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BIOLOGICAL ASSESSMENT AND
CULTURAL RESOURCES RECORDS REVIEW

RIDGEGATE MESA TOPS – HILLCAMP DRIVE
CABELA DRIVE AND VIEWSIDE DRIVE
LONE TREE, COLORADO

Prepared for:

JR ENGINEERING, LLC
7200 South Alton Way, Suite C400
Centennial, Colorado 80112

Attention:

Kevin Rohrbough

Project No. DN52,378.000-200-R1R

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TERMS

ACOE – Army Corps of Engineers

BGEPA – Bald and Golden Eagle Protection Act

CHS – Colorado Historical Society

CPW – Colorado Parks and Wildlife

CWA – Clean Water Act

ESA – Endangered Species Act

Federally Endangered/Threatened Species – Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future.

FEMA – Federal Emergency Management Agency

IPaC – Information for Planning and Consultation

Jurisdictional WOTUS– Waters that are "jurisdictional" are subject to the multiple regulatory requirements of the Clean Water Act by the US Army Corps of Engineers. Non-jurisdictional waters are not subject to those requirements.

MBTA – Migratory Bird Treaty Act

NFHL – National Flood Hazard Layer

NHD – National Hydrology Dataset

NHPA – National Historic Preservation Act

PMJM – Preble's meadow jumping mouse

State Endangered/Threatened Species – A species that is considered Endangered or Threatened by State legislature. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range throughout the state. "Threatened" means a species is likely to become endangered within the foreseeable future.

'Take' – According to the Endangered Species Act, 'take' means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

USFWS – United States Fish and Wildlife Service

USGS – United States Geological Survey

WOTUS – Waters of the U.S.



1.0 INTRODUCTION

This report was prepared by CTL|Thompson, Inc. (CTL|T) for JR Engineering, LLC, and presents the results of the Biological Assessment and Cultural Records Review for the property known as Ridgeway Mesa Tops – Hillcamp Drive, located southeast of Cabela Drive and Viewside Drive in Lone Tree, Colorado, hereto referred to as the “Subject Property” or “Property”. The Biological Assessment and Cultural Resources Records Review was conducted in general accordance with JR’s Standard Agreement for Subconsultant Services to JR Engineering, LLC, contract dated June 9, 2025, and subsequent authorization by Mr. Kevin Rohrbough and Mr. Matthew Wardlow on June 9 and June 10, 2025, respectively.

TABLE I
SUBJECT PROPERTY LOCATION AND DESCRIPTION

Descriptor	Description
<i>Location</i>	Southeast of Cabela Drive and Viewside Drive in Lone Tree, Douglas County, Colorado 80124
<i>Township and Range</i>	Northeast Quarter of Section 22, Township 6 South, Range 67 West of the 6th Principal Meridian
<i>USGS Quadrangle</i>	Highlands Ranch, CO
<i>Parcel Number(s)</i>	223122100014, 223122200025, 223122200020, 223122300004, 223122300003, 223122300009, 223122200022, 223122200026, 223122200013 (only portions of some of these parcels are included in the Property boundaries)
<i>Current Use</i>	Vacant land
<i>Total Land Area</i>	55 Acres
<i>Ownership</i>	City of Lone Tree, BC-RG Mesa Tops JV LLC

The Subject Property location and plan are shown in the attachments Figure 1 (Topographic Area Map) and Figure 2 (Subject Property Map).

We evaluated the Subject Property for:

- The presence of jurisdictional wetlands;
- The presence of threatened or endangered species;
- The presence of endangered or threatened species critical habitat; and,
- The presence of registered archeological and/or historic sites.



On May 22, 2025, Ms. Claire Asmussen conducted a Property visit. Subject Property conditions consisted of temperatures in the 80s (°F), cloud cover of approximately 5% and winds of approximately 5 to 10 miles per hour (mph). Photographic documentation is presented in **Appendix A**. During this visit, Ms. Asmussen collected specific information about the Subject Property's physical features, vegetation, hydrology, soil conditions, and surrounding environmental conditions. This information is required to evaluate aquatic and biological components of the Subject Property. CTL|T searched publicly available literature on federal, state and local websites regarding the Subject Property, which are outlined in the References section of this report.

1.1 Summary of Site Historical Use

The Subject Property has remained generally vacant since at least the late 1903s. Some access roads and trails are located on the Property. Residential development began adjacent to the Property to the northwest in 2021 and part of the western edge of the Property was graded as part of this activity. The Property location and plan are shown on Figure 1 (Area Map) and Figure 2 (Site Plan).

1.2 Existing Conditions

The Subject Property has historically been used for agriculture. The Property is now generally cleared of vegetation and undergoing development activities. The EPA's Level III Ecoregion Map classifies the Subject Property as moderate relief plains. A photographic record of our site reconnaissance is presented in **Appendix A**.

2.0 AQUATIC RESOURCE ASSESSMENT

The following subsections discuss our research and onsite assessment of Waters of the U.S., wetlands, and FEMA floodplains on the Subject Property and/or in connection with the Subject Property.



2.1 Waters of the U.S.

The Clean Water Act was passed by the U.S. Congress in 1971 to protect the physical, biological, and chemical quality of “Waters of the U.S.,” or WOTUS. The Corps Regulatory Program administers and enforces Section 404 of the Clean Water Act. Under Section 404, a Corps permit is required for the discharge of dredged or fill material into wetlands and Waters of the U.S. The Corps defines WOTUS as all navigable waters and their tributaries, all interstate waters and their tributaries, all wetlands adjacent to these waters, and all impoundments of these waters. The State of Colorado further asserts jurisdiction over waters with a “significant nexus” to WOTUS, as described in further detail below.

The Corps will assert jurisdiction over non-navigable tributaries of traditional navigable waters that are relatively permanent where the tributaries typically flow year-round or have continuous flow at least seasonally (e.g. typically three months). The Corps will assert jurisdiction over those adjacent waters and wetlands that have continuous surface connection to such tributaries (e.g. they are not separated by uplands, a berm, dike, or similar feature).

