal and payment of the required license fee.
b. All applications for renewal of a Hauler license shall be submitted no later than December 15 in advance of the upcoming license year, or as otherwise permitted by the Director of Public Works or assigned designee.
c. Licenses issued under this Chapter are non-transferable.
d. The renewal application shall be reviewed by the Director of Public Works or the Director's designee, who shall have the power to grant or deny such Hauler license renewal.

**3-25-9 LICENSE DENIAL, CANCELLATION, SUSPENSION, REVOCATION**

a. A violation of the provisions of this Article may result in a Hauler license being denied, cancelled, non-renewed, suspended, or revoked by the City for failing to properly comply with provisions in this Chapter, or on the grounds that the health, safety, or welfare of the community may be endangered by the continued operation of the licensee, after receipt of a citation for the violation and an opportunity to be heard in municipal court.
b. For purposes of this Section, a Hauler's failure to apply for or maintain a Service Agreement as required by Section 3-25-12(b) is a violation of this Chapter. The refusal of the Producer Responsibility Organization to enter into or renew a Service Agreement with a Hauler that has complied with Section 3-25-12(b) is not, by itself, grounds for denial, cancellation, suspension, revocation, or non-renewal of a license under this Chapter.

**3-25-10 VEHICLE REQUIREMENTS**

a. Haulers shall use vehicles that are watertight, leak-proof, equipped with tight-fitting covers so as to prevent offensive odors from escaping or refuse from escaping from the vehicle; and that is compliant with all local, state, and federal safety and inspection regulations.

b. Haulers shall maintain proof that each vehicle required to be identified has been registered with the U.S. Department of Transportation.
c. No Hauler shall operate any vehicle in such a manner as to litter on any public or private property. Any littering shall constitute a nuisance and shall be governed by the nuisance procedures set forth in Title 7 of the Code. Pursuant to Title 7, if a violation presents an imminent threat to the public health, safety or welfare, a motion for an ex parte order authorizing immediate abatement of the nuisance may be made to the municipal court, along with a citation for the violation issued to the Hauler or Hauler's driver, setting the matter in for hearing at the municipal court date.
d. A Hauler license sticker shall be clearly displayed on both the driver and passenger side windows on the exterior of each vehicle while operating in the City of Littleton.

**3-25-11 LABELING REQUIREMENTS**

Any vehicle or container transporting Solid Waste by the Hauler shall have a label containing the company name and phone number of the Hauler printed visibly, in letters or numbers that are clearly legible.

**3-25-12 RECYCLING COLLECTION SERVICES REQUIREMENTS**

a. All Haulers providing regular curbside collection services of Landfill Materials to Residential and Multifamily Customers shall offer curbside Recyclable Materials collection services to all such customers. Haulers providing only junk removal or large collection bin services to customers for short-term projects, such as roll-off dumpsters for construction and demolition activities, may, but are not required to, offer recycling services to these customers. Any roll-off dumpsters placed in the public right of way require a separate right of way permit.
b. Participation in the Producer Responsibility Program.
   i. Every Hauler licensed under this Chapter that provides Recyclable Materials collection services to Residential or Multifamily Customers, or any other customer class for which the Producer Responsibility Program provides reimbursement, shall submit a complete application to enter into a Service Agreement with the Producer Responsibility Organization, and shall pursue that application in good faith.
   ii. A Hauler that has executed a Service Agreement shall maintain that agreement in good standing for so long as the Hauler is licensed under this Chapter and the Producer Responsibility Organization continues to offer it.
   iii. A Hauler shall not withdraw from or decline to renew a Service Agreement without providing written notice to the Director of Public Works, or the Director's designee, at least thirty (30) days in advance, stating the reason(s) and including Hauler's notice of withdrawal or non-renewal to the Producer Responsibility Organization. If the Producer Responsibility Organization terminates, suspends, or declines to renew a Hauler's Service Agreement, the Hauler shall notify the Director in writing within ten (10) days after receiving notice of that action, accompanied by a copy of the Producer Responsibility Organization's notice or other documentation sufficient to show the action taken and its effective date. A Hauler may redact pricing and other confidential commercial terms

from documentation submitted under this paragraph, and such documentation shall be treated as confidential to the extent permitted by the Colorado Open Records Act.

iv. Nothing in this subsection requires a Hauler to obtain a Service Agreement, and a Hauler that has applied in good faith and been declined, or whose application remains pending, is in compliance with this subsection. A Hauler that declines to execute a Service Agreement on the terms offered by the Producer Responsibility Organization shall notify the Director in writing within ten (10) days, stating its reasons, and shall reapply or resume negotiations at least annually. Such a Hauler remains subject to Section 3-25-12(c)(ii) for so long as it does not hold a Service Agreement.

c. Charges for Recyclable Materials Collection Services.

i. No Hauler that is a party to an active Service Agreement with the Producer Responsibility Organization shall impose a separate, surcharged, or additional fee, rate or charge on any customer, or any Association or Group Account on behalf of such customers, for Recyclable Materials collection services with respect to any customer class or service area for which the Service Agreement provides reimbursement. No Hauler shall impose both a charge for Recyclable Materials collection services and seek or accept reimbursement from the Producer Responsibility Organization for those same services.

ii. A Hauler that is not a party to a Service Agreement remains obligated to offer Recyclable Materials collection services as required by this section and may impose a reasonable charge for those services, provided that:

1. The charge shall not exceed, on a per-gallon-of subscribed-capacity basis, the rate charged by that Hauler for Landfill Materials collection service;
2. The Hauler shall disclose to each impacted customer, in writing at the time service is initiated and annually thereafter, that: A) Recyclable Materials collection is separately charged because the Hauler does not hold a Service Agreement with the Producer Responsibility Organization; B) the charge is set and collected by the Hauler, is not a fee imposed by the City; and C) the charge will cease if an agreement is executed that covers the customer's service; and
3. The charge will cease no later than the first full billing cycle following the effective date of a Service Agreement covering that customer class and service area.

d. All licensed Haulers of Recyclable Materials operating within the City shall have the following duties and rights:

i. The Hauler shall provide notification of available Recyclable Materials collection services and rates to new customers at the time of Landfill Materials collection service is initiated.

ii. Recyclable Materials collection services shall include curbside collection, at a minimum, of the materials designated in the Minimum Recyclables List, on a regular and recurring schedule.

iii. The Hauler shall provide clear written instructions to Recyclable Materials collection service customers on how to properly Source Separate and prepare Recyclable Materials at the time such service is initiated and annually, thereafter, at a minimum.

e. Curbside Recyclable Materials collection services shall be provided to Residential and Multifamily customers on at least a biweekly basis.

f. Haulers providing collection services to Commercial customers shall provide services for the collection of Recyclable Materials from such customers who desire such service on such frequency as is necessary to prevent overflow of the recycling containers.

g. Haulers may meet the requirements for Recyclable Materials collection services by employing a subcontractor to perform such services.

h. Where collection services are provided under a Group Account, the Hauler shall deliver the notices, rates, and written source separation instructions required by this section to each dwelling unit served or shall deliver them to the Association or account holder, together with a written direction that they distribute notices to each dwelling unit. Delivery to the Association or account holder does not satisfy this Section unless the Hauler obtains written confirmation of distribution.

**3-25-13 DESIGNATION OF RECYCLABLE MATERIALS**

a. The Director of Public Works, or the Director's designee, shall maintain a Minimum Recyclables List of materials identified as recyclable by qualified recycling facilities.
b. The Minimum Recyclables List will be updated on an annual basis and made available to licensed Haulers, and shall include, at a minimum, all covered materials on the Minimum Recyclables List, as defined by Colorado's selected Producer Responsibility Organization under Colorado House Bill 22-1355. Any change to Minimum Recyclables List shall take effect no less than ninety (90) days after written notice to licensed Haulers, unless a shorter period is required by state law.
c. All Haulers shall be responsible for notifying their customers of the items designated for recycling.

**3-25-14 PAY AS YOU THROW (VOLUME-BASED) RATE STRUCTURE**

a. Applicability. This Section establishes a pay-as-you-throw, volume-based rate structure for the collection of Landfill Materials in order to provide customers a direct financial incentive to reduce the quantity of material sent to landfill and to increase participation in Recyclable Materials and Organic Materials collection services. Except as otherwise provided herein, this Section applies to every licensed Hauler that provides regular, recurring or periodic collection of Landfill Materials to Residential Customers within the City.
b. Volume-Based Rates for Residential Customers.
   i. Residential Customers shall be afforded the opportunity to subscribe to service limited to typical volumes for a container (e.g. 32, 64, 96 gallons). No hauler may sell only one volume of service. Each hauler shall charge an incremental standardized price for each base volume unit of Landfill Materials subscribed to or placed by the customer, whichever is more, regardless of the number of containers placed by the customer for collection.

ii. The periodic rate charged to a Residential Customer for Landfill Materials collection service shall vary directly with the capacity of the container to which the customer subscribes, as follows:
   a) The rate for each container size offered shall exceed the rate for each smaller container size offered.
   b) The effective rate per gallon of subscribed capacity shall not decrease as container size increases. No Hauler shall offer a volume discount, bundled rate, or other pricing that results in a customer subscribing to a larger container paying less per gallon of subscribed capacity than a customer subscribing to a smaller container.
   c) Special pickups for bulky items are permitted at an additional fee.

iii. The provisions of this section shall not be construed to prohibit any Hauler from also establishing rules and regulations regarding the safe maximum weight of containers of Landfill Materials and/or Recyclable Materials or Organic Materials. A Hauler may refuse to collect any container which is overloaded or which contains a volume greater than the rated or specified volume of such container or shall account for and bill the customer for the collection of such excess.

c. Volume-Based Rates for Multifamily and Commercial Customers.
   i. Haulers that provide collection services to Multifamily or Commercial Customers shall charge these customers for service on the basis of the volume of containers subscribed by the customer for collection by the Hauler.
   ii. Haulers may refuse to collect containers which are overloaded or which contain a volume of materials greater than the service subscribed to or specified volume of such container or shall account for and bill the customer for the collection of such excess.

d. Flat Monthly Fee for Operational Costs.
   i. In addition to the volume-based rates, Haulers may establish a flat monthly fee that may be charged to Residential Customers regardless of whether Landfill Materials, Recyclables, or Organic Materials are placed by the customer for collection during the service month. The flat monthly fee may be charged for the purpose of covering the combined fixed operational costs for collection of Landfill Materials, Recyclable Materials and Organic Materials. A flat monthly fee charged by a Hauler that is a party to the Service Agreement shall not include any cost of Recyclable Materials collection services for which the Hauler is eligible for reimbursement from the Producer Responsibility Organization.
   ii. The flat monthly fee shall not exceed seventy-five percent (75%) of the monthly volume-based rate charged for the weekly collection of the smallest Landfill Materials container offered by the Hauler. All bills for services provided by the Hauler to the customer shall clearly identify any flat monthly fees, along with any volume-based fees charged for collection.
   iii. Nothing herein shall prevent or prohibit such Hauler from charging additional fees for providing services in addition to the collection of Landfill, Recyclable, or Organic Materials.

e. Group Accounts and Association Exemptions. Except as provided in this subsection, the requirements of Section 3-25-14(b) apply to each Residential Customer served under Group Account, and a Hauler shall apply volume-based rates to each such Residential Customer.

i. An Association, whose Group Account was in effect on December 31, 2026, may apply to the Director of Public Works, or the Director's designee, for an exemption from Section 3-25-14(b) as to Residential Customers served under its Group Accounts. The application shall be in writing, signed by an officer of the Association, and shall state the number of dwelling units served, the term and expiration date of the current collection contract, the container capacity provided to each dwelling unit, and the basis for the request.

ii. The Director may grant an exemption upon finding that the Association's recorded covenants or the terms of its current collection contract preclude the application of volume-based rates to individual dwelling units, and that the Association has disclosed the request to its members. An exemption shall be valid for a term not to exceed three (3) years and may be renewed upon application. The Director may revoke an exemption upon a finding that the circumstances supporting it no longer exist, after providing the Association with written notice of the proposed revocation and not less than fifteen (15) days in which to respond in writing. The Director shall issue a written decision on each application for an exemption or renewal and on each proposed revocation, stating the reasons for any denial or revocation and advising the Association of its right to appeal under this subsection.

iii. An Association whose application for an exemption or renewal is denied, or whose exemption is revoked, may appeal the decision by filing a written notice of appeal with the City Manager within fifteen (15) days after the date of the Director's written decision. The notice shall state the grounds for the appeal and may include supporting documentation. The City Manager may request additional information from the Association or the Director and may, but is not required to, hold an informal hearing. The City Manager may affirm, reverse, or modify the Director's decision and shall issue a written decision within thirty (30) days after receipt of notice of appeal. A revocation shall not take effect while the timely appeal is pending. A Hauler that continues to serve the Association in accordance with the exemption during that period shall not be found in violation of this Section. The City Manager's decision shall be the final decision of the City for purposes of review under Rule 106(a)(4) of the Colorado Rules of Civil Procedure.

iv. A Hauler shall not be required to provide the volume-based rates and services set forth in Section 3-25-14(b) to a Group Account held by an Association that holds a valid exemption under this subsection, and shall not be found in violation of this Section by reason of serving such an account in accordance with the exemption.

v. The City shall maintain a current list of Associations holding valid exemptions under this subsection and shall make that list available to licensed Haulers and publish it on the City's website.

vi. Notwithstanding any exemption granted under this subsection, no Hauler shall offer a Group Account a rate in which the effective rate per gallon of subscribed capacity decreases as container size increases

vii. A Hauler serving a Group Account shall maintain a written contract with the Association or account holder confirming that service is provided in compliance with this Section or in accordance with a valid exemption granted under this subsection.

**3-25-15 DISPOSAL OF SOLID WASTE, RECYCLABLE MATERIALS AND ORGANIC MATERIALS**

a. All Haulers that collect source-separated Recyclable Materials shall deliver all such materials to a legally permitted recycling facility and maintain weight tickets and/or receipts from the receiving facility for not less than three (3) years. Recyclable Materials that have been properly prepared by the customer shall not be delivered to a facility for landfill disposal.

b. All Haulers that collect Solid Waste, Recyclable Materials, and/or Organic Materials operating within the City of Littleton shall have the following duties and rights:

i. Each Hauler shall disclose to each Residential Customer, Multifamily Customer, and Commercial Customer, at the time service is initiated and annual thereafter, all container sizes offered and the corresponding rate for each size. Each Hauler shall provide reasonable written notice to any impacted customers before any increase in rates take effect. Where a Hauler offers Organic Materials collection service to Residential Customers, the rate for such service shall be separately disclosed and shall not exceed, on a per-gallon-of-subscribed-capacity basis, the rate charged by that Hauler for Landfill Materials collection service.

ii. Each Hauler shall offer Residential Customers a method by which Landfill Materials in excess of subscribed container capacity may be set out and collected on an occasional basis, such as prepaid tags, stickers, or bags sold by volume. Charges for excess volume shall be reasonably proportional to the rate charged under for Landfill Materials collection services. A Hauler may decline to collect excess material that is not accompanied by the required prepaid tag, sticker, or bag.

iii. A Residential Customer may change container size not less than once during each twelve (12) month period without payment of any exchange, delivery, or administrative fee. A Hauler shall complete a requested container exchange within fourteen (14) days after the request is received. Where service is provided under a Group Account held by an Association that holds a valid exemption under Section 3-25-14(e), this subsection applies to the Association rather than to the individual Residential Customer.

iv. Except for materials which customers have not properly prepared for collection, Haulers shall not dispose of Source Separated Recyclable Materials or Organic Materials set out by customers by any means that result in the materials not being recycled or properly processed.

v. Haulers shall establish such policies and procedures as are necessary to provide for the orderly collection of Recyclable Materials and/or Organic Materials, including

requirements regarding the preparation of materials for collection and requirements for Source Separation.

vi. If a Hauler elects to perform collection of Solid Waste through subcontractors or agents, such agency relationship shall not relieve the Hauler of responsibility for compliance with the provisions of the City Code.

vii. All materials placed for collection shall remain the property of and be the responsibility of the customer until the materials are collected by the Hauler. The material then shall become the property and the responsibility of the Hauler.

**3-25-16 ELECTRONIC DEVICES**

a. No Hauler shall knowingly: i) collect an Electronic Device as Landfill Materials or Recyclable Materials; ii) deliver an Electronic Device to a landfill, or to a transfer station or other facility for the purpose of landfill disposal; or iii) otherwise dispose of an Electronic Device in a manner prohibited by C.R.S., Title 25, Article 17, Part 3, or by the rules of the Colorado Solid and Hazardous Waste Commission.

b. Devices Observed at Collection. If a Hauler's employee observes an Electronic Device in, on, or beside a Landfill Materials or Recyclable Materials container at the time of service, the Hauler shall not collect the Electronic Device as part of that service.

**c.** Separate Collection for Recycling. Nothing in this Section prohibits a Hauler from offering separate collection of Electronic Devices for recycling or processing for reuse, as those terms are defined in C.R.S. § 25-17-302. A Hauler that collects Electronic Devices for that purpose shall deliver them only to an electronics recycler or collection facility that recycles or processes Electronic Devices for reuse in compliance with applicable state and federal law, and shall retain, for not less than three (3) years, records of each delivery.

d. Signage. Each Hauler shall post and maintain, in a conspicuous location at each business office and facility from which it serves customers within the City, a sign stating that Electronic Devices are prohibited from disposal in landfills.

e. Customer Notification. Each Hauler shall notify its customers in writing, at the time service is initiated and at least annually thereafter, that Electronic Devices may not be placed in Landfill Materials or Recyclable Materials containers, and shall provide information about Electronic Device recycling options, including any separate collection service the Hauler offers and the rates for that service. This notice may be combined with the notices required by Sections 3-25-12 and 3-25-15.

f. Relationship to State Law. This Section supplements C.R.S. Title 25, Article 17, Part 3, and the rules adopted under it, and shall be interpreted consistently with them. Nothing in this Section authorizes any disposal of an Electronic Device that state law prohibits.

**3-25-17 HOURS OF OPERATION**

No Hauler shall operate any vehicle for the purpose of collecting Solid Waste on any street within the City of Littleton except during the permitted hours of operation in accordance with Littleton Municipal Code Section 7-3-5(E).

**3-25-18 RECORDS AND REPORTS**

a. Annual Report.
All Haulers shall submit an annual report for the previous year to the City, evidencing compliance with the provisions set forth herein. These reports shall be submitted by January 31st of each year.

b. Each Hauler shall accurately and completely report to the City the following information:
   i. Weight in tons collected of the following waste streams:
      1. Landfill Materials
      2. Recyclable Materials
      3. Organic Materials
   ii. Total number of service accounts by customer type subscribed to Landfill Materials collection, Recyclable Material collection, and Organic Material collection.
   iii. Education and outreach activities, such as flyers, brochures, events, and other resources and efforts made by the Hauler to educate customers on proper sorting.
   iv. Weight in tons delivered to facilities for each collected waste stream, identifying for each waste stream the facility to which such materials were delivered and the weight in tons for each facility. For Recyclable Materials, the Hauler shall state whether the receiving facility is a legally permitted recycling facility. Where materials are transferred to a transfer station, consolidation site, or intermediate facility before final disposition, the Hauler shall identify both the intermediate facility and, to the extent known to the Hauler, the final receiving facility.
   v. The Hauler's Producer Responsibility Program status during the reporting period, including whether the Hauler held a Service Agreement, the customer classes for which reimbursement was received, and whether any charge was imposed on Residential or Multifamily Customers for Recyclable Materials collection services under Section 3-25-12(c).
   vi. The number of Group Accounts served and the number of dwelling units under them, reported separately from other Residential Customers accounts, identifying which are held by an Association holding a valid exemption under Section 3-25-14(e).
   vii. If the Hauler offers separate collection of Electronic Devices under Section 3-25-16(c), the weight or number of Electronic Devices collected within the City during the reporting period, and the name and address of each facility to which they were delivered.

c. Records Retention and Inspection. Each Hauler shall retain the records underlying the reports required by this Section for not less than three (3) years and shall make such records, its Collection Vehicles, available to the City for inspection upon reasonable notice for the purpose of verifying compliance with this Chapter.

d. Confidentiality. Reports submitted under this Section that contain customer counts, rates, or other confidential commercial information shall be treated by the City as confidential,

to the extent permitted by the Colorado Open Records Act, and the City may publish such data only in aggregated form that does not identify an individual Hauler.

e. Additional Data and Report Format. The Director may, by written administrative rule issued to all licensed Haulers, not less than ninety (90) days before a report is due, require additional information or data reasonably necessary to measure waste generation and diversion, and may prescribe the form and format of reports required herein.

**3-25-19 ENFORCEMENT AND PENALTIES**

a. The licensee under this article shall have the sole burden and responsibility of disposing of Solid Waste collected and shall defend, indemnify, and hold the City of Littleton, its officers, employees and agents, harmless, including from reasonable attorney fees and costs, should any claim be made regarding the collection or disposal thereof.

b. In addition to the suspension, revocation or refusal to renew any license issued hereunder, any licensee who violates any provision of this Chapter may be punished by a fine or imprisonment or both, in accordance with 1-4-1 of the Littleton City Code. Additionally, the City may take any other legal action available to address violations of the provisions of this Chapter.

**3-25-20 CONTINUITY OF SERVICE**

a. Voluntary Cessation or Reduction of Service(s). A licensee that intends to cease providing collection services within the City, to discontinue service to any class or geographic area of customers, or to transfer its customer accounts to another Hauler, shall provide written notice to the Director of Public Works, or assigned designee, and to each impacted customer no later than sixty (60) days prior to the last date of service. The notice to customers shall state the last date of service, instructions for the return of any Hauler-owned containers, procedure for obtaining any refund of prepaid amounts, and a statement directing the customer to the City's list of licensed Hauler's maintained under Section 3-25-4.

b. Involuntary Cessation. Where a license is revoked, suspended, cancelled, or not renewed, the licensee shall, within thirty (30) days of the effective date of that action, provide written notice to each impacted customer(s) containing the information requested by subsection (a) herein. Notwithstanding a suspension or revocation, the Director of Public Works may authorize a former licensee to continue collection operations for a period not to exceed sixty (60) days solely for the purpose of orderly transition of customers and public health and safety, provided that the former licensee maintains the insurance required by Section 3-25-6 throughout that period and complies with all other provisions of this Chapter.

**3-25-21 EFFECTIVE DATE AND TRANSITION**

a. All applications for the year 2027 are due by December 1, 2026. Enforcement of this Ordinance shall be effective January 1, 2027. All subsequent renewal applications are subject to the requirements herein.

b. Transition Period of Existing Haulers. Any person or entity that was lawfully providing collection services within the City on the date of adoption of this Chapter (an "Existing Hauler") shall comply as follows:

i. Licensing, insurance and vehicle requirements. An Existing Hauler shall submit a complete license application by the date set forth in Subsection (a) herein, and shall satisfy requirements under Sections 3-25-6, *Insurance,* 3-25-10, *Vehicle Requirements*, and 3-25-11, *Labeling Requirements*, in full as of January 1, 2027.

ii. Rate structure. Section 3-25-14 shall apply to all new customer accounts initiated on or after January 1, 2027. With respect to a customer account in existence on December 31, 2026 and governed by a written service agreement, an Existing Hauler shall bring the account into compliance with Section 3-25-14 upon the earlier of:

1. Expiration or renewal of the existing service agreement; or
2. Any change in the rate charged to that customer other than an adjustment made under a price escalation provision contained in the service agreement as of December 31, 2026.

iii. Recycling service. An Existing Hauler shall offer the services required by Section 3-25-12, *Recycling Collection Services Requirements,* to all Residential and Multifamily Customers no later than July 1, 2027, and shall provide written notice of the availability and rates of such services to all then-current customers not less than thirty (30) days prior to that date. An Existing Hauler shall submit the application required by Section 3-25-12(b) no later than January 1, 2027.

iv. Administrative extension. The Director of Public Works, or the Director's designee, may grant an Existing Hauler a written extension of the deadline in subsection (iii), not to exceed one hundred eighty (180) days and renewable once for good cause, upon a showing that the Hauler timely submitted the application required by Section 3-25-12(b), has diligently pursued execution of a Service Agreement, and that the delay is attributable to circumstances outside the Hauler's reasonable control. An extension under this subsection does not relieve the Hauler of any other requirement of this Chapter, including the licensing requirement of Section 3-25-3.

v. Existing Group Accounts. With respect to any Group Account in effect on December 31, 2026, an Existing Hauler shall bring the account into compliance with Section 3-25-14 upon the earlier of expiration or renewal of that contract, or any change in the rate charged under it, other than an adjustment made under a price escalation provision contained in that contract as of December 31, 2026. An Association served under such account may apply for an exemption under Section 3-25-14(e) at any time.

vi. Reporting. The first annual report required by Section 3-25-18 shall be the report covering calendar year 2027, due in 2028. No report shall be required for periods preceding January 1, 2027.

vii. No extension. Nothing in this subsection extends the deadline to obtain a license. An Existing Hauler that has not obtained a license by January 1, 2027 shall cease operations within the City until licensed and shall notify existing customers as soon as reasonable.

viii. Conformance with state law. The provisions of this Chapter that reference the Producer Responsibility Program shall be administered consistently with the Producer Responsibility Program for Statewide Recycling Act and implementing regulations as amended. In the event that Act is repealed, materially amended, enjoined, or its implementation suspended or delayed, the Director of Public Works shall administer the impacted provisions in a manner consistent with the purposes of this Chapter and may suspend enforcement of any provision rendered inoperable, pending City Council action.

**Section 2:** Severability. If any part, section, subsection, sentence, clause or phrase of this ordinance is for any reason held to be invalid, such invalidity shall not affect the validity of the remaining sections of this ordinance. The City Council hereby declares that it would have passed this ordinance, including each part, section, subsection, sentence, clause or phrase hereof, irrespective of the fact that one or more parts, sections, subsections, sentences, clauses or phrases may be declared invalid.

**Section 3:** Repealer. All ordinances or resolutions, or parts thereof, in conflict with this ordinance are hereby repealed, provided that this repealer shall not repeal the repealer clauses of such ordinance nor revive any ordinance thereby.

INTRODUCED AS A BILL at a regularly scheduled meeting of the City Council of the City of Littleton on the 20th day of October, 2026, passed on first reading by a vote of ___ FOR and ___ AGAINST; and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

PUBLIC HEARING on the Ordinance to take place on the 3rd day of November, 2026, in the Council Chamber, Littleton Center, 2255 West Berry Avenue, Littleton, Colorado, at the hour of 6:30 p.m., or as soon thereafter as it may be heard.

PASSED on second and final reading, following public hearing, by a vote of ___ FOR and ___ AGAINST on the ___ day of _____, 202 and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

ATTEST:

_____
Colleen L. Norton
CITY CLERK

_____
Kyle Schlachter
MAYOR

APPROVED AS TO FORM:

_____
Reid Betzing
CITY ATTORNEY

COLORADO CIRCULAR COMMUNITIES

# South Metro Waste Diversion Plan

## Final Plan

June 30, 2025

**STEPS**
Strategic Technical Expertise
For the Public Sector

Centennial COLORADO

CITY OF Englewood

Littleton Colorado

CITY OF Sheridan







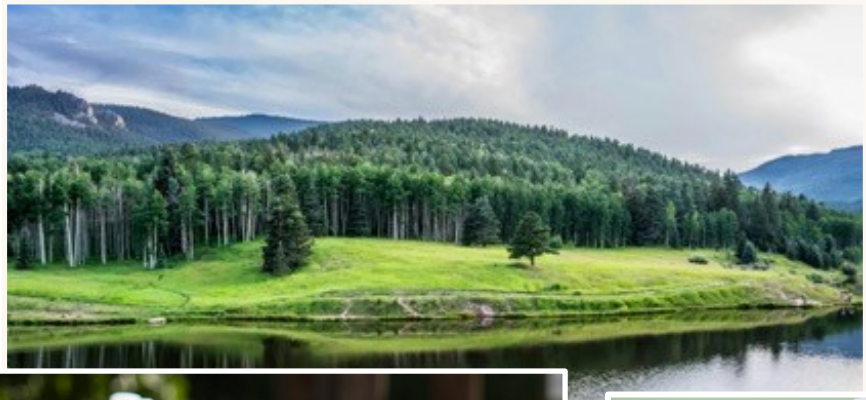






# About

The Colorado Circular Communities (C3) Enterprise is a statewide program dedicated to supporting Colorado's communities, businesses, nonprofits, schools, institutions of higher learning, and tribes to advance the state's transition to a circular economy. The Enterprise provides financial and technical assistance to enhance circularity across the state, and helps organizations achieve their waste aversion and diversion goals. The Strategic Technical Expertise for the Public Sector (STEPS) program is the primary mechanism for communities in Colorado to access C3-funded technical assistance for circularity planning. STEPS assists local governments, tribes, and public K-12 school districts with efforts to enhance circularity, including averting and diverting waste, by implementing sustainable, long-term solutions that meet the unique needs of each community. The STEPS program offers a range of support from resources and workshops to multi-month direct consulting support. Technical assistance provided to communities across Colorado is aligned with the C3 Enterprise's mission of supporting Colorado's path to circularity. Technical support is provided by the C3 Outreach and Technical Assistance staff and a team of contracted subject matter experts led by Resource Recycling Systems (RRS). The STEPS program has replaced the Front Range Waste Diversion (FRWD) Technical Assistance Service Provider (TASP) program.







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# Acknowledgements

The South Metro Waste Diversion Plan was made possible through the valuable contributions of residents, city agency representatives, industry stakeholders across the value chain, local businesses, trusted community organizations and committees, and a wide range of external partners.

**Public** participation was gathered through the resident survey, waste champion training, and virtual comments.

**Industry** participation was provided by haulers, recyclers and composters, and landfill/transfer station operators.

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Terrance Kelly, Council Member, *City of Sheridan*

**Colorado Department of Public Health and Environment (CDPHE)**

**Strategic Technical Assistance for the Public Sector (STEPS) Project Team**

# Acronyms and Abbreviations

C&D – Construction and Demolition (Debris)
CAA – Circular Action Alliance
CDPHE – Colorado Department of Public Health and Environment
CEDC – Colorado Circular Economy Development Center
C3 – Colorado Circular Communities
EPR – Extended Producer Responsibility
EPA – Environmental Protection Agency
E-Waste – Electronic Waste
FTE – Full-Time Employee
HHW – Household Hazardous Waste
HOA – Homeowners Association
HTR – Hard-to-Recycle
MRF – Materials Recovery Facility
MSW – Municipal Solid Waste
PAYT – Pay-As-You-Throw
RTD – Regional Transportation District
SEMSWA – Southeast Metro Stormwater Authority
SMWDP – South Metro Waste Diversion Plan
STS South – STS South Denver transfer station
STEPS – Strategic Technical Expertise for the Public Sector



# Executive Summary

The South Metro Region, including the cities of Centennial, Englewood, Littleton, and Sheridan of Colorado, has set an ambitious goal of **progressing to a system favoring equitable waste reduction and waste diversion strategies driven by data and best practices**.







It is estimated that by 2035, the South Metro region will generate approximately 260,000 tons of waste. Maintaining the status quo of all policies, programs, and strategies, South Metro is projected to send 221,000 tons to landfills for disposal by 2035. This underscores the need for a comprehensive waste diversion and reduction plan to mitigate future landfill dependency.

Through a first-of-its-kind regional collaboration, these cities have come together to develop the **South Metro Waste Diversion Plan**, a ten-year data-driven roadmap to transform how waste is managed across the region. This project serves businesses, residents, and local governments in the South Metro region by developing a clear set of actionable strategies to reduce the amount of waste sent to landfills.

Serving more than 190,000 residents and local businesses, this initiative aims to create a fair, inclusive, and effective system of waste reduction and diversion tailored to the distinct needs of each community. This plan was developed by the **Strategic Technical Expertise for the Public Sector (STEPS)** project team and is funded by the **Colorado Circular Communities (C3) Enterprise.**[1] The plan is grounded in best practices and a comprehensive understanding of current conditions. It includes a regional assessment of existing waste services, policies, infrastructure, and the types of materials being disposed.

**Key components of the plan include:**

- A baseline analysis of the regional and city-specific solid waste system
- Stakeholder and public engagement

[1] This project was initiated under the Font Range Waste Diversion (FRWD) Technical Assistance Service Provider (TASP) program, which STEPS has replaced.

- A two-season waste composition study and projected waste generation through 2035
- A robust analysis of gaps and opportunities
- Three high-impact regional actionable strategies
- Seven high-impact actionable strategies for each participating city
- Implementation timeline
- Infrastructure evaluations to identify future opportunities for Colorado Circular Communities (C3) Enterprise investment

Community engagement has been central to this effort, with over 43,500 community interactions across stakeholder meetings, resident surveys, social media engagements, focus groups, and a waste summit. This extensive outreach ensured that diverse voices shaped the plan's direction, including those from multi-family housing, businesses, and historically underserved populations.

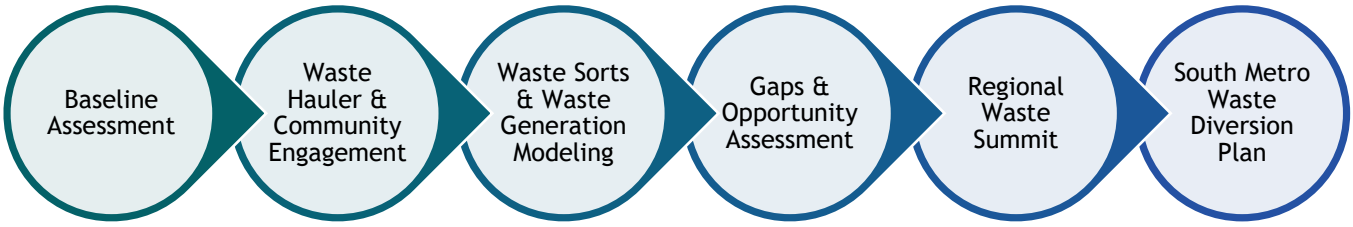



**Figure 1: South Metro Waste Diversion Plan Development Process**

The South Metro Waste Diversion Plan is more than just a policy document—it is a call to action. It reflects the region's commitment to sustainability, collaboration, and a circular economy that values resources, reduces waste, and uplifts communities. Together, these cities are setting a powerful example of how local governments can collaboratively lead with purpose and unity to create a plan that supports a sustainable future.



# 1.0 South Metro Baseline and Background

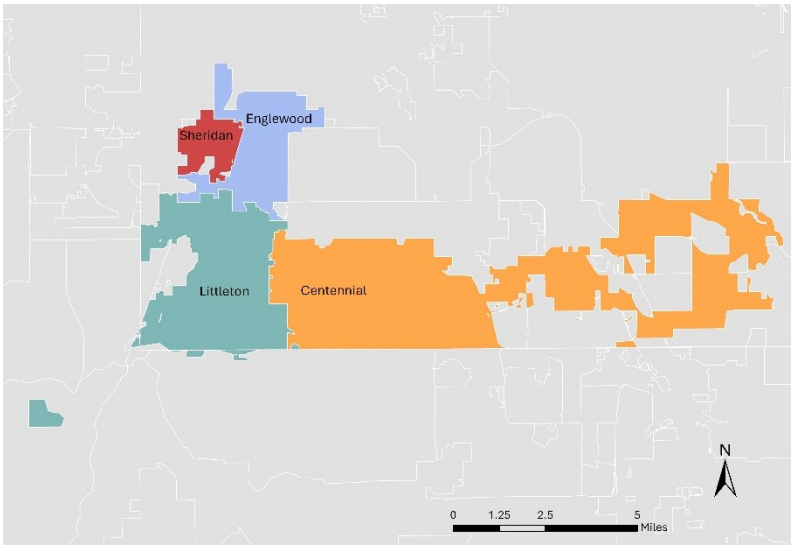



Figure 2: Map of South Metro

The Cities of Centennial, Englewood, Sheridan, and Littleton are situated in the Southern Denver metropolitan area beside the E-470 beltway. Together, these South Metro cities are home to approximately 190,000 residents and are known for their rich history and diverse character.

