



Denver Permitting Office		
Subject: How 180 Days of City Review Time is Calculated	Date: May 14, 2025 Approved on: June 4, 2025	Pages: 1-9

**A. Purpose**

Per Executive Order 151, the Denver Permitting Office is authorized to issue policies and procedures, subject to approval by the Executive Permitting Committee. To ensure accountability with the City’s commitment to the maximum of 180 calendar days of City review time, the following procedure is provided to confirm how the 180 days will be counted to ensure transparency.

**B. What is Counted**

All permit applications and formal site development plan and associated plans shall be completed, defined as either approved or denied, within 180 calendar days of cumulative City review time. Per the Executive Order the 180 days of City time does not apply to subdivision plats, concept plans, large development review or infrastructure master plans.

Associated plans for site development plans are transportation engineering plans (TEP), storm and sanitary plans (SSPR), transportation demand management plans (TDM), and erosion control plans.

If any record is closed due to inactivity, meaning that the customer has not provided a resubmittal to the City within 180 days per City adopted building and zoning codes or other timeframe as outlined in other applicable code, rule or regulation, then the record shall be closed. If the customer requests to reopen the record, and that request is granted, then the 180 days of City review time will start over. Site development plan records will not be reopened, and instead a new record/application must be provided by the customer.

Electrical, plumbing, mechanical and roofing permits issued via quick permits without plan review are not counted as they are issued immediately once fees are paid.

**C. How 180 Days will be Calculated**

The 180 days will be calculated as follows for the specific application type. Initial intake time does not count as during that time the City is confirming if the provided

submittal is complete to begin reviews. Resubmittal time will be counted towards City time as customers may upload documents throughout the process even when not responding to comments.

For all records, please note that on the day the City changes the status in the City’s permitting system, that is considered a day of City time, and the following day starts the clock for customer time. For a resubmittal, the day the customer uploads a resubmittal counts as a day of customer time, and the following day is then considered the start of City time.

If the customer requests any type of variance or administrative adjustment – for example for zoning, wastewater or transportation – that process is counted as customer time as it is a customer decision to pursue this separate process, and the specific review task subject to the variance request on the original record is likely in a not approved status (zone lot amendment record use a status of “pending zoning relief”) until a decision has been made.

Task statuses noted below reference the specific review tasks shown in the City’s online permitting system where customers can submit applications and view project status (E-Permits).

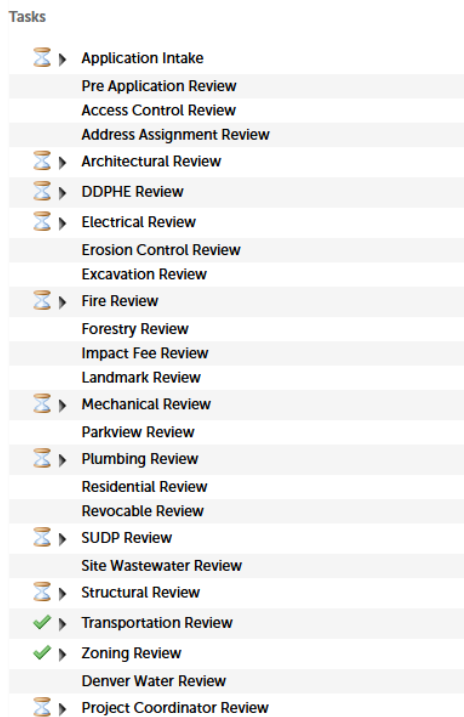


Figure 1: Example of a LOG record and Review Task Names as shown in E-permits

### Formal Site Development Plan (SDP)

- This plan uses the SDP record type.
- The clock for measuring the 180 days of City time starts once a complete application is accepted by intake meaning the Application Intake review task has changed to either “accepted” or “updated documents accepted”.
- City time ends once the Coordinated Review Status review task is changed to “resubmittal required” or “approved”. Once that happens, we will now be calculating customer time until a resubmittal is received.
- Due to current system limitations, the SDP record will be used as a default to measure time with any associated right-of-way vacations and dedications, easement relinquishments, right-of-way encroachments required for that SDP project. If any of these are required for project approval, it is recommended that customers submit these separate applications as soon as possible in the process, and work closely with your project champion and appropriate Department of Transportation and Infrastructure (DOTI) staff to ensure timely coordination.