The Corps will assert further jurisdiction over non-navigable waters, defined as not relatively permanent tributaries and their adjacent wetlands, as long as such waters and wetlands have a continuous surface connection to WOTUS. Corps jurisdictional determination includes consideration of hydraulic factors, including the following:

- Volume, duration, and frequency of flow, including consideration of certain physical characteristics of the tributary;
- Proximity to the traditional navigable water;
- Size of the watershed;
- Average annual rainfall; and,
- Average annual winter snow pack.

The State of Colorado will assert further jurisdiction over waters that are not relatively permanent, nor traditionally navigable, and do not contain a surface connection to one of the former, as long as such tributaries and wetlands have a “significant nexus” connection to a Corps jurisdictional water. A “significant nexus” means the water or wetland may have a physical, chemical, or biological impact on a jurisdictional water.



Finally, the Corps and the State have indicated the following geographic features generally are not jurisdictional waters:

- Swales or erosion control features (e.g. gullies, small washes characterized by low volume, infrequent, or short duration flow); and,
- Ditches (including roadside ditches) excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water.

It should be noted that regulations surrounding WOTUS have recently been in flux. The Corps jurisdiction of the “Waters of the U.S.” changed in 2006 as a result of the U.S. Supreme Court’s decision in *Rapanos v. United States* & *Carabell v. United States*. The June 5, 2007, Agency Guidance document indicates the Corps would assert jurisdiction over all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters, which are subject to the ebb and flow of the tide, as well as those waters with a “significant nexus” to them. However, the *Rapanos* decision was overturned on May 25, 2023, in the U.S. Supreme Court decision in *Sackett v. Environmental Protection Agency*. As a result, the Corps will only assert jurisdiction according to the *Sackett* decision, which outlines that waters and wetlands must be relatively permanent, standing, or continuously flowing bodies of water, or connected to other waters through a surface connection. As a result of this decision, on July 6, 2023, the Colorado Department of Public Health and Environment Water Quality Control Division (CDPHE-WQCD) released CW-17: Enforcement of Unpermitted Dredge and Activity in State Waters. This policy was intended as a temporary measure to assert jurisdiction over “*Sackett* gap waters,” or “State Waters,” which are loosely defined as those waters and wetlands in Colorado that were previously regulated under the *Rapanos* decision but became unregulated as a result of the *Sackett* decision. On May 30th, 2024, House Bill (HB) 24-1379 was signed into law. This bill is very similar, albeit more permanent and detailed, to CW-17. HB 24-1379 directs the Water Quality Control Division (WQCD) to develop a dredge and fill program for the State by December 31, 2025. The outcome will be Regulation No. 87, which is currently in draft form and not yet finalized. Therefore, waters and wetlands fall under the definitions and jurisdictions of the *Sackett* decision (for Waters of the U.S., Corps jurisdiction). As of January 1, 2025, any person seeking authorization to discharge dredged or fill material into State Waters (generally, non-WOTUS, but still meet “significant nexus” rule) shall apply for a Temporary Authorization from the WQCD. Temporary Authorizations recognized Nationwide Permits (NWP) and Regional General Permits (RGP) issued by USACE as valid authorizations for discharge of dredged or fill materials into State Waters.



During our Property visit on July 1, 2025, we assessed the Property for potential Waters of the U.S or State Waters. We did not observe obvious evidence of a Water of the U.S. or State Water as defined by the Corps of the State of Colorado on the Property.

2.2 Wetlands

Wetlands are defined by the U.S. Army Corps of Engineers (Corps) as those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. To meet the classification, a wetland that is not significantly disturbed and is under normal conditions must show evidence of a minimum of one positive wetland indicator from each three parameters: hydrology, soils, and vegetation. If the wetland is considered significantly disturbed or not considered to be under normal conditions, only one parameter is necessary for a positive classification. Delineated wetlands that are determined as jurisdictional by the Corps or the State are regulated, and proper care must be taken to protect them during development. If the disturbance and/or development of a jurisdictional wetland cannot be avoided, the Corps or the State may approve mitigation. Guidelines for the mitigation of wetlands are outlined in the U.S. Army Corps of Engineers Standard Operating Procedures for the Regulatory Program.

The U.S. Fish and Wildlife Service (USFWS) defines wetlands as lands transitional between terrestrial and aquatic systems, where the water table is usually at or near the surface, or the land is covered by shallow water. For the purpose of this classification, wetlands must have at least one of the following three attributes: (1) at least periodically, the land supports predominantly hydrophytes; (2) the substrate is predominantly undrained hydric soil; (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of the year.

A wetland determination data point was taken on the Property by CTL|Thompson, Inc. on October 15, 2025, following procedures outlined in the U.S. Army Corps of Engineers (USACE) 1987 Wetland Delineation Manual and May 2010 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region (Version 2.0). This data form is presented in **Appendix E**.



Our sampling was performed in the draw leading to a culvert as indicated on Figure 2. Our sampling did not reveal evidence of a dominance of hydrophytic vegetation, hydric soils, or wetland hydrology. We also did not observe potential wetlands elsewhere on the Subject Property. Thus, it is the professional opinion of CTL|T that wetlands are not present on the Property and further investigation is not warranted.

CTL|T used a USFWS National Wetland Inventory (NWI) Map as an aid to help determine the location of wetlands that may be present on the Subject Property. The map does not indicate the presence of wetlands on the Subject Property. Cottonwood Creek, indicated as a riverine wetland on the NWI map, runs outside of Property boundaries approximately 200 to 600 feet to the north.

2.3 FEMA Floodplains

The Federal Emergency Management Agency (FEMA) provides Flood Insurance Risk Maps (FIRMs), which display floodplains (also referred to as flood zones) and define floodplains based on the annual chance of flooding over a designated period of time. Floodplains may provide critical habitat for State and/or Federal protected species. FEMA also provides locations of regulatory floodways, which must be preserved in order to discharge the base flood of an area without cumulatively increasing the water surface elevation more than a designated height. FEMA requires hydrologic and hydraulic analyses that demonstrate that the proposed development of a regulatory floodway would not result in any increase of flood levels.