Of the four cities, Centennial is the largest by both area and population, representing 54% of the combined area and 56% of the overall population.

The makeup of single-family and multi-family housing varies significantly across the cities. Sheridan has the highest proportion of residents living in multi-family units[2] with five or more dwellings at 54%, while Centennial has the lowest at 13%. Despite these differences, the multi-family housing population is growing steadily in all four cities. Sheridan also has the highest share of Hispanic or Latinx residents and individuals who speak a language other than English at home, at 41.7% and 31.7%, respectively. Additional key demographic characteristics for each individual city are provided in Table 1.

Table 1: South Metro Demographics

| Description | Centennial | Englewood | Littleton | Sheridan |
|---|---|---|---|---|
| **Area (square miles)** | 26.9 | 6.7 | 13.8 | 2.3 |
| **Population** | 105,865 | 33,642 | 44,755 | 5,970 |
| **Households** | 40,952 | 15,686 | 20,484 | 2,442 |
| **Median Household Income** | $124,617 | $79,375 | $90,273 | $53,707 |
| **Persons Below Poverty Level** | 3.1% | 8.3% | 7.6% | 11.9% |
| **Bachelor's Degree or Higher** | 61.3% | 44.3% | 56.0% | 19.0% |
| **Language other than English spoken at Home** | 12.4% | 12.2% | 9.7% | 31.7% |
| **Hispanic or Latinx (of any race)** | 9.0% | 18.5% | 12.2% | 41.7% |
| **Multi-family Units*[2]** | 16.8% | 36.6% | 38.4% | 40.1% |
| **Total Employer Firms (2017)** | 3,633 | 1,475 | 1,825 | 423 |

Source: US Census V2022, 2020 5-year ACS and Root Policy Research, American Community Survey 2018-2022 Estimates, CP04 Comparative Housing Characteristics

[2] There are variations in the definition of 'multi-family' across jurisdictions within city codes, reports and/or contracts. For the purposes of this plan, 'multi-family' is defined as housing structures with five or more units, based on the 2018-2022 Estimate of the American Community Survey from the U.S Census Bureau. Mobile Homes, or Boats, RV, van, etc. are included in this definition. 'Single-Family' is defined as one-unit detached or attached and four or fewer housing units.

# 1.1 Plan Development Process

The development of the South Metro Waste Diversion Plan involved a comprehensive evaluation of the current waste management system. This included a waste characterization study to identify the types of waste generated in the region and waste modeling to project future tonnage. A robust stakeholder engagement process was also implemented to gather critical feedback on diversion strategies. This included focus groups, a residential survey completed by more than 1,300 residents, and interviews with waste haulers serving the region. These baseline findings helped identify initial gaps and opportunities to improve waste diversion. Representatives from each city also provided input on these elements during a Regional Waste Summit. Together, these efforts informed the recommended strategies and formed the foundation of the final plan. The plan development process is presented in Figure 3.

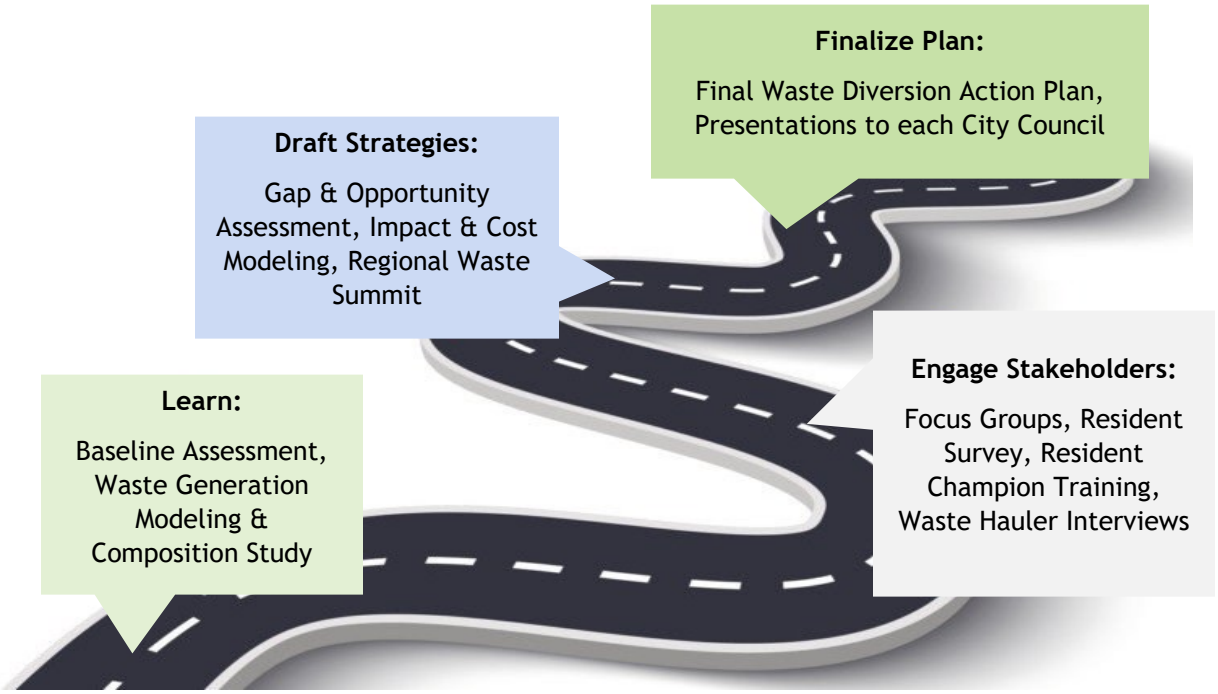



**Figure 3: Plan Development Roadmap**

# 1.2 Baseline Assessment

A baseline assessment was conducted to develop an inventory of South Metro's regional solid waste system and determine if the current systems are supportive of their future goals. The assessment included an analysis of waste collection options, material processing infrastructure, existing policies, and past studies, as well as community engagement activities and interviews with staff at each community.

Table 2 summarizes key findings from South Metro's baseline assessment for the mentioned sections. For more information, please reference the South Metro Waste Diversion Activity 3 Baseline Assessment report.

**Table 2: South Metro Baseline Highlights**

| Description | Centennial | Englewood | Littleton | Sheridan |
|---|---|---|---|---|
| **Area (square miles)** | 26.9 | 6.7 | 13.8 | 2.3 |
| **Population** | 105,865 | 33,642 | 44,755 | 5,970 |
| **Population % of South Metro** | 56% | 18% | 24% | 3% |
| **Multi-Family Units*** | 16.8% | 36.6% | 38.4% | 40.1% |
| **Collections Structure** | Open Market | Open Market | Open Market | City Contract for Residential Collection |
| **Opt-in or Universal Curbside Recycling** | Opt-In | Opt-In | Opt-In | Universal |
| **Pay Structure for Curbside Collections** | Open-Market | Open-Market | Open-Market | Pay-As-You-Throw (PAYT) |
| **Hauler Licensing** | No | Yes | No | Yes |
| **Universal Recycling**** | No | Yes, Opt-In | No | Yes, Opt-In |
| **Sustainability Plans** | No | Yes | Yes | Yes |
| **City Waste Goals** | No | Yes | Yes | Yes |
| **Recycling Website** | Yes | Yes | Yes | Yes |
| **Citizen Action Groups** | Yes | Yes | Yes | Yes |

*Multi-Family Units: Housing structures with five or more units, including mobile homes or boat, RV, van, etc. 2018-2022 American Community Survey, U.S. Census Bureau

**Universal recycling refers to a policy or system where all residents and/or businesses within a jurisdiction are required to have access to recycling services, typically alongside trash service. The goal is to make recycling as standard, consistent, and widely available as trash collection.



## 1.2.1 Collections

All collections in the South Metro region are provided by the private sector. Approximately 97% of residents in the Cities of Centennial, Englewood, and Littleton receive trash and recycling curbside services through the open market by subscribing directly with private haulers. Residents in these cities must opt in for recycling curbside services, generally for an additional fee. The City of Sheridan, which accounts for the remaining 3% of residents in the South Metro Region, contracts with Republic Services for single-family households with a pay-as-you-throw (PAYT) system for trash services, where residents pay based on cart size and the amount of waste generated. Sheridan residents receiving the city's contracted service also have recycling collections included as part of the program.

Trash and recycling collections for commercial and multi-family properties in the four cities are served through the open market, where property managers and owners subscribe directly with private haulers for services. None of the cities in the region provide or require recycling services for multi-family or commercial customers.

## 1.2.2 Infrastructure

South Metro is supported by various solid waste infrastructure in the region including Materials Recovery Facilities (MRFs) that handle single-stream recycling, recycling drop-offs, organics processing facilities and drop-offs, municipal solid waste (MSW) infrastructure composed of landfills and transfer stations, and miscellaneous recycling infrastructure. The following section provides an overview of the disposal infrastructure systems in the South Metro region.

Similar to collections, all materials processing and disposal facilities are fully owned and operated by the private sector. None of the cities in the region own, manage, or operate processing infrastructure. Below are illustrative examples of recovery infrastructure, including a MRF, an organics processing facility, and a MSW landfill.







### 1.2.2.1 Recyclable Material Processing Infrastructure

The South Metro region is served by two privately owned and operated MRFs that process single-stream recycling (Republic Services and Waste Management), shown on the map below. There are no public recycling drop-off centers in the South Metro boundary. The two closest recycling drop-off centers are located in Arvada and Aurora and owned and operated by private facilities (SustainAbility and Recycling Convenience Center at the Denver Arapahoe Disposal Site Landfill operated by Waste Management).

Waste Management is currently building a new $100M recycling facility in Denver East, estimated to be completed by mid-2026. AMP and Waste Connections, an artificial intelligence-powered recycling facility, is expected to be built and operated in Commerce City and is projected to open in early 2026.

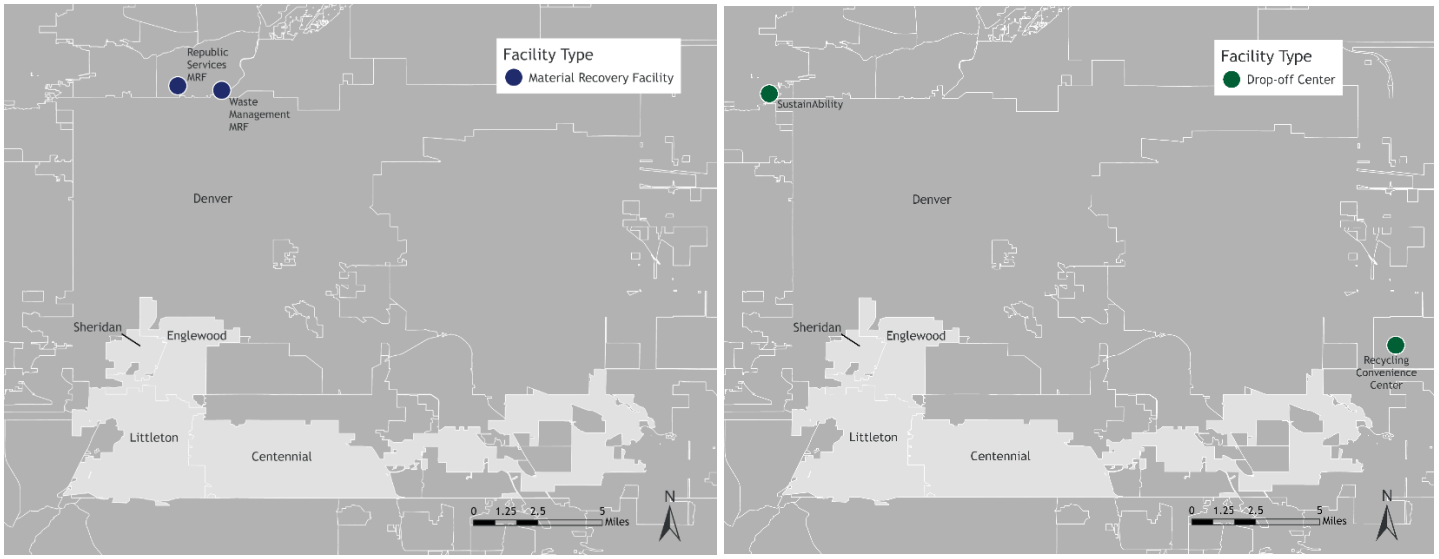



**Figure 4: Maps of MRF and Drop-Off Infrastructure Surrounding South Metro**

**Table 3: Details of MRFs and Drop-Off Infrastructure Surrounding South Metro Region**

| Facility Name & Link | Infrastructure Type | Materials Accepted | Physical Address |
|---|---|---|---|
| Republic MRF | Materials Recovery Facility | Single-Stream Recycling | 645 W 53rd Pl, Denver, CO 80216 |
| Waste Management MRF | Materials Recovery Facility | Single-Stream Recycling | 5395 Franklin St, Denver, CO 80216 |
| SustainAbility | Drop-off Center | Hard-to-Recycle Items | 6240 W. 54th Ave, Arvada, CO 80002 |
| Recycling Convenience Center at DADS Landfill | Drop-off Center | Municipal Solid Waste | 3500 South Gun Club Rd, Aurora, CO 80018 |

### 1.2.2.1 Organics Processing Infrastructure

A1 Organics in Sheridan does limited processing of yard debris (i.e., mulching and grinding) and accepts food scraps to be transferred to A1 Organics in Eaton or Keenesburg for composting. There are 11 organics drop-off sites accessible to residents that are operated by either SustainAbility, Compost Colorado, Scraps, or Wompost through subscription.

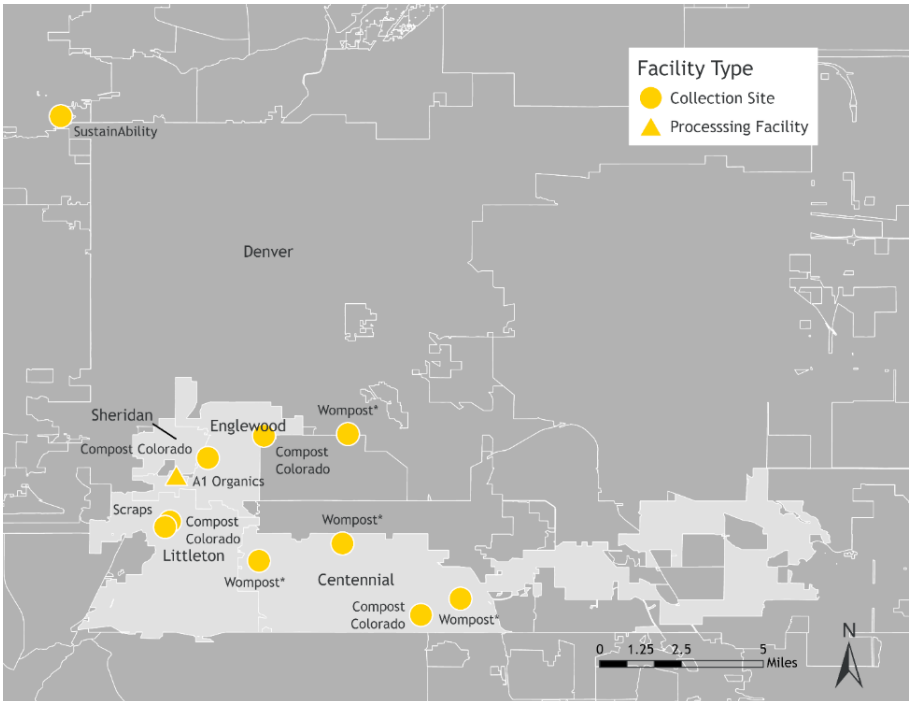



Figure 5: Map of Organics Infrastructure in South Metro

Table 4: Organics Infrastructure in South Metro

| Facility Name & Link | Materials Accepted | Operating Hours | Physical Address |
|---|---|---|---|
| A1 Organics | Yard debris | Mon - Fri: 7:00am - 4:00pm<br>Sat: Spring only | 2300 W Radcliff Ave,<br>Sheridan, CO 80110 |
| Compost Colorado | Food scraps and<br>Other Compostables | 24hrs for subscribers only | 1155 W Oxford Ave,<br>Englewood CO 80110 |
| Compost Colorado | Food scraps and<br>Other Compostables | 24hrs for subscribers only | 900 E Hampden Ave,<br>Englewood, CO 80113 |
| Compost Colorado | Food scraps and<br>Other Compostables | 24hrs for subscribers only | 5610 S Curtice St,<br>Littleton, CO 80120 |
| Compost Colorado | Food scraps and<br>Other Compostables | 24hrs for subscribers only | 7070 E Mineral Ave,<br>Englewood, CO 80112 |
| Scraps | Food scraps and<br>Other Compostables | 24hrs for subscribers only | 5767 S Rapp St,<br>Littleton, CO 80120 |
| Wompost | Food scraps and<br>Other Compostables | 24hrs for subscribers only | Precise location available<br>upon subscription<br>Denver, CO 80222 |
| Wompost | Food scraps and<br>Other Compostables | 24hrs for subscribers only | Precise location available<br>upon subscription<br>Centennial, CO 80121 |
| Wompost | Food scraps and<br>Other Compostables | 24hrs for subscribers only | Precise location available<br>upon subscription<br>Centennial, CO 80121 |
| Wompost | Food scraps and<br>Other Compostables | 24hrs for subscribers only | Precise location available<br>upon subscription<br>Centennial, CO 80112 |
| SustainAbility | Food scraps and<br>Other Compostables | Mon - Thurs: 9:00am - 4:00pm<br>Fri - Sat: 9:00am - 3:00pm | 6240 W. 54th Ave, Arvada,<br>CO 80002 |

### 1.2.2.3 Municipal Solid Waste Infrastructure

Three privately operated landfills (owned by Waste Management and Republic Services) along with four transfer stations (owned by Waste Connections, Waste Management, and Republic Services) manage the municipal solid waste (MSW) generated in the region.

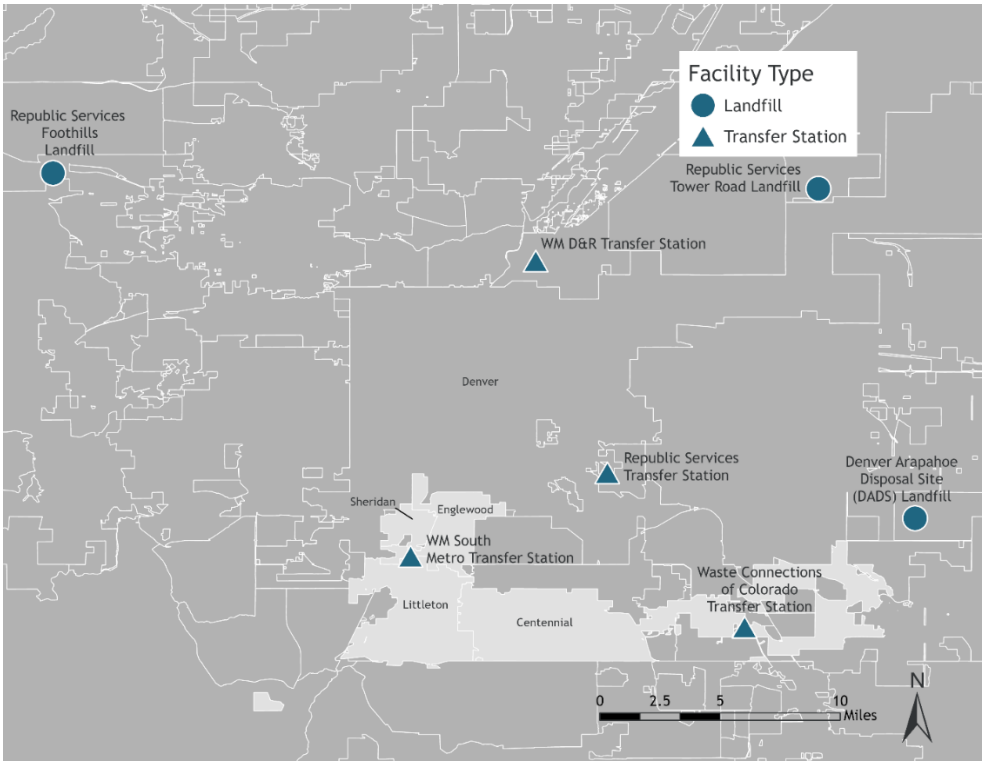



Figure 6: Landfills and Transfer Stations Surrounding South Metro

Table 5: Municipal Solid Waste Landfills and Transfer Stations in South Metro

| Facility Name & Link | Infrastructure Type | Materials Accepted | Physical Address |
|---|---|---|---|
| Denver Arapahoe Disposal Site (DADS) Landfill | MSW - Landfill | Municipal Solid Waste | 3500 South Gun Club Rd, Aurora, CO 80018 |
| Republic Services Tower Road Landfill | MSW - Landfill | Municipal Solid Waste | 8480 Tower Rd, Commerce City, CO 80022 |
| Republic Services Foothills Landfill | MSW - Landfill | Municipal Solid Waste | 8900 CO-93, Golden, CO 80403 |
| Waste Connections of Colorado Transfer Station | MSW - Transfer Station | Municipal Solid Waste | 7120 S. Jordan Rd, Centennial, CO 80112 |
| Waste Management South Metro Transfer Station | MSW - Transfer Station | Municipal Solid Waste | 2400 W Union Ave, Englewood CO 80110 |
| Republic Services Transfer Station | MSW - Transfer Station | Municipal Solid Waste | 7750 Cherry Creek S Dr, Denver, CO 80231 |
| Waste Management D&R Transfer Station | MSW - Transfer Station | Municipal Solid Waste | 6091 Brighton Blvd, Commerce City, CO 80022 |

### 1.2.2.4 Miscellaneous Infrastructure

Residents may divert electronics, construction & demolition (C&D) debris, and scrap metal through various permanent, designated drop-off sites in the South Metro region. These sites are complementary to several municipal events, private drop-off locations, and specialized pick-up services (e.g., Ridwell and Terracycle) that exist to increase material recovery. The locations of the miscellaneous recycling infrastructure in South Metro are shown in Figure 7.

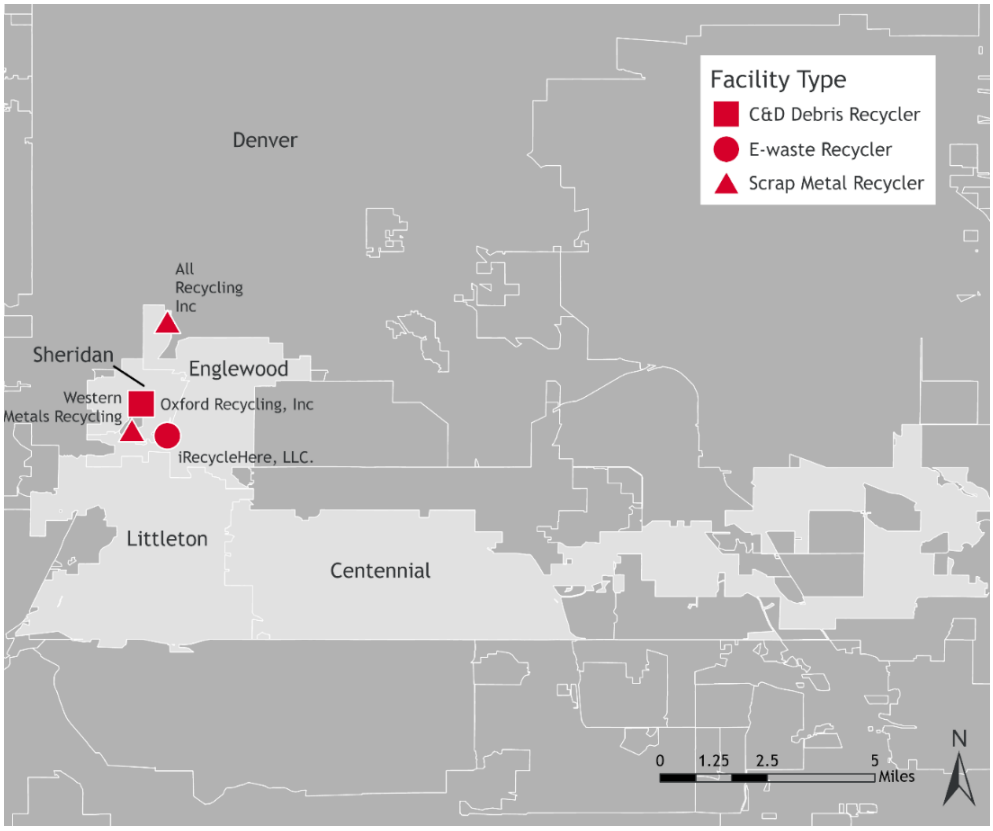



Figure 7: Map of Miscellaneous Recycling Infrastructure

Table 6: Miscellaneous Recycling Infrastructure

| Facility Name & Link | Infrastructure Type | Materials Accepted | Physical Address |
|---|---|---|---|
| iRecycleHere, LLC. | Misc. Recycling | Electronic Waste | 1865 W Union Ave Ste Q, Sheridan, CO 80110 |
| Oxford Recycling, Inc | Misc. Recycling | C&D Debris | 2400 W Oxford Ave, Sheridan, CO 80110 (Located in Unincorporated Arapahoe County) |
| All Recycling Inc | Misc. Recycling | Scrap Metal | 1775 W Wesley Ave, Englewood, CO 80110 |
| Western Metals Recycling | Misc. Recycling | Scrap Metal | 2100 W Oxford Ave, Sheridan, CO 80110 |

### 1.2.3 Policy

In general, the cities in the region have taken a hands-off approach to managing materials. None of the cities require recycling or composting for residential or commercial properties. Additionally, ordinances and regulations that drive recycling related behaviors (such as equal space for recycling, C&D requirements, or pay-as-you-throw ordinances) are not present in the region.

Englewood and Sheridan, representing 20% of the total population of South Metro, are the only cities that require licensed waste haulers. Both cities require licensed waste haulers to offer recycling services to residents, as specified in their respective city codes. There is an opportunity to strengthen hauler licensing ordinances in both cities by requiring haulers to report tonnages and bundle recycling services with trash service, rather than simply offering them as an optional add-on to customers.

Unlike the other South Metro communities, the City of Sheridan adopted a single-hauler system in 2014 through a contract with Republic Services that includes pay-as-you-throw pricing. Through the contract, Sheridan offers resident-funded trash and recycling collection to single-family homes and buildings with seven or fewer units. Although recycling collection is free, it is not automatically bundled with trash collection services, requiring residents to actively sign up for it. The contracted service includes a volume-based pricing structure for trash collection. While Sheridan has a hauler licensing ordinance, it does not require haulers to report data beyond what is outlined in the residential collection contract.

While Englewood and Sheridan have limited recycling-specific policies to date, both cities have incorporated waste-related goals within their respective sustainability plans. Additionally, the City of Littleton's Environmental Stewardship Board has prepared an Environmental Stewardship Action Plan that includes targeted goals for waste reduction and recycling.

### 1.2.4 Community Engagement

All four South Metro cities maintain dedicated webpages for trash and recycling services. Translation services are available on the websites for the Cities of Centennial, Littleton, and Sheridan, enhancing accessibility for non-English speaking residents.

Each city also hosts a variety of impactful recycling events, addressing materials such as Christmas trees, electronics, fall leaves, cooking oil, and household hazardous waste (HHW). Citizen action groups are active in all four cities, reflecting a range of perspectives on waste management practices. Through these action groups and recycling events, cities have reported growing interest in composting, reflecting a stronger desire among residents for more sustainable waste disposal options.




**Figure 8: Earth Day Celebration 2025 in the City of Englewood**

## 1.3 Waste Hauler Engagement

To better understand the existing waste management services including the barriers and opportunities for increasing waste diversion in the South Metro region, the STEPS project team conducted in-depth interviews with eight haulers operating in the region. These haulers included solid waste, recycling, and organic waste haulers that provide services to single-family households, multi-family households, and commercial properties. High-level findings and a summary of interviews are presented in Figure 9.

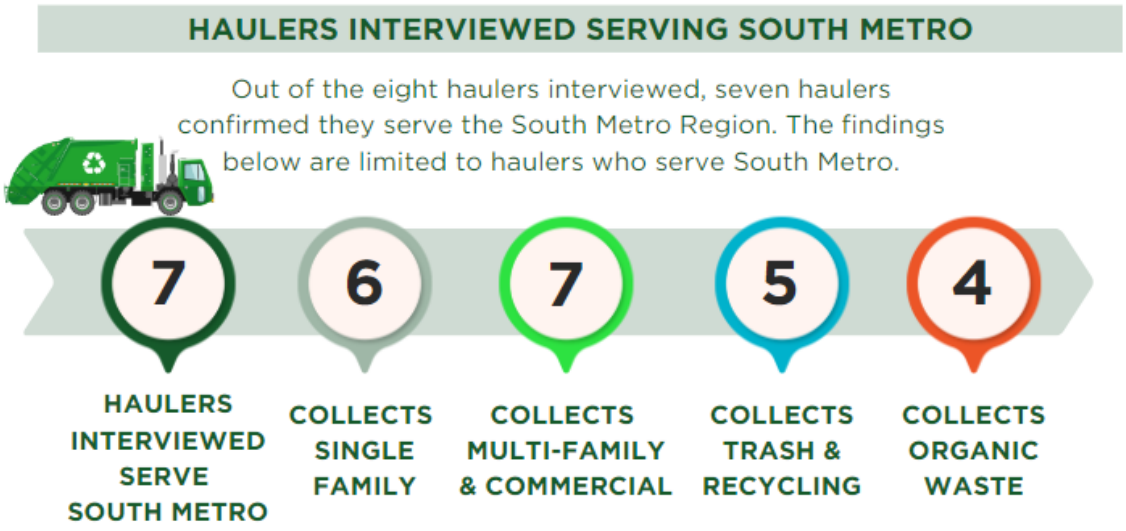



**Figure 9: Summary of Hauler Services in South Metro**

## 1.3.1 Perceived Barriers for Recycling & Composting

The top reasons cited by haulers for why they believe individuals opt out of recycling or composting include cost constraints, education and awareness, lack of convenience (for commercial and multi-family), and a lack of trust that recyclables are truly processed and recycled as claimed.

### WHAT SHOULD SOUTH METRO DO TO SUPPORT RECYCLING?

*"Improve education around recycling - this could be done with haulers in the area."*

*"Diversion will increase if there are more contracts in place. Contracts help establish clarity for customers about who and how their materials are being collected."*

*"Combat the distrust of the recycling industry."*

*"Would love to partner with municipalities."*

## 1.3.2 City-Led Initiatives to Improve Residential Recycling & Composting

Haulers providing organic waste collection services frequently noted that expanding free, public access to drop-off sites throughout the region, along with free or subsidized services, would increase residential and commercial composting participation. This recommendation is supported by communities who have transitioned to providing subsidized or free organics services across the state and country.

Multiple haulers emphasized the need to expand educational programs to increase recycling and composting participation. A significant portion of the public lacks awareness of proper recycling and composting practices, questions the effectiveness of these efforts, or does not see value in these services, particularly when they involve additional costs.

It is important to note that, beginning in 2026, Colorado's Extended Producer Responsibility (EPR) legislation will require producers of packaging and paper products to fund a statewide system to recycle covered materials, resulting in 'no-cost' recycling services for covered generators.

### 1.3.3 Contamination

Haulers reported that some homeowners associations (HOAs) and multi-family communities opt out of recycling services due to contamination fees, which are often incurred when residents do not recycle properly. Haulers charge contamination fees to cover the costs of managing and disposing of contaminants in the recycling stream. Many multi-family communities and HOAs have decided that they would prefer to suspend recycling services instead of providing education to residents.

Service providers specializing solely in compost collection have robust educational and feedback programs in place that help reduce contamination. They either provide proactive education by training residents and commercial building staff on best practices, or reactive feedback by providing real-time guidance on contaminants found in individual bins. While many of these organic waste haulers operate on a relatively small scale, they believe these methods could be effective on a large scale to maintain clean organic waste streams.

## 1.4 Community Engagement

Community engagement is an integral process of the South Metro Waste Diversion Plan. Engaging the community ensures that the plan is not only aligned with the needs and priorities of stakeholders, but also fosters a sense of ownership, trust, and collaboration. Therefore, community engagement is embedded throughout many of the project activities. To ensure community needs and desires were thoughtfully captured and integrated into South Metro's future actions, a robust community engagement strategy was implemented including a website, survey, engagement collateral, focus groups, and Resident Champion training.

### 1.4.1 Website Development

The cities expressed a desire to create a website to communicate progress on the South Metro Waste Diversion Plan with both the public and elected officials. In response, the South Metro Waste Diversion website was developed. During the stakeholder engagement phase, it served as a landing page for the South Metro Residential Survey and hosted the registration for focus groups.

Today, the website continues to serve as a central hub for information about the waste diversion plan. It provides access to reports and memorandums created from this project and offers opportunities for stakeholders to provide feedback that informs plan development. The website also includes the Resident Champion Training videos and toolkit, developed as part of the broader stakeholder engagement strategy discussed later in this section.

Since the launch of the South Metro Waste Diversion website, there have been approximately 3,300 unique visitors as of June 2024. The majority of the website visitors have accessed the site directly, either by scanning the QR code from the survey mailer or by entering the SouthMetroWasteDiversion.com website directly into their browser.

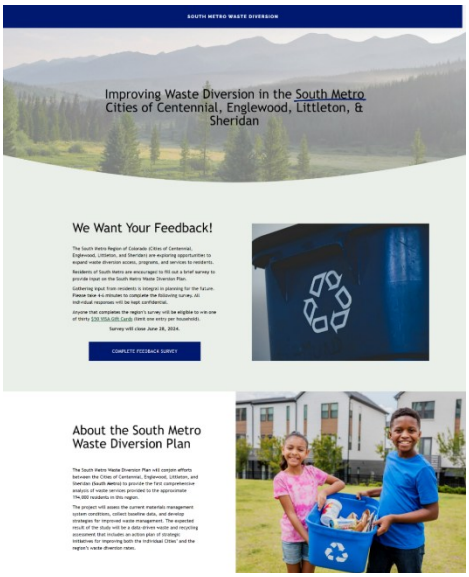



**Figure 10: South Metro Waste Diversion Website Screenshot**

### 1.4.2 Survey

To better understand the factors that motivate or hinder residential participation in South Metro's solid waste management systems, an online survey was developed in English and Spanish to gather input directly from residents. Questions were tailored to gather data on municipal solid waste disposal methods, current and potential waste diversion practices, and residents' perspectives on implementation of various waste diversion methods. The survey was conducted with a random sample of residents in June 2024 and yielded results with a ±5% margin of error at a 99% confidence level.

