



HOME BUILDERS
ASSOCIATION
of
METRO DENVER®

September 20, 2022

Town of Castle Rock
Mayor Jason Gray
Town Council
110 N. Wilcox St.
Castle Rock, CO 80104

Dear Mayor Gray and Members of Town Council:

I am writing to share our concerns regarding the Town of Castle Rock's consideration of a new water conservation ordinance scheduled to be implemented on January 1, 2023.

These comments are being provided on behalf of the Home Builders Association (HBA) of Metro Denver. HBA of Metro Denver represents over 400 homebuilders, developers, remodelers, architects, mortgage lenders, title companies, subcontractors, suppliers, and service providers in the eight metro-area counties we serve.

In the Town of Castle Rock, HBA of Metro Denver represents many builders and developers currently active within the municipality with 475 registered permit applications approved so far this year.

Based on the information presented before the Town Council on September 6th and conversations we have had with Castle Rock Water over the course of this year, it is our understanding that the Town is interested in improving water conservation within the municipality by prohibiting the use of turf on front yards and limiting the use of turf in backyards to 500 SF of the total surface area in new residential developments.

First, our association would like to commend the Town of Castle Rock on the exemplary work the municipality has already accomplished on water conservation thus far. Over the past 20 years, the Town has set a sustainability standard that other cities and towns across Colorado and the country have worked to emulate – creating a multiplier effect with impacts felt far beyond the Town's limits.

We also appreciate Castle Rock's stakeholder and outreach efforts both with our association and the other civic, business and development community within its' borders - to make sure decisions are made and implemented thoughtfully, and in a manner that considers all of Castle Rocks shared goals and values.

While we support the core objectives of this ordinance and the town's commitment to conservation, we still have some unresolved concerns that warrant further consideration by the Town Council.

Our first concern is the Water Department's insistence that builders install backyard landscaping for homeowners. A rear-yard landscaping requirement would be unprecedented in Colorado and most builders simply do not have the resources or expertise to perform this work in a manner that will be accepted by the market. This provision has created a real predicament for Castle Rock builders, as we don't believe it has been fully contemplated.

In order to opt-out of this provision, homeowners would no-longer be eligible for any of the water savings incentives related to new ordinance even if they fully comply with the new landscaping requirements. Conversely, the considerable cost of installing a "Coloradoscape" backyard that meets the Town's guidelines would negate much if not all of the savings associated with the incentives, significantly increasing the purchase price of a home. Furthermore, the cost related to providing individual landscape designs for backyards (which may never actually be constructed) is unnecessarily burdensome and will add further costs to aspiring homeowners.

It should be noted that all of these costs are based on estimates that a number of our active builders in Castle Rock found questionable at best and are insufficient to convey the true cost homeowners will incur to install front and rear yard Coloradoscape. We request Castle Rock Water provide a more thorough analysis into the costs provided to Council to illustrate the true scope of the financial burden.

Secondly, our Association has repeatedly requested flexibility for alley-loaded home designs that inhibits rear-yard landscaping. As an alternative solution, we are requesting an exemption to the ordinance by allowing front yard landscaping up to 500 square feet. From a new urbanist design perspective, the entire incentive of moving the garages of single-family homes into the backyard is to offer additional space in the front yard - encouraging greater community interaction within suburban neighborhoods.

Some developments in Metro Denver (Central Park, Painted Prairie, etc.) further encourage this type of community building by merging front yards together - creating quality common areas for kids to play and neighbors to interact with one another. This proposed ordinance needlessly prohibits any flexibility in this regard, even if the community design substantially meets all the ordinance's conservation goals.

While other municipalities have already started proposing and implementing similar water conservation ordinances, it is worth noting that only the Town of Castle Rock is imposing these strict mandates upon the building community. In fact, the City of Aurora recently passed a similar ordinance earlier this month that does not require builders to landscape the backyard and offers an exemption for alley-loaded homes – providing the needed flexibility to meet needs of Castle Rock residents.

We would like to reiterate that the Home Builders Association supports water conservation policy both in Castle Rock and across the metro area when reasonably implemented. With thoughtful evaluation of

proposed conservation policies, they can be employed in a manner that conserves water, lowers utility bills and ensures Colorado's most precious resource remains viable for future generations.

Given Castle Rock's role as a leader in water conservation across the metro area, we hope the Town Council will consider including these amendments and provide the residential construction industry the flexibility it needs to meet the Town's water conservation goals, while continuing to meet the long-term housing needs of Castle Rock residents.

Thank you for your time and consideration of our concerns.

Sincerely,



Ted Leighty
Chief Executive Officer
Home Builders Association of Metro Denver

Cc: David Corliss, Town Manager
Mark Marlow, Director of Castle Rock Water