



GILL GROUP

December 31, 2024

TWG Development, LLC
1301 East Washington Street, Suite 100
Indianapolis, Indiana 46202

ATTENTION: Seth Atkinson

SUBJECT: Land Suitability Analysis Report
3161 North Castleton Court
3161 North Castleton Court
Castle Rock, Colorado 80104
Project No. E513T2848

Dear Mr. Atkinson:

Gill Group is pleased to provide this Land Suitability Analysis Report (LSAR) for the referenced site. This LSAR conforms to the Castle Rock, Colorado Municipal Code 17.10.030-Land Suitability. If you have any questions or comments, please contact the undersigned Gill Group participants at (800) 428-3320.

Sincerely,
Gill Group, Inc.

Joseph Finn
Staff Geologist

Jacob G. Epperson, P.G.
Director of Environmental Services



GILL GROUP

Land Suitability Analysis Report

**3161 North Castleton Court
3161 North Castleton Court
Castle Rock, Colorado 80104**

**Report Issuance Date:
December 31, 2024**

**Project Number:
E513T2848**

**Prepared For:
TWG Development, LLC
1301 East Washington Street, Suite 100
Indianapolis, Indiana 46202**

GILL GROUP, INC.
2100 Gill Plaza Drive, Suite B
DEXTER, MISSOURI 63841

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1.0 Project Information

1.1 Location and Project Description

The subject property is located at 3161 North Castleton Court in Castle Rock Colorado and can be further described as being located at 39.4083330 and -104.8685600 Longitude. An aerial map, and topographic map are provided in Appendix A-Figures 1 and 2.

1.2 Current Land Ownership and Land Use

The subject property is listed as being owned by Enterprise LTD and is assigned parcel number 235127401032. Additionally, the subject property is zoned as B, Business/Commercial, no changes in zoning are anticipated. The subject property consists of one approximately 3.10-acre parcel of land that is undeveloped and vacant. An early attempt to develop on the subject property occurred in the early 2000s; however, no building was constructed, but soil was moved around on the subject property in an attempt to grade the land. A tax parcel map and zoning map are provided in Appendix A-Figures 3 and 4. Photographs of the subject property are provided in Appendix B.

2.0 Land Suitability

2.1 Topography

The property is reported in the EDR report to have an average topographic elevation of approximately 6,146 feet above mean sea level. The subject property is relatively flat lying but the overall topography of the area slopes gently to the southwest. An intermittent stream is mapped to the southwest and south of the subject property. The site reconnaissance of the subject property revealed that the western and southern property boundaries are steeply sloping, potentially due to the previous attempts to grade the subject property for commercial development. The northeastern portion of the property is raised, and the central portion of the property is flat lying.

2.2 General Slope

Gill conducted a general slope survey using available online elevation tools via Google Earth. The overall slope from east to west is approximately 9%. The subject property's slope from north to south is approximately 9.5%. It is recommended to have certified surveyors analyze the slope of the subject property.

2.3 Geology

According to the Geologic Map of the Castle Rock Northern Quadrangle, the subject property is underlain by sheetwash deposits (Unit Qsw) and is approximately Holocene to late Pleistocene in age. The unit is described as being poorly sorted sand, silty and clayey sand with minor amounts of gravel including some cobbles and small boulders. The unit is considered to have been derived from the Dawson Formation with an estimated thickness of 3-20 feet. A geologic map is provided in Appendix A-Figure 5.

2.4 Soil

According to the USDA Web Soil Mapper, the subject property consists of the Kutch sandy loam. This soil is described as being well drained with high runoff. Transmissivity through the soil can be moderately low to moderately high. The subject property soil is also classified as Bresser soils which are characterized as sandy loam. This soil has moderate infiltration rates with moderately coarse textures. The soil is also reported as not being hydric soil and as not prime farmland. A soil map is provided in Appendix A-Figure 6.

2.5 Vegetation

Currently, the property consists of vacant, undeveloped land covered in low lying grass vegetation and fill material. The property is accessed via North Castleton Court to the east. Photographs of the subject property can be viewed in Appendix B.

2.6 Floodplain Management

The subject property is located within a FEMA Flood Zone X area as noted by FEMA Flood Insurance Rate Map number 08035C0186G. The project does not consist of a critical action. No data exists for the Federal Flood Standard Support Tool. A FEMA FIRMette is provided in Appendix A-Figure 7.

2.7 Wetlands

There are no wetlands present on the subject property according to the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) map, and as confirmed by our site reconnaissance (presence of hydrophytic vegetation, iron redox indicators in soil, and visible hydrologic feature). A wetlands map is provided in Appendix A-Figure 8.

2.8 Wildlife Habitat

The USFWS Endangered Species IPaC Trust Resources Report was obtained for analyzing project level impacts of Threatened and Endangered Species (T&E Species) in the project area. The USFWS lists one threatened mammal (Preble's Meadow Jumping Mouse), one threatened bird (Piping Plover), one endangered bird (Whooping Crane), one endangered fish (Pallid Sturgeon), one proposed threatened insect (Monarch Butterfly), and two threatened flowering plants (Ute Ladies'-tresses, Wester Prairie Fringed Orchid). However, no critical habitat is identified on the subject property in the IPaC report. No threatened or endangered species mentioned above were observed during the site reconnaissance. Further, the surrounding properties have been developed for commercial use from as early as 1980. Deer and canine prints were observed but burrowing creature's entrances were not observed. The observed plants on the subject property were Curly Dock, Milk Thistle, Smooth Brome, and Small Soapweed. The official species list is provided in Appendix C.