We researched the FEMA National Flood Hazard Layer (NFHL) map for floodplains on the Subject Property. The FEMA NFHL indicated the Property as an area of minimal flood hazard. Floodplains were not indicated on the Property. The FEMA NFHL map is presented in **Appendix C**.

3.0 BIOLOGICAL RESOURCE ASSESSMENT

The following subsections discuss our assessment of critical habitat or potential habitat of State and Federal protected species, as well as other species of concern, on the Subject Property and/or in connection with the Subject Property.



3.1 Federally Threatened, Endangered, and Candidate Species

The Subject Property was assessed for potential habitat for threatened and endangered species under the Endangered Species Act (ESA). Federally threatened and endangered species are protected under the Endangered Species Act of 1973 as amended (16 U.S.C. 1531 et seq.). Significant adverse effects to a federally listed species or its habitat require consultation with the U.S. Fish and Wildlife (USFWS) under Section 7 or 10 of the Endangered Species Act (ESA). The service lists five threatened or endangered species with potential habitat on or near the Subject Property. Table II lists common and scientific names and the status of the species.

TABLE II
FEDERAL THREATENED, ENDANGERED, AND CANDIDATE SPECIES

COMMON NAME	SCIENTIFIC NAME	STATUS
Pallid Sturgeon	Fish – <i>Scaphirhynchus albus</i>	Endangered
Piping Plover	Bird – <i>Charadrius melodus</i>	Threatened
Whooping Crane	Bird – <i>Grus americanus</i>	Endangered
Ute-Ladies'-tresses	Plant – <i>Spiranthes diluvialis</i>	Threatened
Western Prairie Fringed Orchid	Plant – <i>Platanthera praeclara</i>	Threatened

The pallid sturgeon is an endangered, bottom-oriented, large obligate river fish. The fish inhabits mainly the Missouri and Mississippi river systems. USFWS states that in the region of the Subject Property, the Pallid sturgeon only needs to be taken into consideration if the development of the Property could affect the North Platte, South Platte, or Laramie River basins. Additionally, the Pallid sturgeon is not known to inhabit the portions of the South Platte in Colorado, it is listed only because upstream impacts to water quality may affect downstream populations in other states. Cottonwood Creek lies approximately 200 to 600 feet to the north of the Property and runoff from the Subject Property likely drains to this creek. To protect the pallid sturgeon, we recommend that sediment control measures and BMPs be used to protect the water quality of the surface water features on and adjacent to the Property and their connected waterways.

The piping plover (*Charadrius melodus*), and the whooping crane (*Grus americanus*) are species that are affected by impacts to waterways and lakes. Piping plovers typically reside along open shorelines of creeks, lakes, and rivers primarily in Kiowa and Bent Counties in Colorado. We did not observe significant open shorelines on the Property and do not consider the Property to present significant habitat or stopover habitat for the piping plover. Whooping cranes breed and



nest in wetland habitat where bulrush and cattail are the dominant vegetation type. We did not observe wetlands dominated by cattails and bulrush on the Property indicating a lack of habitat for this species. Additionally, whooping cranes are believed to be extirpated in the state of Colorado, as they have not been observed in the state since 2010, and there are currently no experimental populations within the state. We do not believe the development of the Property will impact this species.

The Ute ladies'-tresses (*Spiranthes diluvialis*) typically occurs at elevations below 6,500 feet in moist to wet alluvial meadows, floodplains of perennial streams, and around springs and lakes. Occurrences of Ute ladies'-tresses have been documented in Colorado, Wyoming, Idaho, Nevada, and Utah. The populations in Colorado mostly occur along the Front Range. The Subject Property was assessed for potential Ute ladies'-tresses habitat. According to the FEMA NFHL there are no floodplains of perennial streams located on the Subject Property, indicating a lack of habitat for this species. Proper sediment control measures and BMPs should be used to protect the nearby Cottonwood Creek.

The western prairie fringed orchid (*Platanthera praeclara*) is a perennial orchid found in North American tall grass prairies. The orchid grows to a height of approximately four (4) feet tall with a flowering stalk that bears up to 24 white flowers about one inch across. The species is believed to occur in Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, and South Dakota. This species is listed in Colorado because of the potential downstream effects from activities in this area. We did not observe surface water features on the Property, indicating a lack of habitat for this species. To protect the western prairie fringe orchid, we recommend that sediment control measures and BMPs be used to protect the nearby Cottonwood Creek.

3.2 State Threatened, Endangered, and Candidate Species

The project area was assessed for potential habitat for threatened and endangered species as designated by Colorado Parks and Wildlife (CPW). Species not discussed in the following sections were determined not to have significant habitat or likelihood of occupying the Property based on species ranges or Property conditions; or are discussed elsewhere in Section 3 of this report.



The Preble's meadow jumping mouse (*Zapus hudsonius preblei*), referred to as PMJM, is a species that is typically located in low undergrowth consisting of grasses and forbs, in open wet meadows, riparian corridors near forests, or where tall shrubs and low trees provide adequate cover. It is listed by CPW as state threatened and federally threatened. The mice prefer well developed riparian habitats with adjacent, relatively undisturbed grassland communities and a nearby water source. Their nests are composed of plant material and are generally located above ground at the base of shrubs and trees or in open grasslands. The Property generally does not contain riverine adjacent habitat and therefore does not provide desirable habitat for this species. The USFWS published a Block Clearance Zone Map for the Denver Metro Area in 2016 which outlines areas where development has been determined not to be a concern for the PMJM. The 2016 document indicates the Property is within the block clearance zone. Given this, and the lack of suitable habitat, we do not believe the development of the subject Property will encroach on PMJM protections.