Survey results revealed that at least 87% of residents in Centennial, Englewood, and Littleton reported that their trash hauler offers recycling. In Sheridan, 18.2% of respondents reported that their trash hauler does not offer recycling services. This lack of service was most commonly reported among residents of trailers/mobile homes, duplexes & multiplexes, and apartment buildings. Recycling habits were found to be prevalent, with 85% of South Metro residents having a recycling bin and actively recycling, while 13% reported lacking a recycling bin and not recycling at all (Figure 11).

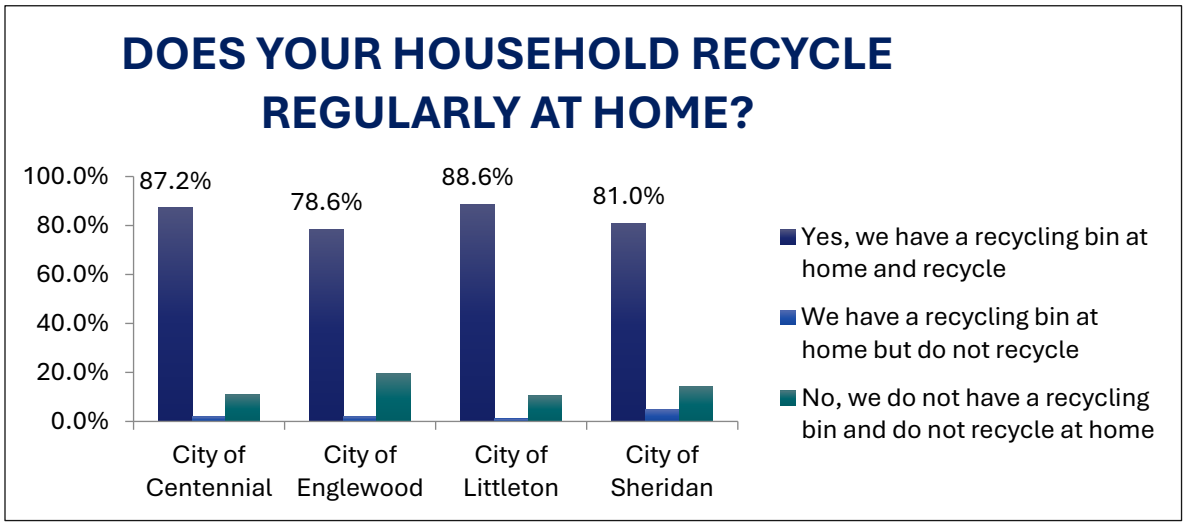



**Figure 11: Survey Results on Whether Households Recycle Regularly at Home**

Across the South Metro region, respondents strongly agreed that they support efforts to increase access to composting and recycling in their communities and that recycling helps to conserve natural resources to preserve the environment for the future. Additionally, 58% of respondents shared they would be willing to compost both yard and food scraps, and over 50% of the respondents somewhat agreed or strongly agreed that households in their communities have access to convenient recycling services and believe that most of their neighbors recycle today.

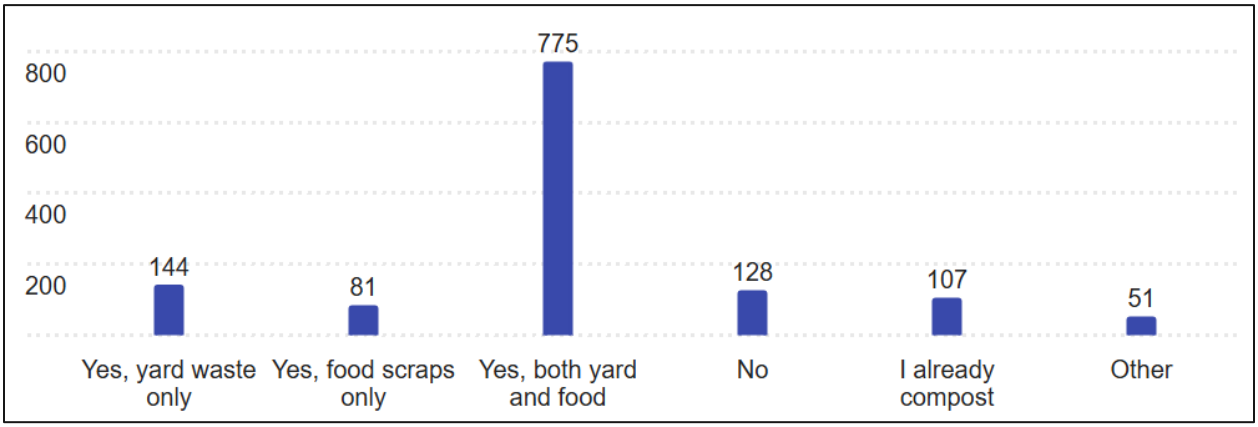



**Figure 12: South Metro Willingness to Compost Food or Yard Debris**

Despite general enthusiasm for expanded recycling and composting services, challenges remain. Residents in Centennial, Englewood, and Littleton identified low trust as the greatest barrier, while Sheridan residents cited confusion about what can be recycled as their primary challenge. Furthermore, respondents identified the need for additional recycling drop-off locations.

With regards to costs, 17% of the survey respondents were unsure how much they pay per month for trash services, with 20% reporting they pay between $21-$30/month. Residents in the City of Sheridan, the only city in South Metro that has organized hauling services through Republic Services, most reported paying in the $11-$20 a month range, while other cities most reported paying in the $21-$30 a month range.

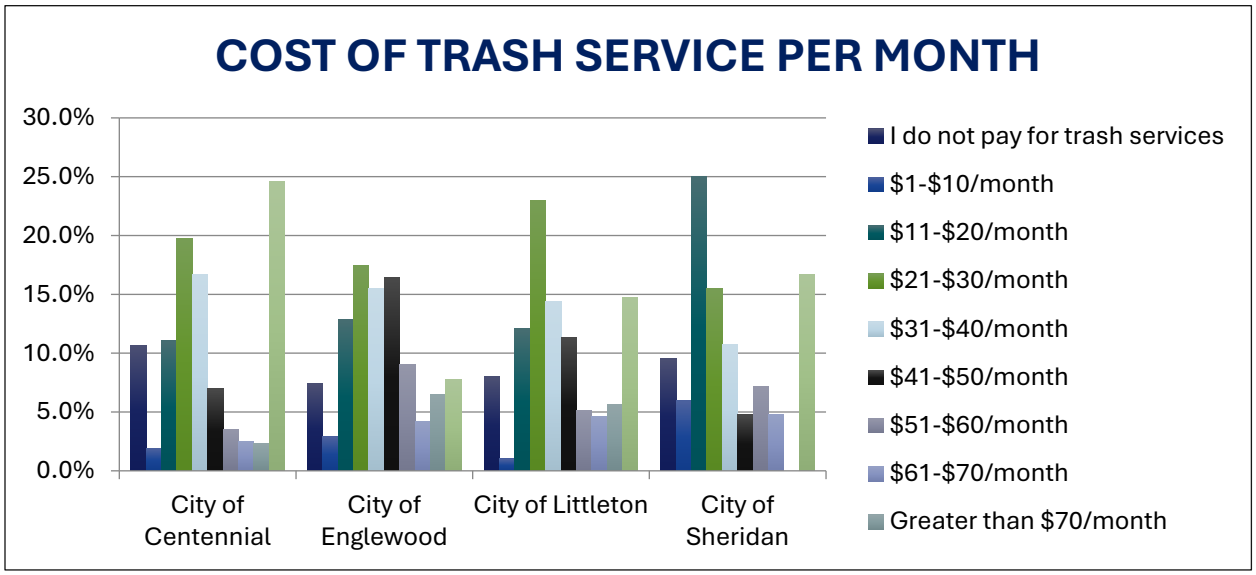



Figure 13: Cost of Trash Service per Month

## 1.4.3 Mailer

To facilitate broader survey participation, a bilingual mailer was developed with information on accessing the South Metro survey and to inform residents of the South Metro Waste Diversion project. A 5"x7" postcard mailer was designed and made available in English and Spanish given that Spanish is the second most spoken language in the region. The mailer utilized the font and color family consistent with the branding of the website. Each of the respective city logos were utilized to communicate that this was a regional project. The mailer provided a QR code that directed residents to the South Metro Waste Diversion website. A visual of the mailer is shown in Figure 14.




Figure 14: Mailer Screenshot

The mailers were sent to a sample of 14,875 randomly selected households in the region, consisting of a representative proportion of both single-family and multi-family homes across all four cities. The QR code on the mailer was accessed 1,891 times from the time of receipt until the end of the survey response period.




**Figure 15: Social Media Graphic Promoting Focus Groups**

## 1.4.4 Focus Groups

Three virtual focus groups were conducted to gather insights from stakeholders on existing waste management patterns, barriers, and opportunities. The three groups identified and formed were multi-family residents, businesses, and disadvantaged communities.

Participants were engaged through various community-facing channels and sources, including trusted community groups, committees, chambers, and social media. Focus group participants were recruited from all four cities to ensure diverse and representative input across the three target groups. Following established best practices for qualitative research, the first ten eligible respondents were invited to participate in each session. Participants received a $50 Visa online gift card in recognition of their time and contributions. The focus groups were conducted virtually and held separately, beginning with an overview of the project and review of ground rules, followed by a facilitated conversation guided by a set of pre-developed questions.

All focus group participants reported having access to trash services, however, fewer than half had curbside recycling, and only one business had contracted composting services. Several common barriers to recycling were identified, including lack of access, insufficient space and dumpster capacity in multi-family complexes, limited involvement in waste management decisions for businesses, and the high cost of services for disadvantaged communities. Participants also cited a lack of reliable educational resources and recycling services. Across all three focus groups, concerns were raised about the high number of waste haulers operating in the community, with specific worries about child safety, property damage, and road deterioration. Additionally, there was a shared desire to expand access to services for hard-to-recycle materials as well as recycling drop-off centers.

## 1.4.5 Resident Champion Training

A virtual Resident Champion training session was conducted for South Metro residents, focused on the benefits and logistics of recycling and waste diversion, as well as strategies for effectively sharing this information within their communities. As the cities move toward exploring and implementing specific policy measures, Resident Champions are expected to play a vital role in providing informed community input, supporting public engagement, and assisting with on-the-ground implementation. Although the primary goal of the training was to raise awareness of the South Metro Waste Diversion Plan, no specific waste-related policies were discussed.

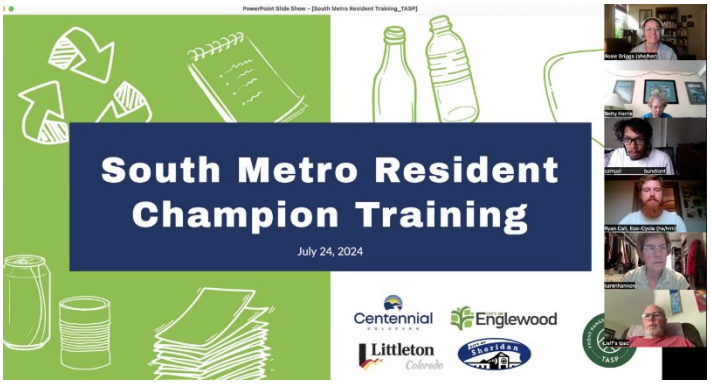



**Figure 16: Screenshot of Virtual Training of the Resident Champion Training**

All attendees received a copy of the training recording, slide deck, and a Resident Champion toolkit, which includes guidance on recyclable materials, common contaminants, frequently asked questions, and the broader benefits of recycling. All materials in the toolkit were also made available in Spanish to enhance accessibility. A screenshot of the virtual training format is shown in Figure 16.

# 1.5 Regional Waste Summit

A Waste Summit was held to present findings to elected officials from the four South Metro cities. The presentation covered information collected to date, including the baseline infrastructure evaluation, hauler interviews, public engagement findings, the waste characterization study, and the initial gaps and opportunities analysis. At the meeting, input from elected officials was gathered to identify potential gaps in the waste system and was incorporated into further research and the development of recommended policies and strategies.

The Summit was a zero-waste event, with all materials reused, composted, recycled, or otherwise diverted. This served as both a conversation piece to explore waste reduction practices and as a way to highlight Colorado's strong end markets for metals and glass recycling.



**Figure 17: South Metro Waste Summit Day 1 and Zero Waste Stations at the Event**

Throughout the event, strategies were presented and discussed through both verbal dialogue and the virtual polling platform, PollEv. Elected officials were asked to identify priorities they wished to explore further, focusing on those they viewed as feasible and/or as offering a positive strategy for advancing waste diversion in the South Metro region and their individual cities.

***What are the top priorities we should further explore regionally?***

Regionally, yard debris and food scraps collections were the top priority identified to explore further. Organic waste comprises 48% of residential trash, which elected officials cited as being a key factor in their interest in exploring organics collection. By a slight margin, there was a preference for yard debris collection over food scraps collections. There were discussions about the various pathways to capturing yard and food scraps, with officials citing they partake in backyard composting or burying their food scraps at home. Strategies were also discussed at large, such as capturing landscaping yard debris via mulching or composting, increasing access to food scraps drop-off sites, and supporting commercial entities in using compostable service ware. Concerns were also brought up regarding odors and the possibility of attracting pests to curbside bins.

The secondary priority identified was increased commercial and multi-family unit recycling access, citing limited access in many multi-family complexes. Elected officials expressed interest in exploring ways to support this gap. Speakers discussed various options that can improve access for commercial and multi-family units including education, outreach, and technical assistance to property owners and/or tenants.

# 2.0 South Metro Waste Composition and Generation

The South Metro Waste Diversion Plan included a waste composition study and waste generation modeling analysis to identify current waste trends and project future waste tonnage production for the region and each individual city. These data points were critical for identifying gaps and opportunities and for guiding the development of effective waste reduction strategies, as they highlighted specific concerns around contamination, diversion rates, and total waste generation. Waste generation models were applied to estimate current and projected tonnages through 2035. These estimates include the total material generated, landfilled, and diverted, broken down by generating sector for each city within the South Metro region.

Findings from these tasks confirmed that a significant portion of the region's waste continues to be landfilled, with comparatively lower rates of diversion through recycling and composting. Projections indicate that by 2035, the South Metro region will generate approximately 260,000 tons of waste. If all strategies, policies, operations, and engagement stay the same, the South Metro region will be diverting roughly 15.2% of its waste, or approximately 39,000 tons of waste through recycling or composting.

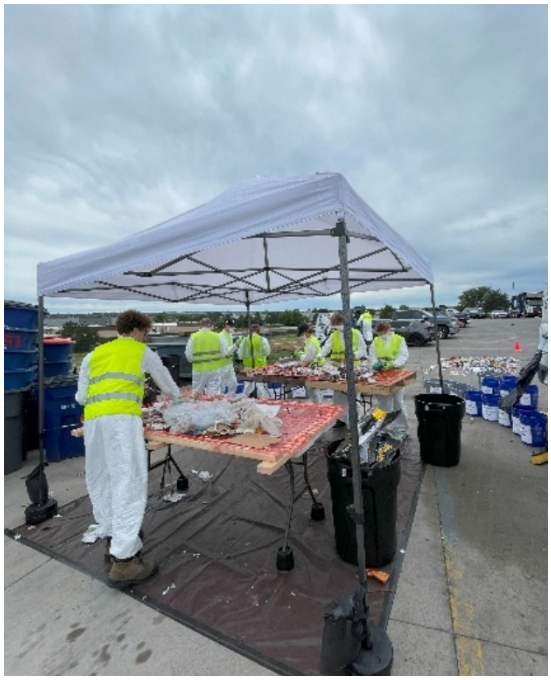


Figure 18: Waste Characterization Study

## 2.1 Waste Composition

The South Metro Waste Diversion Project included a two-season waste characterization study (also known as a 'waste audit' or 'waste sort'). The aim of the waste characterization study was to sort samples of trash and recycling to assess the overall composition of the region's waste streams. Approximately 10,200 pounds of trash and recycling from both residential and commercial/multi-family sectors were sorted into 32 categories. Samples from all four cities in South Metro were represented in the study.

### 2.1.1 Municipal Solid Waste (MSW)

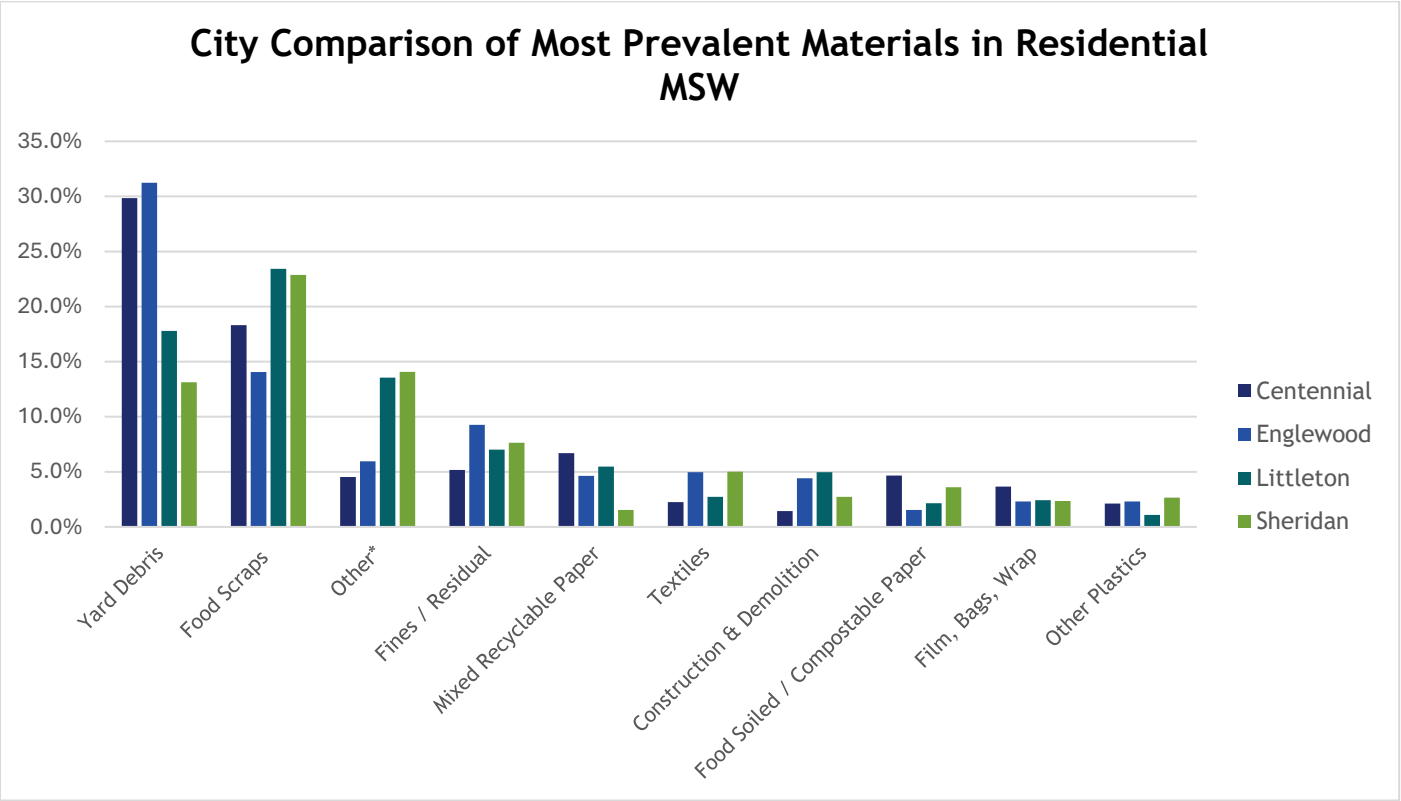
The most prevalent materials in combined residential and commercial MSW were food scraps (18.6%), followed by yard debris (17.1%), and Other[3] (9.2%).

Although seasonal variability influenced food scraps, yard debris, and construction and demolition (C&D) material categories most significantly, food scraps and yard debris emerged as the most prevalent materials in the waste stream across both sorting seasons, indicating their significance and diversion potential.

In the residential MSW, yard debris was the most prevalent material landfilled (24.0%), followed by food scraps (19.4%). Together, these materials make up 43.4% of residential MSW, representing a significant opportunity for diversion from

[3] *Other* includes materials that do not belong in any other defined category, such as rubber, tires, bulky furniture, diapers, sanitary products, pet waste, and wipes.*

South Metro's residential trash stream. This was consistent across individual cities additionally, with both food scraps and yard debris in the top three material categories for all cities. Figure 19 show the top 10 most prevalent materials in South Metro's Residential MSW.




*Other* includes materials that do not belong in any other defined category, such as rubber, tires, bulky furniture, diapers, sanitary products, pet waste, and wipes.*

**Figure 19: City Comparison of Most Prevalent Materials in Residential MSW**

### 2.1.2 Recyclables

A total of 27 samples of recycling were collected and sorted, including 18 residential and 9 commercial samples. Corrugated cardboard (37.0%) was the most prevalent material in combined residential and commercial recycling streams, alongside mixed recyclable paper (20.4%) and glass bottles and jars (11.3%).

For residential streams, the most prevalent materials in recycling are corrugated cardboard (27.8%), followed by mixed recyclable paper (24.8%), and glass bottles and jars (14.1%). This was consistent across individual cities, with both corrugated cardboard and mixed recyclable paper in the top two material categories for all cities. Figure 20 shows the top 10 most prevalent materials in South Metro's residential recycling stream.

Contamination in the residential recyclables stream represented 20.6% of the recyclables stream, which is above the national average contamination rate for inbound recycling at 17%. Contamination is defined as the improper disposal of materials into a waste stream, such as food scraps in the recycling stream. Individually, Centennial had a contamination rate of 13.0%, Englewood had 13.2%, Littleton had 18.8%, and Sheridan had 34.5%.

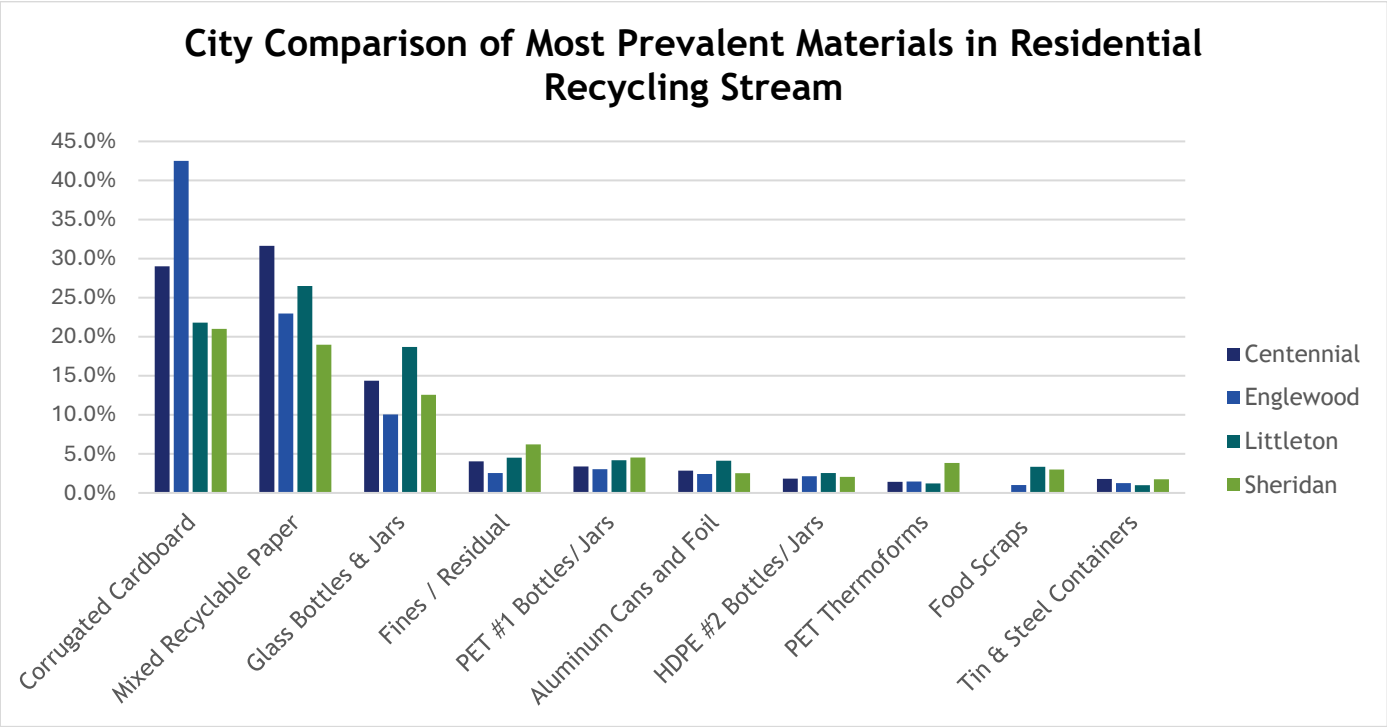
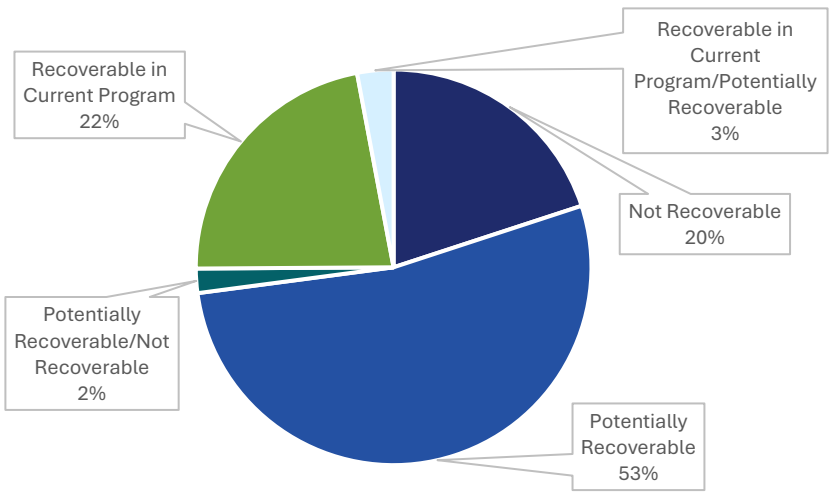



Figure 20: City Comparison of Most Prevalent Materials in Residential Recycling Stream

### 2.1.3 Recoverability

Up to 78% of what is disposed of in the trash across all sectors (residential, commercial, and multi-family) can either be recovered in existing programs or potentially be recovered if hard-to-recycle or other divertible materials were properly separated. Based on current programs and existing local infrastructure, 22% of materials in MSW can be recovered through existing programs. Figure 21 shows comparisons of material compositions based on recoverability for combined residential, commercial, and multi-family MSW.




**Approximately**

**78%**

**of South Metro's waste is recoverable through recycling, composting, or special collections.**

Figure 21: Recoverable Tons in MSW Across All Sectors

# 2.2 Waste Generation

Waste tonnages were modeled and projected for both the city and the South Metro Region from 2023 to 2035. Estimates include total material generated, landfilled, and diverted, and are broken down by generating sector. Of all generated waste, it is estimated that South Metro is diverting approximately 15.2% of materials from the landfill.




Findings from these tasks confirmed that a significant portion of the region's waste continues to be landfilled, with comparatively lower rates of diversion through recycling and composting. It is estimated that the South Metro region will generate approximately 255k tons of waste by 2033 and 260k tons of waste by 2035.

If all current strategies, policies, operations, and engagement stay the same, the South Metro region will be disposing 85% of its waste or sending approximately 221k tons of MSW to landfills. Population growth for South Metro from 2023 to 2035 is presented in Table 7. Total tonnage projections in South Metro from 2023 to 2035, broken down by total tons of materials generated, landfilled, diverted, and by generating sector, are presented in Table 8.

### Table 7: South Metro Population Projections (2023-2035)

| Year | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Centennial | 106,883 | 107,909 | 108,946 | 110,115 | 111,277 | 112,438 | 113,558 | 114,674 | 115,899 | 117,108 | 118,309 | 119,500 | 120,681 |
| Englewood | 34,275 | 34,604 | 34,937 | 35,312 | 35,684 | 36,056 | 36,415 | 36,773 | 37,166 | 37,554 | 37,939 | 38,321 | 38,700 |
| Littleton | 44,451 | 44,867 | 45,285 | 45,755 | 46,227 | 46,698 | 47,153 | 47,605 | 48,100 | 48,588 | 49,072 | 49,551 | 50,025 |
| Sheridan | 5,908 | 5,965 | 6,022 | 6,087 | 6,151 | 6,215 | 6,277 | 6,339 | 6,406 | 6,473 | 6,540 | 6,605 | 6,671 |
| South Metro | 191,517 | 193,344 | 195,190 | 197,268 | 199,338 | 201,407 | 203,402 | 205,391 | 207,572 | 209,724 | 211,860 | 213,977 | 216,077 |

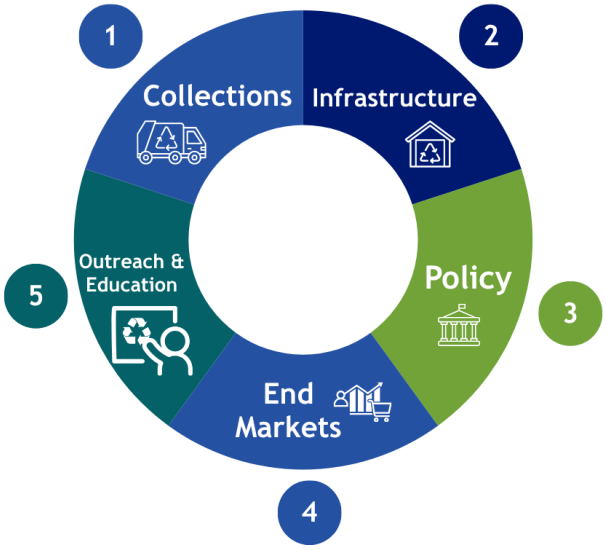
### Table 8: South Metro Region Tonnage Projections (2023-2035)

| Year | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Single-Family** | | | | | | | | | | | | | |
| **Disposal** | 57,877 | 58,430 | 58,988 | 59,617 | 60,243 | 60,869 | 61,473 | 62,074 | 62,734 | 63,385 | 64,031 | 64,672 | 65,307 |
| **Diversion** | 10,335 | 10,434 | 10,534 | 10,646 | 10,758 | 10,869 | 10,977 | 11,085 | 11,202 | 11,319 | 11,434 | 11,549 | 11,662 |
| **Total Generation** | 68,212 | 68,864 | 69,522 | 70,263 | 71,001 | 71,738 | 72,450 | 73,159 | 73,936 | 74,704 | 75,465 | 76,221 | 76,969 |
| **Multi-Family** | | | | | | | | | | | | | |
| **Disposal** | 20,415 | 20,609 | 20,806 | 21,026 | 21,246 | 21,466 | 21,678 | 21,890 | 22,122 | 22,350 | 22,577 | 22,802 | 23,025 |
| **Diversion** | 3,646 | 3,680 | 3,715 | 3,755 | 3,794 | 3,833 | 3,871 | 3,909 | 3,950 | 3,991 | 4,032 | 4,072 | 4,112 |
| **Total Generation** | 24,061 | 24,290 | 24,521 | 24,781 | 25,040 | 25,300 | 25,550 | 25,799 | 26,072 | 26,341 | 26,609 | 26,874 | 27,137 |
| **Commercial** | | | | | | | | | | | | | |
| **Disposal** | 117,438 | 118,559 | 119,691 | 120,965 | 122,234 | 123,503 | 124,726 | 125,946 | 127,283 | 128,602 | 129,912 | 131,211 | 132,498 |
| **Diversion** | 20,971 | 21,171 | 21,373 | 21,601 | 21,828 | 22,054 | 22,273 | 22,490 | 22,729 | 22,965 | 23,199 | 23,431 | 23,660 |
| **Total Generation** | 138,409 | 139,730 | 141,064 | 142,566 | 144,062 | 145,557 | 146,999 | 148,436 | 150,012 | 151,567 | 153,111 | 154,641 | 156,158 |
| **All Sectors** | | | | | | | | | | | | | |
| **Disposal** | 195,730 | 197,598 | 199,484 | 201,608 | 203,724 | 205,838 | 207,877 | 209,910 | 212,139 | 214,337 | 216,520 | 218,685 | 220,830 |
| **Diversion** | 34,952 | 35,285 | 35,622 | 36,001 | 36,379 | 36,757 | 37,121 | 37,484 | 37,882 | 38,275 | 38,664 | 39,051 | 39,434 |
| **Total Generation** | 230,682 | 232,883 | 235,107 | 237,610 | 240,103 | 242,595 | 244,998 | 247,394 | 250,021 | 252,612 | 255,185 | 257,736 | 260,264 |

# 3.0 Gaps & Opportunities

Following the baseline assessment of waste generation, policies, and infrastructure in the South Metro region, a comprehensive gap analysis was conducted to identify opportunities for system improvement. This analysis aimed to pinpoint areas where existing programs could be optimized, new initiatives could be introduced, or innovative investments could be made to support the region's waste diversion goals.

Figure 22: Best Management Practices Chart




The initial gap analysis drew on baseline findings, components of the current materials management system, community engagement insights, waste generation modeling, and a comparison of South Metro's system with national best management practices. The analysis revealed specific areas for improvement that support the region's ambitious goals to improve equitable access to services, increase recovery and reuse, reduce waste, support recycling market development, and build strategic partnerships.

To structure the analysis, the project team used five best management practice areas: Collection & Access, Infrastructure, End Markets, Outreach & Education, and Supportive Policy. Effective materials management requires these components to work in concert. For example, even the most advanced recycling facilities are limited in impact without robust education and outreach or reliable end markets for recovered materials to maintain clean material streams and sustained demand for processed materials.

Each key area has several components or categories of best practices that have been identified by the project team's expertise of nearly four decades in the industry. Within each practice area, the evaluated system components are listed alphabetically. Their order is not an indication of priority. The project team utilized grades to represent relative uptake scores for each of the best practices (ranging from best (A) to worst (F) on the region's relative uptake). Additional details about each category and grades can be found in the Activity 8: Gaps and Opportunities memo.

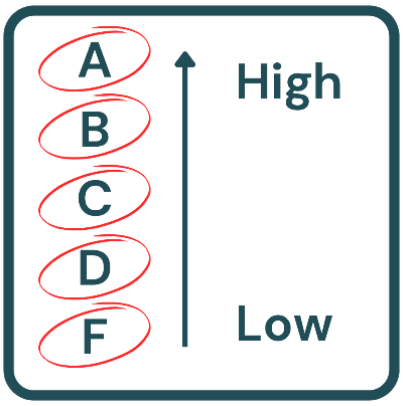



Figure 23: Relative Uptake of Best Management Practices

# 3.1 Collection and Access

For recycling programs to be effective, every household and business in a community must have convenient access. This can be through curbside collection, drop-offs, a reuse and sharing economy, or a combination of these options. As a first step in resource recovery, material diversion and recovery need to be as convenient as waste disposal.




