



Meeting Date: March 3, 2026

AGENDA MEMORANDUM

To: Honorable Mayor and Members of Town Council

Through: David L. Corliss, Town Manager

From: Tara Vargish, P.E., Director, Development Services
Jon White, Chief Building Official

Title: Ordinance No. ____ — An Ordinance Amending Chapter 15.20 of the Castle Rock Municipal Code, Adopting, By Reference As A Primary Code, the 2025 Colorado Wildfire Resiliency Code

Executive Summary

The Development Services Building Division and Castle Rock Fire and Life Safety Division staff have worked together to propose the attached ordinance to adopt the 2025 Colorado Wildfire Resiliency Code ("CWRC" or "Code") by reference and amend the Town of Castle Rock Municipal Code to establish wildfire mitigation standards for development within designated Wildland-Urban Interface (WUI) areas.

The CWRC was developed and adopted by the State of Colorado Wildfire Resiliency Code Board to establish minimum statewide standards for ignition-resistant construction, defensible space, and wildfire risk reduction (Attachment B). State law requires local jurisdictions to adopt the Code or adopt standards that meet or exceed its requirements, no later than April 1, 2026.

Adoption of the Code will enhance community safety, align the Town with state mandates, reduce long-term wildfire risk, and provide clear and consistent standards for builders and property owners. Staff recommends an enforcement (effective) date of July 1, 2026, consistent with state requirements.

Discussion

In 2023, the Colorado General Assembly adopted legislation directing the development of a statewide wildfire resiliency code to establish minimum construction and defensible space standards in high-risk wildfire areas. The resulting Colorado Wildfire Resiliency Code Board adopted the Colorado Wildfire Resiliency Code (“CWRC” or “Code”), with an effective date of July 1, 2026.

The Code establishes minimum requirements for new construction and certain substantial improvements within designated Wildland-Urban Interface (WUI) areas. Standards address:

- Ignition-resistant building materials and assemblies
- Defensible space and vegetation management
- Access and water supply requirements
- Ember-resistant vents, roofing, siding, and decking
- Site design standards to reduce wildfire risk

The Town of Castle Rock contains areas identified as having elevated wildfire hazard risk due to topography, vegetation, climate conditions, and proximity to wildland fuels. Adoption of the CWRC will establish consistent wildfire mitigation standards for future development within mapped WUI areas.

Colorado Wildfire Resiliency Code Requirements

The CWRC standards are generally more stringent than those for typical modern home construction because they specifically address ignition resistance and ember intrusion in wildfire-prone areas. While modern homes built under standard building codes focus on structural safety, energy efficiency, and general fire protection, the Colorado Wildfire Resiliency Code adds requirements such as Class A fire-rated roofing, noncombustible or ignition-resistant exterior siding, protected vents to prevent ember entry, tempered or multi-pane windows, and stricter defensible space considerations around the structure. In contrast, a typical modern home outside a wildfire hazard zone may allow more combustible exterior materials and less restrictive venting or glazing options. Overall, the Wildfire Resiliency Code builds upon standard residential construction practices but increases material performance standards and detailing requirements to reduce the risk of ignition from radiant heat, flames, and wind-driven embers.

Hazard Classification

- Properties will be classified as Low, Moderate, or High Fire Intensity based on wildfire hazard mapping.
- The classification determines construction and defensible space requirements

The following table lists the required CWRD structure hardening per fire intensity classification, and identifies how current new home construction is either already meeting these requirements or where they will need to change.