2.9 Wildfire Hazard

According to the Colorado Wildfire Risk Viewer, the subject property is located in the lowest burn probability and lowest fire intensity areas. A Wildfire Hazard map is provided in Appendix A-Figure X.

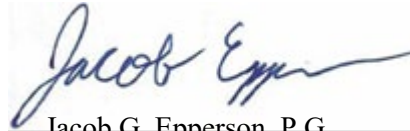
3.0 Evaluation

Based on the information obtained during the site reconnaissance, records reviews, and interviews, Gill has evaluated the land suitability of the property described above. Based on our review, it is Gills opinion that no natural drainage ways exist on the subject property, there are no unique site features, the subject property does not occupy a 100-year flood plain, no visual impacts of off-site areas exist, and that no endangered wildlife or plants utilize the subject property. It is our opinion that the proposal meets the criteria established in Castle Rock, Colorado Municipal Code 17.10.030-Land suitability and does not have any extraordinary circumstances or that the proposal individually or cumulatively does not have a significant effect on the human environment.

Gill Group, Inc.



Caroline Patterson
Project Geologist



Jacob G. Epperson, P.G.
Director of Environmental Services

4.0 Limitations

This report was prepared solely for the use of TWG Development, LLC., its affiliates, successors or assigns. Use of this report by any party other than the client is prohibited without prior written consent. The findings and recommendations contained within this report are derived from the information obtained from the client, property management, the on-site activities, and analytical services provided under the scope of work performed. The results, findings, conclusions, and recommendations expressed in this report are based on the conditions observed during our survey. The information contained in this report is representative of the date of inspection and should not be relied upon at a later date. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation, mitigation or remediation activities deemed necessary. Gill does not warrant the work of regulatory agencies, laboratories, or other third parties supplying information which may have been used in preparation of this report. No warranty expressed or implied is made.

5.0 References

Section Map	Web Source
Aerial Image	Environmental Data Resources Historical Aerials Report dated December 16, 2024.
Topographic Map	Environmental Data Resources Topographic Map Report dated December 16, 2024.
Zoning Map	Castle Rock GIS, accessed December 29, 2024, https://castlerock.maps.arcgis.com/apps/webappviewer/index.html?id=4762ab6424a24af48fe51b31ab09a961
Geologic Map	Thorson, Jon P. "OF-05-02 Geologic Map of the Castle Rock North Quadrangle, Douglas County, Colorado." Geologic. Open File Report. Denver, CO: Colorado Geological Survey, Division of Minerals and Geology, Department of Natural Resources, 2005. https://coloradogeologicalsurvey.org/publications/geologic-map-castle-rock-north-quadrangle-douglas-colorado .
Soil Map	https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx
Federal Emergency Management Agency (FEMA)	https://msc.fema.gov/portal/home
Wetland Map	https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
U.S. Fish and Wildlife Service IPaC	https://ipac.ecosphere.fws.gov/
Elevation Data	Google Earth
Wildfire Risk	https://co-pub.coloradoforestatlas.org/#/

6.0 Appendices

The following appendices are included and attached to this report:

Appendix A: Figures

Appendix B: Photographs

Appendix C: Official Species List

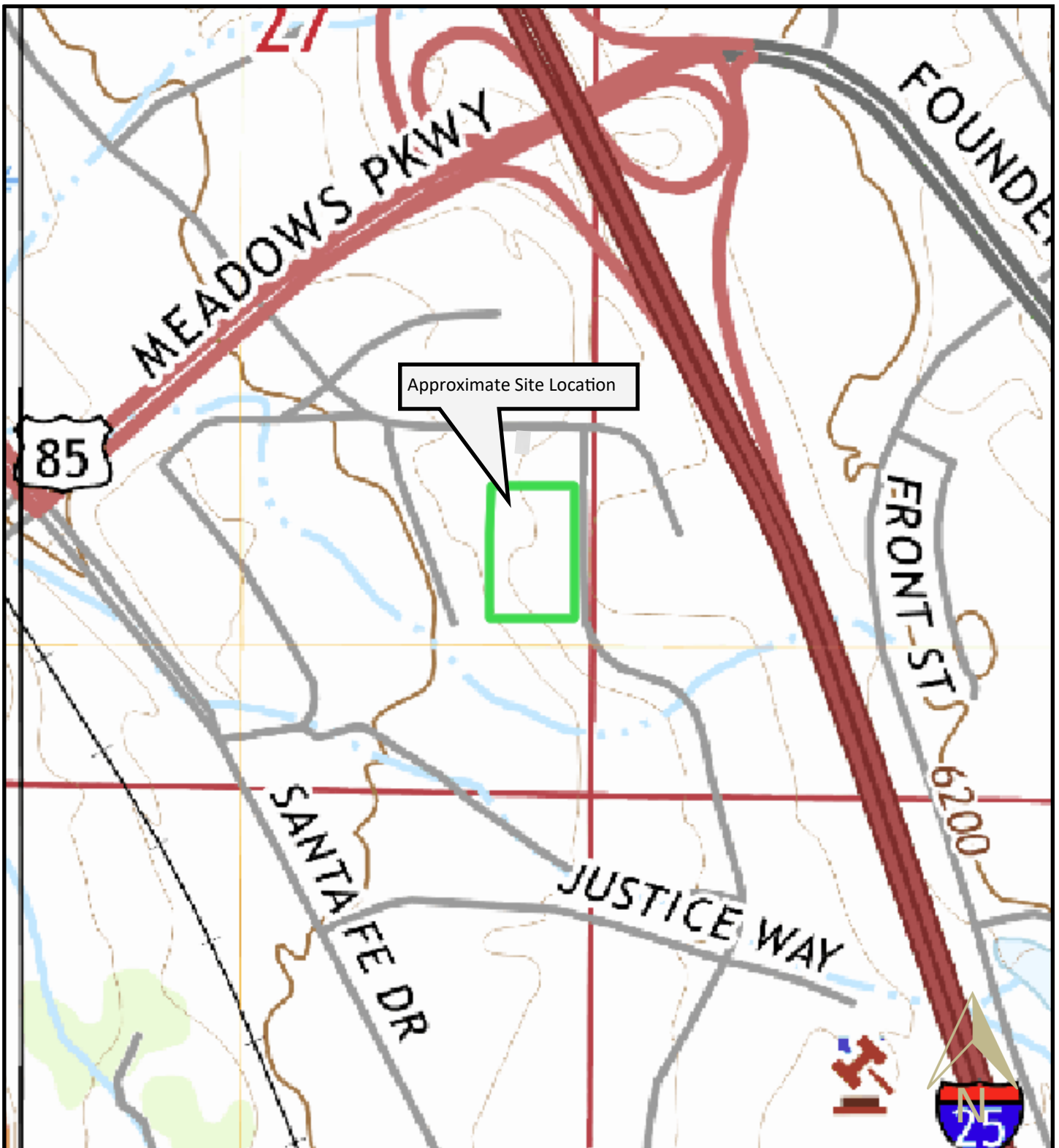
APPENDIX A

FIGURES



Source: Image provided courtesy of EDR.

<p>Figure 1– Aerial Photograph</p> <p>3161 North Castleton Court</p> <p>3161 North Castleton Court</p> <p>Castle Rock, Colorado</p>	<p>Project Number: E513T2848</p> <p>Date Drawn: 12/26/24</p> <p>Drawn By: JF</p> <p>Checked By: JE</p>	 <p>GILL GROUP</p>
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Source: Image provided courtesy of EDR.

Figure 2– Topographic Map

3161 North Castleton Court
3161 North Castleton Court
Castle Rock, Colorado

Project Number: E513T2848

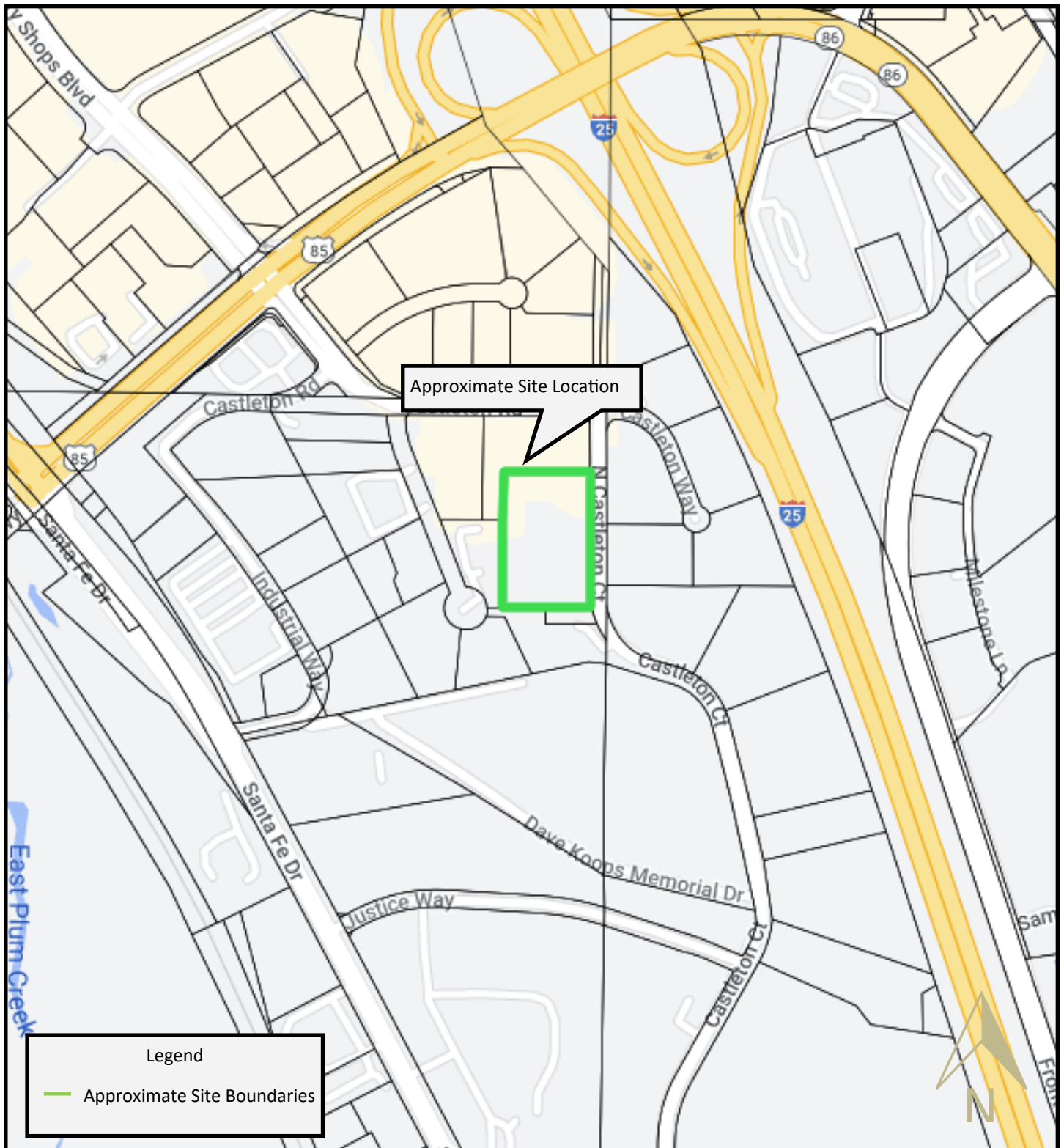
Date Drawn: 12/26/24

Drawn By: JF

Checked By: JE



GILL GROUP



Source: Image provided courtesy of EDR.