**Figure 24: At-Your-Door Collection Service Flyer**

South Metro's waste collection system demonstrates several strengths, including universal access to recycling for single-family, multi-family, and commercial sectors. The Cities of Englewood, Centennial, and Littleton also provide special collections through "At-Your-Door" services for hazardous waste and electronics. Additionally, organics diversion is available, though participation depends on residents and businesses subscribing to market-driven services.

Opportunities to increase diversion for the region remain. Approximately 17.1% of landfilled waste consists of yard debris that could be diverted through dedicated curbside or drop-off services. Furthermore, approximately 18.6% of landfilled waste is food scraps that could be diverted by piloting food scraps drop-off sites or curbside collection. Multi-family residents face challenges accessing recycling and hazardous waste disposal, often due to insufficient infrastructure and lack of property management engagement. Additionally, gaps in drop-off locations, lack of organized single-hauler systems, and barriers to participation for commercial entities hinder optimal waste diversion. Addressing these issues through expanded services, regional recycling centers, and targeted ordinances could improve efficiency, reduce waste, and foster greater community participation in recycling and composting programs.

**Table 9: South Metro Gap Analysis Grades: Waste Collection**

| Collection and Access | | |
|---|---|---|
| Overall Grade | Category | Grade |
| C- | Carts and Dumpsters | B |
| | Collection Schedules | C |
| | Commercial Access | D |
| | Food Scraps | D |
| | Hard-to-Recycle Items | C |
| | Multi-Family Access | D |
| | Recycling Drop-Off Locations | D |
| | Single-family Access | B |
| | Yard Debris | D |



## 3.2 Infrastructure

It is crucial for the region to have processing facilities conveniently located, technologically advanced, and with enough capacity to handle the population's current and future material streams.

As discussed in Section 1.2.2 of this Plan, there are two Materials Recovery Facilities (MRFs), three landfills, and four transfer stations that service the Denver Metro area, including South Metro. Two additional MRFs in the Denver metro-region are planned to be built by 2026. South Metro also has one organics processing facility for yard debris and clean lumber in Sheridan, along with several other organics collection sites and haulers. The infrastructure to support municipal solid waste (MSW) and single-stream recycling is strong in the region. However, infrastructure for food scraps processing is overall inadequate, and there is a lack of adequate infrastructure for processing hard-to-recycle materials.

Insufficient infrastructure can be addressed through public-private partnerships by developing an organics processing site, funding or supporting the development of a hard-to-recycle materials center, and supporting the development of a C&D recycling facility or the expansion of materials accepted at existing recycling centers. A C&D recycling ordinance could also further recycling for these materials.

**Table 10: South Metro Gap Analysis Grades: Infrastructure**

| Infrastructure | | |
|---|---|---|
| Overall Grade | Category | Grade |
| B- | Compost Facility within 30 miles | D |
| | Food Scraps Sites | C |
| | Hard-to-Recycle Items & Drop-Offs | F |
| | Landfill Capacity | A |
| | MRF/Recycling Transfer within 30 miles | A |
| | MRFs Process Additional Materials | B |
| | MRF Technology | A |
| | Multiple MRFs Available | A |
| | Tip Fees Encourage Recycling | C |

## 3.3 Supportive Policy

Policy should be crafted to ensure responsible material recovery is the standard practice across the community, not merely a best practice. Local policy can be adopted to support all of the practice areas.

To support the development of robust recycling systems and establish regulatory consistency across their cities, South Metro communities should coordinate to adopt similar, introductory recycling policies. While some recycling policies, such as organized hauler (single-hauler) contracts, commercial recycling ordinances, and pay-as-you-throw (PAYT) ordinances (requiring residential haulers to offer




**Figure 25: Volume-Based Pricing, PAYT**

volume-based pricing for trash bins) have proven to boost waste diversion rates, it is more strategic to first establish and then build upon a strong base of introductory policies, such as hauler licensing and equal space ordinances.

**Table 11: South Metro Gap Analysis Grades: Supportive Policy**

| Policy | | |
|---|---|---|
| Overall Grade | Category | Grade |
| D | City Waste Goals / Sustainability Plans | C |
| | Commercial Recycling Ordinance | F |
| | C&D Recycling | F |
| | Equal Space Ordinance | F |
| | Hauler Licensing | C |
| | Organized Hauler (Single Hauler) | D |
| | Pay-As-You-Throw | D |
| | Universal Residential Recycling | C |

## 3.4 End Markets



End markets for collected recyclables and finished compost leads to the success of a sustainable circular economy that ultimately allows material to be diverted from landfills. This also includes reuse and refurbishment. By increasing demand, the region creates a 'pull' for additional materials that, in turn, drives supply.

The South Metro region of Denver has several strengths in its waste diversion infrastructure, including yard debris processing through A1 Organics, sufficient single-stream recycling capacity with multiple MRFs, and access to scrap metal recycling facilities. Additionally, the region has strong local end markets for glass recycling, with outlets such as Glass to Glass and Rocky Mountain Bottling Company ensuring high-value recovery of this material. These strengths provide a solid foundation for regional waste diversion efforts.

However, opportunities remain to improve and expand end markets. Compostable products are not widely accepted due to contamination concerns, underscoring the need for statewide compostable product labeling requirements and public education. Furthermore, utilizing finished compost for government use and development projects could boost organics end markets. Leveraging existing resources like the pulverizer at the STS South Denver transfer station and exploring partnerships with innovative companies like Tereform could advance recycling for hard-to-recycle materials.

Local/in-state end market development remains limited for aluminum, paper, post-consumer plastics, and steel, suggesting that investment in infrastructure, outreach, and incentive programs could strengthen the region's recycling ecosystem. The Colorado Circular Economy Development Center's (CEDC) End Market Opportunity Assessment identified waste tires, textiles, clean wood, and colored high-density polyethylene (HDPE) as opportunity areas for end market development in Colorado.

Actions to improve end markets include fostering partnerships for emerging technologies, proactively implementing Extended Producer Responsibility (EPR) requirements, and investing in public education to drive participation and reduce contamination. Furthermore, there are opportunities to increase reuse systems by piloting reuse programs to reduce the need for single-use disposable materials and encourage the recovery of textiles.

**Table 12: South Metro Gap Analysis Grades: End Markets**

| End Markets | | |
|---|---|---|
| Overall Grade | Category | Grade |
| C+ | C&D | D |
| | Glass | A |
| | Hard to Recycle Materials | C |
| | Local End Market Development | D |
| | Organics | C |
| | Plastics | B |
| | Reuse Markets | D |
| | Scrap Metal | A |
| | Textiles | D |

## 3.5 Outreach & Education

All residents and businesses will need to know how to handle and sort materials in their homes, at work, and away. Systems continue to evolve as material composition changes and technologies change. Thus, information must be regularly communicated to residents in various ways to supply MRFs, composters, and end markets with high-quality material, while continuing to decrease the amount of waste sent to landfills. Two-way communication should also be established to provide opportunities for program participants and community members to ask questions, give feedback, and self-identify as Resident Champions.

South Metro's waste outreach and education system is built on a foundation of accessible resources and community engagement. Each city maintains webpages with recycling and waste disposal information, supported by a new regional website designed to centralize updates. Consistent language and multilingual accessibility in recycling guidelines enhance clarity and inclusivity. The system also engages community groups and trained Resident Champions to advocate proper waste management through peer-to-peer outreach, fostering a culture of sustainability. Recycling collection events offer additional opportunities for engagement while addressing hard-to-recycle materials.

Despite these strengths, there are several areas for improvement. Staffing constraints have limited consistent public engagement efforts, reducing opportunities to build trust and maintain participation. Recycling guidelines, while accessible, could be enhanced with clearer visuals, multilingual labels, and broader public availability. Training municipal staff in recycling practices would enable them to better assist residents with waste diversion. Furthermore, the lack of interactive tools and focused outreach to multi-family and commercial sectors leaves significant gaps in participation. Addressing these issues through targeted outreach, enhanced resources, and regular communication could greatly enhance South Metro’s waste education and outreach impact.

**Table 13: South Metro Gap Analysis Grades: Outreach and Education**

| Outreach & Education | | |
|---|---|---|
| Overall Grade | Category | Grade |
| C- | Community Groups / Resident Champions | C |
| | Consistent and Translated Recycling Language | C |
| | Dedicated Recycling Webpage | B |
| | Guidelines Publicly Provided | F |
| | Multi-family and Commercial engagement | D |
| | Ongoing General Public Engagement | C |
| | Public Interactive Tools | D |
| | Recycling Collection Events | B |
| | Training Municipal Staff | D |

# 4.0 Waste Diversion Actions

**90%**

South Metro residents agree or strongly agree with efforts to increase recycling and composting.

Approximately 90% of South Metro residents shared that they agree or strongly agree with efforts to increase access to recycling and composting in their communities, and believe recycling helps conserve natural resources to preserve the environment for the future.

The South Metro Diversion Plan proposes actions to be implemented over the next 10 years that increase the recovery of recyclables and organics, address hard-to-recycle materials, reduce consumption, and support the circular economy.

The South Metro Project Team evaluated a total of 50 strategies in the categories of Collections, Infrastructure, End-Markets, Policies & Governance, and Education & Outreach. High impact strategies were introduced and discussed with elected officials and staff representatives from each city during the Regional Waste Summit. The draft strategies were shared with city staff and leadership for a more detailed review. Each city was then asked to identify and prioritize seven high-impact strategies for local implementation and three strategies for potential regional collaboration.

Each strategy was evaluated and presented with associated attributes, including an estimated diversion impact (categorized from ♺ to ♺♺♺♺), a cost impact range (categorized from $ to $$$), an anticipated implementation timeline, and a list of affected stakeholder groups (single-family households, multi-family households, or the broader community) as shown in Table 14.

## 4.1 Impact Modeling

To evaluate the potential diversion and climate impacts of the priority strategies, the project team applied a scenario-based planning model tailored to the South Metro region. This model integrates projected waste generation, disposal, and diversion tonnages, population and household data from the U.S. Census, findings from the two-season waste composition study conducted in 2024, and benchmarks from high-performing waste diversion programs across Colorado and other leading U.S. jurisdictions.

Diversion impact was evaluated based on the estimated increase in diversion rate that each strategy contributed, either for the region as a whole or for each city.

The model operates under the assumption that all recommended strategies are implemented to their full intended effect and accounts for inter-dependencies among actions, recognizing that the success of one may hinge on the implementation of another. Estimated outcomes are cumulative and reflect these relationships. Detailed model outputs, including impact estimates for each strategy, are provided at the end of each city's waste diversion goals and actions section.

**Table 14: Diversion and Fiscal Impact Rating Scale**

| Diversion Impact | |
|---|---|
| Diversion Impact on Tons Diverted | Estimated Additional Diversion Rate % |
| ♺ | < 1.5% |
| ♺♺ | 1.5% – < 3.5% |
| ♺♺♺ | 3.5% – < 5.5% |
| ♺♺♺♺ | ≥ 5.5% |

| Fiscal Impact | |
|---|---|
| Fiscal Impact on Tons Diverted | Estimated Fiscal Range |
| $ | < $10,000 |
| $$ | $10,000 – < $100,000 |
| $$$ | ≥ $100,000 |

# 5.0 Regional Waste Diversion Goals and Actions

Building on the identified gaps and opportunities, as well as strategy development and collaborative discussions held during the Regional Waste Summit, the cities identified strategies they believed would best be pursued for regional implementation. While each city maintains its own solid waste management program and is at a different stage in its waste diversion efforts, they share common goals and challenges that are well-suited to be addressed through a coordinated, regional approach.

**Table 15: Regional Strategies Summary**

| ID | Action | Fiscal Impact | Diversion Impact | Implementation Timeline | | |
|---|---|---|---|---|---|---|
| | | | | FY26-30 | FY30-35 | FY35-40 |
| 5.1 | Support and/or develop a regional recycling drop-off center within South Metro | $$$ | ♺ | X | X | |
| 5.2 | Work together regionally towards improving organic diversion access and supporting a large-scale organics processing infrastructure that accepts food scraps and other compostables | $$$ | ♺♺♺♺ | | X | X |
| 5.3 | Support efforts to increase multi-family and commercial access to recycling / compost services | $$ | ♺♺ | X | X | X |

## 5.1 Regional Recycling Drop-Off Centers ♺

Drop-off centers can serve as a critical infrastructure asset to manage recyclables. In the Colorado Needs Assessment, it was identified that 80% of the Front Range population had access to both recycling curbside and drop-off options. South Metro is among the 20% of communities that do not have access to recycling through drop-off centers. The closest recycling drop-off centers are located in Aurora and Arvada.

The lack of a recycling drop-off center in the South Metro region was also one of the core recommendations that emerged from stakeholder engagement through focus groups and surveys.

A recycling drop-off center provides additional capacity and convenient access to handle surges in recyclable material, particularly during spring cleaning or move-in

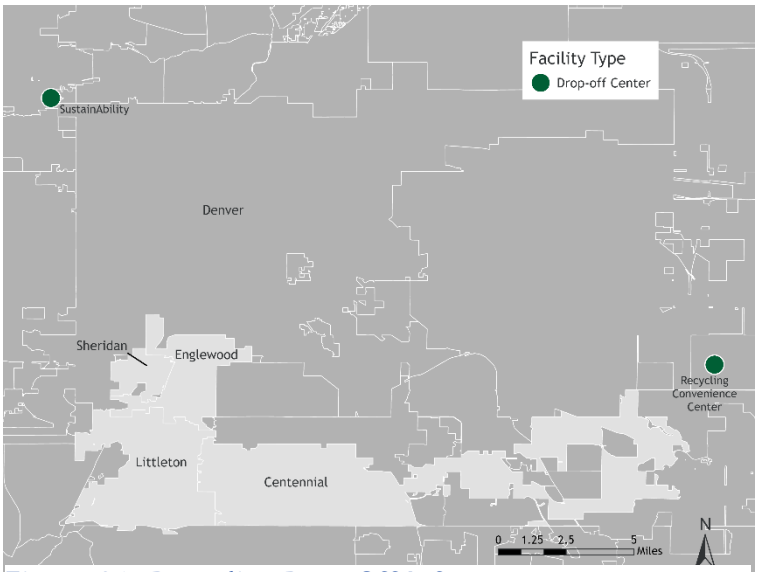



**Figure 26: Recycling Drop-Off Infrastructure**

and move-out periods. Drop-off centers provide an overflow option that helps prevent overfilled containers and litter. For multi-family residents where property management does not provide adequate recycling access, convenient drop-off centers can offer a place for residents to drop off materials. It is generally best practice for urban environments with populations over 100,000 to establish one drop-off center per 50,000 residents. It is recommended for South Metro to explore establishing up to four regional recycling drop-off centers, conveniently located between the four communities.

While the overall diversion impact may be lower compared to other strategies, due to its reliance on voluntary resident participation, this approach is critical from an equity standpoint, as it significantly improves recycling access for communities that currently lack convenient options.




**Implementation Steps**

- Identify and secure funding through municipal budgets, statewide funding, or grants.
    - Apply for Colorado Circular Communities (C3) Enterprise funding for infrastructure support or request reimbursements from Circular Action Alliance through Colorado's Extended Producer Responsibility (EPR) Law
- Site and design
- Permit as necessary
- Site development (e.g., utilities, parking, fencing, lighting, roads, pads, etc.)
- Equipment selection & procurement
- Haulers startup & training
- Education and outreach campaign to promote launch of centers
- Launch program and maintain operations

## 5.2 Regional Organics Facility



The cities of South Metro seek to work together regionally towards improving organic diversion access and supporting a large-scale organics processing infrastructure that accepts food scraps and other compostables.

Organic materials, including food scraps and yard debris, make up 43.4% of South Metro's residential municipal solid waste (MSW). With just under half of the residential waste stream comprised of organic materials, this presents a significant opportunity to increase diversion if capacity is expanded through the development of an organics processing facility.

**Implementation Steps and Timeline**

- Conduct a feasibility study to determine the capacity needed at a facility, anticipated capital and operating costs, and key considerations.
- Secure funding through municipal budgets, statewide funding, or grants.
- Secure and establish partnerships, which can include regional partnerships and a public-private partnership. This will require a Request for Proposal (RFP).
- Site, design, and permit
- Site development (e.g., aerated static piles (ASP) system, utilities, roads, pads, etc.)
- Equipment selection & procurement
- Secure organic waste feedstock through policy, contracts for collection, and increasing access.

# 5.3 Support Efforts to Increase Multi-Family and Commercial Access to Recycling / Compost Services




Access to recycling and compost services for multi-family and commercial buildings remains limited across the South Metro region. The four cities of South Metro are committed to supporting efforts to increase multi-family and commercial access to recycling and compost services. The four cities have selected city-specific strategies to support this effort, such as passing an equal space ordinance and leveraging the state's Extended Producer Responsibility (EPR) law, which covers support for multi-family properties.

There are various strategies the region can take to increase recycling and composting access. Below are some example actions that have been successfully employed in communities leading waste diversion programs across the country. Implementation steps, fiscal impacts, and diversion impacts may vary based on the actions South Metro adopts, and its effectiveness will depend on the cumulative impacts of other diversion strategies for multi-family and commercial properties.

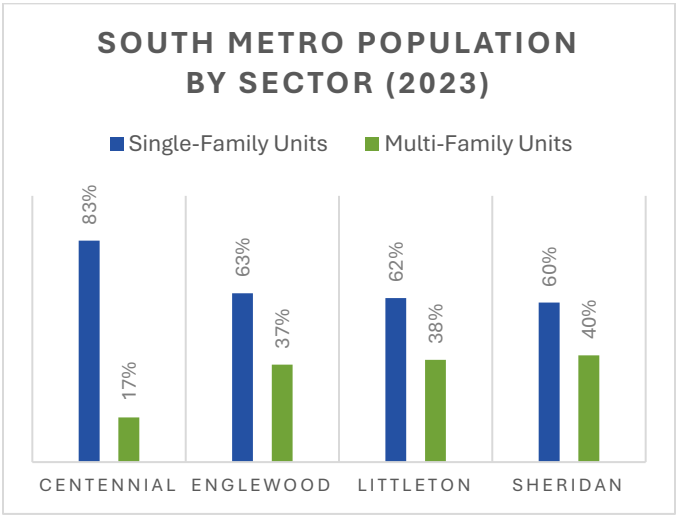



**Figure 27: South Metro Population by Sector (2023)**

**Implementation Steps**

- Encourage or require by ordinance commercial and multi-family property owners and/or managers to submit a recycling implementation plan
- Leverage or expand existing green business programs
- Offer technical assistance for property managers including:
  - Resources (e.g., Resident Champion Training toolkit) and information on the South Metro Waste Diversion website
  - Information on how multi-family properties can benefit and request reimbursement from Colorado's EPR Law
  - Downloadable recycling, composting, and trash signs in English/Spanish
  - Sample emails and letter templates to engage tenants and residents in recycling and/or composting information
  - Training and attendance logs for housekeeping or property maintenance staff
  - Flyers or booklets for move-in
  - List of licensed haulers for recycling, composting, and trash services
  - Guidance on creating a green team
  - Public recognition and spotlights of businesses and multi-family properties leading the path on waste diversion

# 6.0 City of Centennial Diversion Goals and Actions

The City of Centennial, located in Arapahoe County, is home to approximately 106,000 residents. The city is guided by a vision of being a connected community, where neighborhoods matter, education is embraced, businesses are valued, and innovation absolute. Centennial is one of the more densely populated areas in the region, with an average of 3,648 residents per square mile. According to the 2022 US Census, the city had 40,952 households, with an average of 2.59 residents per household. Housing in Centennial is predominantly composed of single-family homes, which account for 83% of all residential units, while multi-family units comprise the remaining 17%.

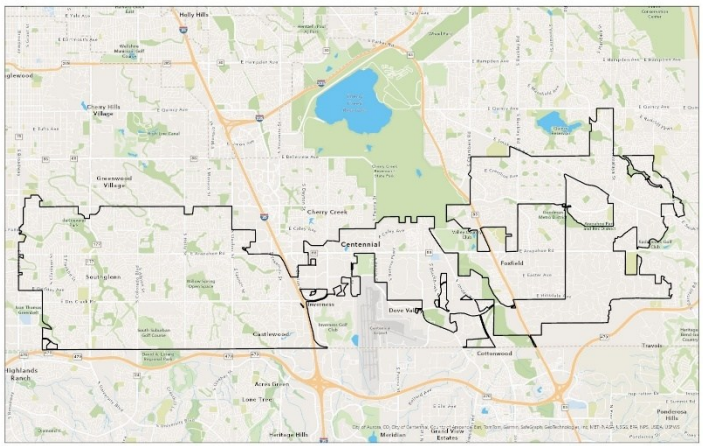



**Figure 28: City of Centennial Boundary**

Centennial operates under an open market (also referred to as open subscription) solid waste collection system. Under this system, residents and businesses independently contract private haulers for trash and recycling services. The city does not require hauler reporting or licensing. Although some homeowner associations (HOAs) maintain contracts with a single provider, there is limited data on the extent of such agreements within the city. Furthermore, there is insufficient information regarding recycling and composting services or participation rates for multi-family properties and commercial businesses.

The city does not have mandatory recycling requirements, and curbside recycling pricing structures are determined by individual haulers. Composting services are available on a voluntary, opt-in basis, with subscription fees determined by the private market. Residents may choose to divert food and organic waste by subscribing directly to these composting services.

Currently, the city does not have an adopted sustainability plan or defined waste diversion goals. However, city staff have expressed interest in collecting baseline data on waste collection and diversion as a foundation for potential future policy development. While there are no permit requirements for waste haulers, the city does regulate solid waste infrastructure. Furthermore, Chapter 7 Article 5 of Centennial's City Code includes regulations prohibiting dumpsters on residential and public property, with some exemptions.

Centennial provides a "Neighborhood Trash Collection Toolkit" on its city website to encourage neighborhoods (both HOA and non-HOA) to coordinate single-day trash collection. The webpage includes survey forms, tips for proposal setup, and a form for consideration of potential vendors.



In collaboration with the Southeast Metro Stormwater Authority (SEMSWA), the city offers a specialized home collection program through a partnership with Waste Management. The "At Your Door Special Collection Service" allows residents to schedule a collection appointment for household hazardous waste, including automotive products, batteries, garden and household chemicals, paint, electronics, mercury-containing items, and pool chemicals. A $20 co-pay is required per event, and bilingual promotional materials (English and Spanish) are available on SEMSWA's website.




**Figure 29: Electronics Recycling in the City of Centennial**

Additionally, the city organizes one-day electronics recycling events. In 2024, the city hosted a collection event in April at the Centennial Civic Center, sponsored by Jacobs, the city's contractor for Public Works, Code Compliance and Facilities, and Park and Fleet Maintenance Services.

Centennial also collaborates with the Arapahoe Park and Recreation District and the South Suburban Parks and Recreation District to offer seasonal drop-off events for tree limbs and woody plant materials. These materials are chipped and mulched, and free mulch is made available to residents at designated city locations. A similar service is offered during the winter months to recycle Christmas trees, including the collection of holiday lights at no cost.

**Table 16: City of Centennial Strategies Summary**

| ID | Action | Fiscal Impact | Diversion Impact | Implementation Timeline | | |
|---|---|---|---|---|---|---|
| | | | | FY26-30 | FY30-35 | FY35-40 |
| 6.1 | Require hauler licensing, including the requirement for haulers to track and report tonnage data | $ | ♺ | X | | |
| 6.2 | Leverage Colorado's Extended Producer Responsibility (EPR) for recycling programs | $ | ♺♺ | X | X | X |
| 6.3 | Explore the transition to organized residential collection (single hauler) | $$ | ♺♺ | X | X | |
| 6.4 | Pass an equal space ordinance to ensure commercial recycling access | $ | ♺♺♺♺ | X | | |
| 6.5 | Promote yard debris curbside services for composting for single-family residents | $ | ♺♺ | X | X | X |
| 6.6 | Support the growth of community-scale composting sites for single-family residents | $$ | ♺ | X | X | X |
| 6.7 | Support the development of a hard-to-recycle center | $$$ | ♺ | | X | |
| 6.8 | Ongoing community group engagement with universal and accessible guidelines | $$ | ♺♺ | X | X | X |

## 6.1 Require Hauler Licensing, Including the Requirement for Haulers to Track and Report Tonnage Data ♺

A hauler licensing ordinance is a policy that requires both residential and commercial sector waste haulers to obtain a license through the local governing body to operate within the government's jurisdiction. Licenses can include requirements such as providing proof of insurance, setting prices based on volume of trash containers (pay-as-you-throw), safety requirements, minimum service standards, enforcement mechanisms, or operating only on certain days and during a set timeframe to reduce traffic and noise.



It is considered best practice for hauler licensing policies to also require haulers to regularly report how many tons of trash, recyclables, and organic waste have been collected in their community. This helps establish baseline data for local governments to understand their waste streams and track progress.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders (haulers and/or residents) to gather insights into potential barriers
- Document feedback on challenges, service gaps, and potential ordinance impacts
- Draft and adopt a hauler licensing ordinance
- Communicate with haulers on new requirements
- Develop a reporting mechanism to receive hauler data annually

## 6.2 Leverage Colorado's Extended Producer Responsibility (EPR) for Recycling Programs ♺♺

Colorado's Producer Responsibility for Recycling Packaging Program (EPR) requires covered producers to join a Producer Responsibility Organization, and through it, fund and manage the end of life for packaging and paper, including collection, processing, and recycling or composting.

This EPR program will cover 100% of the net recycling service costs for all Colorado single-family and multi-family homes starting in 2026. The state's Producer Responsibility Organization, Circular Action Alliance (CAA), has indicated that it will start by covering recycling costs in communities with organized (non-open market) systems.

Communities that do not currently offer recycling for residents or that have open-market recycling collection systems pose a bigger challenge, and it will take longer to coordinate payments for recycling haulers that choose to participate.

Steps that Centennial can take to fully access the benefits of Colorado's Producer Responsibility program include adopting an equal space ordinance; implementing a hauler licensing ordinance with a requirement for providing recycling bundled into all services; introducing pay-as-you-throw pricing; and/or establishing a municipally coordinated hauling contract or contracts for residential collections.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders to share information about EPR and gather insights on potential barriers related to ordinance impacts
- Draft and adopt ordinances
- Draft and implement a communications plan to roll out new requirements
- Apply and receive reimbursements provided through Colorado's EPR law for collections

## 6.3 Explore the Transition to Organized Residential Collection (Single Hauler)

♺♺

**Organized Residential Collection** refers to a system in which a municipality manages curbside trash and recycling services on behalf of residents through a contract with one or more licensed haulers. Under this model, residents may have the option to opt out of the municipal service for a fee. Municipal contracts can mandate that recycling is included for all households and may incorporate a pay-as-you-throw (PAYT) pricing structure, where fees are based on the size of the trash cart and the volume of waste generated.

This approach can result in lower and more stable service costs for residents, expanded access to recycling, and the expansion of services such as compost collection or bulky item pickup. It also reduces the number of collection trucks on neighborhood streets, thereby minimizing traffic, emissions, and road wear. Organized collection typically covers single-family homes and smaller multi-family buildings (fewer than seven units), with optional participation or phased inclusion available for homeowners associations (HOAs).

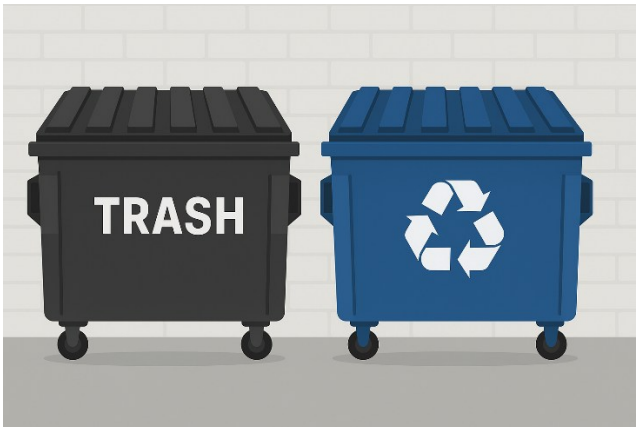
During the stakeholder engagement process for this South Metro Waste Diversion Plan, which included surveys and focus groups, residents throughout the South Metro region consistently raised concerns about the high number of waste haulers operating within the same neighborhoods. Key issues cited included child safety risks, wear and tear of roads, and increased air and noise pollution. Residents also emphasized a lack of accountability under the current open hauling system, expressing a desire for more structured oversight and coordination.

**Implementation Steps:**

- Engage stakeholders to communicate benefits and gather feedback on potential barriers and service needs
- Conduct a legal review to ensure compliance with state single-hauler regulations
- Coordinate regionally with neighboring jurisdictions aiming to also implement
- Outline implementation steps and timeline

## 6.4 Pass an Equal Space Ordinance to Ensure Commercial Recycling Access

♺♺♺♺




An **Equal Space Ordinance** requires that all newly constructed commercial buildings allocate the same amount of space for recycling collection infrastructure (such as enclosures, receptacles, chutes, staging areas, and collection rooms) as is allocated for trash.

Insufficient space for recycling is a common barrier for commercial entities. By integrating this requirement into building codes, municipalities can ensure future developments support recycling access without retrofitting existing structures.

In Centennial, approximately 17% of housing consists of multi-family units, and there are 3,633 employer firms, highlighting the importance of planning for equitable recycling infrastructure in both residential and commercial development.

**Implementation Steps:**

- Conduct outreach to stakeholders to gather insights on potential barriers
- Draft and adopt an equal space ordinance
- Roll out communications plan and consider providing technical support for commercial property managers
- Coordinate with the Community Development Department to align on communicating requirements for new developments and significant site redevelopments

## 6.5 Promote Yard Debris Curbside Services for Composting for Single-family Residents♺♺



The South Metro Waste Characterization study found that yard debris comprises 20% of the City of Centennial's single-family waste stream, yet less than 1% of the yard debris is being diverted. Promoting curbside yard debris collection for single-family residents could significantly increase the city's waste diversion rate, depending on the level of participation.

Like curbside recycling collection service, adding a third collection point for diverting organic material (yard debris and sometimes food scraps) creates an opportunity to reduce the amount of waste sent to landfills and contribute to the environmental benefits of composting. Local governments can promote the benefits of curbside yard debris collection programs and encourage residents to subscribe.

**Implementation Steps:**

- Develop outreach materials (e.g., webpage, mailer, social media posts, etc.) to explain the benefits of yard debris composting
- Provide information to residents on how to reach out to haulers for yard debris composting services
- Promote the benefits of composting and diverting yard debris from landfills

## 6.6 Support Growth of Community-Scale Composting Sites for Single-family Residents♺

Community-scale compost processing sites are much smaller than commercial composting sites and therefore require much less regulation and operational support.

South Metro has a strong network of composting sites available for subscription drop-off services for food scraps. Community compost bins are available to residents for a monthly fee.

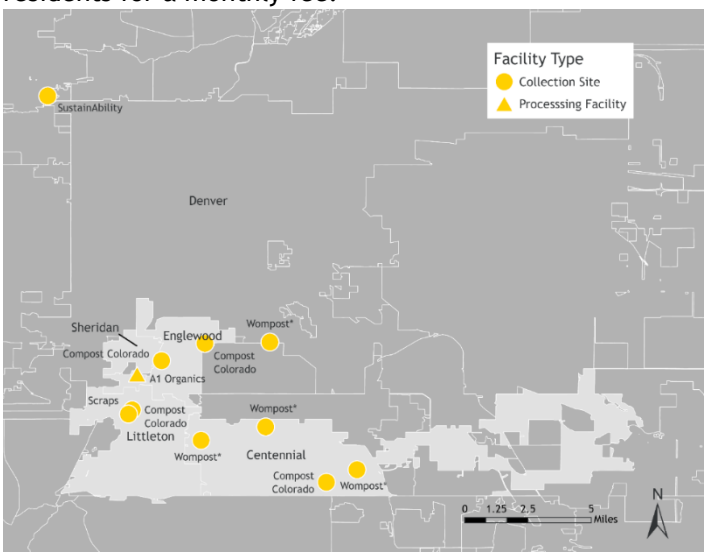



**Figure 30: Composting Drop-Offs in South Metro**

Additionally, communities can support the growth of local composting sites through partnerships with community garden programs. Communities can also support the growth of local composting by sharing educational resources, including hands-on workshops on how to compost.

**Implementation Steps:**

- Evaluate market pricing conditions of existing community composting programs in South Metro
- Consider the feasibility of a subsidized community composting program
- Promote existing community-scale composting programs in the region

## 6.7 Support the Development of a Hard-to-Recycle Drop-Off Center for Textiles, Foam Polystyrene, Plastic Film, etc.




Approximately 13% of the current municipal waste stream is hard-to-recycle (HTR) materials that cannot be diverted through traditional recycling programs. These materials include textiles, electronics, batteries, household hazardous waste, plastic film, other plastics.

Developing a drop-off center can support the collection of these hard-to-recycle materials and incorporate spaces to manage materials that can be reused or otherwise diverted.

**Implementation Steps:**

- Identify and establish a funding mechanism (e.g., Colorado Circular Communities (C3) Enterprise funding) to support the hard-to-recycle center
- Assess available end markets to consider what would be accepted for collection
- Consider joint procurement with regional cities and/or county.
- Ongoing education to encourage usage of HTR drop-off-center

## 6.8 Ongoing Community Group Outreach and Engagement

Community outreach and engagement includes public education, feedback collection, community collection events, and direct interaction with residents and organizations on recycling and waste issues. While the City of Centennial implements various recycling-related communication strategies, outreach must be continuous to ensure both current and new residents receive up-to-date information on how to recycle and compost effectively.

Leveraging community groups and peer networks is a powerful strategy to expand awareness and increase participation in waste diversion efforts. One proven approach is to train **Recycling Champions** (local advocates or community ambassadors) within existing groups to share recycling and composting information through their networks.

Training should emphasize local recycling guidelines, using clear and consistent wording and visuals to show what is accepted in the curbside program. To improve accessibility and understanding, materials should be available in multiple languages.