Table 1: Required Structure Hardening per Fire Intensity Classification

Fire intensity classification	Required CWRC structure hardening	Current New Construction Meets CWRC Hardening Requirements
Low Fire Intensity	<p>Class 1</p> <ul style="list-style-type: none"> • Roofing: Class A roof covering/assembly • Roof flame/ember protection where roof profile creates a space: firestopping; cap sheet • Roof valley flashing: min 0.019 in (No. 26 ga) corrosion-resistant metal over 36-in underlayment • Gutters/downspouts: noncombustible. • Vents: listed vents tested to ASTM E2886 OR 1/8-in max-opening noncombustible corrosion-resistant mesh. 	<p>Yes No</p> <p>No</p> <p>Yes No</p>
Moderate Fire Intensity and High Fire Intensity	<p>Class 2 -Includes all requirements from Class 1 and adds the following:</p> <ul style="list-style-type: none"> • Eaves/soffits/fascias: protect exposed underside/backside with noncombustible, ignition-resistant, or specified fire-resistance-rated materials (e.g., 5/8-in Type X, nominal lumber, or exterior-rated fire-retardant-treated wood/plywood). • Exterior walls: use one listed construction method. Exterior wall coverings limited to noncombustible, fire-retardant-treated wood, or ignition-resistant; provide 6-in min metal/noncombustible flashing at ground/deck/roof intersections. • Underfloor areas: enclose to the ground or meet exterior wall requirements. • Deck walking surfaces: noncombustible, Class A rated, exterior-rated fire-retardant-treated wood, or ignition-resistant (composite min Class B allowed by exception). • Exterior glazing (windows): tempered/multilayer/glass block OR 20-min rating. • Exterior doors: noncombustible, solid-core wood (>=1 3/4 in), OR 20-min rating; vehicle access door gaps <= 1/8 in (ember intrusion resistance). 	<p>Currently, all new homes constructed are meeting this requirement on the sides of homes only where within 5' of property lines</p> <p>Currently, all new homes constructed have exterior walls meeting this requirement</p> <p>No</p> <p>No</p> <p>Yes</p> <p>No</p>