Figure 3– Tax Map

3161 North Castleton Court
 3161 North Castleton Court
 Castle Rock, Colorado

Project Number: E513T2848

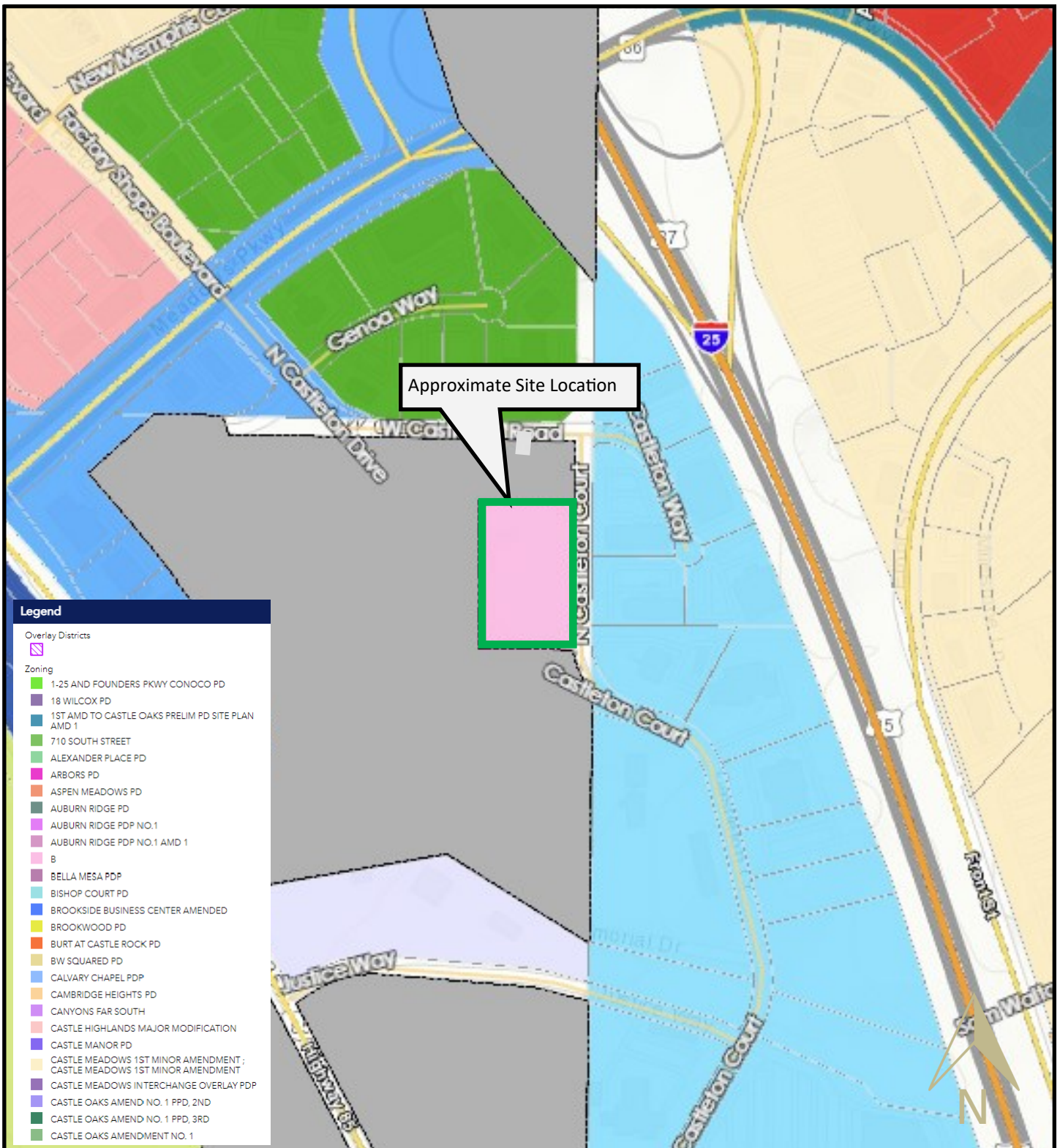
Date Drawn: 12/26/24

Drawn By: JF

Checked By: JE



GILL GROUP



Source: Image provided courtesy of Castle Rock GIS.