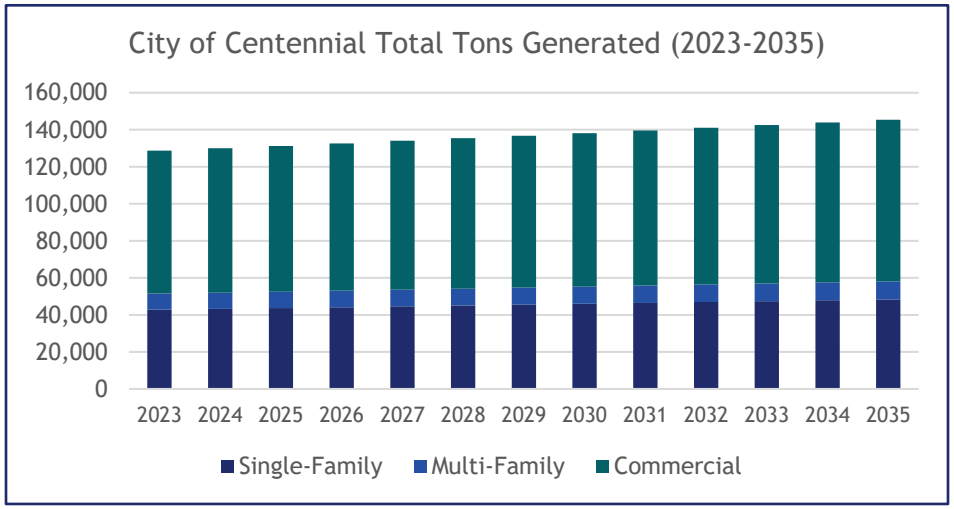
**Implementation Steps:**

- In partnership with haulers, develop and maintain list of recyclable materials
- Reach out to existing community groups to speak at meetings or events about waste diversion
- Host trainings for interested residents to become Recycling Champions and share knowledge with their networks
- Share information about waste diversion by tabling at public events, meetings, or community centers
- Engage Resident Champions over time with ongoing community efforts (e.g., events, webinars, new resources)
- Continue utilizing the South Metro Waste Diversion website to promote efforts and events

# 6.9 Tonnage Projections

### Table 17: City of Centennial Tonnage Projections (2023-2035)

| Year | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Single-Family** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 36,353 | 36,702 | 37,055 | 37,453 | 37,848 | 38,243 | 38,623 | 39,003 | 39,420 | 39,831 | 40,240 | 40,645 | 41,046 |
| Diversion | 6,492 | 6,554 | 6,617 | 6,688 | 6,759 | 6,829 | 6,897 | 6,965 | 7,039 | 7,113 | 7,186 | 7,258 | 7,330 |
| Total Generation | 42,845 | 43,256 | 43,672 | 44,141 | 44,606 | 45,072 | 45,520 | 45,968 | 46,459 | 46,944 | 47,425 | 47,903 | 48,376 |
| **Multi-Family** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 7,341 | 7,411 | 7,482 | 7,563 | 7,642 | 7,722 | 7,799 | 7,876 | 7,960 | 8,043 | 8,125 | 8,207 | 8,288 |
| Diversion | 1,311 | 1,323 | 1,336 | 1,350 | 1,365 | 1,379 | 1,393 | 1,406 | 1,421 | 1,436 | 1,451 | 1,466 | 1,480 |
| Total Generation | 8,651 | 8,734 | 8,818 | 8,913 | 9,007 | 9,101 | 9,192 | 9,282 | 9,381 | 9,479 | 9,576 | 9,673 | 9,768 |
| **Commercial** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 65,541 | 66,170 | 66,806 | 67,523 | 68,235 | 68,947 | 69,633 | 70,318 | 71,069 | 71,811 | 72,547 | 73,278 | 74,002 |
| Diversion | 11,704 | 11,816 | 11,930 | 12,058 | 12,185 | 12,312 | 12,435 | 12,557 | 12,691 | 12,823 | 12,955 | 13,085 | 13,215 |
| Total Generation | 77,244 | 77,986 | 78,735 | 79,580 | 80,420 | 81,259 | 82,068 | 82,875 | 83,760 | 84,634 | 85,502 | 86,363 | 87,216 |
| **All Sectors** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 109,234 | 110,283 | 111,343 | 112,538 | 113,725 | 114,911 | 116,056 | 117,197 | 118,449 | 119,685 | 120,912 | 122,129 | 123,336 |
| Diversion | 19,506 | 19,693 | 19,883 | 20,096 | 20,308 | 20,520 | 20,724 | 20,928 | 21,152 | 21,372 | 21,591 | 21,809 | 22,024 |
| Total Generation | 128,741 | 129,976 | 131,226 | 132,634 | 134,033 | 135,431 | 136,780 | 138,125 | 139,601 | 141,057 | 142,503 | 143,938 | 145,360 |




### Table 18: City of Centennial Community Profile

| Description | 2022 |
|---|---|
| Single-Family Units | 83.2% |
| Multi-Family Units | 16.8% |
| Total Number of Households | 40,952 |
| Household Size* | 2.59 |
| Single-Family Households | 34,072 |
| Multi-Family Households | 6,880 |
| Single-Family Population | 88,927 |
| Multi-Family Population | 17,956 |
| Total Population | 106,883 |
| Total Employer Firms | 3,633 |

City of Centennial Demographic Snapshot, US Census Bureau 2022

Figure 31: City of Centennial Total Tons Generated (2023-2035)

# 6.10 Impact Analysis Results

**Table 19: City of Centennial Impact Analysis Results**

| Aim | ID | Strategy | Additional Diversion % | Tons Low | Tons High | GHG Emissions Reduced | Fiscal Impact |
|---|---|---|---|---|---|---|---|
| Centennial | 6.1 | Require hauler licensing, including the requirement for haulers to track and report tonnage data | 0.6% | 800 | 800 | 2,368 | $ |
| Centennial | 6.2 | Leverage Colorado's Producer Responsibility (EPR) for recycling programs | 3.2% | 4,500 | 4,900 | 13,421 | $ |
| Centennial | 6.3 | Explore the transition to organized residential collection (single hauler) | 2.1% | 2,900 | 3,300 | 5,289 | $$ |
| Centennial | 6.4 | Pass equal space ordinances to ensure commercial recycling access | 5.0% | 6,600 | 8,000 | 20,847 | $ |
| Centennial | 6.5 | Promote yard waste curbside services for composting for single-family residents | 1.4% | 1,800 | 2,200 | 572 | $ |
| Centennial | 6.6 | Support growth of community-scale composting sites for single-family residents | 1.2% | 1,500 | 1,900 | 498 | $$ |
| Centennial | 6.7 | Develop a hard-to-recycle center for textiles, foam polystyrene, plastic film, etc. | 0.6% | 900 | 900 | 776 | $$$ |
| Centennial | 6.8 | Ongoing community group engagement (such as resident champion training) with universal and accessible guidelines | 1.5% | 2,100 | 2,300 | 2,709 | $$ |
| | | | **15.6%** | **21,100** | **24,300** | **46,479** | |

| Fiscal Impact | |
|---|---|
| Fiscal Impact on Tons Diverted | Estimated Fiscal Range |
| $ | < $10,000 |
| $$ | $10,000 – < $100,000 |
| $$$ | ≥ $100,000 |

# 7.0 City of Englewood Waste Diversion Goals and Actions

Located in the heart of the Denver metropolitan region, the City of Englewood is home to approximately 34,000 residents. The 7-square-mile city is an independent full-service community with the third highest concentration of millennials in Colorado. Englewood is connected by two light rail stops on the Denver regional passenger rail system and is accessible from US Highway 285, US Highway 85, and bus services provided by the Regional Transportation District (RTD). The Englewood Trolley is a free-fare bus option that connects Englewood light rail station to downtown Englewood, the medical district, and the civic center. Housing in Englewood is predominantly composed of single-family homes, which account for 63% of all residential units, while multi-family units comprise the remaining 37%.




**Figure 32: Englewood Downtown Map**

The City of Englewood operates in an open market structure for both residents and businesses. Although haulers must obtain a license through the city to operate, they are not required to report their tonnages to the city. Residents must opt in to recycling services through private haulers at open market rates.

Residents are required to store trash in containers to prevent scattering by animals or weather and to reduce offensive odors. Englewood restricts when containers can be set out in front of a property to no more than 24 hours before collections. Containers must be stored at the rear of the property and positioned so they do not obstruct alley rights-of-way. Finally, all households and businesses are required to have trash removal service at least once a week.

Private haulers performing trash hauling in the city must first obtain a license pursuant to City Code §5-26. Collections are limited to Mondays and Wednesdays, and haulers are prohibited from



**Figure 33: Englewood Sustainability Staff Tabling on Earth Day**

collecting between the hours of 10:00 p.m. and 7:00 a.m. Under the city's trash hauler licensing requirements, haulers must offer recycling services to Englewood residents. The list of licensed city trash haulers is posted annually on the city's code-enforcement website, with approximately six haulers licensed in 2024.

In 2021, Englewood estimated tonnage data for the city using data received from two large haulers to inform its greenhouse gas inventory. City staff estimated that approximately 9,000 tons of waste were generated by businesses and 73,000 tons of waste were generated by households in 2021.

The City of Englewood's 2022-2025 Strategic Plan includes a waste and recycling subsection as one of their eight sustainability goals listed under the sustainability priority area. The listed waste and recycling-related projects include construction and demolition waste, green building codes, hazardous and electronic collection, public education and outreach, and implementing a compost program at all city facilities. Additionally, the city's webpage lists several waste-related programs that are in various stages of completion, including goals to track tonnage, fully implement the new At-Your-Door hazardous waste pickup program, increase public outreach and education, prepare for the state's 2026 Extended Producer Responsibility program, and expand construction & demolition (C&D) debris recycling options. These stated projects help Englewood's elected officials, city staff, and residents envision improved waste systems.




**Figure 34: City of Englewood's Sustainability Plan**

The City of Englewood hosted multiple special collection events throughout each year for materials such as household hazardous waste, medicine, and electronic waste until 2024. In response to growing resident demand for a year-round disposal option, Englewood implemented the "At Your Door" service in 2024 through a partnership with Waste Management to collect household hazardous waste and electronics.



### Table 20: City of Englewood Strategies Summary

| ID | Action | Fiscal Impact | Diversion Impact | Implementation Timeline | | |
|---|---|---|---|---|---|---|
| | | | | FY26-30 | FY30-35 | FY35-40 |
| 7.1 | Work with internal city departments (such as Parks, Recreation, Library, and Golf (PRLG) and/or the Public Works Department) to utilize finished compost in municipal projects and the Community Development Department to connect developers with the finished compost | $$ | ♺ | X | X | |
| 7.2 | Establish a construction & demolition (C&D) recycling ordinance | $ | ♺♺♺♺ | X | | |
| 7.3 | Implement food scraps curbside services for composting for single-family residents | $$$ | ♺♺ | X | X | |
| 7.4 | Leverage Colorado's Extended Producer Responsibility (EPR) for recycling programs | $ | ♺♺♺ | X | X | X |
| 7.5 | Pass an equal space ordinance to ensure multi-family and commercial recycling access | $ | ♺♺♺♺ | X | X | |
| 7.6 | Support the transition to organized residential collection across the city (single hauler) especially when financially and accessibility conducive for majority of residents | $$ | ♺♺ | X | X | |
| 7.7 | Ongoing community group engagement (such as Resident Champion training) with universal recycling and accessible guidelines | $$ | ♺♺ | X | X | X |
| 7.8 | Explore business waste diversion grants | $$ | ♺ | X | | |
| 7.9 | Repair/reuse events such as fix-it clinics | $ | ♺ | X | | |

## 7.1 Utilize Finished Compost in Municipal Projects and Connect Developers with the Finished Compost ♺

An effective strategy to improve soil health and support local composting businesses is for local governments to purchase and apply locally produced compost and mulch in public works projects.

Local governments can play a significant role in ensuring that locally manufactured compost and mulch are integrated into open space, landscaping, and public works projects.



Closing the loop on organics recycling by buying and using local compost and mulch is critical to a sustainable organics program. Communities that incorporate finished compost often see great benefits, such as improved soil health, reduced erosion, and support for local composting infrastructure. People and entities using these products, or "end markets," are essential to creating a circular economy for organic materials.

**Implementation Steps:**

- Identify areas where finished compost can be used for local public works, parks, or development projects
- Partner, source, and utilize local finished compost for Englewood public works, parks or development projects

## 7.2 Establish a Construction and Demolition (C&D) Recycling Ordinance ♺♺♺♺

**Construction and Demolition (C&D) Recycling Ordinances** require contractors to sort and recycle recoverable materials, such as untreated wood, metals, cardboard, and aggregates, most of which are generated during demolition activities.

These ordinances often include square footage thresholds, exempting smaller projects from compliance. Effective implementation depends on the availability of sorting infrastructure, access to end markets, and strong coordination with contractors. One common compliance mechanism is a deposit system, where contractors submit a financial deposit based on project size. The deposit is refunded upon proof of compliance with recycling requirements.

A complementary strategy is **deconstruction**, a process that involves systematically dismantling buildings to preserve materials for reuse. This approach can reduce the need for recycling infrastructure by diverting materials directly into reuse pathways.

C&D recycling ordinances are currently enforced in the cities of Lakewood, Fort Collins, and Boulder. The City and County of Denver are also in the process of developing and implementing similar policies.

**Implementation Steps:**

- Conduct a detailed C&D end market and recovery infrastructure assessment.
- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders (e.g., developers, haulers, residents) to gather insights into potential barriers
- Document feedback on challenges, service gaps, and potential ordinance impacts
- Draft and adopt a C&D recycling ordinance
- Communicate new requirements
- Coordinate with Planning & Zoning to engage with development and re-development projects

## 7.3 Implement Food Scraps Curbside Services for Composting for Single-family Residents ♺♺



It is estimated that by 2035, the City of Englewood's single-family sector will generate roughly 2,300 tons of food scraps and other compostables per year, or roughly 29% of its total waste generated.

A dedicated curbside service for food scraps can significantly divert the amount of landfill-bound material and contribute to the environmental benefits of composting. Local governments can promote the benefits of curbside food scraps collection programs.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar program
- Define program goals and scope
- Design service model
- Establish a wait list to understand residential demand
- Procure equipment or contract out services; consider a joint purchasing agreement with regional partners to achieve economies of scale
- Develop an outreach and education campaign
- Launch program
- Monitor and evaluate performance

## 7.4 Leverage Colorado's Extended Producer Responsibility (EPR) for Recycling Programs ♺♺♺

Colorado's Producer Responsibility (EPR) for Recycling Packaging Program requires covered producers to join a Producer Responsibility Organization (PRO), and through it, fund and manage the end of life for packaging and paper, including collection, processing, and recycling or composting.

This EPR program will cover 100% of the net recycling service costs for all Colorado single-family and multi-family homes starting in 2026. The state's PRO, Circular Action Alliance (CAA), has indicated that they will start by covering recycling costs in communities with organized (non-open market) systems.

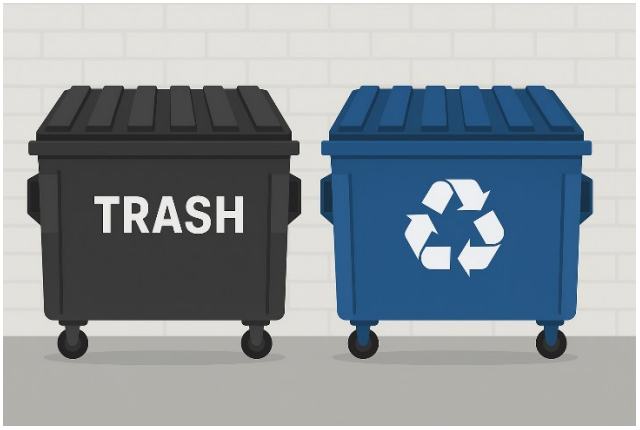
Communities that do not currently have recycling for residents or that have open market recycling collection systems pose a bigger challenge, and it will take longer to coordinate payments for recycling haulers that choose to participate.

To fully access the benefits of Colorado's Producer Responsibility program, it is recommended that the city considers adopting an equal space ordinance; implement a hauler licensing ordinance with a requirement for providing recycling bundled into all services; introduce pay-as-you-throw pricing; and establish a municipally coordinated hauling contract or contracts for residential collections.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders to share information about EPR and gather insights on potential barriers related to ordinance impacts
- Draft and adopt ordinances
- Draft and implement a communications plan to roll out new requirements
- Apply and receive reimbursements provided through Colorado's EPR law for collections

## 7.5 Pass an Equal Space Ordinance to Ensure Commercial and Multi-Family Recycling Access ♺♺♺♺




An **Equal Space Ordinance** requires that all newly constructed commercial buildings allocate the same amount of space for recycling collection infrastructure (such as enclosures, receptacles, chutes, staging areas, and collection rooms) as is allocated for trash.

Insufficient space for recycling is a common barrier for commercial entities, particularly in dense urban areas. By integrating this requirement into building codes, municipalities can ensure future developments support recycling access without retrofitting existing structures.

In Englewood, approximately 37% of housing consists of multi-family units, and there are 1,475 employer firms, highlighting the importance of planning for equitable recycling infrastructure in both residential and commercial development.

**Implementation Steps:**

- Conduct outreach to stakeholders to gather insights on potential barriers
- Draft and adopt an equal space ordinance
- Roll out a communications plan and consider providing technical support for commercial property managers
- Coordinate with the Planning & Zoning Department to align on communicating new requirements for new developments and significant site redevelopments

## 7.6 Support the Transition to Organized Residential Collection Across the City (Single Hauler) ♺♺

**Organized Residential Collection** refers to a system in which a municipality manages curbside trash and recycling services on behalf of residents through a contract with one or more licensed haulers. Under this model, residents may have the option to opt out of the municipal service for a fee. Municipal contracts can mandate that recycling is included for all households and may incorporate a pay-as-you-throw (PAYT) pricing structure, where fees are based on the size of the trash cart and the volume of waste generated.

This approach can result in lower and more stable service costs for residents, expanded access to recycling, and the expansion of services such as compost collection or bulky item pickup. It also reduces the number of collection trucks on neighborhood streets, thereby minimizing traffic, emissions, and road wear. Organized collection typically covers single-family homes and smaller multi-family buildings (fewer than seven units), with optional participation or phased inclusion available for homeowners associations (HOAs).

In 2019, the Englewood City Council began collecting public feedback to explore the concept of franchising and having a single hauler carry out collections for the city. This was paired with a robust campaign, “Talk n’ Trash,” which included a community-wide survey and in-person meetings at the Englewood City Center. In response to public feedback, the city issued a request for proposals in 2021 for waste haulers to provide collection to all residential properties and received two submissions. After an extensive engagement period, results showed that people were concerned about cost, reliability of service, and yard debris collection, along with interest in composting at an additional cost. In the spring of 2022, the City Council discussed at length the idea of converting to a single hauler organized collection system for garbage and recycling but the proposal was ultimately tabled. Survey results at this time showed that residents were divided on the issue.

Since the initial evaluation, additional survey and focus groups conducted in 2024 for this South Metro Waste

Diversion Plan revealed that residents consistently raised concerns about the high number of waste haulers operating within the same neighborhoods. Key issues cited included child safety risks, wear and tear of roads, and increased air and noise pollution. Residents also emphasized a lack of accountability under the current open hauling system, expressing a desire for more structured oversight and coordination.

Furthermore, with the state's Extended Producer Responsibility law set to take effect in 2026, which will cover net recycling service costs for all single-family and multi-family homes, and with CAA indicating they will begin supporting communities with organized collection systems, this is an opportune time for Englewood to revisit its approach. With recycling costs covered by EPR, the overall financial benefit to residents could — and likely will — be drastically increased compared to the 2022 hauler bid.

As such, the City of Englewood seeks to support the transition to organized residential collections across the city if it is **financially and accessibly conducive for a majority of the residents**.

**Implementation Steps:**

- Preliminary assessment, including a cost-benefit analysis to determine whether a single hauler will be more financially conducive and accessible for the majority of residents, especially considering that recycling costs will be covered under EPR
- Coordinate regionally with neighboring jurisdictions aiming to also implement a single-hauler system
- Engage stakeholders to communicate benefits and gather feedback on potential barriers and service needs
- Conduct a legal review to ensure compliance with state single-hauler regulations
- State law requires the city to give written notice to any existing service providers within six months of charging a fee for residential solid waste services. The notice must also be posted in a local newspaper of general circulation and include the impacted area, the start date of the fee, and an explanation of the option to request a chance to bid on the residential services.
- Work with the city attorney's office to ensure compliance with state law
- Outline implementation steps and timeline

## 7.7 Ongoing Community Group Outreach and Engagement

♺♺

Community outreach and engagement includes public education, feedback collection, community collection events, and direct interaction with residents and organizations on recycling and waste issues. While the City of Englewood implements various recycling-related communication strategies, outreach must be continuous to ensure both current and new residents receive up-to-date information on how to recycle and compost effectively.

Leveraging community groups and peer networks is a powerful strategy to expand awareness and increase participation in waste diversion efforts. One proven approach is to train **Recycling Champions** (local advocates or community ambassadors) within existing groups to share recycling and composting information through their networks.

Training should emphasize local recycling guidelines, using clear and consistent wording and visuals to show what is accepted in the curbside program. To improve accessibility and understanding, materials should be available in multiple languages.

**Implementation Steps:**

- Reach out to existing community groups to speak at meetings or events about waste diversion
- Host trainings for interested residents to become Recycling Champions and share knowledge with their networks
- Share information about waste diversion by tabling at public events, meetings, or community centers
- Engage Resident Champions over time with ongoing community efforts (e.g., events, webinars, new resources)
- Continue utilizing the South Metro Waste Diversion website to promote efforts and events

## 7.7 Explore Business Waste Diversion Grants ♺

Businesses, especially restaurants that generate large volumes of food scraps, may be interested in subscribing to an organics collection service, but the cost of service can be a barrier. Local governments can create a financial incentive or grant program to encourage the private sector to sign up for organic collection services.




Businesses can be reimbursed for infrastructure, hauling, compostable food service ware, education, training, and signage. Financial incentives can also build support for a future commercial composting ordinance, as it creates local case studies of successful organics diversion programs.

**Implementation Steps:**

- Identify funding source for grants
- Design grant program framework
  - Define eligible applicants
  - Establish match requirements, if any
  - Outline funding amounts and funding categories
  - Develop an application, review, and selection process
- Launch and promote the grant program through a communications plan
- Award and administer grant agreements

## 7.8 Repair/Reuse Infrastructure such as Fix-It Clinics ♺

Repair and reuse opportunities help reduce unnecessary waste and strengthen communities by empowering individuals to fix or repurpose items instead of sending them to landfills.




**Repair and Reuse Fix-It Clinics** are community-driven events designed to reduce waste by helping residents repair broken items instead of discarding them. These clinics empower individuals to extend the life of everyday products, such as small appliances, electronics, bicycles, clothing, and furniture, through hands-on guidance from volunteer fixers. They promote a culture of reuse, encourage skill-building, and foster environmental stewardship by keeping valuable materials out of landfills.

Fix-it clinics also offer educational opportunities, raising awareness about product longevity and the environmental impact of a throwaway culture.

To implement a fix-it clinic, a city or organization typically partners with a local library, community center, or nonprofit to host the event. Planning includes recruiting skilled volunteers (e.g., tinkerers, mechanics, tailors), advertising the clinic to the community, and

coordinating logistics such as tools, tables, signage, and registration. Some cities also provide liability waivers and ask participants to stay and assist in the repair process to promote learning. A successful fix-it clinic relies on community engagement, accessible locations, and ongoing support to build momentum for future events and grow a local reuse movement.

Additionally, cities can promote additional reuse opportunities such as thrift stores, resale stores, repurposed buildings, local 'buy-nothing' groups, and more. Communities can support these initiatives by funding repair/fix-it clinics, creating a reuse directory, or funding the development of infrastructure to host repair clinics and reuse.

**Implementation Steps:**

- Identify partners such as libraries to host fix-it events
- Identify volunteers or champions to support the events
- Promote through the city and South Metro websites and social media channels
- Develop a reuse directory for community members to search for local reuse opportunities

# 7.9 City of Englewood Tonnage Projections

### Table 21: City of Englewood Tonnage Projections (2023-2035)

| Year | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Single-Family | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 8,883 | 8,969 | 9,055 | 9,152 | 9,249 | 9,345 | 9,438 | 9,531 | 9,633 | 9,733 | 9,833 | 9,932 | 10,030 |
| Diversion | 1,586 | 1,602 | 1,617 | 1,634 | 1,652 | 1,669 | 1,685 | 1,702 | 1,720 | 1,738 | 1,756 | 1,774 | 1,791 |
| Total Generation | 10,469 | 10,571 | 10,672 | 10,786 | 10,901 | 11,014 | 11,123 | 11,233 | 11,353 | 11,471 | 11,589 | 11,706 | 11,821 |
| Multi-Family | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 5,128 | 5,177 | 5,227 | 5,283 | 5,339 | 5,395 | 5,448 | 5,502 | 5,561 | 5,619 | 5,676 | 5,734 | 5,790 |
| Diversion | 916 | 925 | 933 | 943 | 953 | 963 | 973 | 983 | 993 | 1,003 | 1,014 | 1,024 | 1,034 |
| Total Generation | 6,044 | 6,102 | 6,160 | 6,226 | 6,292 | 6,358 | 6,421 | 6,485 | 6,554 | 6,622 | 6,690 | 6,758 | 6,824 |
| Commercial | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 21,017 | 21,219 | 21,423 | 21,653 | 21,881 | 22,110 | 22,330 | 22,549 | 22,790 | 23,028 | 23,264 | 23,499 | 23,731 |
| Diversion | 3,753 | 3,789 | 3,826 | 3,867 | 3,907 | 3,948 | 3,987 | 4,027 | 4,070 | 4,112 | 4,154 | 4,196 | 4,238 |
| Total Generation | 24,770 | 25,008 | 25,249 | 25,520 | 25,788 | 26,058 | 26,317 | 26,576 | 26,860 | 27,140 | 27,419 | 27,695 | 27,969 |
| All Sectors | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 35,029 | 35,365 | 35,705 | 36,088 | 36,469 | 36,850 | 37,217 | 37,582 | 37,984 | 38,380 | 38,774 | 39,164 | 39,551 |
| Diversion | 6,255 | 6,315 | 6,376 | 6,444 | 6,512 | 6,580 | 6,646 | 6,711 | 6,783 | 6,854 | 6,924 | 6,994 | 7,063 |
| Total Generation | 41,284 | 41,680 | 42,081 | 42,532 | 42,981 | 43,430 | 43,863 | 44,293 | 44,767 | 45,234 | 45,698 | 46,158 | 46,614 |

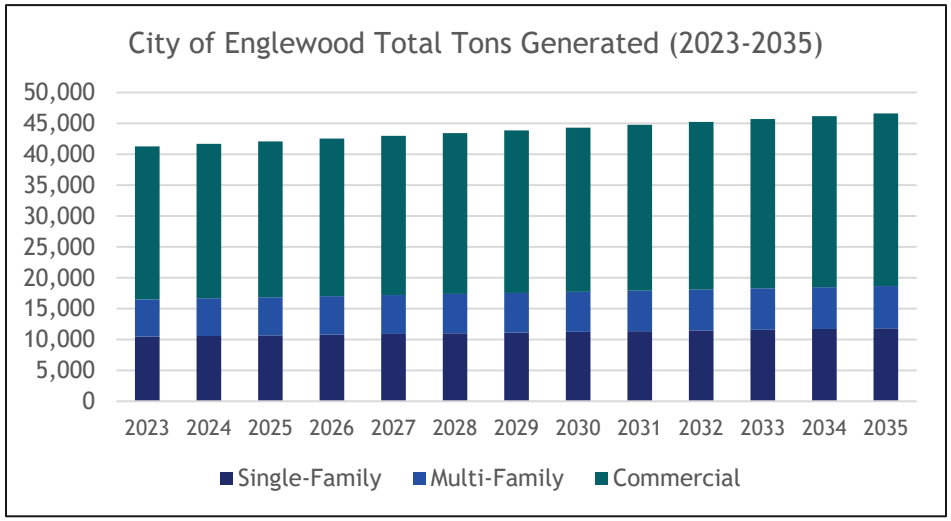



Figure 35: City of Englewood Total Tons Generated (2023-2035)

### Table 22: City of Englewood Community Profile

| Description | 2022 |
|---|---|
| Single-Family Units | 63.4% |
| Multi-Family Units | 36.6% |
| Total Number of Households | 15,686 |
| Household Size* | 2.11 |
| Single-Family Households | 9,945 |
| Multi-Family Households | 5,741 |
| Single-Family Population | 21,730 |
| Multi-Family Population | 12,545 |
| Total Population | 34,275 |
| Total Employer Firms | 1,475 |

City of Englewood Demographic Snapshot, US Census Bureau 2022

# 7.10 Impact Analysis Results

**Table 23: City of Englewood Impact Analysis Results**

| Aim | ID | Strategy | Additional Diversion % | Tons Low | Tons High | GHG Emissions Reduced | Fiscal Impact |
|---|---|---|---|---|---|---|---|
| Englewood | 7.1 | Work with parks departments to utilize finished compost in municipal projects and connect developers with the finished compost | 0.0% | n/a | n/a | n/a | $$ |
| Englewood | 7.2 | Establish a C&D recycling ordinance | 6.2% | 2,800 | 3,050 | 1,112 | $ |
| Englewood | 7.3 | Implement food waste curbside services for composting for single-family residents | 1.9% | 900 | 950 | 265 | $$$ |
| Englewood | 7.4 | Leverage Colorado's Extended Producer Responsibility (EPR) for recycling programs | 3.9% | 1,700 | 1,890 | 5,063 | $ |
| Englewood | 7.5 | Pass an equal space ordinance to ensure multi-family and commercial recycling access | 5.6% | 2,500 | 2,730 | 7,332 | $ |
| Englewood | 7.6 | Support the transition to organized residential collection across the city (single hauler) especially when financially and accessibility is conducive for majority of residents | 1.7% | 800 | 840 | 1,418 | $$ |
| Englewood | 7.7 | Ongoing community group engagement (such as resident champion training) with universal and accessible guidelines | 2.4% | 1,000 | 1,160 | 1,014 | $$ |
| Englewood | 7.8 | Explore business organics grants | 1.1% | 500 | 530 | 140 | $$ |
| Englewood | 7.9 | Repair/reuse infrastructure such as fix-it clinics | 0.2% | 100 | 110 | 37 | $ |
| | | | **23.0%** | **10,300** | **11,260** | **16,381** | |

| Fiscal Impact | |
|---|---|
| Fiscal Impact on Tons Diverted | Estimated Fiscal Range |
| **$** | < $10,000 |
| **$$** | $10,000 - < $100,000 |
| **$$$** | ≥ $100,000 |

# 8.0 City of Littleton Waste Diversion Goals and Actions

The City of Littleton is a municipality spanning across three counties: Arapahoe, Douglas, and Jefferson. The 13-square-mile city is home to approximately 45,000 people and 2,000 diverse businesses and organizations. Littleton has more than 59 parks and open spaces with access to two light rail stations that provide convenient service to Downtown Denver. Littleton has experienced growth and development over the years, evolving into a dynamic urban center within the greater Denver region. According to the latest census available, 62% of Littleton's housing type consists of single-family homes and 38% are multi-family homes. The city anticipates growth in the multi-family housing pipeline over the next 5-10 years, with an additional 2,732 multi-family properties vs. 420 single-family homes.

Waste collections are carried out through an open market structure where residents and businesses subscribe directly with haulers for collection of trash and recycling services. Littleton currently does not have a hauler licensing program, resulting in limited data on which haulers operate in the city, how many tons of trash and recyclables are collected, and where those materials are processed. On the city's website, Littleton encourages residents to coordinate services for their street, block, or neighborhood. Approximately 14-17 haulers of varying services (organics, bulk, trash and recycling, medical and hazardous waste) serve the City of Littleton.

Littleton's City Code includes regulations on waste transportation, minimum services provided, dumping restrictions, waste incineration, and container requirements. The City of Littleton does not license or permit private haulers. For noise control, City Code §7-3-5 restricts garbage, trash, or compactor hauling operations between 10:00 p.m. and 7:00 a.m. within 800 feet of residential areas or within 300 feet of any hotel or motel.



The City of Littleton has contracted with a waste hauler to provide At-Your-Door pickup services for household hazardous waste and electronics. The city also hosts special events for cooking oil and prescription drugs through the Littleton Police Department's Drug Take-Back Day. The city offers a Christmas tree recycling program that turns trees into mulch for the community, as well as a leaf recycling program in the fall.



Figure 36: Christmas Tree Recycling in Littleton

The City of Littleton is committed to the environment and is making progress towards its environmental programs and initiatives. In December 2022, Littleton City Council unanimously voted to create the Environmental Stewardship Board and tasked the appointed group of residents with drafting an environmental stewardship action plan that includes recommendations to enhance the city's sustainability efforts. The draft plan included 89 recommended actions spanning categories of air quality/emissions, built environment, consumption and waste diversion, natural environment, water, and community. Two significant recommendations include the exploration of a single hauler and providing every building with recycling and composting options.

### Table 24: City of Littleton Strategies Summary

| ID | Action | Fiscal Impact | Diversion Impact | Implementation Timeline | | |
|---|---|---|---|---|---|---|
| | | | | FY26-30 | FY30-35 | FY35-40 |
| 8.1 | Implement yard debris curbside services for composting for single-family residents | $$$ | ♺♺♺ | X | | |
| 8.2 | Implement food scraps curbside services for composting for single-family residents | $$$ | ♺♺ | X | X | |
| 8.3 | Leverage Colorado's Extended Producer Responsibility (EPR) for recycling programs | $ | ♺♺♺ | X | X | X |
| 8.4 | Require hauler licensing, including the requirement for haulers to track and report tonnage data | $ | ♺ | X | | |
| 8.5 | Pass an equal space ordinance to ensure commercial recycling access | $ | ♺♺♺ | X | X | |
| 8.6 | Support the transition to organized collection (single hauler) | $$ | ♺♺ | X | X | |
| 8.7 | Ongoing community group outreach and engagement Update websites with guidelines, events, and sorting tool | $$ | ♺♺♺ | X | X | X |
| 8.8 | Explore adopting a universal recycling ordinance | $ | ♺♺ | | X | |
| 8.9 | Establish a construction & demolition (C&D) recycling ordinance | $ | ♺♺♺♺ | X | | |

## 8.1 Implement Yard Debris Curbside Services for Composting for Single-family Residents

♺♺♺



The South Metro Waste Characterization study found that yard debris comprises 20% of the City of Littleton's single-family waste stream, yet less than 1% of the yard debris is being diverted. Promoting curbside yard debris collection for single-family residents could significantly increase the city's waste diversion rate, depending on the level of participation.

Like curbside recycling collection service, adding a third collection point for diverting organic material (yard debris and sometimes food scraps) creates an opportunity to reduce the amount of waste sent to landfills and contribute to the environmental benefits of composting. Local governments can promote the benefits of curbside yard debris collection programs and encourage residents to subscribe.

**Implementation Steps:**

- Define program goals and scope
- Design service model
- Procure equipment or contract out services; consider a joint purchasing agreement with regional partners to achieve economies of scale
- Develop an outreach and education campaign
- Launch program
- Monitor and evaluate performance

## 8.2 Implement Food Scraps Curbside Services for Composting for Single-family Residents

♺♺



It is estimated that by 2035, the City of Littleton's single-family sector will generate roughly 2,900 tons of food scraps and other compostables per year, or roughly 20% of its total generated waste.

A dedicated curbside service for food scraps can significantly divert the amount of landfill-bound material and contribute to the environmental benefits of composting. Local governments can promote the benefits of curbside food scraps collection programs.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar program
- Define program goals and scope
- Design service model
- Establish a wait list to understand residential demand
- Procure equipment and services; consider a joint purchasing agreement with regional partners to achieve economies of scale
- Develop an outreach and education campaign
- Launch program
- Monitor and evaluate performance

## 8.3 Leverage Colorado's Extended Producer Responsibility (EPR) for Recycling Programs ♺♺♺

Colorado's Producer Responsibility (EPR) for Recycling Packaging Program requires covered producers to join a Producer Responsibility Organization (PRO), and through it, fund and manage the end of life for packaging and paper, including collection, processing, and recycling or composting.

This EPR program will cover 100% of the net recycling service costs for all Colorado single-family and multi-family homes starting in 2026. The state's PRO, Circular Action Alliance (CAA), has indicated it will start by covering recycling costs in communities with organized (non-open market) systems.