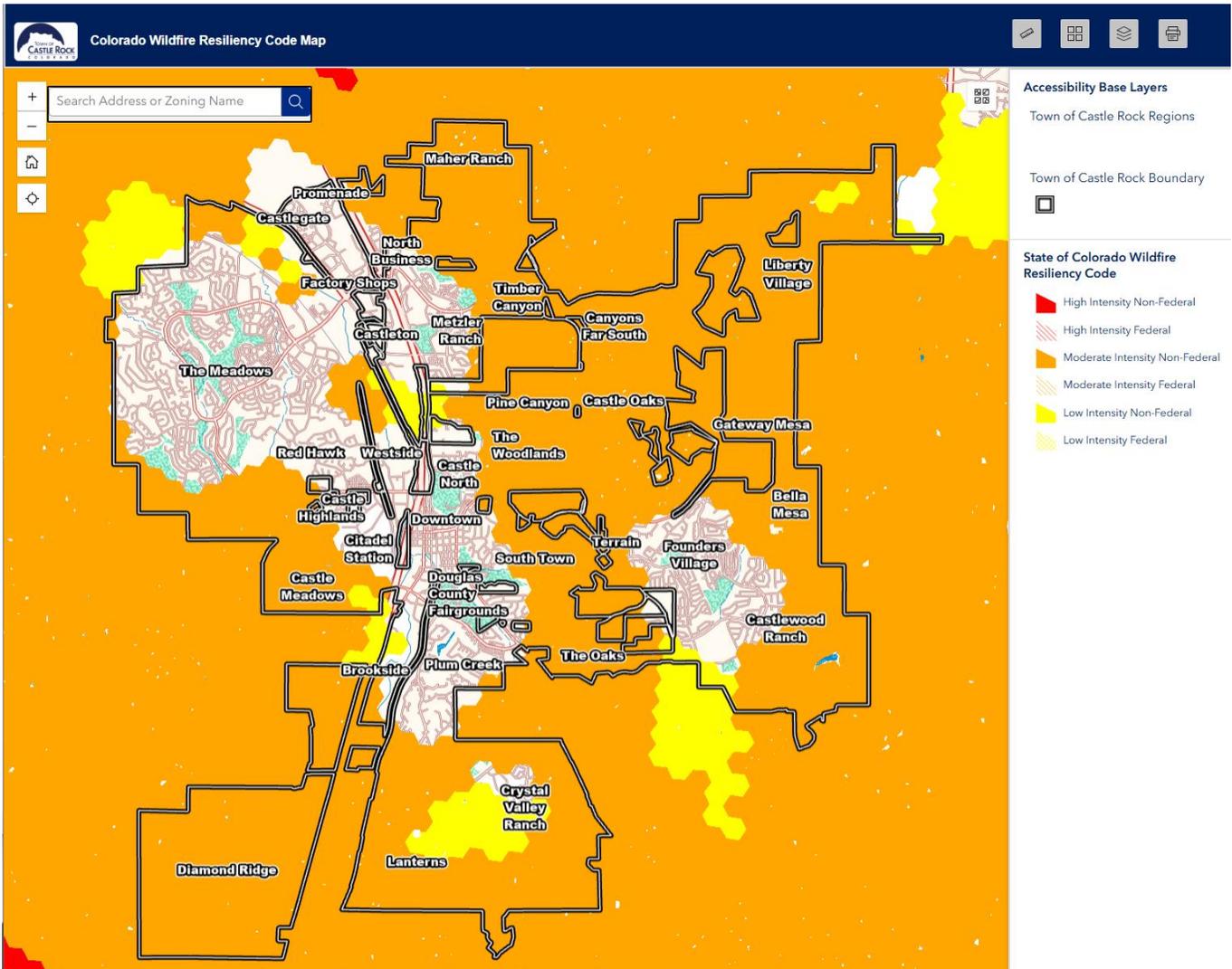
Defensible Space

There are 3 Classifications for Site and Area Requirements.

- Class 1 (Low): 0–5 feet: noncombustible materials only (no combustible vegetation).
- Class 2 (Moderate): 5–30 feet: reduced and properly spaced vegetation. (Must meet all of Class 1 and 2 requirements).
- Class 3 (High): 30–100 feet: thinning to reduce crown fire potential. (Must meet all of Class 1, 2 and 3 requirements).

Colorado Wildfire Resiliency Map

Pursuant to the requirements of the Colorado Wildfire Resiliency Code, the Town will be required to incorporate an associated Wildfire Resiliency Mapping into the Town Code. Staff is proposing to adopt the State's 2025 Colorado Wildfire Resiliency Map at this time. Fire staff is looking to update local mapping in 2027 and may bring back a future recommendation to change to a more local focused map at that time. The image below represents the 2025 Colorado Wildfire Resiliency Map overlaid on the Town's boundary. This mapping product will be improved and made available to the public prior to the July 1st enforcement date.



Exemptions

The 2025 CWRC does allow an exemption to be issued for the repair or rehabilitation of a historic structure or construction of a contributing structure upon a determination that the proposed repair or rehabilitation will not preclude the structure's continued designation as a historic structure, and that the exemption is the minimum necessary to preserve the historic character and design of the structure, within the spirit of this code.

The local jurisdiction may establish a historic preservation exemption or exemptions in their jurisdiction that consists of the spirit and intent of this code. The proposed ordinance includes an exemption for historic properties, as allowed under the CWRC.

Additionally, a property owner may request a review of their property's fire intensity classification to verify that the mapping accurately reflects the current site-specific conditions. This is referred to as "ground-truthing" in the CWRC. The property owner must engage a qualified wildfire professional to prepare and submit technical documentation to the Castle Rock Fire Department for a determination on their request.

Construction Activities Not Subject to the CWRC

The Colorado Wildfire Resiliency Code requirements do not apply to the following construction activities:

1. Interior alterations of existing structures.
2. Additions that do not increase the footprint of a structure by more than 500 square feet.
3. The reconstruction, replacement, alteration, or repair of the exterior walls of an existing building, when less than 25 percent of the surface area of all exterior walls is affected.
4. The reconstruction, replacement, alteration, or repair of the exterior roof covering of an existing building, when less than 25 percent of the surface area of the exterior roof covering or an attachment thereto is affected.
5. Alterations or repairs to the exterior of an existing structure, or an attachment to it, when less than 25 percent of the exterior of the structure is affected by the alteration or repair.
6. Painting, staining and similar maintenance or restorative work.
7. One-story detached accessory, nonhabitable structures, such as tool and storage sheds, playhouses and similar uses, provided that the floor area does not exceed 120 square feet and the structure is located greater than or equal to 10 feet from the nearest adjacent occupiable structure.
8. Accessory structures and buildings of an accessory character classified as Utility and
9. Miscellaneous Group U (including Agricultural Structures) located more than 50 feet from a structure containing occupiable or habitable space.
10. Fences located more than 8 feet from a habitable structure.

Regarding item 7 above for one-story detached accessory nonhabitable structures, the Town building code does not currently require permitting of these structures less than 200 sqft in size. In order to regulate their placement, per the CWRC, Town building codes will need to be amended to require permitting for 120 sqft and larger. Staff recommends amending the building code to permit structures of this size, and incorporate that amendment with the 2024 International Residential Code (IRC) later this spring to align with the Colorado Wildfire Resiliency Code (CWRC).