### Transportation Engineering Plans (TEP) and Transportation Demand Management (TDM) and Mobility Studies (TIS)

- All of these plans use a TRAN record type. They are differentiated using the “Review Type” ASI dropdown field.
- The clock for measuring the 180 days of City time starts once a complete application is accepted by intake meaning the Application Intake review task has changed to “accepted”.
- The clock for City time stops when the Review/Finalize Comments review task is changed to “Resubmittal Required”, “Additional Info Required”, or “Withdrawn”. Once this change is made, time is now being measured as with the customer.
- Once the Review/ Finalize Comments review task status is set to “Technically Complete”, the Plan Approval review task is activated with a task status of “Under Review” and this is still City time.
  - When the Plan Approval task status is set to “Under Review”, or “Ready for Signature”, or “Signed” this starts or maintains the City’s time.
  - When the Plan Approval task status is set to “Additional info Required”, “Withdrawn” or “Approved” that is the end of City time.

### Storm and Sanitary Plan Review (SSPR)

- This plan uses a SSPR record type.
- The clock for measuring the 180 days of City time starts once a complete application is accepted by intake meaning the Application Intake review task has changed to “accepted”.
- The clock for City time stops when the DES Wastewater review task is changed from “in progress” to “resubmittal required”, “additional info required”, “revision approved”, or “withdrawn”. Once this change is made, time is now being measured as with the customer.
- Once the DES Wastewater Review task status is set to “Approved/Technically Complete”, the Plan Approval review task is activated with a task status of “In Progress” and time is still with the City:
  - When the Plan Approval task status is set to “Additional info Required”, “Not Required”, “Ready to Pay”, or “Withdrawn” that stops the City time.
  - When the Plan Approval task status is set to “In Progress” that starts City time.
- Once the Plan Approval task status is set to “Approved” it activates the Signature task with a task status of “Ready for Signature”. This time is still with the City.
  - When the Signature task status is set to “Signed” or “Withdrawn” that ends City time.
  - When the Signature task status is set to “Ready for Signature” or “In Progress” that starts City time.

### Erosion Control

- This plan uses an EC record type and will be tracking those labeled as ‘private’ for private development projects.
- The clock for measuring the 180 days of City time starts once a complete application is accepted by intake meaning the Application Intake review task has changed to “accepted”.
- The clock for City time stops when the Engineer Review task is changed to “resubmittal required”, or “additional info required”. Once this change is made, time is now being measured as with the customer.
- Once the Engineer Review task status is set to “approved”, the Permit Issuance task is activated and set to “ready to pay”. This ends the time with that City.

- When the Permit Issuance task status is set to “Ready to Pay”, “Withdrawn”, “Canceled”, or “Issued”, the City time stops.
- When the Permit Issuance task status is set to “In Progress” or “Payment Received”, then the City time starts, until the permit is issued and the Permit Issuance task status is “Issued”.

Building, Zoning, Sewer Use and Drainage Permits, and Excavation and Shoring

- These application types use a LOG record type.
- The clock for measuring the 180 days of City time starts once a complete application is accepted by intake, and the customer has paid the applicable plan review fees (for zoning only permit submittals the 180 days will begin once the application is accepted by intake as there are no plan review fees).
- Reviews that are marked as “review not required” do not trigger the application to move from City time to customer time.
- The Affordable Housing review task will be exempted from the 180 day clock as assessment of any affordable housing linkage fees occurs after plan review is completed and permits are created. Even if this task remains in either “initial review” or “resubmittal review”, it will be exempted from the calculation of the 180 days of City review time as the task exists to ensure the right fee is assessed to the project and is generally completed as soon as other reviews are approved.
- A consolidated set of comments is not currently provided for building and zoning only project types, and as a result, the project can be both in the City and the customer’s hands at the same time. Therefore, the following is how time will be counted until a process change is made expected later in 2025.
  - If all review tasks are open and with the City (such as when a project is first accepted for review and all review tasks are in “initial review”), that time shall be counted as City time.
  - If all review tasks are in “not approved” then the City clock stops, and the time is now counted as with the customer.
  - When there are instances that at least one review task remains in the City’s hands to complete a review, while other review tasks have been completed (meaning comments provided to the customer or the review is approved), then this time shall be counted as City/Customer Overlapping Time and will be attributed appropriately if the total City time reaches 120 days. See Exhibit A for an example.
- If a review task is changed to a status of “approved pending final review”, that time will not be counted as City time or customer time. Once the review task

becomes “final review” (which is triggered automatically once all other review tasks are approved) then it is in City hands. The zoning review and residential review tasks are the only review tasks that use this status.

- Once a Sewer Use and Drainage Permit review task is changed to ‘Ready to Pay’ then it is in the customer’s hand.
- For projects subject to a site development plan, the Project Coordinator review task status “waiting for building reviews” will not be counted as City or customer time until it is changed to “initial review” once all other reviews are approved. That time will then be counted as City time until the review status is changed to “not approved” or “approved”.