Communities that do not currently offer recycling for residents or that have open market recycling collection systems pose a bigger challenge, and it will take longer to coordinate payments for recycling haulers that choose to participate.

To fully access the benefits of Colorado's Producer Responsibility program, it is recommended that the city considers adopting an equal space ordinance, a hauler licensing ordinance with a requirement for providing recycling bundled into all services, incorporate pay-as-you-throw pricing, and establish a municipally coordinated hauling contract or contracts for residential collections.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders to share information about EPR and gather insights on potential barriers related to ordinance impacts
- Draft and adopt ordinances
- Draft and implement a communications plan to roll out new requirements
- Apply and receive reimbursements provided through Colorado's EPR law for collections

## 8.4 Require Hauler Licensing, Including the Requirement for Haulers to Track and Report Tonnage Data ♺

A hauler licensing ordinance is a policy that requires both residential and commercial sector waste haulers to obtain a license through the local governing body to operate within the government's jurisdiction. Licenses can include requirements such as providing proof of insurance, setting prices based on volume of trash containers (pay-as-you-throw), safety requirements, minimum service standards, enforcement mechanisms, or operating only on certain days and during a set timeframe to reduce traffic and noise.



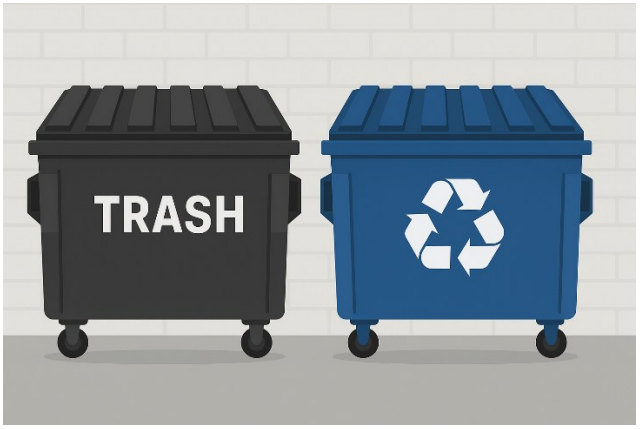
It is considered best practice for hauler licensing policies to also require haulers to regularly report how many tons of trash, recyclables, and organic waste have been collected in their community. This helps establish baseline data for local governments to understand their waste streams and track progress. This tonnage data could also provide data necessary for the greenhouse gas inventory.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders (haulers and/or residents) to gather insights into potential barriers
- Document feedback on challenges, service gaps, and potential ordinance impacts
- Draft and adopt a hauler licensing ordinance
- Communicate with haulers on new requirements
- Develop a reporting mechanism to receive hauler data annually

## 8.5 Pass an Equal Space Ordinance to Ensure Commercial and Multi-Family Recycling Access

♺♺♺




An **Equal Space Ordinance** requires that all newly constructed commercial buildings allocate the same amount of space for recycling collection infrastructure (such as enclosures, receptacles, chutes, staging areas, and collection rooms) as is allocated for trash.

Insufficient space for recycling is a common barrier for commercial entities, particularly in dense urban areas. By integrating this requirement into building codes, municipalities can ensure future developments support recycling access without retrofitting existing structures.

In Littleton, approximately 38% of housing consists of multi-family units, and there are 1,825 employer firms, highlighting the importance of planning for equitable recycling infrastructure in both residential and commercial development.

**Implementation Steps:**

- Conduct outreach to stakeholders to gather insights on potential barriers
- Draft and adopt an equal space ordinance
- Roll out a communications plan and consider providing technical support for commercial property managers
- Coordinate with the Planning & Zoning Department to align on communicating new requirements for new developments and significant site redevelopments

## 8.6 Support the Transition to Organized Residential Collection (Single Hauler)

♺♺

**Organized Residential Collection** refers to a system in which a municipality manages curbside trash and recycling services on behalf of residents through a contract with one or more licensed haulers. Under this model, residents may have the option to opt out of the municipal service for a fee. Municipal contracts can mandate that recycling is included for all households and may incorporate a pay-as-you-throw (PAYT) pricing structure, where fees are based on the size of the trash cart and the volume of waste generated.

This approach can result in lower and more stable service costs for residents, expanded access to recycling, and the addition of services such as compost collection or bulky item pickup. It also reduces the number of collection trucks on neighborhood streets, thereby minimizing traffic, emissions, safety concerns, and road wear. Organized collection typically covers single-family homes and smaller multi-family buildings (fewer than seven units), with optional participation or phased inclusion available for homeowners associations (HOAs).

During the stakeholder engagement process for this South Metro Waste Diversion Plan, which included surveys and focus groups, residents throughout the South Metro region consistently raised concerns about the high number of waste haulers operating within the same neighborhoods. Key issues cited included child safety risks, wear and tear of roads, and increased air and noise pollution. Residents also emphasized a lack of accountability under the current open hauling system, expressing a desire for more structured oversight and coordination.

**Implementation Steps:**

- Engage stakeholders to communicate benefits and gather feedback on potential barriers and service needs
- Conduct a legal review to ensure compliance with state single-hauler regulations
- Coordinate regionally with neighboring jurisdictions aiming to also implement
- Outline implementation steps and timeline

# 8.7 Ongoing Community Group Outreach and Engagement

♺♺♺

Community outreach and engagement includes public education, feedback collection, community collection events, and direct interaction with residents and organizations on recycling and waste issues. While the City of Littleton implements various recycling-related communication strategies, outreach must be continuous to ensure both current and new residents receive up-to-date information on how to recycle and compost effectively.

Leveraging community groups and peer networks is a powerful strategy to expand awareness and increase participation in waste diversion efforts. One proven approach is to train **Recycling Champions** (local advocates or community ambassadors) within existing groups to share recycling and composting information through their networks.

Training should emphasize local recycling guidelines, using clear and consistent wording and visuals to show what is accepted in the curbside program. To improve accessibility and understanding, materials should be available in multiple languages.

**Implementation Steps:**

- Reach out to existing community groups to speak at meetings or events about waste diversion
- Host trainings for interested residents to become Recycling Champions and share knowledge with their networks
- Share information about waste diversion by tabling at public events, meetings, or community centers
- Engage Resident Champions over time with ongoing community efforts (events, webinars, new resources)
- Continue utilizing the South Metro Waste Diversion website to promote efforts and events

## 8.7.1 Update Websites with Guidelines, Events and Sorting Tool

The recommended best practice is to have a comprehensive city webpage dedicated to recycling/waste diversion to give residents a central location to find accurate, up-to-date information and recycling guidelines.

A sorting tool is an interactive web component for residents to practice sorting items and materials on a website or app. With this option, a city can choose key items to feature in the virtual game to help inform residents.

**Implementation Steps:**

- Create recycling guidelines and post on website
- Contract with a web developer to create an interactive web component for residents to practice sorting items into recycling or trash
- Keep website updated with events and program changes
- Create and widely distribute graphic and bilingual guidelines and train municipal staffers on waste guidelines

## 8.7.2 Create and Widely Distribute Graphic and Bilingual Guidelines and Train Municipal Staff on Waste Guidelines

Guidelines for what can and cannot be recycled, (or composted, if available in the community), should be clear and specific, with images of materials/items alongside descriptive text in both English and Spanish.

Every time a material is referenced, it should be accompanied by an image that is shown consistently across media. Photos are preferred over drawings to ensure people recognize the objects depicted. Trainings for municipal staff should include reviewing guidelines and answering frequently asked questions about waste to dispel myths. Color coding outreach materials and containers can also support reinforcing correct sorting behaviors.

**Implementation Steps:**

- Create recycling guidelines that are clear and specific with images and text in English and Spanish
- Host training sessions for municipal staff on the guidelines and frequently asked questions about waste

- Table at community events and recycling events to distribute guidelines & resources and answer questions

## 8.7.3 Table at Community and Recycling Events to Distribute Resources and Answer Questions

Ongoing community engagement, visibility, and access to recycling resources are important to increase buy-in and participation in recycling programs. These methods can build relationships with community members, fostering trust and creating connections.

Tabling at community events (e.g., Earth Day celebrations, farmer's markets, and other events) can provide valuable resources about recycling, including recycling guidelines, FAQ handouts, local resources for hard-to-recycle materials, yard debris, and hazardous waste. These events can also feature reusables giveaways (e.g., water bottles, metal straws, bamboo utensils), as well as a physical sorting game or examples of recyclable materials and common contaminants. Tables should be staffed by trained municipal staff and/or community volunteers.

**Implementation Steps:**

- Schedule staff to table at upcoming community events (e.g., Earth Day, farmer's markets)
- Create a tabling kit of resources about recycling (guidelines, frequently asked questions, hard-to-recycle resources), reusable giveaways (straws or utensils), and props (sorting game or examples of common recyclables)
- Ongoing community group engagement (such as Resident Champion training) with universal and accessible guidelines

## 8.8 Explore Adopting a Universal Recycling Ordinance (URO)♺♺

**Universal Recycling Ordinances** require commercial buildings (including multi-family housing and businesses) to provide access to recycling services. Commercial recycling ordinances are typically adopted after residential recycling programs are well-established. Best practices for commercial recycling ordinances include extensive outreach to the business community, the multi-family housing sector, and waste haulers. Pilot projects and technical assistance for businesses build community buy-in and help with the transition to policy compliance.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders (haulers and/or residents) to gather insights into potential barriers
- Document feedback on challenges, service gaps, and potential ordinance impacts
- Draft and adopt a universal recycling ordinance
- Communicate with haulers on new requirements
- Develop a reporting mechanism to receive hauler data annually

# 8.9 Establish a Construction and Demolition (C&D) Recycling Ordinance ♺♺♺♺



**Construction and Demolition (C&D) Recycling Ordinances** require contractors to sort and recycle recoverable materials, such as untreated wood, metals, cardboard, and aggregates, most of which are generated during demolition activities.

These ordinances often include square footage thresholds, exempting smaller projects from compliance. Effective implementation depends on the availability of sorting infrastructure, access to end markets, and strong coordination with contractors. One common compliance mechanism is a deposit system, where contractors submit a financial deposit based on project size. The deposit is refunded upon proof of compliance with recycling requirements.

A complementary strategy is **deconstruction**, a process that involves systematically dismantling buildings to preserve materials for reuse. This approach can reduce the need for recycling infrastructure by diverting materials directly into reuse pathways.

C&D recycling ordinances are currently enforced in the cities of Boulder, Fort Collins, and Lakewood. The City and County of Denver are also in the process of developing and implementing similar policies.

**Implementation Steps:**

- Conduct a detailed C&D end market and recovery infrastructure assessment.
- Coordinate regionally with neighboring jurisdictions aiming to implement a similar requirement
- Conduct outreach to stakeholders (e.g., developers, haulers, residents) to gather insights into potential barriers
- Document feedback on challenges, service gaps, and potential ordinance impacts
- Draft and adopt a C&D recycling ordinance
- Communicate new requirements
  Coordinate with Planning & Zoning to communicate with development and re-development projects

# 8.10 Tonnage Projections

### Table 25: City of Littleton Tonnage Projections (2023-2035)

| Year | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Single-Family** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 11,194 | 11,298 | 11,404 | 11,522 | 11,641 | 11,760 | 11,874 | 11,988 | 12,113 | 12,235 | 12,357 | 12,478 | 12,597 |
| Diversion | 1,999 | 2,018 | 2,036 | 2,058 | 2,079 | 2,100 | 2,120 | 2,141 | 2,163 | 2,185 | 2,207 | 2,228 | 2,250 |
| Total Generation | 13,193 | 13,316 | 13,440 | 13,580 | 13,720 | 13,859 | 13,994 | 14,129 | 14,276 | 14,420 | 14,564 | 14,706 | 14,847 |
| **Multi-Family** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 6,978 | 7,043 | 7,109 | 7,183 | 7,257 | 7,331 | 7,402 | 7,473 | 7,551 | 7,627 | 7,703 | 7,778 | 7,853 |
| Diversion | 1,246 | 1,258 | 1,269 | 1,283 | 1,296 | 1,309 | 1,322 | 1,334 | 1,348 | 1,362 | 1,376 | 1,389 | 1,402 |
| Total Generation | 8,224 | 8,301 | 8,378 | 8,465 | 8,552 | 8,640 | 8,724 | 8,808 | 8,899 | 8,989 | 9,079 | 9,167 | 9,255 |
| **Commercial** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 27,257 | 27,512 | 27,769 | 28,057 | 28,346 | 28,635 | 28,914 | 29,192 | 29,495 | 29,794 | 30,091 | 30,384 | 30,675 |
| Diversion | 4,867 | 4,913 | 4,959 | 5,010 | 5,062 | 5,113 | 5,163 | 5,213 | 5,267 | 5,320 | 5,373 | 5,426 | 5,478 |
| Total Generation | 32,125 | 32,425 | 32,728 | 33,067 | 33,408 | 33,749 | 34,077 | 34,404 | 34,762 | 35,114 | 35,464 | 35,810 | 36,153 |
| **All Sectors** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 45,429 | 45,854 | 46,282 | 46,762 | 47,244 | 47,725 | 48,190 | 48,653 | 49,158 | 49,657 | 50,151 | 50,641 | 51,125 |
| Diversion | 8,112 | 8,188 | 8,265 | 8,350 | 8,436 | 8,522 | 8,605 | 8,688 | 8,778 | 8,867 | 8,956 | 9,043 | 9,130 |
| Total Generation | 53,541 | 54,042 | 54,546 | 55,112 | 55,680 | 56,248 | 56,795 | 57,341 | 57,937 | 58,524 | 59,107 | 59,684 | 60,255 |

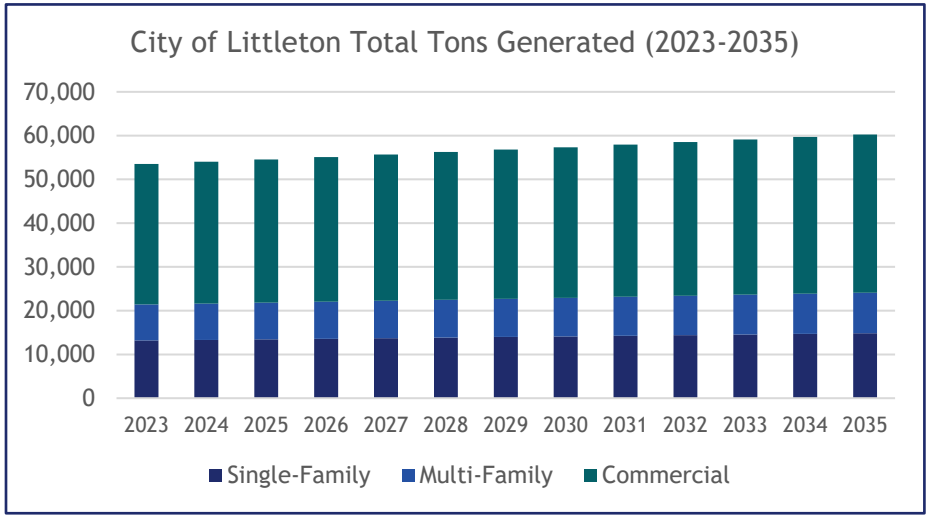



Figure 37: City of Littleton Total Tons Generated (2023-2035)

### Table 26: City of Littleton Community Profile

| Description | 2022 |
|---|---|
| Single-Family Units | 61.6% |
| Multi-Family Units | 38.4% |
| Total Number of Households | 20,484 |
| Household Size* | 2.19 |
| Single-Family Households | 12,618 |
| Multi-Family Households | 7,866 |
| Single-Family Population | 27,382 |
| Multi-Family Population | 17,069 |
| Total Population | 44,451 |
| Total Employer Firms | 1,825 |

City of Littleton Demographic Snapshot, US Census Bureau 2022

# 8.11 Impact Analysis Results

**Table 27: City of Littleton Impact Analysis Results**

| Aim | ID | Strategy | Additional Diversion % | Tons Low | Tons High | GHG Emissions Reduced | Fiscal Impact |
|---|---|---|---|---|---|---|---|
| **Littleton** | **8.1** | Implement yard waste curbside services for composting for single-family residents | 3.8% | 2,200 | 2,400 | 659 | **$$$** |
| **Littleton** | **8.2** | Implement food waste curbside services for composting for single-family residents | 1.8% | 1,000 | 1,200 | 333 | **$$$** |
| **Littleton** | **8.3** | Leverage Colorado's Extended Producer Responsibility for recycling programs | 3.3% | 1,900 | 2,100 | 1,959 | **$** |
| **Littleton** | **8.4** | Require hauler licensing, including the requirement for haulers to track and report tonnage data | 0.5% | 300 | 300 | 982 | **$** |
| **Littleton** | **8.5** | Pass an equal space ordinance to ensure commercial and multi-family recycling access | 4.8% | 2,800 | 3,000 | 8,360 | **$** |
| **Littleton** | **8.6** | Support the transition to organized collection (single hauler) | 1.7% | 1,000 | 1,100 | 1,726 | **$$** |
| **Littleton** | **8.7** | Ongoing community group engagement | 4.5% | 2,500 | 2,900 | 2,125 | **$$** |
| **Littleton** | **8.8** | Adopt a universal recycling ordinance | 2.7% | 1,500 | 1,700 | 4,528 | **$** |
| **Littleton** | **8.9** | Establish a construction & demolition recycling ordinance | 3.3% | 1,900 | 2,100 | 5,604 | **$** |
| | | | ***24.6%*** | **14,100** | **15,600** | **26,181** | |

| Fiscal Impact | |
|---|---|
| Fiscal Impact on Tons Diverted | Estimated Fiscal Range |
| **$** | < $10,000 |
| **$$** | $10,000 – < $100,000 |
| **$$$** | ≥ $100,000 |

# 9.0 City of Sheridan Waste Diversion Goals and Actions

Originally incorporated as a town in 1890 and transitioned to a statutory city in 1959, the City of Sheridan has a rich history defined by its cultural and demographic diversity. Located in Arapahoe County and bordering the cities of Denver and Englewood, Sheridan has an estimated population of approximately 5,970 residents.

The community reflects a wide range of ethnic, cultural, and socioeconomic backgrounds. According to US Census data, 31.7% of residents speak a language other than English at home, and 41.7% identify as Hispanic or Latinx. The city's median household income is just over half the state average, underscoring the need for creative funding strategies and regional partnerships to advance sustainability goals outlined in Sheridan's first Sustainability Plan, adopted in 2023.

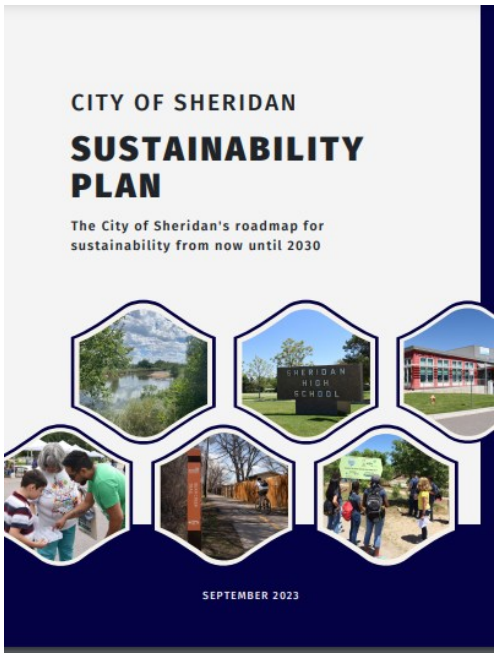



**Figure 38: Sheridan Sustainability Plan**

Sheridan is recognized as a Justice 40 Community by the federal government, a disproportionately impacted community by the Colorado Department of Public Health and Environment (CDPHE), and a Higher Emissions Community by Xcel Energy. Within the South Metro region, Sheridan has the highest proportion of multi-family housing, representing 40% of the overall housing structures. Similar to the other cities, little is known about the multi-family and commercial recycling and composting participation rates in Sheridan.

Unlike the other three South Metro cities, Sheridan operates under a contract-based residential waste collection model. In 2014, the city adopted a single-hauler system through a contract with Republic Services, covering all single-family homes and multi-unit residences up to seven units. Under this model, Republic Services provides weekly trash collection and biweekly recycling services. The contract follows a pay-as-you-throw (PAYT) structure, which incentivizes waste reduction and recycling by charging residents based on their selected trash cart size (32, 64, or 96 gallons). Recycling services are automatically included in the fee structure, with recyclables collected in 96-gallon containers and no separate sign-up required.

The service contract includes provisions to support service equity. For residents with physical impairments, carry-out cart service is available at no additional cost. Additionally, the contract offers an optional, twice-yearly yard debris pickup in the spring and fall, allowing each household to dispose of up to 20 bags or bundled items such as leaves, shrubs, and tree limbs. Currently, however, that yard debris is sent to the landfill and is not being composted.



In 2024, Sheridan partnered with A1 Organics and the cities of Littleton and Englewood to host a regional leaf drop-off event in November. The Republic Services contract also includes a provision for annual holiday tree collection at no cost to residents, with the option for trees to be chipped or sent to a compost facility. Although included in the agreement, this service has not yet been exercised by the city.

City Code (§22-173–214) requires private haulers operating in Sheridan to obtain a license and submit a plan detailing their recycling and collection services. However, there is no current requirement for data reporting beyond services provided through the residential contract.

Sheridan's City Council has indicated support for waste diversion strategies and targeted policy actions that will help the city achieve its goals. In January 2023, the City of Sheridan hired a part-time sustainability program manager and adopted the city's first ever sustainability plan in September 2023. Sheridan's City Code includes requirements concerning waste container enclosures and placement. On its waste and recycling webpage, the City of Sheridan lists several waste-related goals and project status updates, including increasing community outreach and education, exploring curbside and drop-off composting options, conducting a waste characterization study, partnering with A1 Organics on a leaf collection program, promoting hazardous and electronic waste drop-off events, utilizing Plastic Pollution Reduction Act (HB21-1162) bag fee funds, and exploring multi-family recycling options. Sheridan also lists internal city goals, such as increasing water bottle fill stations, updating recycling signage, reducing paper usage, and ensuring recycling access at city-owned buildings.

### Table 28: City of Sheridan Strategies Summary

| ID | Action | Fiscal Impact | Diversion Impact | Implementation Timeline | | |
|---|---|---|---|---|---|---|
| | | | | FY26-30 | FY30-35 | FY35-40 |
| 9.1 | Implement At-Your Door collections program for household hazardous waste and electronics | $$ | ♺ | X | | |
| 9.2 | Leverage Colorado's Extended Producer Responsibility (EPR) for recycling programs | $ | ♺♺♺♺ | X | X | X |
| 9.3 | Implement food scraps curbside services for composting for single-family residents | $$ | ♺♺ | X | X | |
| 9.4 | Work with the city's hauler to transition yard debris curbside services for single-family residents so the material is composted instead of landfilled | $$ | ♺♺♺ | X | | |
| 9.5 | Pass an equal space ordinance to ensure commercial recycling access | $ | ♺♺♺ | X | X | |
| 9.6 | Ongoing community group engagement (such as Resident Champion training) | $$ | ♺♺ | X | X | X |
| 9.7 | Explore business organics grants | $$ | ♺ | X | | |

## 9.1 Implement At-Your Door Collections for Household Hazardous Waste and Electronics♺



The "At Your Door Special Collection" service, offered by the Southeast Metro Stormwater Authority (SEMSWA) in partnership with Waste Management, provides residents of unincorporated Arapahoe County participating cities with a convenient home collection program for household hazardous waste. All cities in South Metro except the City of Sheridan offer this service.

For a small co-pay, residents can schedule a pickup of items such as automotive products (e.g., motor oil, antifreeze), batteries, garden chemicals, paints, household cleaners, electronics, mercury-containing items, and swimming pool chemicals. To participate, residents schedule a collection through the program's website or by calling the designated phone number.

It is recommended that the City of Sheridan offer this convenient service to residents to support the safe and responsible disposal of hazardous materials, thereby protecting the environment and public health.

**Implementation Steps:**

- Identify funding sources (e.g., stormwater utility fees)
- Procure and partner with a provider and establish a service agreement
- Develop an outreach and education campaign to notify residents of the new service
- Launch the program

## 9.2 Leverage Colorado's Extended Producer Responsibility (EPR) for Recycling Programs ♺♺♺♺

Colorado's Producer Responsibility (EPR) for Recycling Packaging Program requires covered producers to join a Producer Responsibility Organization (PRO), and through it, fund and manage the end of life for packaging and paper, including collection, processing, and recycling or composting.

This EPR program will cover 100% of the net recycling service costs for all Colorado single-family and multi-family homes starting in 2026. The state's PRO, Circular Action Alliance (CAA), has indicated that they will start by covering recycling costs in communities with organized (non-open market) systems. As such, the City of Sheridan is well positioned to take early advantage of EPR funding for residents currently receiving service through the City's designated hauler.

However, the City can still further leverage the benefits of Colorado's EPR law. There are opportunities to expand recycling access and collection services for multi-family properties in Sheridan. In addition, the EPR program is slated to expand to non-residential properties including schools, state/local government buildings, public spaces, hospitality venues, and small businesses beginning 2028.

CAA has also indicated its intent to collaborate with local governments, collection service providers, and community-based organizations for enhanced education and outreach efforts.

**Implementation Steps:**

- Conduct outreach to stakeholders to share information about EPR
- Apply and receive reimbursements provided through Colorado's EPR law for single-family collections
- Explore additional reimbursement and collaboration opportunities provided through Colorado's EPR law

## 9.3 Implement Food Scraps Curbside Services for Composting for Single-Family Residents ♺♺



It is estimated that by 2035, the City of Sheridan's single-family sector will generate roughly 380 tons of food scraps and other compostables per year, or roughly 20% of its total generated waste.

A dedicated curbside service for food scraps can significantly divert the amount of landfill-bound material and contribute to the environmental benefits of composting. Local governments can promote the benefits of curbside food scraps collection programs.

With EPR covering recycling costs, the City of Sheridan will be well positioned to explore the addition of curbside composting. The city's current hauler, Republic Services, currently offers curbside composting to other Colorado communities, such as Lafayette, CO.

**Implementation Steps:**

- Coordinate regionally with neighboring jurisdictions aiming to implement a similar program
- Define program goals and scope
- Design service model
- Establish a wait list to understand residential demand
- Procure equipment or contract out services; consider a joint purchasing agreement with regional partners to achieve economies of scale
- Develop an outreach and education campaign
- Launch program
- Monitor and evaluate performance

## 9.4 Ensure Yard Debris Curbside Services for Single-family Residents is Composted instead of Sent to Landfills

♺♺♺

The South Metro Waste Characterization study found that yard debris comprises 20% of the City of Sheridan's single-family waste stream, yet less than 1% of the yard debris is being diverted.

Currently, yard debris is hauled to the landfill and is not composted. The Sheridan City Council, who attended the South Metro Waste Summit, indicated that the city should prioritize sending yard debris to composting facilities, rather than to landfills. Ensuring curbside yard debris for single-family residents is composted could significantly increase a community's waste diversion rate, depending on the level of participation.

Like curbside recycling collection service, adding a third collection point for diverting organic material (yard debris and sometimes food scraps) creates an opportunity to reduce the amount of waste sent to landfills and contribute to the environmental benefits of composting. Local governments can promote the benefits of curbside yard debris collection programs and encourage residents to subscribe.

**Implementation Steps:**

- Define program goals and scope
- Design service model
- Procure equipment or contract out services; consider a joint purchasing agreement with regional partners to achieve economies of scale.
- Develop an outreach and education campaign
- Launch program
- Monitor and evaluate performance

## 9.5 Pass an Equal Space Ordinance to Ensure Commercial and Multi-Family Recycling Access ♺♺♺




An **Equal Space Ordinance** requires that all newly constructed commercial buildings allocate the same amount of space for recycling collection infrastructure (such as enclosures, receptacles, chutes, staging areas, and collection rooms) as is allocated for trash.

Insufficient space for recycling is a common barrier for commercial entities, particularly in dense urban areas. By integrating this requirement into building codes, municipalities can ensure future developments support recycling access without retrofitting existing structures.

In Sheridan, approximately 40.1% of housing consists of multi-family units, and there are 423 employer firms, highlighting the importance of planning for equitable recycling infrastructure in both residential and commercial development.

**Implementation Steps:**

- Conduct outreach to stakeholders to gather insights on potential barriers
- Draft and adopt an equal space ordinance
- Roll out a communications plan and consider providing technical support for commercial property managers
- Coordinate with the Planning & Zoning Department to align on communicating new requirements for new developments and significant site redevelopments

## 9.6 Ongoing Community Group Engagement with Universal and Accessible Guidelines ♺♺

Community outreach and engagement includes public education, feedback collection, community collection events, and direct interaction with residents and organizations on recycling and waste issues. While the City of Sheridan implements various recycling-related communication strategies, outreach must be continuous to ensure both current and new residents receive up-to-date information on how to recycle and compost effectively.

Leveraging community groups and peer networks is a powerful strategy to expand awareness and increase participation in waste diversion efforts. One proven approach is to train **Recycling Champions** (local advocates or community ambassadors) within existing groups to share recycling and composting information through their networks. This is especially important for the City of Sheridan as the community is diverse in culture as well as languages.

Training should emphasize local recycling guidelines, using clear and consistent wording and visuals to show what is accepted in the curbside program. To improve accessibility and understanding, materials should be available in multiple languages.

**Implementation Steps:**

- Reach out to existing community groups to speak at meetings or events about waste diversion
- Host trainings for interested residents to become Recycling Champions and share knowledge with their networks
- Share information about waste diversion by tabling at public events, meetings, or community centers
- Engage Resident Champions over time with ongoing community efforts (events, webinars, new resources)
- Continue utilizing the South Metro Waste Diversion website to promote efforts and events

# 9.7 Explore Business Waste Diversion Grants ♺

Businesses, especially restaurants that generate large volumes of food scraps, may be interested in subscribing to an organics collection service, but the cost of service can be a barrier. Local governments can create a financial incentive or grant program to encourage the private sector to sign up for organic collection services.




Businesses can be reimbursed for infrastructure, hauling, compostable food service ware, education, training, and signage. Financial incentives can also build support for a future commercial composting ordinance, as it creates local case studies of successful organics diversion programs.

**Implementation Steps:**

- Identify funding source for grants
- Design grant program framework
  - Define eligible applicants
  - Establish match requirements, if any
  - Outline funding amounts and funding categories
  - Develop an application, review, and selection process
- Launch and promote the grant program through a communications plan
- Award and administer grant agreements

# 9.9 Tonnage Projections

### Table 29: City of Sheridan Tonnage Projections (2023-2035)

| Year | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Single-Family** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 1,447 | 1,461 | 1,475 | 1,490 | 1,506 | 1,522 | 1,537 | 1,552 | 1,569 | 1,585 | 1,601 | 1,617 | 1,633 |
| Diversion | 258 | 261 | 263 | 266 | 269 | 272 | 274 | 277 | 280 | 283 | 286 | 289 | 292 |
| Total Generation | 1,705 | 1,721 | 1,738 | 1,757 | 1,775 | 1,794 | 1,812 | 1,829 | 1,849 | 1,868 | 1,887 | 1,906 | 1,925 |
| **Multi-Family** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 968 | 978 | 987 | 998 | 1,008 | 1,019 | 1,029 | 1,039 | 1,050 | 1,061 | 1,072 | 1,083 | 1,094 |
| Diversion | 173 | 175 | 176 | 178 | 180 | 182 | 184 | 186 | 188 | 189 | 191 | 193 | 195 |
| Total Generation | 1,141 | 1,152 | 1,163 | 1,176 | 1,188 | 1,201 | 1,213 | 1,225 | 1,238 | 1,251 | 1,263 | 1,276 | 1,289 |
| **Commercial** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 3,623 | 3,658 | 3,693 | 3,732 | 3,772 | 3,811 | 3,849 | 3,887 | 3,928 | 3,969 | 4,010 | 4,050 | 4,090 |
| Diversion | 647 | 653 | 659 | 666 | 674 | 681 | 687 | 694 | 701 | 709 | 716 | 723 | 730 |
| Total Generation | 4,270 | 4,311 | 4,352 | 4,399 | 4,445 | 4,492 | 4,536 | 4,581 | 4,630 | 4,678 | 4,726 | 4,774 | 4,821 |
| **All Sectors** | | | | | | | | | | | | | |
| MSW Disposal (Landfill) | 6,038 | 6,096 | 6,155 | 6,221 | 6,286 | 6,352 | 6,415 | 6,478 | 6,547 | 6,616 | 6,683 | 6,751 | 6,817 |
| Diversion | 1,078 | 1,089 | 1,099 | 1,111 | 1,123 | 1,134 | 1,146 | 1,157 | 1,169 | 1,181 | 1,193 | 1,205 | 1,217 |
| Total Generation | 7,116 | 7,184 | 7,254 | 7,331 | 7,409 | 7,486 | 7,561 | 7,635 | 7,716 | 7,797 | 7,877 | 7,956 | 8,035 |

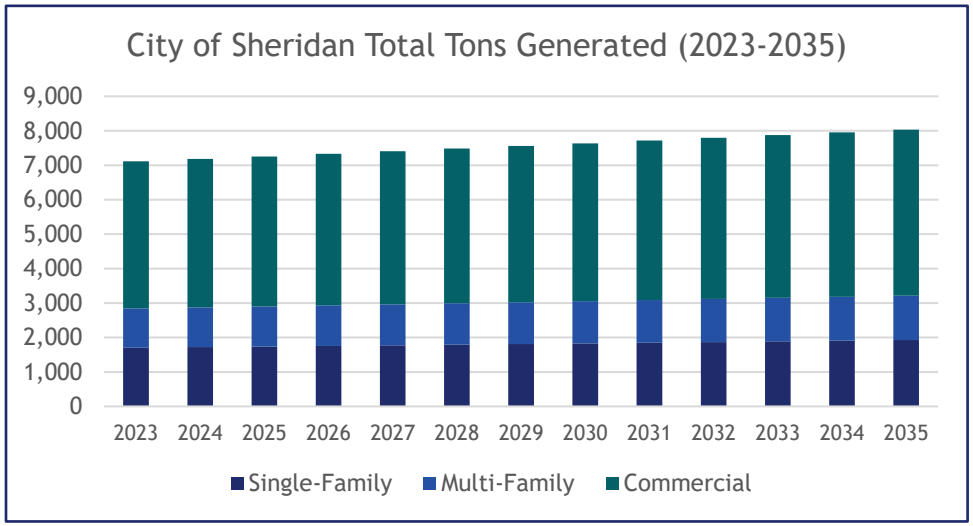



Figure 39: City of Sheridan Total Tons Generated (2023-2025)

### Table 30: City of Sheridan Community Profile

| Description | 2022 |
|---|---|
| Single-Family Units | 59.9% |
| Multi-Family Units | 40.1% |
| Total Number of Households | 2,442 |
| Household Size* | 2.48 |
| Single-Family Households | 1,463 |
| Multi-Family Households | 979 |
| Single-Family Population | 3,539 |
| Multi-Family Population | 2,369 |
| Total Population | 5,908 |
| Total Employer Firms | 423 |

City of Sheridan Demographic Snapshot, US Census Bureau 2022

# 9.10 Impact Analysis Results

**Table 31: City of Sheridan Impact Analysis Results**

| Aim | ID | Strategy | Additional Diversion % | Tons Low | Tons High | GHG Emissions Reduced | Fiscal Impact |
|---|---|---|---|---|---|---|---|
| **Sheridan** | **9.1** | Implement At-Your Door collections program for household hazardous waste and electronics | 0.2% | 19 | 21 | n/a | $$ |
| **Sheridan** | **9.2** | Leverage Colorado's Extended Producer Responsibility for recycling programs | 6.2% | 500 | 530 | 1,025 | $ |
| **Sheridan** | **9.3** | Implement food waste curbside services for composting for single-family residents | 2.5% | 200 | 210 | 65 | $$ |
| **Sheridan** | **9.4** | Work with hauler to ensure yard waste curbside services for single-family residents is composted instead of sent to landfill | 3.7% | 300 | 320 | 85 | $$ |
| **Sheridan** | **9.5** | Pass equal space ordinances to ensure commercial and multi-family recycling access | 5.0% | 400 | 420 | 1,263 | $ |
| **Sheridan** | **9.6** | Ongoing community group engagement | 2.5% | 200 | 210 | 131 | $$ |
| **Sheridan** | **9.7** | Explore business organics grants | 1.2% | 100 | 110 | 24 | $$ |
| | | | **21%** | **1,700** | **1,800** | **2,593** | |

| Fiscal Impact | |
|---|---|
| Fiscal Impact on Tons Diverted | Estimated Fiscal Range |
| **$** | < $10,000 |
| **$$** | $10,000 - < $100,000 |
| **$$$** | ≥ $100,000 |

# Appendix A – South Metro Waste Diversion Reports and Memorandums

**Table 32: South Metro Waste Diversion Reports and Memorandums**

| Report Title | Description |
|---|---|
| Project Website | www.SouthMetroWasteDiversion.com |
| Baseline Assessment | The Cities of Centennial, Englewood, Sheridan, and Littleton (collectively known as South Metro) seek to transition to a system that favors equitable waste reduction and waste diversion strategies driven by data and best practices.<br><br>As part of this effort, the STEPS project team interviewed cities, researched, and assessed the baseline for waste and recycling in the region. |
| Hauler Engagement | Waste haulers servicing the region were engaged through one-on-one interviews. A summary of these interviews was provided to the South Metro Project Team. |
| Residential Survey | A residential survey was conducted to collect data and analyze the South Metro region and each participating city. The results of this survey will be used to better understand the common motivating factors and barriers to residential participation in South Metro's solid waste management systems. |
| Focus Groups | Three focus groups were held virtually to engage multi-family residents, businesses, and disadvantaged communities.<br><br>The results of the research will be used to better understand the common motivating factors and barriers to residential participation in South Metro's solid waste management systems. |
| Community Engagement | A community engagement strategy for the South Metro Waste Diversion Plan was developed to include a website, engagement collateral, and a Resident Champion training. |
| Waste Generation | Current waste tonnages were modeled by using tons generated, tons diverted, tons landfilled, tons by generating sector, tons by individual city, and tons for the South Metro region.<br><br>Projections were also developed for annual tonnages through 2033, including scenarios that assumed full implementation of all recommended waste diversion strategies. |
| Gaps & Opportunities | Following the baseline assessment of the South Metro region's waste generation, policies, and infrastructure, the STEPS project team completed an analysis of potential gaps in the system. The gaps highlight opportunities to expand programs, optimize existing system aspects, or pursue new initiatives and investments to support the region's waste diversion goals. |
| Regional Waste Summit | A Waste Summit was held to present findings to elected officials from the four cities. The presentation covered information collected to date, including a baseline infrastructure evaluation, interviews with hauling companies, public engagement findings, a waste characterization study, and the initial gaps and opportunities analysis. At the meeting, input from elected officials was gathered to identify potential gaps in the waste system. |
| Waste Characterization Study | A two-season waste characterization study (also referred to as a 'waste audit' or 'waste sort') was conducted in 2024. The study sorted samples of trash and recycling to assess the overall composition of the region's waste streams. Samples were collected from the four South Metro cities: Centennial, Englewood, Littleton, and Sheridan. |

# Appendix B – Infrastructure Fiscal Impact Analysis

For the two regional infrastructure strategies identified in this plan, a fiscal analysis was conducted to estimate the capital and operational costs.

