

Comments on the Memmen Young-Founders Vista Proposed Site Development Plan
Submitted to the Castle Rock Town Council at its meeting on 3 June 2025
Submitted by Douglas Reagan, Ph.D.

I have been a resident of Castle Rock since 1977 and have lived at 350 Gordon Drive for more than 30 years. As a professional ecologist, I spent four decades prior to retirement performing environmental impact assessments, developing environmental mitigation and restoration plans, and (with a national certification in environmental dispute resolution) resolving environmental conflicts.

For the record, I am not now, nor have I ever been, opposed to this project; however, I have serious concerns about the extent of blasting and drainage on existing neighborhoods, including Gordon Drive, and more. Construction and maintenance of the access road planned for Gordon Drive is a major concern because it directly impacts my property. I would like these written comments submitted to Development Services for inclusion in the formal record and distributed to Town Council Members for the June 3, 2025 meeting and submitted to the developer, Rusty Hall, to consider while preparing the final construction plans for this section of road.

For the past two years I have expressed my concerns with potential adverse to my residence and neighborhood from impacts from this proposed development at neighborhood meetings and at additional meetings. In a meeting with representatives of Castle Rock Water, Castel Rock Development Services, and the developer on March 13, 2025, I was told that the planned access road connecting to Gordon Drive would pass near my property line (within 40 feet of my house), and that the existing concrete flume on the Town's property would have to be relocated to make room for the road (See Figure 1), but that my property and the trees on it would not be disturbed by road construction or use.

There is a small shed, apparently built by the previous owners of my house, located behind my house and between my house and the fence on the owners of the property currently proposed for development (See Figures 1, 2, and 3). Because the shed was on my side of the owner's fence, I had assumed it was on my property. I have used the shed for the past 33 years. More recently I became aware that the shed was not on my property.

Because the currently planned access road intersects part of this shed, the feasibility of moving the shed onto my property was discussed at the March 13th meeting with Town and developer representatives. Such a solution could be complicated and would require cutting natural vegetation to accommodate the shed. A simpler solution and less destructive alternative would be to alter the route of the planned road so that the curve in the road (that would intersect the corner of the existing shed) could be moved 30 – 40 feet farther east (See Figure 3). There does

not appear to be any engineering reason that this cannot be easily done with no additional expense or adverse effect on the construction and use of this access road. This minor modification would reduce the direct negative impacts on my property and the shed, and would preserve the adjacent dense brushy thicket that provides important nesting habitat diversity for native birds (Figure 4).

I understand that formal opportunities for public comments will end once this site development plan is approved by the Planning Commission and the Town Council, and that final decisions on road alignment would be made during the construction planning phase of development. Development Services has assured me that I will be “kept in the loop”. I appreciate the willingness of the Development Service personnel, Castle Rock Water, and the developer, Rusty Hall, to provide project-related information and attempt to resolve these issues, and I hope that final road alignment will be adjusted to avoid the shed.