The burrowing owl (*Athene cunicularia*) is a small, migratory owl that occupies prairie dog towns in Colorado during the spring and summer breeding season. It is listed by CPW as state threatened. The owl is active during the day and uses prairie dog burrows for nesting and roosting. Burrowing owls are a threatened species and are protected under federal and state laws, including the Migratory Bird Treaty Act. Per CPW, no human encroachment is allowed within 150 feet of prairie dog burrows that are being used as nests from March 15 through October 31. It is recommended that efforts to eradicate prairie dogs or destroy abandoned towns do not occur between March 15 and October 31, as owls may be present. CPW data indicates that the Property falls within potential burrowing owl breeding range. We did not observe prairie dogs or their burrows on or directly adjacent to the Property, indicating a lack of habitat for the burrowing owl. We do not anticipate the development of the Property negatively impacting the burrowing owl.

The black-tailed prairie dog (*Cynomys ludovicianus*) is a burrowing rodent, approximately 15 inches in length with a black-tipped tail. It is listed by CPW as state special concern. Once occupying seven million acres in Colorado, the black-tailed prairie dog is now present on the eastern third of Colorado below 6,000 feet. Approximately 150 other species rely on the habitat that the black-tailed prairie dog creates. We did not observe prairie dogs or their burrows on the Property. If active prairie dog colonies are encountered on the Property, CPW recommends attempting to remove or exterminate them prior to development activities for humane reasons. It is important to note that destruction of prairie dogs or their burrows is not recommended during



burrowing owl breeding season (March 15 through October 31) since burrowing owls may use prairie dog burrows as habitat. We do not believe the development of the Property will negatively affect the black-tailed prairie dog.

Other CPW listed species of concern have been taken into consideration. Based on lack of suitable habitat on site and information regarding population locations from CPW, we do not believe these species to be a concern for the Subject Property.

3.3 State Wildlife Action Plan Species

Colorado's State Wildlife Action Plan (SWAP) articulates a set of conservation priorities that considers an expansive array of wildlife from a statewide perspective. SWAP does not provide any direct regulatory protections for species of concern. This is only an action plan compiled by CPW and partner organizations. According to SWAP, the Tier 1 species list represents species of highest conservation priority to the state, while Tier 2 species remain important in light of population trends or habitat conditions that may eventually lead to a threatened or endangered listing status. There are currently over 150 species on the Tier 1 level, over 250 on the Tier 2 level, and over 200 in consideration. Many of these species overlap with other state or federally listed species, or with migratory bird or raptors/eagles as otherwise discussed in further detail in other sections of this report.

Based on the lack of riparian or wetland features on the Subject Property, the Property does not provide adequate habitat for any Tier 1 or 2 fish, amphibian, or mollusk species. Best management practices should be applied for erosion and stormwater control to protect from downstream impacts to these species.

We used CPW's SWAP Data Hub to assess the Subject Property for primary habitat usage for SWAP species. According to the data hub, the oak and mixed mountain shrub habitat subtype may support primary habitat for 15 Tier 1 and 2 terrestrial SWAP species. Four of these species are migratory birds covered by the Migratory Bird Treaty Act (MBTA) as discussed in Section 3.4 and are therefore not discussed in detail in this section. Nine of these species do not have ranges overlapping with the Subject Property and were therefore not reviewed in further detail. The remaining two species that may be supported by this habitat type and have range in the vicinity of the Subject Property are discussed in further detail below.



The fringed myotis (*Myotis thysanodes*) is a colonial-roosting bat species found mostly in dry habitats where open areas (e.g., grasslands and deserts) are interspersed with mature forests (usually ponderosa pine, pinyon-juniper, or oak), creating complex mosaics with ample edges. Most reported occurrences in Colorado are at elevations between roughly 3,900 feet and 6,900 feet. Roost structures vary widely for this species, from caves and underground mines to buildings, bridges, and rock crevices. They may utilize pinyon-juniper cavities for local roosting, though larger colony activity in this setting is rare. These bats are most threatened by impacts to roost sites, foraging areas, water sources, and exposure to toxic chemicals. Maintenance of the forested-grassland mosaic habitat is important to the conservation of this species. While we do believe it is possible that the fringed myotis may utilize the Subject Property as habitat based on their range and habitat preferences, we do not believe significant roost sites exist on or directly adjacent to the Property. Based on the size of this project, we believe impacts to this species, if they occur, will be minimal. The SWAP does not impose any direct regulatory protection requirements for these species.

Hernandez's short-horned lizard (*Phrynosoma hernandesi*) is a small, wide, and flat lizard species with a fringe of enlarged scales lining each side of the body. They are variable in color and typically blend with the local soil. They generally range throughout Colorado and may even reach elevations of up to 11,000 feet in the southwestern portion of the state. While they are generally scarce, they are common in a few localized areas, particularly in shortgrass prairie, sagebrush, semidesert shrubs, shale barrens, shrubby plateaus, pinyon-juniper woodland, pine-oak woodland, and oak-grass associations. They rely on areas of sparse ground vegetation and access to sunlight. We believe development of the Property may overlap with habitat and range for this species. Per CPW, while a specific management plan for this species has not been developed, impacts can be mitigated through maintaining appropriate habitat and foraging cover for this species – namely, by planting appropriate cover such as bunchgrasses. Management of invasive plants, such as cheatgrass, can also help this species. Based on the size of this project, we believe impacts to this species, if they occur, will be minimal. The SWAP does not impose any direct regulatory protection requirements for these species.

3.4 Migratory Bird Treaty Act

Migratory birds, as well as their eggs and nests, are protected under the Migratory Bird Treaty Act (MBTA). The MBTA does not contain any prohibition that applies to the destruction of



a bird nest alone (without bird or eggs), provided that no “take” (of bird or eggs) occurs during the destruction. The regulatory definition of “take” means to pursue, hunt, shoot, kill, trap, capture or collect, or attempt to pursue, hunt, wound, kill, trap, capture, or collect. While destruction of a nest by itself is not prohibited under MBTA, nest destruction that results in the unpermitted take of migratory birds or their eggs is illegal and fully prosecutable under the MBTA. One method to avoid a violation of the MBTA is to remove vegetation and nests outside the active breeding season, which typically falls between March and August, depending on species.