Figure 4– Zoning Map

3161 North Castleton Court
3161 North Castleton Court
Castle Rock, Colorado

Project Number: E513T2848

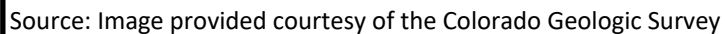
Date Drawn: 12/26/24

Drawn By: JF

Checked By: JE



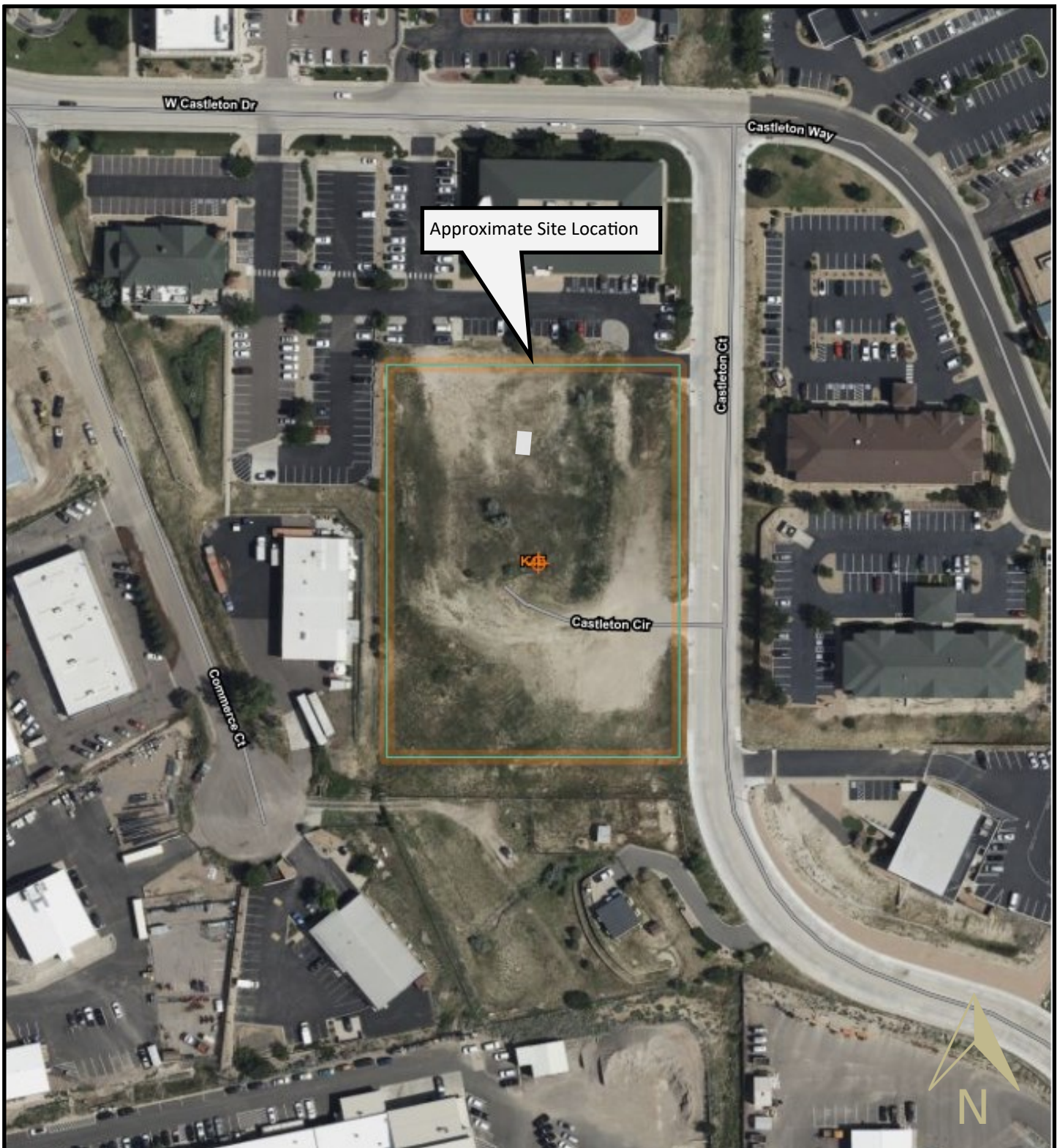
GILL GROUP



3161 North Castleton Court
3161 North Castleton Court
Castle Rock, Colorado

Checked By: JE





Source: Image provided courtesy of the USDA Web Soil Mapper

Figure 6— Soil Map

3161 North Castleton Court
3161 North Castleton Court
Castle Rock, Colorado

Project Number: E513T2848

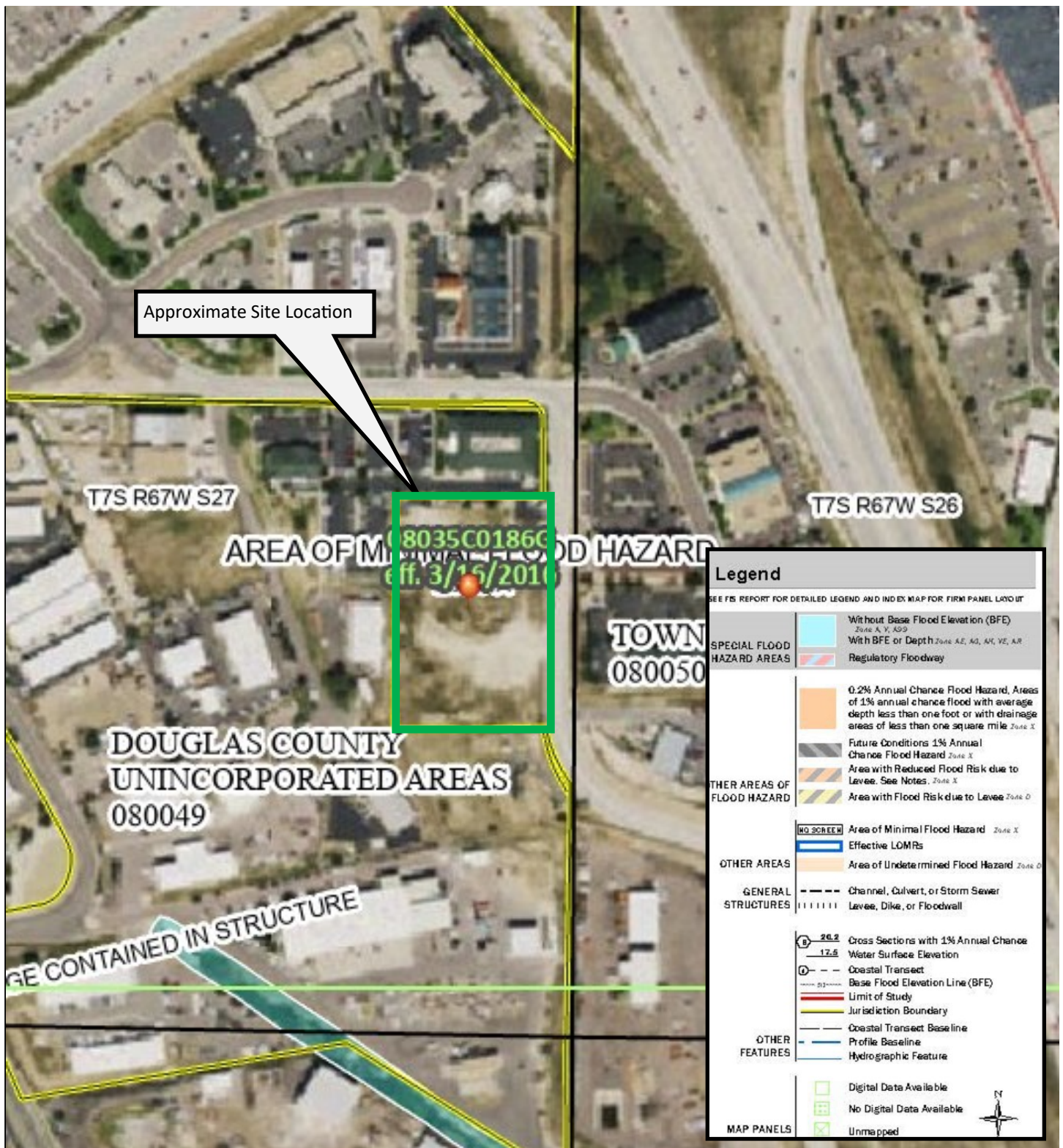
Date Drawn: 12/26/24

Drawn By: JF

Checked By: JE



GILL GROUP



Source: Image provided courtesy of FEMA Flood Map Service Center Map Panel 08035C0186G

Figure 7– Floodplain Management

3161 North Castleton Court

3161 North Castleton Court

Castle Rock, Colorado

Project Number: E513T2848

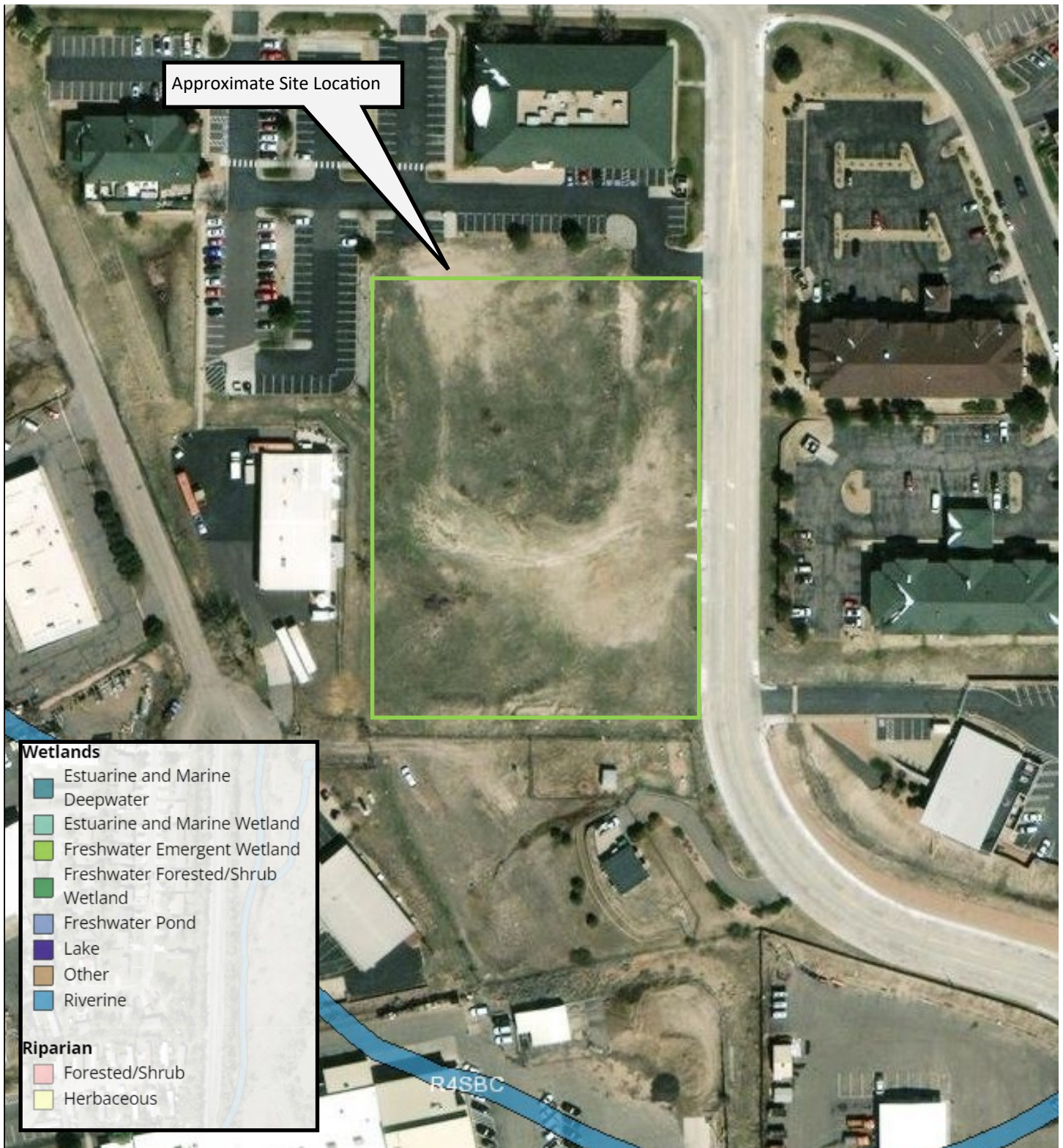
Date Drawn: 12/26/24

Drawn By: JF

Checked By: JE



GILL GROUP

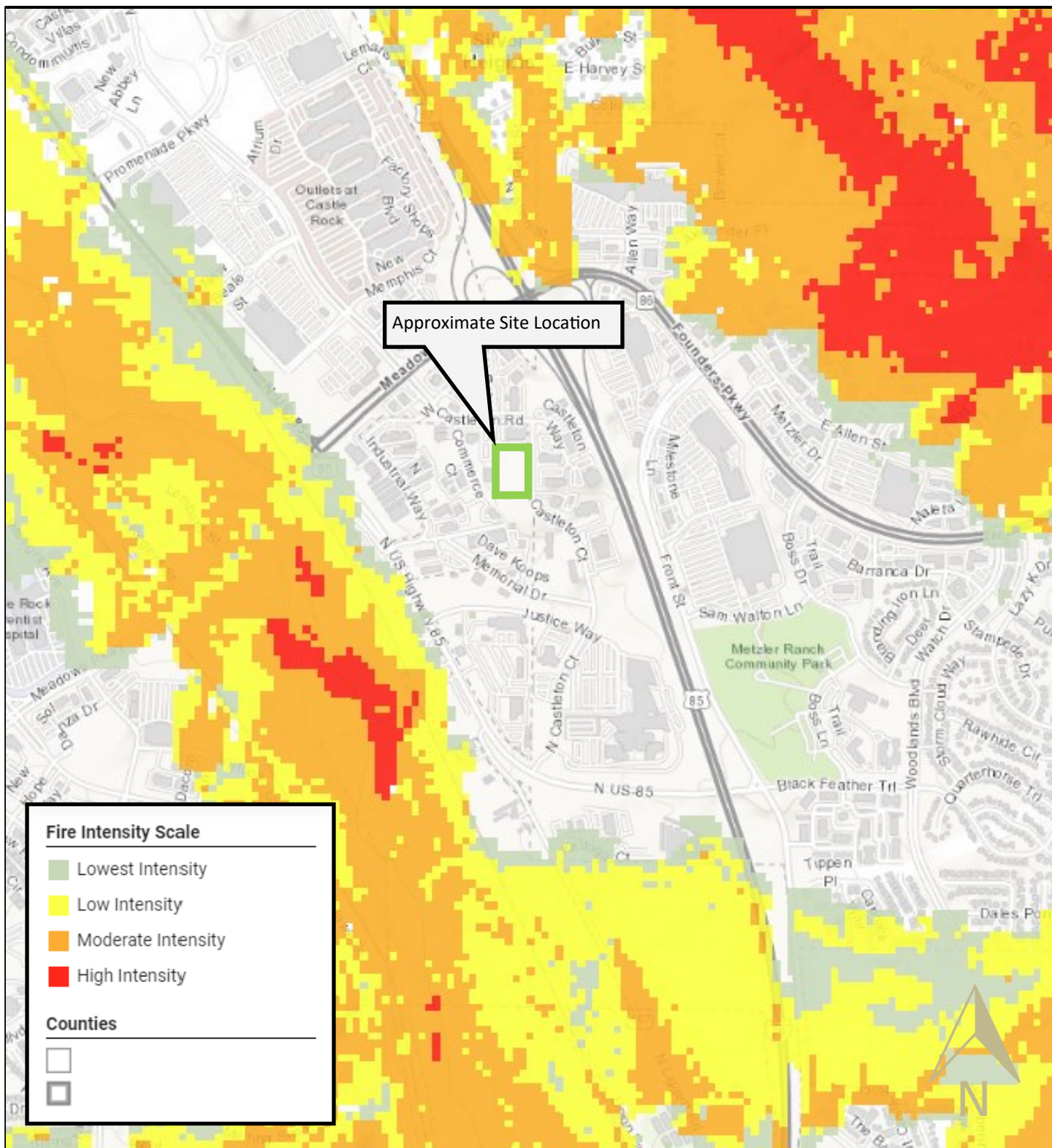


Source: Image provided courtesy of U.S. Fish & Wildlife Service-National Wetlands Inventory Mapper.

Figure 8– Wetlands Map
3161 North Castleton Court
3161 North Castleton Court
Castle Rock, Colorado

Project Number: E513T2848
Date Drawn: 12/26/24
Drawn By: JF
Checked By: JE





Source: Image provided courtesy of Wildlife Risk Viewer.

Figure 9– Wildfire Risk Map

3161 North Castleton Court

3161 North Castleton Court

Castle Rock, Colorado

Project Number: E513T2848

Date Drawn: 12/31/24

Drawn By: AM

Checked By: JE



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APPENDIX B
PHOTOGRAPHS



No. 1

View of the center of the subject property



No. 2

View of the pole-mounted transformers on the western boundary

Inspector: Joseph Finn

Date of Inspection: 12/19/2024



No. 3

View of a ventilation pipe near the northwest boundary



No. 4

View of PVC pole on the southwestern portion of the subject property

Inspector: Joseph Finn

Date of Inspection: 12/19/2024



No. 5

View of the subject property from the northeast corner



No. 6

View of the subject property from the northwest corner

Inspector: Joseph Finn

Date of Inspection: 12/19/2024



No. 7

View of the subject property from the southwest corner



No. 8

View of the subject property from the southeast corner



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Project Name: 3161 North Castleton Court

Property Address: 3161, North Castleton Court, Castle Rock, Colorado



No. 9

View of Castleton Court looking south



No. 10

View of the northern adjoining Meadows Crossing office building

Inspector: Joseph Finn

Date of Inspection: 12/19/2024



No. 11

View of Castleton Court, Days Inn and the Colorado State Patrol building



No. 12

View of the Comfort Suites



No. 13 | View of the southern Douglas County Maintenance Services Building



No. 14 | View of the Castleton Water and Sanitation District water taps



No. 15	View of the western Rockyard Brewing warehouse
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No. 16	Front view of the Rockyard Brewing Warehouse
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No. 17

View of the Rockyard Brewing restaurant



No. 18

Front view of the western property boundary slope

Inspector: Joseph Finn

Date of Inspection: 12/19/2024



No. 19	View of the southern property boundary slope
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APPENDIX C
OFFICIAL SPECIES LIST



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Colorado Ecological Services Field Office
Denver Federal Center
P.O. Box 25486
Denver, CO 80225-0486
Phone: (303) 236-4773 Fax: (303) 236-4005



In Reply Refer To:

12/26/2024 21:50:26 UTC

Project Code: 2025-0035894

Project Name: North Castleton Court

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

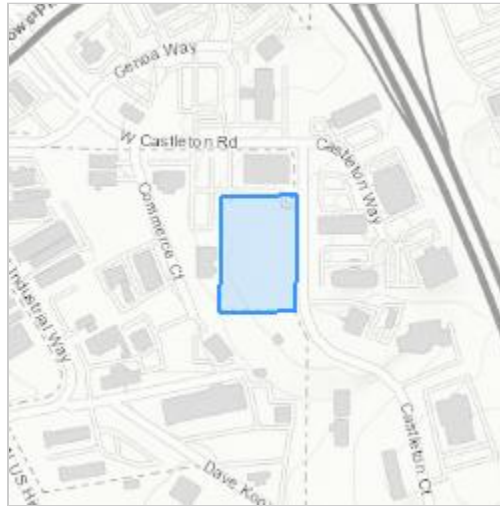
Colorado Ecological Services Field Office

Denver Federal Center
P.O. Box 25486
Denver, CO 80225-0486
(303) 236-4773

PROJECT SUMMARY

Project Code: 2025-0035894
Project Name: North Castleton Court
Project Type: Federal Grant / Loan Related
Project Description: HUD funding
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@39.40832915,-104.86855216698021,14z>



Counties: Douglas County, Colorado

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 2 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
<p>Preble's Meadow Jumping Mouse <i>Zapus hudsonius preblei</i></p> <p>There is final critical habitat for this species. Your location does not overlap the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/4090</p> <p>General project design guidelines:</p> <p>https://ipac.ecosphere.fws.gov/project/V2CHQVVXWNEPFPMZHCNTGULGTU/documents/generated/6861.pdf</p>	Threatened

BIRDS

NAME	STATUS
<p>Piping Plover <i>Charadrius melodus</i></p> <p>Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered.</p> <p>There is final critical habitat for this species. Your location does not overlap the critical habitat.</p> <p>This species only needs to be considered under the following conditions:</p> <ul style="list-style-type: none"> Project includes water-related activities and/or use in the N. Platte, S. Platte, and Laramie River Basins which may affect listed species in Nebraska. <p>Species profile: https://ecos.fws.gov/ecp/species/6039</p>	Threatened
<p>Whooping Crane <i>Grus americana</i></p> <p>Population: Wherever found, except where listed as an experimental population</p> <p>There is final critical habitat for this species. Your location does not overlap the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/758</p>	Endangered

FISHES

NAME	STATUS
<p>Pallid Sturgeon <i>Scaphirhynchus albus</i></p> <p>No critical habitat has been designated for this species.</p> <p>This species only needs to be considered under the following conditions:</p> <ul style="list-style-type: none"> Project includes water-related activities and/or use in the N. Platte, S. Platte, and Laramie River Basins which may affect listed species in Nebraska. <p>Species profile: https://ecos.fws.gov/ecp/species/7162</p>	Endangered

INSECTS

NAME	STATUS
<p>Monarch Butterfly <i>Danaus plexippus</i></p> <p>There is proposed critical habitat for this species.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/9743</p>	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
<p>Ute Ladies'-tresses <i>Spiranthes diluvialis</i></p> <p>No critical habitat has been designated for this species.</p>	Threatened

NAME	STATUS
Species profile: https://ecos.fws.gov/ecp/species/2159	
Western Prairie Fringed Orchid <i>Platanthera praeclara</i>	Threatened
No critical habitat has been designated for this species.	
Species profile: https://ecos.fws.gov/ecp/species/1669	

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Joseph Finn
Address: 2100 Gill Plaza Drive, Suite B
City: Dexter
State: MO
Zip: 63841
Email: joseph.finn@gillgroup.com
Phone: 5748762294