## Regional Recycling Drop-Off Center

A recycling drop-off center provides additional capacity and convenient access to handle surges in recyclable material, particularly during spring cleaning or move-in and move-out periods. Drop-off centers provide an overflow option, preventing overfilled containers and litter. For multi-family residents where property management does not provide adequate recycling access, convenient drop-off centers can offer a place for residents to drop off materials. It is generally best practice for urban environments with populations over 100,000 to establish one drop-off center per 50,000 residents. It is recommended for South Metro to explore establishing up to four regional recycling drop-off centers, conveniently located between the four communities.

**Table 33: Recycling Drop-Off Center Assumptions**

| Description | Qty |
|---|---|
| Paved Recycling Drop-Off Center Dimensions per Center | 120 ft x 75 ft |
| Area per Center | 9,000 square feet (sq ft) |
| Perimeter per Center | 390 linear feet (lin ft) |
| Residents Served per Center | 50,000 |
| Number of Centers | 4 |

Based on the available budget, South Metro may consider as a long-term goal, expanding the drop-off center to accept additional streams of materials, such as yard debris, food scraps, plastic film, textiles, household hazardous waste (HHW), electronic waste, and/or other materials in Circular Action Alliance (CAA) Colorado's "Additional Materials List (AML)."

Each center should be located in an area that is most convenient to potential users, whether it is centrally located, along a commonly traveled highway, or near popular areas of interest (e.g., parks, shopping malls, and recreation areas).

Each site should allocate, at a minimum, approximately 0.25 to 1 acre of operational space for material handling and storage, as well as traffic and parking for residential vehicles and haulers providing the collection service. Recycling drop-off centers may be set up either through larger roll-off containers (e.g., 30 or 40 yd) or through front-load dumpsters (e.g., 8 yd). Site constraints, budget, operational efficiency, and density of area may determine whether the region considers setting up the drop-off centers through roll-off or front load containers.

The design of the drop-off centers should prioritize adaptability to accommodate shifting market demands and the emergence of new material streams. This flexibility can be achieved, in part, by selecting sites with more space than is initially required. Furthermore, strategies for mitigating illegal dumping should be incorporated into the planning and operational framework.

Site preparation (leveling, grading, and paving) costs may be required based on the location identified. It is recommended that drop-off centers are fenced and/or gated, along with installation of Closed-Circuit Television (CCTV) cameras for monitoring and deterring illegal dumping. Lighting fixtures are critical, as well-lit areas can deter vandalism and illegal dumping, especially after hours. It can also provide a safer environment for residents and staff when daylight is limited.

Please note that the following table is for illustrative purposes, as the region may identify existing developed and paved sites for service provision. Fencing may also be optional based on the site. The estimated capital costs below also assume the use of front-end dumpsters vs. roll-off containers. The cost of land is also not factored into this analysis, as suitable sites may already be owned by the municipality or may be secured through a Memorandum of Understanding (MOU). Additionally, land acquisition costs can vary significantly depending on location and market conditions.

### Table 34: Estimated Capital Costs

| Description | Qty | Estimated Unit Cost | Extended Cost |
|---|---|---|---|
| Site leveling and grading | 9,000 (sq ft) | $2/sq ft | $18,000.00 |
| Paving (asphalt) | 9,000 (sq ft) | $4/sq ft | $36,000.00 |
| Galvanized or vinyl-coated chain link fence | 390 (lin ft) | $30/lin ft | $11,700.00 |
| Lighting fixtures | 2 | $3,000/ea. | $6,000.00 |
| Striping directional arrows / parking lines | 1 | $1,000 | $1,000.00 |
| 8 yd Front end (FE) side door dumpster | 8 | $1,500 | $12,000.00 |
| Signage and banners | 20 | $200.00 | $4,000.00 |
| | | Per recycling drop-off center | $96,200.00 |
| | | (4) Recycling drop-off centers | $384,800.00 |

It is recommended that collections are contracted through a private hauler providing front-load dumpster service for cost efficiencies. Below are estimated operational cost for 8 yd recycling dumpsters using an “on call” recycling dumpster price rate. This is a high-level estimate; a formal solicitation could yield a more competitive rate through a scheduled, bulk-rate service.

### Table 35: Estimated Annual Operational Costs

| Description | Estimated Unit Cost | Frequency | Annual Cost |
|---|---|---|---|
| 8 yd Recycling dumpsters | $16/yard | 3x/week | $19,968 |
| | | Per recycling drop-off center per year (8 containers) | $159,744.00 |
| | | (4) Recycling drop-off centers per year | $638,976.00 |

Colorado’s Extended Producer Responsibility law (HB 22-1355) sets up a Producer Responsibility program (EPR) that requires companies that sell products in packaging and paper products to fund a statewide recycling system to recycle

those materials. The companies coordinate to support, fund, and manage the statewide recycling system. Colorado's EPR law, which is expected to start implementation in 2026, also sets the framework of reimbursing service providers 100% of the eligible net costs associated with recycling covered materials.

The Colorado Plan Proposal, published in February 2025 by CAA, states that "reimbursement of drop-off and curbside collection costs will cover costs such as a capital costs, base-level education and outreach, operational costs, reasonable profit margin, and eligible administrative expenses." While this draft plan proposal is currently under review, South Metro should continue to monitor and stay engaged for funding opportunities for regional recycling drop-off centers.

## Regional Organics Facility

The South Metro region is projected to generate approximately 74,500 tons of organic waste in 2035 (including food scraps, food soiled / compostable paper, compostable foodservice products, yard debris, wood, and other organics). This represents nearly 29% of the total waste generated in the region. If the region does not take any additional action to support the diversion of organics, 72,700 tons of organic waste is estimated to be disposed of in the landfill in 2035 (97% of the generated organic waste).

The Colorado Statewide Organics Management Plan: A Framework for Regional Organics Opportunities published in 2022, showed that Colorado's compost facilities have the capacity to manage 127,000 to 157,000 additional tons of organic materials without significant investments or facility expansions.

In addition to the capacity that the state's Organics Management Plan modeled, there is additional yard debris and lumber organics processing capacity available through the A1 Organics Facility in Sheridan, Colorado. This facility went through an expansion with five additional acres in 2024. Given this site's proximity to South Metro, the region may consider a potential public-private-partnership to support the goal of **establishing large-scale organics processing infrastructure that accepts food scraps and other compostables.**

If existing facilities are unable to process the necessary composting capacity, developing a regional compost facility would require an evaluation of upfront capital costs, operating costs, and projected. Capital costs encompass total expenses for site procurement and development, systems, and equipment. Operating costs include ongoing labor, maintenance, and equipment maintenance expenses. Revenues are calculated based on tipping fees and the sale of finished compost.

With 75,000 tons of organic waste projected to be generated in the South Metro region by 2035, the region should consider a phased approach to diverting significant organic waste and be strategic in community engagement and buy-in. Participation will increase over time with strategic policy implementation, contracts, and capacity ramp-up. Table 36 below details the high-level financial implications and potential revenue for developing a compost facility with either a 25,000 or 50,000 tons per year processing capacity. These figures are not based specifically on data from the South Metro region. A feasibility study with cost modeling is necessary to determine the capital and operating costs, as well as potential revenue associated with developing a compost facility designed to process organic materials from South Metro.

An aerated static pile (ASP) composting facility was analyzed and is recommended as the preferred method for a regional-scale processing facility. ASP composting is a highly efficient and scalable method for processing large volumes of food scraps. It can process compostable products, such as compostable service ware and bags, and is particularly well-suited for combined municipal yard debris and food scraps collection programs. In this system, organic material is placed over perforated pipes, air ducts, or an aeration pad. Airflow, either pushed (positive aeration) or pulled (negative aeration) with fans, maintains optimal oxygen and temperature levels to accelerate decomposition. The piles are covered either with a synthetic cover or a biolayer, such as finished compost or woodchips, to retain heat and moisture while controlling odors.



**Figure 40: Engineered Compost Systems (ECS) example of a 20,000 TPY ASP Curbside Food Scrap and Yard Trimming Facility**

**Table 36: Estimated Costs & Revenue for ASP Facilities**

| ASP Facility Cost & Revenue Factors | 25k TPY Facility | 50k TPY Facility |
|---|---|---|
| **Feedstock Throughput (TPY)** | **25,000** | **50,000** |
| **Capital Costs** | | |
| **Aerated Static Pile System ($)** | $2.2 M | $4.4 M |
| **Equipment Capital ($)** | $3.2 M | $4.8 M |
| **Site Development and Building Capital ($)** | $10.9 M | $14.9 M |
| **Total Capital Cost ($)** | $16.4 M | $24.1 M |
| **Total Annualized Capital Cost ($)** | $1.5 M | $2.3 M |
| **Total Annualized Capital Cost ($/ton)** | $61.21 | $45.10 |
| **Operating Costs** | | |
| **Total Annual Operating Cost ($)** | $1.2 M | $2.2 M |
| **Total Operating Cost ($/ton)** | $48.56 | $43.24 |
| **Revenues** | | |
| **Tipping Fee ($/ton)** | $37 | $37 |
| **Compost Sales ($/CY)** | $23 | $23 |
| **Total Annual Revenue ($)** | $1.4 M | $2.9 M |
| **Total Revenue ($/ton)** | $57.84 | $57.84 |
| **Profitability** | | |
| **Total Annual Income ($/ton) *** | $9.28 | $14.60 |
| **Total Annual Profit ($/ton) **** | ($51.93) | ($30.50) |
| **Total Annual Profit ($) **** | ($1.3 M) | ($1.5 M) |

*Total Annual Income = Total Revenue – Total Operating Costs
**Total Annual Profit = Total Revenue – Total Operating Costs – Annualized Capital Costs

Note: Negative values are represented using parentheses ()

The annual profit of a 25,000 ton per year (TPY) facility is ($1.3 M), and the annual profit of a 50,000 TPY facility is ($1.5 M). With an overall estimated capital cost of $16.4 M for a 25,000 TPY facility and $24.1 M for a 50,000 TPY facility, the annual income of the facilities after tip fees and compost sales would be ($51.93) per ton of incoming material for a 25,000 TPY facility and ($30.50) per ton for a 50,000 TPY facility. It will take approximately 71 years for the 25,000 TPY facility and 33 years for the 50,000 TPY facility to reach the break-even point, calculated as capital costs divided by annual revenue minus annual operating costs. However, this timeline assumes no grant funding, upfront capital expenses, and all new equipment. Excluding capital costs, the annual income of the facility is $9.28 and $14.60 per ton processed for a 25,000 TPY and 50,000 TPY facility, respectively. Significant capital expenses may be offset by securing additional funding or identifying other cost-saving opportunities.

# Appendix C - Funding Opportunities and Other Resources

1. The **Colorado Circular Communities (C3) Enterprise** has ongoing applications available for Mini Grants, Impact Grants, and Capacity Building Grants. These funding opportunities support projects that contribute to the advancement of a circular economy in Colorado. https://coloradocircularcommunities.org/

2. **Colorado's Extended Producer Responsibility law (HB 22-1355)** sets up a Producer Responsibility (EPR) program that requires companies that sell products in packaging and paper products to fund a statewide recycling system to recycle those materials. The companies coordinate, fund, and manage this statewide recycling system. Colorado's EPR law, which is expected to begin implementation in 2026, sets the framework of reimbursing service providers **100% of the eligible net costs associated with recycling covered materials.**

   The Colorado Plan Proposal, published in February 2025 by the Circular Action Alliance (CAA), states that **"reimbursement of drop-off and curbside collection costs will cover costs such as a capital costs, base-level education and outreach, operational costs, reasonable profit margin, and eligible administrative expenses."** While this draft plan proposal is currently under review, South Metro should continue to monitor and stay engaged for funding opportunities for regional recycling drop-off centers. https://cdphe.colorado.gov/hm/epr-program

3. The **Municipal Blueprint for Composting Report** by Closed Loop Partners and Eco-Cycle provides guidance to municipal leaders in zero waste, solid waste and sustainability on establishing and scaling composting infrastructure and organics management programs nationwide. The blueprint offers a clear and actionable framework, including policy and program expansion for diverting food scraps, setting up programs and infrastructure, and communication with program participants. https://www.closedlooppartners.com/research/municipal-blueprint-report/

4. The **Colorado Construction, Demolition and Deconstruction Policy Toolkit** from Recycle Colorado was developed by members of Recycle Colorado's C&D Council, a group of industry stakeholders including public, private, and nonprofit sector entities working to support construction, demolition and deconstruction (C&D) materials recovery in Colorado. The toolkit can assist local government staff and policymakers in developing diversion programs for the built environment which significantly contributes to climate and zero-waste planning efforts. The toolkit provides a step-by-step process to develop policies to manage C&D materials, from research through policy development, program implementation and ongoing management. https://www.recyclecolorado.org/c-d-policy-toolkit

5. The **Local Implementation, Mitigation, and Policy Action (Local IMPACT) Accelerator** is a grant program available to local and tribal governments. It supports the adoption of policies in the areas of buildings, land use, transportation, and waste. Funds are available for both policy advancement and project implementation. Round 2 applications for 2025 will be accepted from January 16 to February 18, 2026, with the Letter of Intent (LOI) due between October 1 and November 17, 2025. https://energyoffice.colorado.gov/local-impact-accelerator

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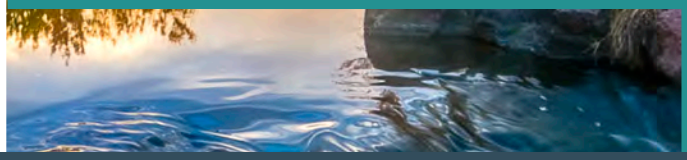
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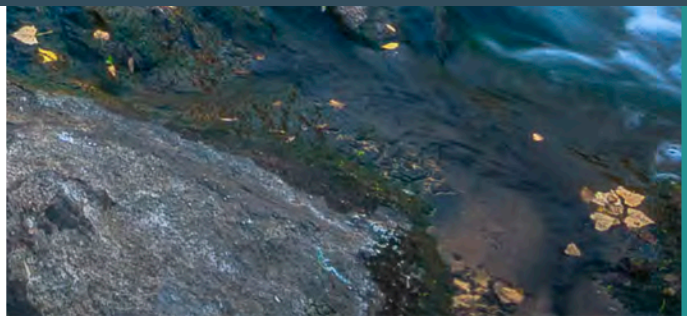




# ESB

## ENVIRONMENTAL STEWARDSHIP BOARD

ENVIRONMENTAL STEWARDSHIP ACTION PLAN



CITY OF LITTLETON

# Environmental Stewardship Action Plan

APRIL 2024


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## Introduction and Core Values

On December 20, 2022, Littleton City Council, by unanimous resolution, created the Littleton Environmental Stewardship Board and tasked it with creating this Environmental Stewardship Action Plan. In compiling this Plan, the ESB has considered a number of existing city initiatives. The impact and effort meters for each item reflect the collective intuition of the ESB. For now, budgetary considerations have been left out, but the ESB plans to return to that in detail in the future. The Plan's recommendations are divided into existing initiatives, quick wins, and long-term/other.

The Littleton Environmental Stewardship Board (ESB) believes in addressing climate change and other threats to the ecology consistent with the following core values:

- **Thoughtful Urgency:** Reversing climate change must happen now, and not at the expense of high-quality decision making
- **Equity:** Defined as fair access and lack of race, gender, age, ability, and other hierarchies in all stewardship efforts
- **Good Governance:** Including measurable outcomes, transparency, and robust public input
- **Uniqueness:** Littleton is a unique community with a strong history and set of values around creative stewardship (e.g., creating South Platte Park). Stewardship will continue to be creative and tailored to our unique, remarkable community
- **Collaboration:** City departments must continue communicating with one another, and Littleton must leverage local, regional, state, national, and global partnerships
- **Re-Wilding:** Conservation is not enough; built and managed environments must enhance, not frustrate, natural processes; and wild places must be set aside and enlarged (no matter how small they are today)
- **Thoughtful Consumption:** Stewardship requires avoiding unnecessary resource use and diverting waste
- **Generational Fairness:** We will leave Littleton's environment better than we found it
- **Optimism:** In the face of significant challenges, we embrace solutions and maintain faith in a better future
- **Sacredness:** Nature is sacred, and close community with healthy, intact ecology is necessary for human thriving

Guided by these values, the ESB recommends that City Council take the actions listed below. Our highest priorities are for the city to:

- Complete a GHG inventory and create a climate action plan
- Hire a sustainability coordinator
- Allow the ESB to act as an accountability body for the city's relationship with South Suburban Parks and Recreation Department
- Educate and inform the public about environmental efforts
- Get people out of cars
- Electrify the built environment, transportation, and lawn and garden equipment
- Incentivize water conservation
- Provide every building with recycling and composting options
- Implement community-supported agriculture (e.g. at the Littleton Museum)

## Acronyms

**ACC** . . . . . Arapahoe Community College

**CO2** . . . . . Carbon Dioxide

**CO2e** . . . . . Carbon Dioxide Equivalent

**CSU** . . . . . Colorado State University

**DDA** . . . . . Downtown Development Authority

**EPA** . . . . . Environmental Protection Agency

**EV** . . . . . Electric Vehicle

**GHG** . . . . . Greenhouse Gas

**GPDP** . . . . . General Planned Development Plan

**HDLM** . . . Historic Downtown Littleton Merchants

**LBC** . . . . . Littleton Business Chamber

**LEDS** . . . . . Littleton Engineering Design Standards

**LPS** . . . . . Littleton Public Schools

**MEETS** . . . . . The Metered Energy Efficiency Transaction Structure

**SPLASH** . . . . . Stormwater Permittees for Local Awareness of Stream Health

**SSPRD** . . . . . .South Suburban Parks and Recreation Department

**ULUC** . . . . . Unified Land Use Code

**UFMP** . . . . . Urban Forestry Management Plan

## Guide for Interpreting the Impact and Effort Meters

| Impact Meter | |
|---|---|
|  | High Impact |
|  | Medium Impact |
|  | Low Impact |
| **Effort Meter** | |
|  | Low Effort |
|  | Medium Effort |
|  | High Effort |

FOR EXAMPLE: An action item that is considered high impact and low effort will appear with two green gauges.

**Impact**



**Effort**



## 1.0 Air Quality/Emissions



Given that 91% of net U.S. greenhouse gas (GHG) emissions are energy-related, our biggest opportunities for decreasing emissions lie in reducing the use of fossil fuels which drive the energy, transportation, industrial, commercial, and residential sectors. Electrification is the largest opportunity for both emissions and air pollution reductions. Despite this, electrification faces friction as fossil fuels have been set up as the default option. The city has numerous avenues it can take to decrease the costs of electrification and support it as the default choice to sustain a more stable climate and reduce health costs related to air pollution.

This section also addresses outdoor and indoor air pollution beyond GHG emissions such as ozone, nitrous oxide, carbon monoxide, and more. Like GHG emissions, most air pollutants come from burning fossil fuels. Therefore, eliminating burning fossil fuels through electrification addresses indoor and outdoor air quality issues which affect community health.

### 1.1 Existing Initiatives

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 1.1.1 | Arapahoe County EV Action Plan | Continue partnering with Arapahoe County on implementing the EV Action Plan. |  |  |
| 1.1.2 | The Spring Tree Program and Urban Forestry Master Plan | Trees absorb both CO2 and air pollutants. Maintaining our tree canopy is also a meaningful adaptation measure to climate change as it reduces ambient air temperatures in warm summer months. |  |  |
| 1.1.3 | Colorado Plastic Pollution Reduction Act (CPPRA) | Plastics generate GHG emissions at every stage of their lifecycle. Support compliance with CPPRA. |  |  |
| 1.1.4 | Transportation Master Plan | Transportation emits more GHGs than other sectors. The multi-modal transportation opportunities in the Transportation Master Plan represent low or no-carbon alternatives to fossil-fueled transportation.<br>Additionally, the Transportation Master Plan should be updated to consider EV charging infrastructure. |  |  |
| 1.1.5 | Solar-ready building codes | Continue implementation of the already-adopted solar-ready provisions of the 2021 International Energy Conservation Code. |  |  |

## 1.2 Quick Wins

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 1.2.1 | Greenhouse Gas Inventory | Conduct an audit of sources of GHG emissions. We expect the majority of emissions will come from residential and commercial sources, but it should also measure additional categories outside of energy-related emissions, including biomass burning, non-energy related agriculture emissions, waste emissions, and non-energy related industrial emissions. |  |  |
| 1.2.2 | Air Quality Monitoring and Assessment Program | Add air quality monitors within the city to assess baseline pollution levels and sources. |  |  |
| 1.2.3 | Climate and Air Quality Action Plan | Building upon the results of the GHG Inventory and air quality monitoring programs, establish a Littleton-specific climate action plan for incrementally reducing, and eventually eliminating, climate emissions and air pollutants. Rewiring America's Pace of Progress tool[1] may help identify interim goals prior to undertaking a climate action plan. |  |  |
| 1.2.4 | Electrification Education Program | Train electrification volunteers (e.g. Go Electric Colorado) to educate the public on opportunities and challenges of electrification. Encourage homeowners and landlords to get energy audits and develop electrification plans. |  |  |
| 1.2.5 | Xcel Partners in Energy Update | Update the existing Partners in Energy Plan and leverage resources from Xcel to identify opportunities for energy efficiency and electrification. |  |  |
| 1.2.6 | Solar Group Buys | Facilitate the purchase and install of solar equipment via combined contracts which reduce costs of equipment and installation through organizations such as Solar United Neighbors. |  |  |
| 1.2.7 | City-Sponsored Composting | Bio waste in landfills emits methane. Composting this waste reduces GHG emissions. |  |  |
| 1.2.8 | Electrification permitting fast tracking | Reduce time to permit for electrification projects to incentivize use. |  |  |
| 1.2.9 | Air sealing and insulation standards for city buildings | Improving air sealing and insulation in existing buildings reduces operating costs in the short-term and reduces the cost of electrification retrofits in the future due to reduced heating/cooling load requirements. |  |  |
| 1.2.10 | Electrification trade programs in Littleton Public Schools | Prepare our younger generations for the future with heat pump, solar, electrical, and other training programs which will lead to stable, well-paying careers. See also 2.2.3. |  |  |

[1] https://pop.rewiringamerica.org/?id=0845255

| | | | | |
|---|---|---|---|---|
| 1.2.11 | Remove subsidies for natural gas hookups | The cost of hooking up new homes to natural gas pipelines are subsidized by all users, causing increases to everyone's bills. Remove these subsidies to balance the upfront costs of electric and fossil-fueled building construction projects. |  |  |
| 1.2.12 | Adopt the Electric Ready codes by the Colorado Energy Code Board | Enable new home buyers' choice between gas and electric by adopting Electric Ready Building Codes[2] which give the option to easily opt-in to electric. Supporting electric-ready is far cheaper than retrofitting later. |  |  |
| 1.2.13 | Lawn and Garden Equipment Emissions Standards | Establish emissions standards for all equipment sold in Littleton. In 2020, lawn and garden equipment in the U.S. emitted more than 21,800 tons of fine particulates – an equivalent amount to the pollution from 234 million typical cars. Most electric lawn and garden equipment is already cost competitive and more reliable than gasoline equipment. |  |  |
| 1.2.14 | All-electric city landscaping equipment | Transition all city lawn and garden equipment to electric. |  |  |

## 1.3 Long-Term/Other

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 1.3.1 | Consider adopting Colorado Model Low Energy and Carbon code | Consider adopting the model low energy and carbon code which will be developed by a board created by the Colorado Energy Office. This code is expected to be created no later than July 1, 2025. |  |  |
| 1.3.2 | Expedite all-electric new building permitting | Faster, easier, and less costly permitting for electric appliances, EV charging, rooftop solar, and all-electric new home builds (which is conducive to the lower impact they have on the community than fossil-fuel equivalents). |  |  |
| 1.3.3 | Electrification Appliance Rebate Program | Provide rebates for the installation of electric appliances (e.g. heat pumps, heat pump water heaters). Similar to Denver, this could be funded by a small sales tax increase. |  |  |
| 1.3.4 | Multi-modal infrastructure | Transportation is the largest sector of GHG emissions in the country. While EVs can reduce emissions in this sector, it is far more cost effective to support a community which does not require car ownership to participate in daily life. Support multi-modal infrastructure, mixed-use zoning, and a walkable community which has a lower environmental footprint and creates strong communities and sales tax bases. Keep this in mind during the 2025 Transportation Master Plan update. |  |  |
| 1.3.5 | Electric School Buses | Upgrade school buses to electric. School buses represent a unique opportunity for fleet electrification as they can be a significant stabilizer to electrical grids during off hours. |  |  |

[2] https://www.energycodes.gov/sites/default/files/2021-10/Residential_Electrification.pdf

| | | | | |
|---|---|---|---|---|
| 1.3.6 | Decommission aging gas infrastructure with electric appliances | Target aging natural gas infrastructure for decommissioning rather than replacement as replacement costs are passed to all customers causing natural gas bills to increase. Support homeowners with financing, group purchasing contracts, and incentives to transition to electric homes. This keeps energy bills stable for customers who remain on natural gas and allows for a paced transition to electric over time. Households may choose to remain on gas when natural gas infrastructure is decommissioned, but they would need to purchase a propane system and fuel to do so. |  |  |
| 1.3.7 | The Metered Energy Efficiency Transaction Structure (MEETS) | Energy efficiency is often not prioritized in commercial buildings because long-term gains cannot be realized in a market where ownership changes often. Model a program after MEETS, which incentivizes all parties towards energy efficiency. Additional provisions could be added to support electrification. |  |  |
| 1.3.8 | All-electric city fleet | Electric vehicles cost more upfront but have a lower total cost of ownership than their fossil-fueled equivalents. The city can save money by replacing aging city vehicles with electric equivalents. |  |  |
| 1.3.9 | All-electric city buildings | Retrofit existing buildings to be all-electric. |  |  |
| 1.3.10 | Public EV charging infrastructure | Create more public EV charging infrastructure in the city. Most homeowners will charge their vehicles at home, but many individuals in multi-family units do not have access to home charging. A robust public charging infrastructure allows all to benefit from the electric vehicle transition. |  |  |



## 2.0 Built Environment



The built environment (BE) includes buildings, distribution systems, and transportation infrastructure. In addition to the built structures and systems, the BE also includes land uses and land use planning. One of the main controls any municipality has over its future is through its land use decisions.

### 2.1 Existing Initiatives

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 2.1.1 | Follow through with existing planning | Littleton has done extensive past planning that, if carried out, would benefit local environmental sustainability. For example: Comprehensive Plan Sections ENV 4 regarding expanding recycling and composting and ENV 8 regarding stormwater management. |  |  |
| 2.1.2 | Enforce Building Codes | Increase enforcement of current and future environmentally friendly building codes. |  |  |
| 2.1.3 | Transportation Planning | Continue to implement the Transportation Master Plan with an emphasis on multi-modal forms of transportation. |  |  |
| 2.1.4 | Infrastructure Upgrades | Continue upgrades to infrastructure such as stormwater sewers, especially where their failure impacts transportation. |  |  |
| 2.1.5 | Land Use Planning | Ensure compliance with stated environmental guidelines within the ULUC. This is particularly important regarding parcels currently undergoing a review process. As the ULUC is revisited, make environmental stewardship a more explicit value of the plan. |  |  |

### 2.2 Quick Wins

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 2.2.1 | Building Code Review | Adopt environmentally friendly building codes including Electric Ready and Colorado Model Low Energy and Carbon Code (see Section 1 - Air Quality and Emissions).<br>Example: Reduce required roof setback for solar panels to encourage implementation of solar installations. |  |  |
| 2.2.2 | Pedestrian and Bicycle infrastructure around schools | Plan and implement transportation safety initiatives around schools and other high-pedestrian areas. |  |  |
| 2.2.3 | Expand workforce and trades for | Work with educational institutions such as LPS and ACC to train a workforce knowledgeable in environmental |  |  |

| | | | | |
|---|---|---|---|---|
| | renewable energy and electrification | stewardship programs (e.g. linespeople, HVAC installers, electricians, etc.). | | |
| 2.2.4 | Improve stormwater infrastructure upgrades | Upgrading stormwater infrastructure provides opportunities for expanding green infrastructure. Examples exist at Eco Park in Centennial and 39th Avenue Greenway in Denver. |  |  |
| 2.2.5 | Sustainability Coordinator | Hire one. Include representatives from the ESC on interview panels. Empower them with resources and strategic partnerships to take action and make measurable impacts. Part of this position will be to directly connect residents and businesses to sustainability resources. |  |  |
| 2.2.6 | Adopt Dark Skies Initiative | Adopt Dark Skies standards in city codes to meet needs to see at night, conserve energy, avoid harmful effects on wildlife, and protect views of the night sky. Ensure city models Dark Skies best practices by updating city-controlled lighting infrastructure. |  |  |

## 2.3 Long-Term/Other

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 2.3.1 | Get people out of cars and support multi-modal transportation | Land use decisions should encourage walkability, density, and community character. |  |  |
| 2.3.2 | Electrify transportation infrastructure | Ensure adequate charging stations and provide resources to assist homeowners in upgrading residential electrical systems to accommodate EV charging. Support implementation of Arapahoe County EV action plan. Refer to item 1.3.10. |  |  |
| 2.3.3 | Storm sewer | Complete location maps. Use Denver's green infrastructure guidelines as appropriate. |  |  |
| 2.3.4 | Develop programs and resources to retrofit houses | Invest in the city's housing stock to ensure equity in the transition to greener options. Identify grants and strategic partnerships. |  |  |
| 2.3.5 | Wildlife Corridors | Work with CDOT to incorporate wildlife corridors on Santa Fe and other highway upgrades. |  |  |



## 3.0 Consumption and Waste Diversion

Colorado's waste diversion rates (recycling and composting) rank significantly below those of other states. The city should measure its existing waste diversion rates and make significant efforts to increase those rates to reduce waste bound for landfills. A significant component of that process should include efforts to reduce consumption of items on the front end that typically end up in landfills. All residents should have access to affordable recycling and composting services.