The Subject Property was assessed for potential migratory bird nesting habitat. The majority of the Property generally provides habitat for ground nesting and tree nesting migratory birds. The Property does not contain large trees but it does contain an abundance of shrub cover which may provide tree-nesting habitat. During our visit we observed scrub jays, American robins, house finches, and western meadowlarks. We recommend removal of vegetation occur outside of the breeding season to avoid infringement of the MBTA. If removal of vegetation is planned during the breeding season, we recommend a supplemental migratory bird survey be performed prior to removal.

3.5 Colorado Raptors

Colorado raptors such as red-tailed hawks (*Buteo jamacicensis*), Ferruginous hawk (*Buteo regalis*), and American kestrels (*Falco sparverius*) are protected by the MBTA (discussed in the previous section). Additionally, Colorado Parks and Wildlife recommends buffer zones around active raptor nests to avoid and minimize disturbance to nesting raptors in Colorado. For raptors, CPW recommends no human encroachment beyond that which historically occurred, within one-third to one-fourth mile radius of active nests, depending on the species. Raptor species in Colorado have varying breeding seasons dependent upon their food sources and when hatchlings fledge (leave) the nest. The general raptor breeding season in Colorado is from January to August.

We observed primarily small trees and shrubs on and adjacent to the Property which would likely not provide habitat for nesting raptors. We did not observe obvious raptor nests on or immediately adjacent to the Property. CPW data does not indicate the presence of a known raptor nest on or adjacent to the Property. We do not believe the development of the Property will result in CPW raptor buffer zone encroachment in its current state.



3.6 Bald and Golden Eagle Protection Act of 1940

Bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) are protected by the MBTA (discussed in the previous section) and the Bald and Golden Eagle Protection Act of 1940, as amended November 1978. These species nest in a variety of habitats, including on cliffs and in large trees, and prefer a nearby water source. The Act allows further protection of eagles by prohibiting anyone, without a permit issued by the Secretary of the Interior, from “taking” eagles, including their parts, eggs or nests. Like MBTA, “take” means to pursue, hunt, wound, kill, trap, capture, or collect; however, it also includes “disturb,” which means to agitate or bother a bald or golden eagle to the level that causes or is likely to cause injury, decrease in productivity, or nest abandonment.

CPW data indicates that the Subject Property falls within the known bald eagle winter range. CPW data indicates that the closest active bald eagle nests are located over a mile from the Subject Property. CPW does not provide data on the locations of active golden eagle nests. We did not observe large trees on or immediately adjacent to the Property which may provide habitat for bald or golden eagles. We did not observe obvious bald or golden eagle nests on or adjacent to the Subject Property. We do not believe the development of the Subject Property will result in a “take” of bald or golden eagles in its current state.

4.0 CULTURAL RESOURCE ASSESSMENT

The following section discusses our assessment of historical or archaeological listings on the Subject Property and/or in connection with the site.

4.1 Historical and Archaeological Findings

Historic properties are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their undertakings on historic properties prior to construction. If it determines that it has no undertaking, or that its undertaking is a type of activity that has no potential to affect historic properties, the agency has no further Section 106 obligations. However, if it determines its undertaking may have an adverse effect on a historic property it must notify the appropriate State Historic Preservation Officer/Tribal



Historic Preservation Officer to consult with during the process. It should also plan to involve the public and identify other potential consulting parties. Additionally, under NHPA Section 110(f), where a federal undertaking may directly and adversely affect a property designated as a National Historic Landmark, the agency must, prior to approving the undertaking and to the maximum extent possible, undertake such planning and actions necessary to minimize harm to such landmark. It should be noted that with certain limited exceptions, federal agencies are prohibited by NHPA Section 110(k) from granting loans, loan guarantees, permits, licenses, or other assistance to any applicant who intentionally significantly adversely affected a historic property to which the assistance would relate with the intent to avoid the requirements of Section 106. If you perform these activities prior to the start of construction, it will help to avoid significant project delays and possible project cancellation. A review of listed cultural resources does not always rise to the level of a Section 106 review.

CTL|T contacted History Colorado, Office of Archaeology and Historic Preservation to request a search of the Colorado Inventory of Cultural Resources on the Subject Property. We received a response letter from History Colorado on August 5, 2025, via email. Per the response, no historical/archeological sites or surveys were identified on the Subject Property. The History Colorado response is presented in **Appendix D**.

5.0 OPINION AND RECOMMENDATION

Based on the direct field observations and our limited literature research it is our opinion that Waters of the U.S. are not present on the Subject Property. A wetland determination data point was taken on the Property as indicated on Figure 2. This sampling did not reveal evidence of a wetland in this location. We also did not observe potential wetlands elsewhere on the Subject Property. Thus, it is the professional opinion of CTL|T that wetlands are not present on the Property and further investigation is not warranted.

The FEMA NFHL indicated the Property primarily as an area of minimal flood hazard. Floodplains were not indicated on the Subject Property.

We did not observe the presence of Federally listed or State listed endangered or threatened species on the Subject Property. We recommend sediment control measures and BMPs be used to protect surface water features and associated habitats near the Property. We do not



believe the development of the Subject Property will significantly adversely impact Federally listed or State listed threatened or endangered species. We did not observe the presence of prairie dogs or their burrows on the Subject Property.

We also assessed State Wildlife Action Plan (SWAP) Tier 1 and Tier 2 species with possible habitat on the Property. The SWAP does not impose any direct regulatory protection requirements for these species. We believe impacts to these species will be minimal based on the size of the project, the type of habitat present on the Property, the use of stormwater control measures and BMPs, and adherence to the MBTA and Bald and Golden Eagle Protection Act of 1940.

We observed potential habitat for tree-nesting and ground-nesting migratory birds on the Property. If development or vegetation removal is planned for migratory bird breeding season (generally March through August) we recommend a migratory bird survey be completed for a higher level of assurance that the MBTA is not infringed upon.