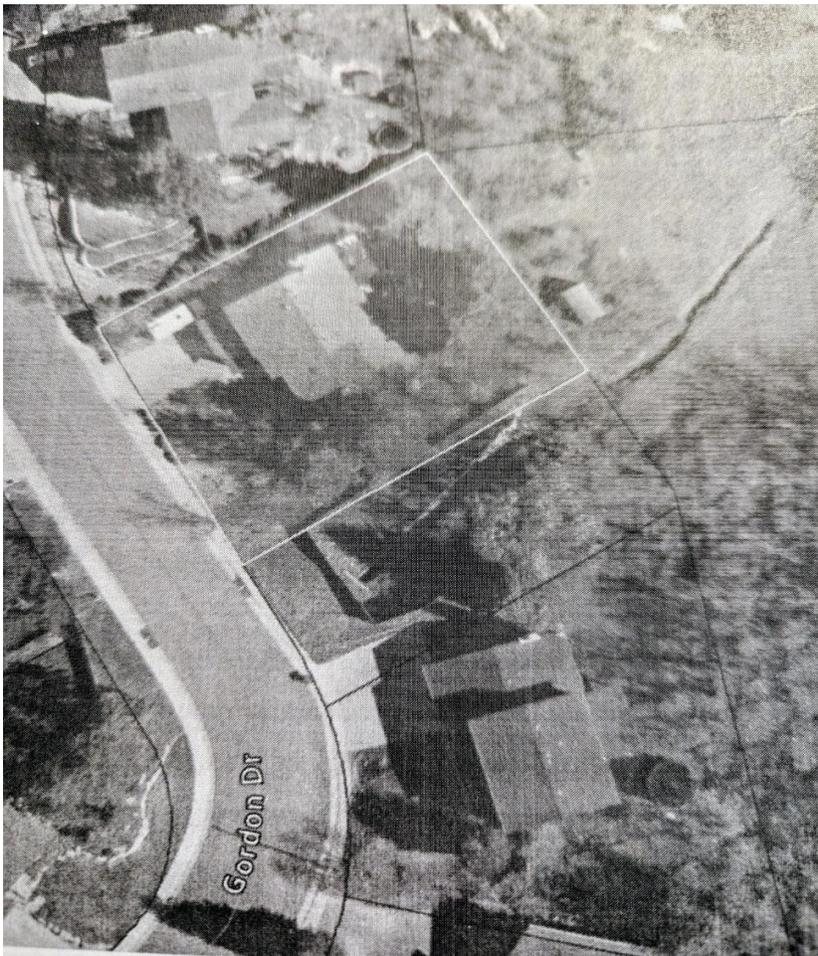


Figure 1. My property at 350 Gordon Drive showing the approximate location of my property boundaries, the shed, and fence of the existing concrete flume on Town property.*



Figure 2. Recent aerial photo of my property at 350 Gordon Drive showing my house, the shed, and fence around the existing concrete flume.*

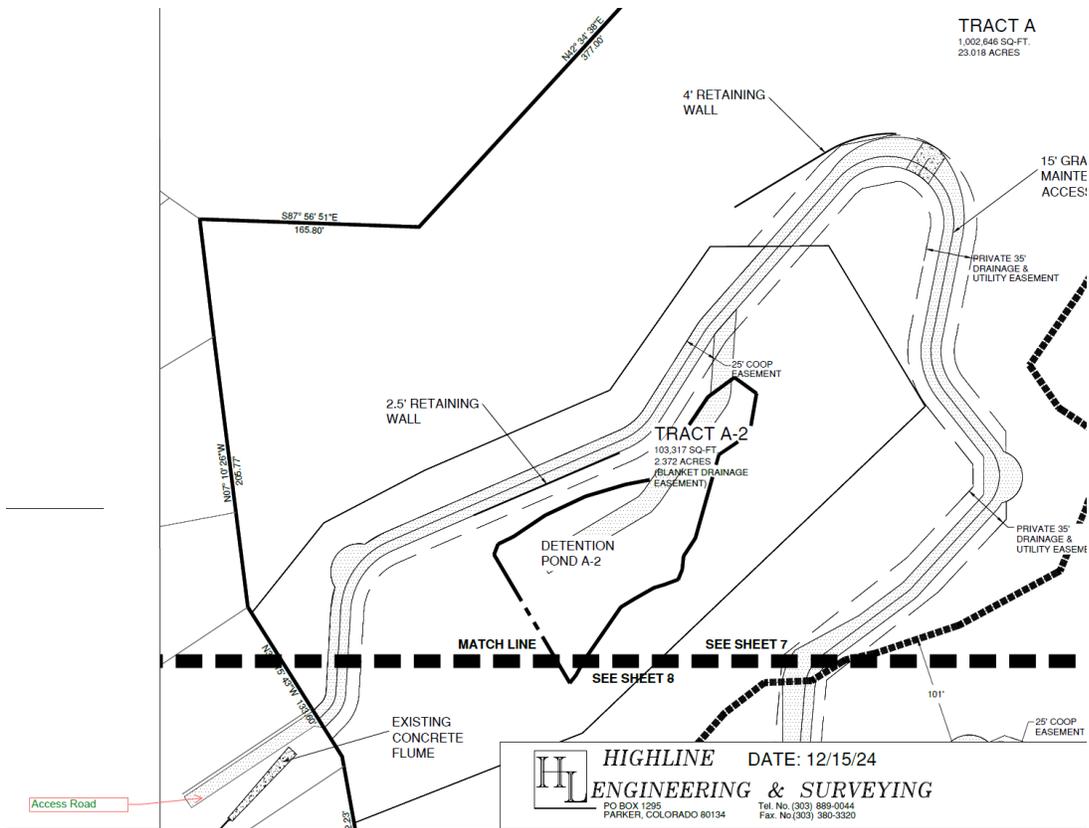


Figure 3. Detailed plan for access road showing curve immediately east of my property and intersecting the shed.*



Figure 4. Recent photo of the shed embedded in natural habitat for nesting birds.

*Figures 1, 2, and 3 were taken from an email sent to Mark Davis by Tara Vargish on February 25, 2025 and forwarded to me on March 3, 2025 in response to Mark's query regarding the proposed access road connecting the Memmen Young – Founders Vista development to Gordon Drive.