### 3.1 Existing Initiatives

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 3.1.1 | Leaf recycling services | Continue seasonal drop off for leaf recycling for several weeks in the fall. |  |  |
| 3.1.2 | Christmas tree recycling | Continue free seasonal drop-off for Christmas trees to be turned to mulch. |  |  |
| 3.1.3 | Front Range Waste Diversion Grant Program | Follow recommendations in the upcoming waste characterization study. |  |  |
| 3.1.4 | Colorado Plastic Pollution Reduction Act (CPPRA) | Support compliance with CPPRA. See also 1.1.3. |  |  |
| 3.1.5 | Producer Responsibility Program for Statewide Recycling (PRPSR) | Support compliance with PRPSR. |  |  |
| 3.1.6 | Household HazMat Roundup and Electronics Recycling Event | Continue existing program and increase frequency of events. Expand program to include other hard-to-recycle items. Consider public/private partnership (e.g. Ridwell) or incorporating into city services. |  |  |

## 3.2 Quick Wins

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 3.2.1 | Study baseline waste, recycling, and composting rates | Determine existing landfill, recycling, and composting rates to set ambitious waste reduction and diversion targets. See also 3.1.3. |  |  |
| 3.2.2 | Promote and educate on at-home composting | Partner with organizations (e.g. Colorado State University (CSU) Extension or Eco-Cycle) on seminars and resources to promote and increase the rate of at-home composting for yard waste and food waste. |  |  |
| 3.2.3 | Leaf recycling program | Educate community on benefits of mulching in place over disposal and the importance of proper disposal. |  |  |

## 3.3 Long-Term/Other

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 3.3.1 | Offer a curbside appliance and mattress recycling program | Work with haulers and the city to implement a curbside appliance, mattress, and other large-item recycling program. |  |  |
| 3.3.2 | Study and evaluate potential for "Pay as You Throw" waste program | Evaluate "Pay as You Throw" waste fees to encourage residents to generate less waste. |  |  |
| 3.3.3 | Offer an opt-in compost pickup service | Contract with existing waste haulers or compost services (e.g. Compost Colorado) for compost pickups at favorable rates. Fold leaf recycling program into composting program. |  |  |
| 3.3.4 | Study, evaluate, and gather bids from waste haulers for a contracted consolidated waste hauling system | Engage a working group to evaluate the feasibility of a consolidated waste hauling program contracted by the city. Ensure inclusion of landfill, recycling, and compost. Potentially partner with Englewood and/or Sheridan to offer regional consolidated contracted hauling options and economies of scale, similar to Denver. |  |  |
| 3.3.5 | Require residents and businesses to recycle | Amend the city code to require recycling in addition to waste hauling. Carefully consider the equities associated with the change. |  |  |

# 4.0 Natural Environment

Littleton is largely a built-out community, but also has significant amounts of open and natural spaces. Maximizing these areas for habitat, carbon sequestration, natural air filtration, natural water storage and filtration, aesthetic enjoyment, and recreation is necessary for a sustainable Littleton.

## 4.1 Existing Initiatives

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 4.1.1 | Urban Forestry Management Plan | Implement and follow the Urban Forestry Master Plan (UFMP). |  |  |
| 4.1.2 | Arborist Licensing | Require all tree companies to be licensed and insured to work within the city. Increases safety and standards. |  |  |
| 4.1.3 | Emerald Ash Borer Outreach | Treat and/or replace city-maintained trees. Increase community outreach and education. Partnering with neighboring municipalities and Colorado State University (CSU) extension. |  |  |

## 4.2 Quick Wins

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 4.2.1 | Re-wilding | Leave certain places alone, including leaving dead plant matter such as tree branches (honor the life cycle of the environment/forest). Be creative on limited city-managed open spaces. |  |  |
| 4.2.2 | Regionally sustainable plantings in city medians | Design, fund, and landscape, considering the changing climate to allow for long-term vitality. |  |  |
| 4.2.3 | Fees and fines to be allocated to “Tree Fund” for equity programs | Target areas, work with finance, training Forestry staff to enforce/receive safe payments. This money comes from the “save the tree/pay for the tree” program. |  |  |
| 4.2.4 | Implement turf conversion program for homeowners | Allocate funding and partner with other organizations to offer reduced-cost turf conversion. |  |  |

## 4.3 Long-Term/Other

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 4.3.1 | Expand the Ketring Park Natural Area | Reduce turf, increase tree canopy, and improve the health of existing open space. |  |  |
| 4.3.2 | Train and establish Tree Ambassadors | Establish trust and relationships with target neighborhoods and partner with existing successful training/apprentice programs. Dedicate staff support and funding. |  |  |
| 4.3.3 | Tree Equity Subsidy Program | Provide funding and community education. With all things tree, recognize the importance of public/private partnership. Funding to come from pre-existing fees and fines. |  |  |
| 4.3.4 | Urban tree canopy assessment goals | The city's Existing Conditions Survey is complete. Recommendations include training tree ambassadors, funding, sourcing, and planting regional species, obtaining contractor support, and providing community education. Equitable canopy distribution to be met in partnership with the Tree Subsidy Program. |  |  |
| 4.3.5 | Add development processes (save the tree/pay for the tree) to the Unified Land Use Code (ULUC) | Adopt policy including an appropriate payment-in-lieu alternative. |  |  |
| 4.3.6 | Tree survey in (re)development process | Implement tree surveys early in the (re)development process. |  |  |
| 4.3.7 | Relationship with South Suburban Parks and Recreation Department (SSPRD) | Insist on equity and environmental sustainability in all SSPRD activities in the city. Allow the Environmental Stewardship Board to act as an accountability body for the city's relationship with SSPRD. |  |  |



## 5.0 Water

Littleton is semi-arid, there will be less water in the future, and it is becoming more expensive to keep water clean. Denver Water controls all of Littleton's potable water. The city controls its stormwater, wastewater, and groundwater systems.



### 5.1 Existing Initiatives

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 5.1.1 | Support city stormwater activities | Maintain the city's stormwater permit and expand the city's stormwater efforts, including:<br>• Provide compostable pet waste bags<br>• Offer year-round leaf composting<br>• Mark storm drains to note that "water drains to stream"<br>• Offer year-round motor oil recycling<br>• Expand and record street sweeps (miles swept)<br>• Collaborate with Stormwater Permittees for Local Awareness of Stream Health (SPLASH)<br>• Ensure that city staff inspects construction sites to protect stormwater quality<br>• All city-initiated construction should model appropriate stormwater quality protection<br>• SSPRD does not have a stormwater permit. The city should inspect all construction activities on SSPRD-managed areas.<br>• Petition Colorado Department of Public Health and Environment (CDPHE) to require that SSPRD obtain a stormwater permit. |  |  |
| 5.1.2 | Conduct and/or re-conduct water audit of city practices | The 2009 Environmental Action Plan noted several ways the city could reduce water use. Follow up and evaluate those activities. |  |  |
| 5.1.3 | Incorporate water considerations into the renovations at Ketring and Gallup Parks | The city plans to renovate Ketring and Gallup Parks. Ketring Lake doesn't have enough water. Its only water source is pumping groundwater. The city should halt all groundwater pumping as soon as possible. Cisterns built under the parking lots could store rainwater for the lake. Consider reducing the size of the lake and increasing the wetlands. |  |  |
| 5.1.4 | Green roofs on city buildings | This is an action item from the 2009 Environmental Action Plan. Evaluate the practicality of installing green roofs on city buildings. |  |  |

## 5.2 Quick Wins

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 5.2.1 | Explore potential of 'water credit' | Pursue the option of earning 'water credits' with Denver Water by measuring water saved. |  |  |
| 5.2.2 | Increase permit compliance to ensure clean stormwater | ACC and LPS have stormwater permits that are often out of compliance. The city should partner with them to ensure stormwater permit compliance. Again, and unbelievably, SSPRD does not have a stormwater permit. They should be required to obtain a stormwater permit as part of our contract. |  |  |
| 5.2.3 | Pursue a permit to treat Ketring and other city lakes with aluminum sulfate (alum) | Water quality in virtually all city lakes is poor due to high concentrations of phosphorus and nitrogen. Alum removes phosphorus, sealing it in the sediments. South Platte Renew should be able to assist. |  |  |
| 5.2.4 | Get estimates for cistern construction | Cisterns store rainwater and could address flooding and stormwater quality issues. Get estimates for building cisterns on city property. |  |  |
| 5.2.5 | Metro Basin Roundtable Updates | The Metro Basin Roundtable is part of a statewide effort to manage water resources. Get South Platte Renew to provide annual updates to city council and the ESC on the Metro Basin Roundtable. |  |  |

## 5.3 Long-Term/Other

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 5.3.1 | Encourage residents to save water | Denver Water has programs to encourage water conservation. If Littleton aggressively expands those programs measures the water savings, a 'water credit' may be created. The programs could include:<br>• Garden in a Box – encourage Denver Water to provide a discount like other water providers do<br>• Rain barrels<br>• Subsidized sales of xeric plants<br>• Irrigation audits<br>• Subsidized tree evaluations for proper maintenance |  |  |
| 5.3.2 | Enhance city stormwater activities | Expand street sweeping which improves water and air quality. Expand composting to make it year-round and accept all garden waste and motor oil. Engage LPS students to help mark storm drains. |  |  |

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|---|---|---|---|---|
| 5.3.3 | Expand outreach and education around water and stormwater issues | Consider collaborating with SSPRD, South Platte Renew, and the City of Englewood to conduct bike tours along the South Platte River and other local waterways, noting water quality, environmental, and recreational activities. |  |  |
| 5.3.4 | Enhance collaboration with South Platte Renew | Increase council briefings on upcoming regulations South Platte Renew is expecting. Participate in the legislative process, where appropriate, to help establish 'how clean is clean' and what we can afford. Collaborate with South Platte Renew's outreach and education program as appropriate. See bike tours. |  |  |
| 5.3.5 | Use state-of-the-art green stormwater infrastructure | Maximize the opportunity to control stormwater and minimize flooding impacts while realizing additional benefits of habitat protection. Use this opportunity of our aging stormwater infrastructure and the need to rehabilitate it by maximizing the use of green stormwater infrastructure. |  |  |
| 5.3.6 | Stop pumping groundwater and close all wells. | Adopt a city policy of protecting and preserving groundwater under the city. Close all groundwater wells and try to ensure that the city's groundwater rights are protected by conservation easements, if possible. Substitute stormwater collected in cisterns to replace groundwater. Consider deeding the groundwater rights to a conservation group. |  |  |
| 5.3.7 | Address issues in the Integrated Water Resources Plan | The integrated water resources plan identified issues with the sustainability of several lakes in the city. For Ketring Lake, consider reducing the size of the lake, expanding the wetlands, and constructing a second filter under the wetlands. For Ridgeview and Geneva Lakes, there is an excellent opportunity to create a stormwater feature at the sites using examples from places like the Eco Park along Cherry Creek and the 39th Avenue Greenway in Denver. At Geneva Lake, there may be an opportunity to construct a cistern under Town Hall's parking lot and use that water to maintain the lake. A cistern may provide some flood control as well. |  |  |



## 6.0 Community



An informed, involved, and knowledgeable community is a critical component of the successful implementation of environmental initiatives. Education, outreach, and the promotion of a strong sense of community will help the city advance and secure its goals of creating a greener, more sustainable, and climate-resilient Littleton.

### 6.1 Existing Initiatives

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 6.1.1 | Community building with downtown partners | Maximize partnership with the Littleton Downtown Development Authority (LDDA), Historic Downtown Littleton Merchants (HDLM), Littleton Business Chamber (LBC), and others to foster a greater sense of community and environmental awareness in the downtown area. |  |  |
| 6.1.2 | Community building through downtown redevelopment | Ensure that the redevelopment vision for downtown fosters community building, environmental awareness, and a sense of belonging for all. |  |  |

### 6.2 Quick Wins

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 6.2.1 | Community cleanups | Engage with SSPRD and other partners to establish neighborhood cleanups of residential neighborhoods, trails, waterways, public lands, etc. |  |  |
| 6.2.2 | Board meeting recordings | Ensure public has access to live and recorded broadcasts from Environmental Stewardship Board meetings so people feel more informed and more comfortable attending/contributing to meetings. |  |  |
| 6.2.3 | Public engagement regarding the potential for a contracted consolidated waste hauling system | Ensure the public has access to information regarding waste disposal and hauling impacts and options. |  |  |
| 6.2.4 | Re-wilding education | Educate the public about the importance of re-wilding so that they understand its value to the community. |  |  |
| 6.2.5 | Environmental stewardship newsletter/insert | Develop a newsletter or insert from the Environmental Stewardship Board. This could go out to all residents via the Littleton Report. This could be a vehicle to inform the public about what the city is doing, why the city is doing it, why it's important, and what they can do to help/contribute. |  |  |

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|---|---|---|---|---|
| 6.2.6 | Resource clearinghouse | Create a page on the city website with links to available grants, solar energy resources, composting, Environmental Stewardship Board agendas and meetings, electrification resources, etc. |  |  |
| 6.2.7 | Support and promote existing community initiatives related to sustainability | E.g. Littleton Social Cycle, Littleton Community Retreat, etc. |  |  |

## 6.3 Long-Term/Other

| ITEM | ACTION | RECOMMENDATIONS | IMPACT | EFFORT |
|---|---|---|---|---|
| 6.3.1 | Create lip sync challenge | Explore the possibility of creating a lip sync challenge[3] with an environmental theme, to encourage an enhanced sense of community in the city. |  |  |
| 6.3.2 | Community meal | Community meal with foraged food, community supported agriculture (CSA), and local businesses to foster an enhanced sense of community. |  |  |
| 6.3.3 | Littleton Museum CSA | There is an opportunity at the Littleton Museum to expand community engagement through the development of a CSA. This could use the current irrigation system and involve the expansion of existing programs at the museum. This would invite a new constituency that the museum needs. |  |  |
| 6.3.4 | Food, regional native, and low-water gardens | Work with Denver Water, Denver Botanic Gardens, and other partners to make affordable and easy pre-planned gardens widely available. |  |  |
| 6.3.5 | Tree Equity Subsidy Program | Establish a Tree Equity Subsidy Program. Engage volunteers to be trained as tree ambassadors. See also 4.5.3. |  |  |
| 6.3.6 | Promotion of year-round recycling and composting | Promote and advertise year-round location and facility for recycling of organics, electronics, hard-to-recycle items, etc. See also 3.1.1. |  |  |
| 6.3.7 | Environmentally focused public art fund | Establish a fund for environmentally focused public art in partnership with the Littleton Arts and Culture Board. |  |  |
| 6.3.8 | Environmentally friendly investment options for city employees | Ensure city employees have access to environmentally friendly investment options for their retirement funds. |  |  |

[3] Example: https://www.youtube.com/watch?v=ZPjjZCO67WI)

COLORADO CIRCULAR COMMUNITIES



**STEPS**
Strategic Technical Expertise for the Public Sector

# Waste Hauler Licensing Ordinance










November 3, 2026

Laura Rosenbaum

# Hauler Licensing Purpose

- Regulate haulers that collect and transport solid waste for residents and businesses.
- May cover haulers that provide trash, recycling, and organics waste services.

**Key Benefits:**

- Data collection
- Level playing field
- Transparency in operations
- Hauler accountability
- Insurance expectations
- Recycling access

# Best Practices



Target Subscription-Based Haulers



Offer or Provide Recycling



Clear & Digital Data Reporting



Nominal Fees



Established Operation Days/Times



Education & Outreach on Recycling



Labeled Trucks & Containers



Colorado Department of Transportation Inspections

# Hauler Licensing Final Overview

- Generally following a medium regulatory model
- Reporting requirements
- Include where materials are disposed/recycled/composted
- Scope includes all haulers (trash, recycling, organics) with limited exceptions
- Must provide recycling and participate in EPR, for curbside haulers with limited exceptions
- Volume-based pricing (aka: Pay-as-you-throw, PAYT) for residential sector
- Graduated enforcement model

## Staff Communication

**File #:** Ordinance 22-2026, **Version:** 2

Agenda Date: 11/03/2026

Subject:
Ordinance 22-2026: An ordinance on second reading establishing a Temporary Moratorium on the acceptance, processing, and approval of applications for Data Centers and directing staff to study and recommend land use regulations for data centers

| | |
|---|---|
| From: | James L. Becklenberg, City Manager |
| Prepared by: | Reid Betzing, City Attorney |
| Presentations: | Reid Betzing, City Attorney |

**PURPOSE:**
To request that City Council consider on second reading Ordinance 22-2026, which would establish a temporary moratorium on the acceptance, processing, and approval of land use and development applications for data centers within the City while staff study the impacts of these facilities and prepare recommended amendments to the Unified Land Use Code.

**LONG-TERM OUTCOME(S) SERVED:**
Robust and Resilient Economy

**DISCUSSION:**
The proposed ordinance would pause new data center development in Littleton for a limited period so the City can determine whether, where, and under what standards these facilities should be allowed. For purposes of the ordinance, a “data center” is a building or portion of a building whose primary use is to house servers, data storage, and related networking, power, and cooling equipment serving off-site users, including colocation facilities, cloud computing facilities, and cryptocurrency mining operations. Server rooms and IT equipment that are accessory to and primarily serve another use on the same property, such as an office building or hospital, are not data centers under the ordinance and are not affected.

During the moratorium, the City would not accept, process, or approve rezonings, site development plans, subdivisions, use approvals, building permits, or other development approvals for the establishment, construction, or expansion of a data center. The moratorium would not apply to applications the City determined to be complete before the ordinance was introduced on second reading, to projects with vested property rights under C.R.S. § 24-68-101 et seq., or to ordinary repair and maintenance of an existing data center that does not increase its floor area, electrical capacity, or water demand.

The moratorium would remain in effect for six (6) months or until City Council adopts amendments to the Unified Land Use Code regulating data centers, whichever occurs first, and Council may extend or end it early by ordinance. The ordinance directs the City Manager and the Community Development Department to study the land use, energy, water, noise, air quality, infrastructure, and fiscal impacts of data centers, to coordinate

with applicable utility providers, and to bring proposed code amendments to the Planning Commission and City Council before the moratorium expires. It also establishes a process for a property owner or applicant to request relief from City Council if the moratorium would cause an undue hardship.

Because an ordinance requires two readings, applications could be filed between second reading and the ordinance's effective date in an effort to avoid the moratorium. To address this, the exception for pending applications applies only to applications the City determined to be complete before the ordinance was introduced on second reading. The ordinance will take effect as provided in the City Charter following second reading and publication.

**BACKGROUND:**
Demand for data centers has grown rapidly across the country and in the Denver metropolitan area, driven largely by cloud computing and artificial intelligence. These facilities can differ significantly from typical commercial or industrial uses. They may require large and continuous amounts of electricity, which can necessitate new transmission and distribution infrastructure and affect grid reliability and utility costs; many rely on water-intensive cooling systems; and they can produce continuous noise from cooling equipment and emissions from diesel backup generators. Data centers also tend to occupy large buildings with relatively few employees, which may not align with the City's goals for its commercial and employment areas.

The City's Unified Land Use Code allows for data centers as a conditional use in the city's corridor-mixed use (CM) district and as a use by right in the City's Industrial Park (IP) and Business Commercial (BC) zoning districts

Colorado law recognizes temporary moratoria as a legitimate land use tool. In Droste v. Board of County Commissioners of Pitkin County, 159 P.3d 601 (Colo. 2007), the Colorado Supreme Court upheld a local government's authority to adopt a temporary moratorium to preserve the status quo while it studies and adopts new regulations. A moratorium prevents applications from being submitted and vesting under existing rules while the City's review is underway. To withstand legal challenge, a moratorium should be reasonable in scope and duration and tied to a genuine planning effort, which is why the ordinance includes a defined time limit, exceptions for pending and vested projects, direction to staff to complete the study, and a hardship relief process.

Prior Actions or Discussions

- Council discussed data centers at a joint study session with Planning Commission on October 13, 2026
- This ordinance passed on first reading on October 20, 2026.

**FISCAL IMPACTS:**
Adopting the ordinance requires no direct City funding. The study and code amendments directed by the ordinance would be completed primarily with existing Community Development and City Attorney's Office staff resources.

**STAFF RECOMMENDATION:**
Staff acknowledge that a moratorium temporarily limits a type of development and may delay potential new investment and tax revenue. However, data centers present impacts on energy, water, noise, air quality, and land use that the City's current code was not designed to address, and once a project vests under existing rules, the City's ability to address those impacts is limited. A short, clearly defined moratorium will give staff, the Planning Commission, City Council, and the public time to develop thoughtful regulations, while protecting

pending and vested projects and providing a path for hardship relief. Staff recommend that City Council approve the ordinance on second reading and schedule a public hearing on second reading.

**ALTERNATIVES:**

- City Council may choose not to adopt a moratorium. Data center applications would continue to be accepted and reviewed under the existing Unified Land Use Code, and staff could still be directed to prepare code amendments.
- City Council may modify the duration of the moratorium, such as shortening or lengthening the six-month period.
- City Council may narrow the scope of the moratorium, for example by excluding cryptocurrency mining operations or applying the moratorium only in certain zone districts.
- City Council may consider adopting the moratorium as an emergency ordinance under the City Charter, which would allow it to take effect sooner but requires the findings and vote specified in the Charter.

**PROPOSED MOTION:**

I move to approve Ordinance 22-2026 on second reading establishing a Temporary Moratorium on the acceptance, processing, and approval of applications for Data Centers and directing staff to study and recommend land use regulations for data centers.

**CITY OF LITTLETON, COLORADO**

**ORDINANCE NO. 22**

**Series, 2026**

**AN ORDINANCE OF THE CITY OF LITTLETON, COLORADO, ESTABLISHING A TEMPORARY MORATORIUM ON THE ACCEPTANCE, PROCESSING, AND APPROVAL OF APPLICATIONS FOR DATA CENTERS AND DIRECTING STAFF TO STUDY AND RECOMMEND LAND USE REGULATIONS FOR DATA CENTERS**

**WHEREAS**, the City of Littleton is a home rule municipality organized and existing pursuant to Article XX of the Colorado Constitution and the Charter of the City of Littleton, and has broad authority to regulate the use of land within its boundaries to protect the public health, safety, and welfare; and

**WHEREAS**, the Local Government Land Use Control Enabling Act, C.R.S. § 29-20-101 *et seq.*, and C.R.S. § 31-23-301 *et seq.*, further authorize the City to plan for and regulate the use of land, and the Colorado Supreme Court has recognized that a temporary moratorium is a legitimate tool for preserving the status quo while a local government studies and adopts appropriate land use regulations, *Droste v. Board of County Commissioners of Pitkin County*, 159 P.3d 601 (Colo. 2007); and

**WHEREAS**, data centers are facilities used primarily to house computer servers, data storage, networking equipment, and the power and cooling infrastructure that supports them, and demand for such facilities has grown rapidly nationwide and in the Denver metropolitan area, driven in large part by cloud computing and artificial intelligence; and

**WHEREAS**, data centers can require large and continuous amounts of electricity, which may necessitate new generation, transmission, and distribution infrastructure and may affect grid reliability and utility costs for Littleton residents and businesses; and

**WHEREAS**, many data centers use water-intensive cooling systems, and the City must evaluate how such demand could affect local and regional water supplies, particularly in light of Colorado's semi-arid climate and recurring drought conditions; and

**WHEREAS**, data centers may also generate continuous noise from cooling equipment, air emissions from on-site backup generators, and large building footprints with relatively few employees and little pedestrian activity, all of which may be incompatible with nearby residential neighborhoods and with the goals of the City's Comprehensive Plan; and

**WHEREAS**, if applications for data centers are submitted and approved under existing regulations before the City has studied these impacts and adopted appropriate standards, the City's ability to plan for and mitigate those impacts could be undermined, and applications submitted while this ordinance is under consideration could defeat its purpose; and

**WHEREAS**, a temporary moratorium of reasonable duration will allow City staff to study the impacts of data centers, allow the Planning Commission and City Council to consider appropriate amendments to the Unified Land Use Code, and allow the public to participate in that process; and

**WHEREAS**, the City Council finds that the moratorium established by this ordinance is reasonable in scope and duration, is necessary for the preservation of the public health, safety, and welfare, and is not intended to permanently prohibit data centers within the City.

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LITTLETON, COLORADO, AS FOLLOWS:**

**Section 1:** Findings. The City Council hereby adopts and incorporates the foregoing recitals as findings of the City Council.

**Section 2:** Definition. For purposes of this ordinance, "data center" means a building, group of buildings, or portion of a building whose primary use is to house computer servers, data storage, and related networking, power, and cooling equipment that store, process, or transmit data for off-site users, including without limitation colocation facilities, cloud computing facilities, and cryptocurrency mining operations. The term does not include server rooms, information technology closets, or similar equipment that is accessory to and primarily serves a principal use located on the same property.

**Section 3:** Moratorium Established. A temporary moratorium is hereby established on the establishment, construction, and expansion of data centers within the City of Littleton. During the moratorium, the City shall not accept, process, or approve any application for rezoning, site development plan, subdivision, use approval, building permit, or any other land use or development approval for the establishment, construction, or expansion of a data center.

**Section 4:** Exceptions. The moratorium shall not apply to:

(a) Accessory server rooms or equipment that do not meet the definition of a data center in Section 2;

(b) Any application for a land use or development approval that the City determined to be complete prior to the date this ordinance was introduced on first reading;

(c) Any site-specific development plan for which vested property rights have been established pursuant to C.R.S. § 24-68-101 *et seq.*; or

(d) The ordinary repair or maintenance of an existing data center that does not increase its floor area, electrical capacity, or water demand.

**Section 5:** Duration. The moratorium shall remain in effect for six (6) months from the effective date of this ordinance, or until the effective date of an ordinance amending the Unified Land Use Code to regulate data centers, whichever occurs first, unless extended or terminated earlier by ordinance of the City Council.

**Section 6:** Direction to Staff. The City Council directs the City Manager and the Community Development Department to study the land use, energy, water, noise, air quality, infrastructure, fiscal, and economic impacts of data centers; to coordinate as appropriate with applicable electric and water utility providers; and to prepare proposed amendments to the Unified Land Use Code addressing the definition, permitted locations, and development standards for data centers for consideration by the Planning Commission and City Council prior to the expiration of the moratorium.

**Section 7:** Relief from Undue Hardship. Any property owner or applicant who believes that the moratorium imposes an undue hardship or deprives the owner of all reasonable use of their property may submit a written request for relief to the City Manager, who shall forward the request to City Council for consideration at a public meeting. In deciding the request, City Council may grant, grant with conditions, or deny relief based on the purposes of this ordinance and the evidence presented.

**Section 8:** Severability. If any part, section, subsection, sentence, clause or phrase of this ordinance is for any reason held to be invalid, such invalidity shall not affect the validity of the remaining sections of this ordinance. The City Council hereby declares that it would have passed this ordinance, including each part, section, subsection, sentence, clause or phrase hereof, irrespective of the fact that one or more parts, sections, subsections, sentences, clauses or phrases may be declared invalid.

**Section 9:** Repealer. All ordinances or resolutions, or parts thereof, in conflict with this ordinance are hereby repealed, provided that this repealer shall not repeal the repealer clauses of such ordinance nor revive any ordinance thereby.

**Section 10:** Effective Date. This ordinance shall take effect as provided in the Charter of the City of Littleton.

INTRODUCED AS A BILL at a regularly scheduled meeting of the City Council of the City of Littleton on the 20th day of October, 2026, passed on first reading by a vote of 7

FOR and _0_ AGAINST; and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

PUBLIC HEARING on the Ordinance to take place on the 3rd day of November, 2026, in the Council Chamber, Littleton Center, 2255 West Berry Avenue, Littleton, Colorado, at the hour of 6:30 p.m., or as soon thereafter as it may be heard.

PASSED on second and final reading, following public hearing, by a vote of ___ FOR and ___ AGAINST on the ___ day of _____, 2026 and ordered published by posting at Littleton Center, Bemis Library, the Municipal Courthouse and on the City of Littleton Website.

ATTEST:

_____
Colleen L. Norton
CITY CLERK

_____
Kyle Schlachter
MAYOR

APPROVED AS TO FORM:

_____
Reid Betzing
CITY ATTORNEY



# Temporary Moratorium on Data Centers

Ordinance 22-2026 · Second Reading

City Council · November 3, 2026

Presented by Reid Betzing, City Attorney

# What Council is asked to do

Approve Ordinance 22-2026 on second reading to pause new data center applications while staff study their impacts and draft Unified Land Use Code amendments.

**Long-term outcome served**
Robust and Resilient Economy

**6 mo** — Maximum duration, unless Council extends it

**$0** — Direct City funding required

**3** — Zone districts that allow data centers today

# Why data centers are different

### Electricity

Large, continuous loads can require new lines and affect reliability and rates

### Water

Many rely on water-intensive cooling systems

### Noise

Cooling equipment runs around the clock

### Air quality

Diesel backup generators produce emissions

### Land use and jobs

Large buildings with relatively few employees

### Rising demand

Driven by cloud computing and AI, including in metro Denver

# Where the code allows them today

## CM

Corridor Mixed Use

**Conditional use**

## IP

Industrial Park

**Use by right**

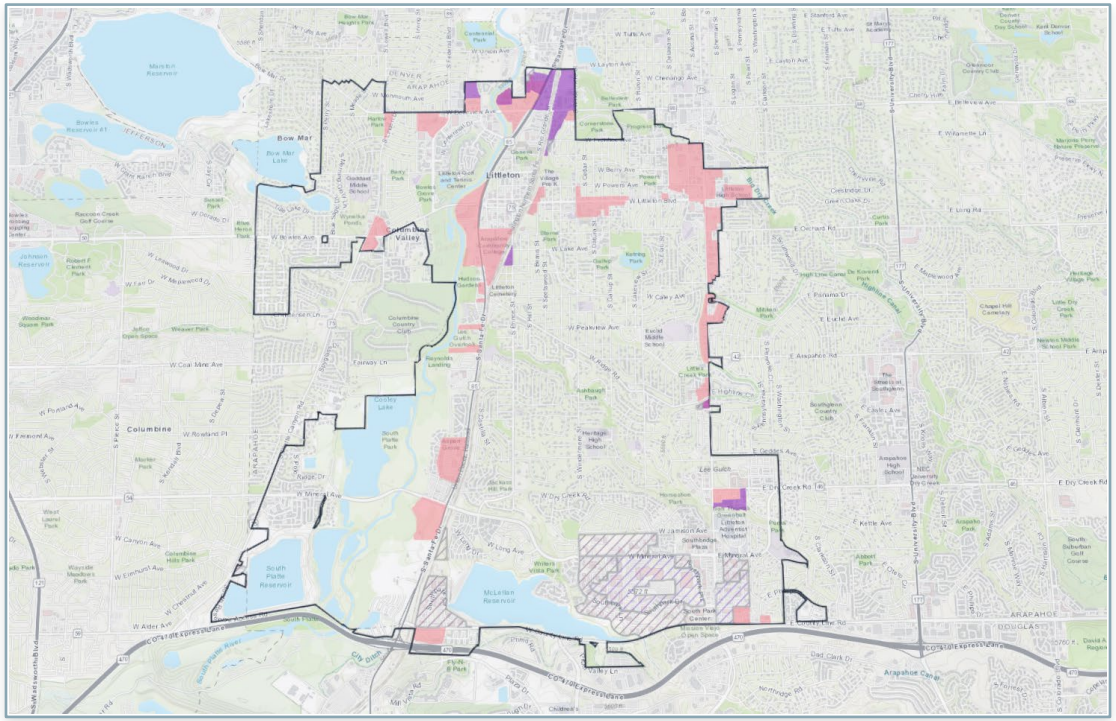
## BC

Business Commercial

**Use by right**

*Once a project vests under these rules, the City's ability to address its impacts is limited.*

# Where those districts are




Shaded areas show the zone districts where the code allows data centers today.

| | |
|---|---|
| CM | Conditional use |
| IP | Use by right |
| BC | Use by right |

# What counts as a data center

## Covered

A building or part of one whose primary use is housing servers, storage, networking, power and cooling equipment that serve off-site users.

- **Colocation facilities**
- **Cloud computing facilities**
- **Cryptocurrency mining operations**

## Not covered

Server rooms and IT equipment that are accessory to, and primarily serve, another use on the same property.

- **An office building’s server room**
- **A hospital’s IT equipment**

# What is paused, and what is not

## Paused for data centers

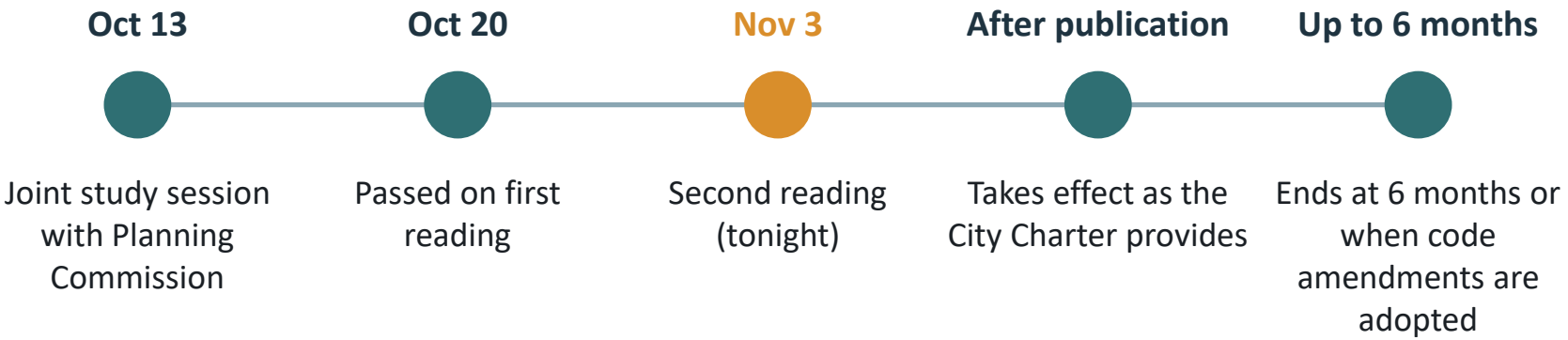
- Rezonings
- Site development plans
- Subdivisions
- Use approvals
- Building permits
- Other development approvals

*for the establishment, construction or expansion of a data center*

## Not affected

- Applications deemed complete before introduction on second reading
- Projects with vested property rights (C.R.S. § 24-68-101 et seq.)
- Repair and maintenance that adds no floor area, electrical capacity or water demand
- Hardship relief: owners and applicants may petition City Council

# Timeline and duration




Council may extend the moratorium or end it early by ordinance.

# What staff will study and deliver

## Impacts to study

- Land use
- Energy
- Water
- Noise
- Air quality
- Infrastructure
- Fiscal

## Path to new rules

1. Study led by the City Manager and Community Development
2. Coordinate with utility providers
3. Planning Commission reviews proposed amendments
4. City Council considers code amendments before expiration

# Legal footing in Colorado

## Droste v. Board of County Commissioners of Pitkin County

*159 P.3d 601 (Colo. 2007)*

The Colorado Supreme Court upheld local authority to adopt a temporary moratorium that preserves the status quo while new rules are studied.

## Built-in safeguards

- **Reasonable duration**
  A defined six-month limit
- **Reasonable scope**
  Exceptions for pending and vested projects
- **Genuine planning effort**
  Staff directed to study and recommend rules
- **Fairness**
  A hardship relief process

# Costs and tradeoffs

$0

**No direct City funding required**
Study and code work use existing Community Development and City Attorney's Office staff

## Short-term cost

A type of development is temporarily limited, which may delay potential new investment and tax revenue.

## What the pause protects

Time to write rules for energy, water, noise, air quality and land use impacts before projects vest under a code not designed for them.

# Alternatives for Council

### 1 No moratorium

Keep reviewing applications under the current code; staff can still draft amendments.

### 2 Change the duration

Shorten or lengthen the six-month period.

### 3 Narrow the scope

For example, exclude cryptocurrency mining or limit the pause to certain zone districts.

### 4

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# Staff recommendation

## Approve Ordinance 22-2026 on second reading.

**Proposed motion**

*“I move to approve Ordinance 22-2026 on second reading establishing a Temporary Moratorium on the acceptance, processing, and approval of applications for Data Centers and directing staff to study and recommend land use regulations for data centers.”*

Reid Betzing, City Attorney