This amendment would revise the allowable size of one-story detached structures from the IRC’s current maximum of 200 square feet of floor area to 120 square feet of floor area, consistent with CWRC requirements.

Neighboring Jurisdictions

The State law requires all Colorado municipalities and counties with land in the Wildland-Urban Interface (WUI), that have authority over building and fire codes to adopt the 2025 Colorado Wildfire Resiliency Code by April 1, 2026. Town staff has confirmed that several of our surrounding jurisdictions are on track to adopt the 2025 CWRC by April 1, 2026. The table below shows Castle Rock and the surrounding jurisdiction’s dates or anticipated dates of adopting the 2025 Colorado Wildfire Resiliency Code.

Jurisdiction	Anticipated Adoption of the 2025 Colorado Wildfire Resiliency Code
Douglas County	Anticipated by April 1, 2026
Parker	Anticipated by March 23, 2026
Castle Pines	Anticipated by April 1, 2026
Lone Tree	Anticipated by April 1, 2026
Castle Rock	Anticipated in April 1, 2026

Public Outreach and Notification

While the State of Colorado Wildfire Resiliency Code Board was directed by State law to create the regulations and standards, Town staff did engage the local development community to review the State regulations and receive their feedback on the new requirements. The stakeholder/staff team organized by the Castle Rock Chief Building Official met regularly to review the Colorado Wildfire Resiliency Code. Stakeholder meetings were held with production builders, designers, utility representatives, and industry organizations.

Meetings included:

- 6/2/2025 – Colorado Wildfire Resiliency Code presentation to Board of Building Appeals
- 9/8/2025 – Update of Colorado Wildfire Resiliency Code to Board of Building Appeals
- 12/18/2025 - Meeting at Townhall with production builders, production homes designers, Black Hills Energy representatives, representatives from the American Wood Council
- 1/15/2026 - Meeting at Townhall with production builders, production homes designers, Black Hills Energy representatives
- 1/22/2026 - Meeting at Townhall with production builders, production homes designers, Black Hills Energy representatives, and representatives from the Home Builders Association
- 2/12/2026 - Meeting at Townhall with production builders, production homes designers

- 2/19/2026 – Colorado Home Builders Association (HBA) Quarterly Meeting. Updated HBA representatives as well as attending Colorado Front Range Building Departments with Code Adoption timelines
- 3/2/2026 – Colorado Wildfire Resiliency Code Adoption Update to Board of Building Appeals

Feedback from stakeholders primarily focused on implementation timelines, material availability, and cost considerations. Staff incorporated this feedback into the proposed enforcement date of July 1, 2026, to provide adequate transition time for the development community. July 1, 2026 is the latest date for enforcement allowed under the state regulation.

Following adoption, staff will provide educational materials, guidance documents, and informational resources to assist property owners and development professionals in understanding and complying with the Code.

Budget Impact

Administrative Costs:

Implementation will require staff training, updates to permit review procedures, potential WUI mapping updates, and public education efforts. These activities are anticipated to be managed within existing departmental budgets, with minimal additional fiscal impact.

Development Costs:

Construction costs for new development or qualifying remodels within designated WUI areas may increase modestly depending on material selection and site-specific requirements. Costs will vary by project scope and design.

Long-Term Financial Considerations:

Adoption of wildfire mitigation standards is expected to reduce future public expenditures associated with wildfire response, infrastructure repair, and disaster recovery. Enhanced resilience may also contribute to long-term economic and insurance stability within the community.

Recommendation

Staff recommends adoption of the 2025 Colorado Wildfire Resiliency Code, to include an Historic Preservation exemption, and meet the State mandated adoption deadline of April 1, 2026. Staff recommends an enforcement (effective) date of July 1, 2026, consistent with the state requirements.

Proposed Motion

Option 1: Approval

“I move to approve this Ordinance as introduced by Title, on first reading.”

Alternative Motions

Option 2: Approval with Conditions

*“I move to approve this Ordinance as introduced by Title, on first with the following conditions;
(list conditions)*

Option 3: Continue item to next hearing (need more information to make decision)

“I move to continue this item to the next meeting on XXXXXXXX, 2026 to allow time for additional research regarding _____.”

Attachments

Attachment A: Ordinance

Attachment B: 2025 Colorado Wildfire Resiliency Code