

## MEMORANDUM

To: Palmer Lake Town Council

From: Charles Roubidoux, Water System Superintendent – Palmer Lake Municipal Drinking Water System

Date: May 8, 2026

Subject: Recommendation to Opt Out of Graywater Law HB24-1362 — New Construction Only Unless Locally Expanded

### Purpose

This memo outlines why the Town of Palmer Lake should adopt a resolution opting out of Colorado House Bill 24-1362 and clarifies that the law only authorizes graywater systems in new construction by default, and existing buildings may only install such systems if the Town Council explicitly authorizes them.

Clarification: HB24-1362 Is Limited to New Construction Unless the Town Says Otherwise  
HB24-1362 states that graywater treatment works may be installed only in new construction projects unless a local government adopts an ordinance allowing installation in existing structures.

### Recommendation

Given the limited scope of the law (new construction only) and the significant burdens it would impose even at that level, I strongly recommend that the Town Council opt out of HB24-1362.

### Key Reasons to Opt Out

1. Increased workload for local governments, including ordinance updates, inspections, and coordination with state agencies.
2. New tracking and reporting requirements, including providing system locations to water utilities.
3. Public health concerns related to cross-connection risks.
4. Unfunded mandates that impose costs on the Town.
5. Limited benefit due to low levels of new construction in Palmer Lake.
6. Water rights and system integrity considerations.

### Conclusion

Opting out preserves public health protections, prevents unfunded workload increases, and avoids introducing unnecessary risk to our municipal water system.