

**Comments on the Memmen Young-Founders Vista Proposed Site Development Plan**  
Submitted to the Castle Rock Planning Commission meeting on 22 May 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. I was a member of the Castle Rock Planning Commission in the 1980s when the development of this property was first planned. 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 some serious concerns with aspects of what is being proposed that I hope the Planning Commission will address.

For the past two years I have had concerns with potential adverse to my residence and neighborhood from impacts from this proposed development. I have participated in neighborhood meetings and additional meetings involving Castle Rock Water and the developer. I have received assurances that routing of the access road planned next to my house, may be adjusted to avoid damage to tall trees on my property and the shed behind my house. These minor modifications would reduce the direct negative impacts. Though formal opportunities for public comment will end once the site development plan for this development is approved by the Planning Commission and the Town Council, I understand that final decisions would be made during the construction planning phase of development that may further reduce impacts. And I have been told that I will be “kept in the loop”. I appreciate the willingness of the Development Service personnel, Castle Rock Water, and the developer, to meet with me to provide project-related information and attempt to resolve these issues.

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 Planning Commission 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 evaluation 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 such criteria and that 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.

Unless the charge to the Planning Commission has changed since I was member in the 1980s, 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. Potential modification of this proposed site development plan falls within the responsibilities of the Planning Commission.

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 outstanding natural resources values and major developmental challenges, as evidenced by the proposed extensive blasting and drainage alterations.

As a path forward, I'm asking that:

1. Members of the Planning Commission and 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 confident and informed basis for review and potential modification of critical aspects of this proposed development.
2. The Planning Commission might also consider providing increased opportunities for public input by expanding the time allocated in meetings from 4 minutes per person to at least 8 minutes.