We did not observe potential raptor or bald and golden eagle habitat on the Subject Property due to the lack of large, mature trees. We did not observe obvious raptor or eagle nests on or adjacent to the Property. We do not believe the development of the Property will result in encroachment of CPW raptor buffer zones or result in a “take” of bald or golden eagles in its current state.

CTL|T contacted History Colorado, Office of Archaeology and Historic Preservation to request a search of the Colorado Inventory of Cultural Resources on the Subject Property. Per History Colorado, no historical/archeological sites or surveys were identified on the Subject Property.

While all construction and development activities have the potential to cause indirect impacts, which may include, but may not be limited to, noise, pollution, dust, and general encroachment, we believe that potential impacts at the Property are limited. Proposed development at the Property is presumably in accordance with local zoning and existing development in the area. There is already residential and commercial development in the area of the Property. Regulations and best management practices regarding stormwater management and spill prevention and control should be followed to best protect local water resources. Additionally, local regulations and



best management practices to reduce noise and dust during construction should be followed. With these measures in mind, we do not believe construction or development at the Property will cause additional indirect impacts beyond those which have historically occurred in the vicinity.

6.0 LIMITATIONS

This assessment only applies to the Subject Property in its current state, in areas that were easily observed. If development of the Subject Property is planned for 2025 or after, we recommend a supplementary biological assessment and cultural records review as species behaviors are not static season to season. We believe that CTL|T performed services in a professional manner, consistent with industry standards and practices in the locality of the project at the time the services were performed. No warranty, express or implied, is made.

CTL|THOMPSON, INC.

Claire Asmussen
Environmental Scientist

Reviewed by:

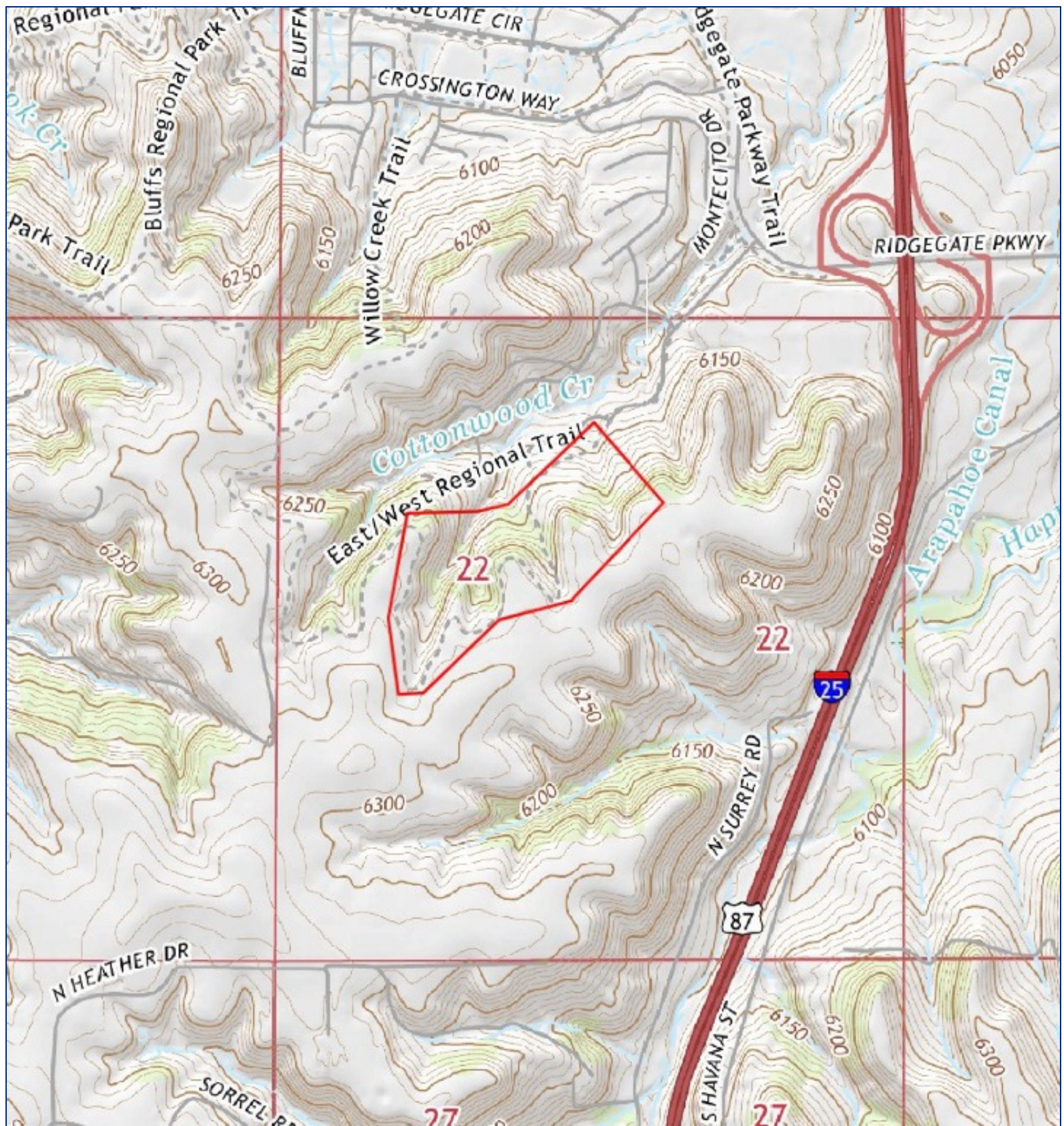
Laura Mooney, PWS
Environmental Scientist

Via e-mail: krohrbough@jrengineering.com



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 Ridgegate Mesa Tops - Hillcamp Drive



Source/Year : USGS, 2019

Scale: 1:18000



Ridgegate Mesa Tops - Hillcamp Drive - Topographic Area Map

Cabela Drive and Viewside Drive, Lone Tree, CO

Date: June 23, 2025

Project No.
DN52,378.000

Figure No:

1



 Ridgegate Mesa Tops - Hillcamp Drive



Source/Year : CURAERIAL, 2023

Scale: 1:9000



Ridgegate Mesa Tops - Hillcamp Drive - Property Map

Cabela Drive and Viewside Drive, Lone Tree, CO

Date: June 23, 2025

Project No.
DN52,378.000

Figure No:

2



APPENDIX A

PROPERTY PHOTOGRAPHS



Description: General Property view
View Direction: North



Description: General Property view with view of graded area
View Direction: Southwest



Description: Access road on northwestern edge and graded area
View Direction: South



Description: Drainage area leading to culvert
View Direction: South

PROPERTY PHOTOGRAPHS

RIDGEGATE MESA TOPS – HILCAMP DRIVE
 Site Reconnaissance – July 1, 2025



Description: Access road along ridge
View Direction: North



Description: Access road along ridge
View Direction: West



Description: General Property view
View Direction: East



Description: General Property view
View Direction: North

PROPERTY PHOTOGRAPHS

RIDGEGATE MESA TOPS – HILCAMP DRIVE
 Site Reconnaissance – July 1, 2025



APPENDIX B

WETLAND INVENTORY MAP



U.S. Fish and Wildlife Service

National Wetlands Inventory

Ridgegate Mesa Tops - Hillcamp Drive - Arroyo



June 27, 2025

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



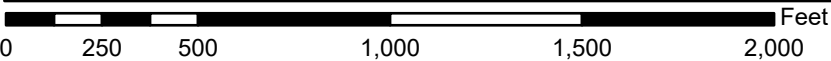
APPENDIX C

FEMA NFHL

National Flood Hazard Layer FIRMette



104°52'55"W 39°31'17"N



1:6,000

104°52'17"W 39°30'50"N

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 6/27/2025 at 10:36 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



APPENDIX D

HISTORY COLORADO RESPONSE



Claire Asmussen
CTL Thompson, Inc.
1971 W 12th Avenue Denver CO 80204

August 5, 2025

Re: Ridgeway Mesa DN52,378.000
File Search No. 27144

At your request, the Office of Archaeology and Historic Preservation has conducted a search of the Colorado Inventory of Cultural Resources based on your specified search criteria (the area shown in the provided map), located in the following areas:

PM	T	R	S
6th	6S	67W	22

0 sites and 0 surveys were located in the search area(s).

If any site, district, building, structure, object, or survey area was identified within the search area, a spreadsheet of detailed information* accompanies this letter. Our records may not represent all cultural resources in Colorado, nor can they be considered comprehensive, as most of the state has not been surveyed for cultural resources. There is the possibility that as yet unidentified cultural resources exist within the proposed impact area.

This letter is not considered formal consultation under Section 106 of the National Historic Preservation Act (36 CFR 800) or the Colorado Register of Historic Places (CRS 24-80.1). In the event that there is federal or state agency involvement, please note that it is the responsibility of the agencies to meet the requirements of these regulations.

We look forward to consulting with you regarding the effect of the proposed project on significant cultural resources in accordance with the Advisory Council on Historic Preservation regulations titled "Protection of Historic Properties" or the Colorado Register of Historic Places, as applicable (<http://www.historycolorado.org/consultation-guidance>).

If you have any questions, please contact the Office of Archaeology and Historic Preservation at (303) 866-3392. Thank you for your interest in Colorado's cultural heritage.

Dawn DiPrince
State Historic Preservation Officer

*Information regarding significant archaeological resources is excluded from the Freedom of Information Act. As such, legal locations of these resources must not be included in documents for public distribution.