In addition to these property-specific issues, I have two broader concerns regarding the overall project that are somewhat unique in both nature and extent. I believe that both deserve close attention by the Town Council prior to approval, as they have potentially serious adverse impacts on current and future residents:

Concern #1: Although I understood that blasting would take place on the top of the escarpment, it was not until last week's neighborhood meeting (14 May 2025) that I recognized the huge extent and intensity of planned blasting. The blast area shown on current plan maps is not just bedrock, it is caprock—a *hard, resistant, and impermeable layer of rock* that overlies and protects layers of softer materials. Destabilizing this rock layer by such extensive blasting could initiate rockfall impacts both immediately (partially mitigatable) and produce hazards far into the future. The extent of the blast area will drastically alter the topography, undoubtedly introduce or expand current cracks in the caprock, and could hasten rockfalls along the escarpment above the Gordon Drive neighborhood and at other locations. The massive amount of blasting and subsequent earthmoving will also affect drainage and runoff. Some of these effects have been considered in the current plan, but unforeseen impacts, such as unmanageable rockfalls, may occur due to the increasingly erratic weather patterns. Such events would directly affect current residents, as the effects of disturbance above the escarpment would be felt at lower elevations in currently developed areas downstream and downgradient of development.

Although I am not a professional geologist, I have experience with such hazards on similar projects, and ask that the currently blasting plan, including redistribution of the loose rock from blasting, and drainage planning be further evaluated by a third party before such unusually extensive blasting is permitted to occur in the heart of existing developed areas of the town.

Another feature of the blasting plan is the intention to blast a trench for sewage management purposes that, in places, is projected to exceed 20 feet in depth across the heart of the no-build area. This area is important for wildlife. If the trench could be located to a less sensitive area, such as the periphery of the no-build area, the engineering goals of the trench could be accomplished while reducing the negative impact of this trench.

Based on my experience in environmental planning, I believe that such extensive blasting and the consequent alteration of the topography indicates that the proposed site use is not consistent with responsible planning and that alternatives that don't require such radical modifications should be considered.

Concern #2:

Aside from the uncertainties in site drainage resulting from blasting and the paving and building on much of the upper development area, I am concerned about the adequacy of design criteria for flood control facilities. According to the proposed plan, there will be a large detention pond behind an impoundment structure to intercept the increased runoff into the culvert discharging under Gordon Drive. I understand that the design of such structures applies a one-hundred-year event criteria for the design of such structures. When I asked an engineer from CR Water about this, I got an answer that they were consistent with Douglas County and State requirements. However, given that there have been two massive rainfall/flash-flooding events within the last one hundred years (1933 and 1965) that likely exceeded the 100-year criteria, and because the weather has become increasingly erratic in the past few decades, it is questionable whether the proposed design measures provide adequate protection for downstream residents, such as residents of the Gordon Drive neighborhood, including me. The fact that other levels of government have not recognized the need to modify these criteria in the face of increasing uncertainties should not excuse the Town of Castle Rock from doing so to protect its residents.

In conclusion:

I agree that the land on which this proposed development would be located can be developed, as it is now an infill area. The landowners have the right to develop it, but development should be protective of current and future residents and of Town infrastructure.

The Planning Commission and Town Council have the responsibility to see that development is done in a manner that is: protective of present and future residents, is consistent with responsible development practices, and considers alternative development practices that are consistent with best uses of the property.

I had the opportunity to walk this property years ago, before the owner put a No Trespassing sign on the fence facing my backyard. Other stakeholders have been denied access to the property, and I don't believe that most (any?) Planning Commission or Town Council Members have toured the property. The vistas from the ridge are panoramic. It is a beautiful property, but one with both outstanding natural resource values and major developmental challenges, as evidenced by the proposed extensive blasting and drainage alterations.

As a path forward, I recommend that:

1. The alignment of the access road connecting to Gordon Drive be adjusted to avoid the shed behind my house, rather than moving the shed and destroying the surrounding vegetation.

2. Members of the Planning Commission, Town Council, and representatives of potentially affected stakeholders (e.g., Town residents) participate in a site tour to better understand the issues, particularly the extent of blasting and site drainage, before approving this site development plan. Participating in such visits were routine practice in the past (1980s) for projects that had unique or controversial issues when I was a member of the Castle Rock Planning Commission. Given the nature of this site, such a visit would provide a more substantial and informed basis for review and potential modification of critical aspects of this proposed development.
3. The Town Council should also consider providing increased opportunities for public input by expanding the time allocated for members of the public to voice their opinions in meetings from 3 minutes per person to at least 8 minutes.