#### Fire Only Permit

- This permit type uses a FIRE record.
- When the Fire Review task is changed to “not approved” or “approved” then the City clock stops. The time will be with the customer until a resubmittal is received, and then the City clock will start again.
- When the Permit Issuance task status is set to “Ready to Pay” then time is with the customer, and the City clock has stopped. Once the customer pays the fee, then the Permit Issuance task status is “Issued”.

#### Zone Lot Amendment

- This application type uses a ZLAM record.
- A pre-application meeting may be required, but the City clock will begin once a formal application has been submitted and the Application Intake review task is accepted.
- When the Project Coordination Review/Finalize review task is changed to “resubmittal required” or “approved”, then the City clock stops. The time will be with the customer until a resubmittal is received, and then the City clock will start again.
- Once the Project Coordination Review/Finalize task is changed to “Approved” it activates the Issue Approval task with a task status of “In Progress”. This time is still with the City.
  - When the Issue Approval task is set to “Denied”, that ends City time.
  - When the Issue Approval task is set to “Approved” or “Approved w/Conditions,” that continues City time.

- Once the Issue Approval task is changed to “Approved” or “Approved w/Conditions” it activates the Recordation task with a task status of “In Progress”. This time is still with the City.
  - When the Recordation task is set to “Complete”, that ends City time.

#### **D. Projects Submitted Prior to May 14, 2025**

Projects submitted to the City prior to the effective date of Executive Order 151, May 14, 2025, shall start counting 180 days on that date for any open reviews or once a resubmittal is made to the City. The 180 days of City time will be from date forward, and will not count time prior to May 14, 2025.

#### **E. Simultaneous Reviews**

Projects are encouraged to submit simultaneous reviews as is allowed to overlap timeframes as much as possible. This includes, but it not limited to, the following.

1. Site development plan, Department of Transportation and Infrastructure (DOTI) civil documents (TEP, TDM, SSPR, Erosion Control, right-of-way dedications, right-of-way encroachments, right-of-way vacations, or other items necessary for the specific project). It is recommended that associated required DOTI documents be submitted at minimum with the 2<sup>nd</sup> formal SDP submittal as approval of these related documents is required to receive site development plan approval.
2. Site development plan and building permitting – Following the first or second formal SDP review, customers may request approval to log in for building permitting so the reviews can occur simultaneously if the customer wants to proceed directly to permitting, and subject to approval of the assigned Project Champion. The project must have an approved address(es) and there cannot be any outstanding comments that impact placement of the building.
3. Zone lot amendment and permitting review for Single-family/duplex projects – Simultaneous review must be authorized by the case manager for the zone lot amendment after confirming that the project will not result in any of the conditions outlined below. Special exceptions to the below may be granted on a case by case basis, and may take a round or two of review of the zone lot amendment before simultaneous review may be allowed.
  - a. The preservation of any existing structures prior to redevelopment, or
  - b. Review referrals that may complicate or change the proposed zone lot, or
  - c. A request for zoning relief (administrative adjustment or variance).

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Approved by: Executive Permitting Committee

**EXHIBIT A - CALCULATING 180 DAYS OF CITY TIME ON A LOG RECORD**

	Start	Customer Only																										End																								
<b>City</b>																																																				
<b>Customer</b>																																																				
<b>Review Task</b>	3/25	3/26	3/27	3/28	3/29	3/30	3/31	4/1	4/2	4/3	4/4	4/5	4/6	4/7	4/8	4/9	4/10	4/11	4/12	4/13	4/14	4/15	4/16	4/17	4/18	4/19	4/20	4/21	4/22	4/23	4/24	4/25	4/26	4/27	4/28	4/29	4/30	5/1	5/2	5/3	5/4	5/5	5/6	5/7	5/8	5/9	5/10	5/11	5/12	5/13	5/14	5/15
Architectural	Plan Review																																																			
	Fees Paid	Initial	Not Approved														Resubmittal Review	Approved																																		
Mechanical	Plan Review																																																			
	Fees Paid	Initial	Not Approved														Resubmittal Review	Approved																																		
Plumbing	Plan Review																																																			
	Fees Paid	Initial	Not Approved														Resubmittal Review	Approved																																		
Electrical	Plan Review																																																			
	Fees Paid	Initial	Not Approved														Resubmittal Review	Approved																																		
<b>City Possession Days</b>																												44																								
<b>Customer Possession Days</b>																												26																								