APPENDIX E
WETLAND DETERMINATION DATA FORM

U.S. Army Corps of Engineers WETLAND DETERMINATION DATA SHEET – Western Mountains, Valleys, and Coast Region See ERDC/EL TR-10-3; the proponent agency is CECW-CO-R		OMB Control #: 0710-0024, Exp: 9/30/2027 Requirement Control Symbol EXEMPT: (Authority: AR 335-15, paragraph 5-2a)			
Project/Site: <u>Ridgegate Mesa Tops- Hillcamp Drive</u>		City/County: <u>Lone Tree, Douglas</u>	Sampling Date: <u>10/15/25</u>		
Applicant/Owner: <u>JR Engineering, LLC</u>		State: <u>CO</u>	Sampling Point: <u>SP1</u>		
Investigator(s): <u>Claire Asmussen</u>		Section, Township, Range: <u>Section 22, Township 6 S, Range 67 W of 6th PM</u>			
Landform (hillside, terrace, etc.): <u>Draw</u>		Local relief (concave, convex, none): <u>Concave</u>	Slope (%): <u>0</u>		
Subregion (LRR/MLRA): <u>LRR E</u>		Lat: <u>39.517305</u>	Long: <u>-104.880019</u>	Datum: <u>NAD83</u>	
Soil Map Unit Name: <u>Fondis-Kutch association</u>		NW1 classification: <u>None</u>			
Are climatic / hydrologic conditions on the site typical for this time of year? Yes <u>X</u> No <u> </u> (If no, explain in Remarks.)					
Are Vegetation <u> </u> , Soil <u> </u> , or Hydrology <u> </u> significantly disturbed? Are "Normal Circumstances" present? Yes <u>X</u> No <u> </u>					
Are Vegetation <u> </u> , Soil <u> </u> , or Hydrology <u> </u> naturally problematic? (If needed, explain any answers in Remarks.)					
SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.					
Hydrophytic Vegetation Present? Yes <u> </u> No <u>X</u>		Is the Sampled Area within a Wetland? Yes <u> </u> No <u>X</u>			
Hydric Soil Present? Yes <u> </u> No <u>X</u>					
Wetland Hydrology Present? Yes <u> </u> No <u>X</u>					
Remarks: Sample point taken at the base of a draw on the Proeprty. Water may subsequently drain from this location into cottonwood creek. Wetland not found at this location.					
VEGETATION – Use scientific names of plants.					
<u>Tree Stratum</u> (Plot size: <u>30 feet</u>)		Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>25.0%</u> (A/B)
1. <u> </u>					
2. <u>Quercus gambelii</u>		<u>10</u>	<u>Yes</u>	<u>UPL</u>	
3. <u>Prunus virginiana</u>		<u>5</u>	<u>Yes</u>	<u>FACU</u>	
4. <u> </u>					
		<u>15</u>	=Total Cover		
<u>Sapling/Shrub Stratum</u> (Plot size: <u>15 feet</u>)					Prevalence Index worksheet: Total % Cover of: Multiply by: OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>3</u> x 2 = <u>6</u> FAC species <u>35</u> x 3 = <u>105</u> FACU species <u>54</u> x 4 = <u>216</u> UPL species <u>22</u> x 5 = <u>110</u> Column Totals: <u>114</u> (A) <u>437</u> (B) Prevalence Index = B/A = <u>3.83</u>
1. <u>Prunus virginiana</u>		<u>3</u>	<u>No</u>	<u>FACU</u>	
2. <u> </u>					
3. <u> </u>					
4. <u> </u>					
5. <u> </u>					
		<u>3</u>	=Total Cover		
<u>Herb Stratum</u> (Plot size: <u>5 feet</u>)					Hydrophytic Vegetation Indicators: <u>1</u> - Rapid Test for Hydrophytic Vegetation <u>2</u> - Dominance Test is >50% <u>3</u> - Prevalence Index is ≤3.0 ¹ <u>4</u> - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <u>5</u> - Wetland Non-Vascular Plants ¹ <u> </u> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Poa secunda</u>		<u>45</u>	<u>Yes</u>	<u>FACU</u>	
2. <u>Cirsium arvense</u>		<u>30</u>	<u>Yes</u>	<u>FAC</u>	
3. <u>Grindelia squarrosa</u>		<u>1</u>	<u>No</u>	<u>FACU</u>	
4. <u>Nassella viridula</u>		<u>10</u>	<u>No</u>	<u>UPL</u>	
5. <u>Symphyotrichum subspicatum</u>		<u>3</u>	<u>No</u>	<u>FACW</u>	
6. <u>Poa pratensis</u>		<u>5</u>	<u>No</u>	<u>FAC</u>	
7. <u>Stachys byzantina</u>		<u>1</u>	<u>No</u>	<u>UPL</u>	
8. <u>Berberis repens</u>		<u>1</u>	<u>No</u>	<u>UPL</u>	
9. <u> </u>					
10. <u> </u>					
11. <u> </u>					
		<u>96</u>	=Total Cover		
<u>Woody Vine Stratum</u> (Plot size: <u> </u>)					Hydrophytic Vegetation Present? Yes <u> </u> No <u>X</u>
1. <u> </u>					
2. <u> </u>					
			=Total Cover		
% Bare Ground in Herb Stratum <u>4</u>					
Remarks:					

SOIL

Sampling Point: SP1**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-15	7.5YR 3/2	100					Loamy/Clayey	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains.²Location: PL=Pore Lining, M=Matrix.**Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)**

☐ Histosol (A1)	☐ Sandy Gleyed Matrix (S4)
☐ Histic Epipedon (A2)	☐ Sandy Redox (S5)
☐ Black Histic (A3)	☐ Stripped Matrix (S6)
☐ Hydrogen Sulfide (A4)	☐ Loamy Mucky Mineral (F1) (except MLRA 1)
☐ 1 cm Muck (A9) (LRR D, G)	☐ Loamy Gleyed Matrix (F2)
☐ Depleted Below Dark Surface (A11)	☐ Depleted Matrix (F3)
☐ Thick Dark Surface (A12)	☐ Redox Dark Surface (F6)
☐ Iron Monosulfide (A18)	☐ Depleted Dark Surface (F7)
☐ Sandy Mucky Mineral (S1)	☐ Redox Depressions (F8)
☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G)	

Indicators for Problematic Hydric Soils³:

☐ 2 cm Muck (A10) (LRR A, E)
☐ Iron-Manganese Masses (F12) (LRR D)
☐ Red Parent Material (F21)
☐ Very Shallow Dark Surface (F22)
☐ Other (Explain in Remarks)

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.**Restrictive Layer (if observed):**Type: _____
Depth (inches): _____**Hydric Soil Present?** Yes _____ No X

Remarks:

Soil was clayey with gravel mixed in. Some nearby boulders had a reddish parent material. Hydric soils not observed..

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

☐ Surface Water (A1)	☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)
☐ High Water Table (A2)	☐ Salt Crust (B11)
☐ Saturation (A3)	☐ Aquatic Invertebrates (B13)
☐ Water Marks (B1)	☐ Hydrogen Sulfide Odor (C1)
☐ Sediment Deposits (B2)	☐ Oxidized Rhizospheres on Living Roots (C3)
☐ Drift Deposits (B3)	☐ Presence of Reduced Iron (C4)
☐ Algal Mat or Crust (B4)	☐ Recent Iron Reduction in Tilled Soils (C6)
☐ Iron Deposits (B5)	☐ Stunted or Stressed Plants (D1) (LRR A)
☐ Surface Soil Cracks (B6)	☐ Other (Explain in Remarks)
☐ Inundation Visible on Aerial Imagery (B7)	
☐ Sparsely Vegetated Concave Surface (B8)	

Secondary Indicators (2 or more required)

☐ Water-Stained Leaves (B9) (MLRA 1, 2 4A, and 4B)
☐ Drainage Patterns (B10)
☐ Dry-Season Water Table (C2)
☐ Saturation Visible on Aerial Imagery (C9)
☒ Geomorphic Position (D2)
☐ Shallow Aquitard (D3)
☐ FAC-Neutral Test (D5)
☐ Raised Ant Mounds (D6) (LRR A)
☐ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present?	Yes _____	No _____	Depth (inches): _____
Water Table Present?	Yes _____	No _____	Depth (inches): _____
Saturation Present?	Yes _____	No _____	Depth (inches): _____
(includes capillary fringe)			

Wetland Hydrology Present? Yes _____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: