

CONCEPTUAL MITIGATION PLAN
FOR THE 75-ACRE FORT BEND COUNTY TOWN CENTER (SEC)
MISSOURI CITY, TEXAS

Under 33 CFR 325.1 (d)(7), applications for a Department of the Army permit must demonstrate how impacts to waters of the U.S. will be either avoided or minimized; and how the applicant will compensate for impacts to special aquatic sites including wetlands. While the district engineer in the has significant discretion in the selection of is appropriate with respect to type, quantity and location of appropriate mitigation, the stated siting preference for mitigation is generally in areas located within the same watershed where the impacts are proposed. The hierarchy of preference places the use of mitigation banking credits and in-lieu-fee programs over permittee-responsible mitigation. The availability of acceptable mitigation sites, as well as an applicant's ability to satisfy specific stewardship requirements are factors that are weighed in the final decision mitigation decision. A key determinant is in determining the required mitigations to identify the affected resources and determine their quantity and functional value.

InControl Technologies (ICT) completed a wetland delineation 75-acre the applicant is proposing to develop as proposed mixed residential and retail center. During its delineation, ICT identified 6 wetlands consisting of three separate Cowardian classes. A small other surface water (OSW) was also identified. Table 1 provides a summary of the wetlands by vegetation class and the acreage delineated within the project site. A more detailed discussion is provided in the wetland delineation report contained in the appendix.

Table 1. Aquatic Habitats

	disposition	Wetland Type	Size (ac.)
Wet A		PFO	6.65
Wet B		PEM	1.06
Wet C		PFO	1.19
Wet D		PFO	1.71
Wet E		PEM	0.82
Wet I		PEM	0.29
OSW		OSW	0.14
Total:			11.87 acres

As presented in Table 2 below the wetlands delineated on-site were grouped into wetland assessment areas (WAA) based on their similar habitat characteristics and assessed using the U.S. Army Corps of Engineers Galveston Districts protocol for evaluating the function of herbaceous / scrub-shrub, and riverine habitats using the interim Hydrogeomorphic Method (iHGM). The functional assessment rendered scores relative to the unique chemical, physical and biological characteristics of each wetland. Table 2 list the wetland acreage and the functional

value for each wetland based the Interim Hydrogeomorphic Method Assessment Functional further detailed in the Assessment Report is included in the Appendices.

Not included in table 2 is wetland I a small excavated depression located near the norther boundary of the property. This 0.29-acre wetland is a manmade excavation located well above the Zone AE, outside of the 100-year floodplain. It is a small surface water dominated by a monoculture of cattails (*Typha latifoliate*). The applicant believes this feature to be a non-jurisdictional and does intend to compensate for impacts associated with filling this excavation. This feature is described in the wetland delineation report accompanying this permit application.

Table 2. Existing Riverine Forested / Herbaceous Wetland FCI & FCU Values

WAA ID	Type	Acreage	TSSW (physical)		MPAC (biological)		RSEC (chemical)	
			FCI	FCU	FCI	FCU	FCI	FCU
WAA 1	PFO	1	0.791	0.791	0.64	0.638	0.81	0.807
WAA 2	PFO	5.64	0.742	4.183	0.71	4.019	0.79	4.437
WAA 4	PEM	1.06	0.597	0.633	0.62	0.654	0.56	0.594
WAA 3	PFO	0.53	0.58	0.376	0.61	0.322	.65	0.344
Total	PFO	7.17		5.35		5.004		5.588
Total	PEM	1.06		0.633		0.654		0.594

It is the intention of the applicant to compensate for these impacts by purchasing mitigation bank credits in the primary or secondary service area of an approved mitigation bank. In the absence of that option, the applicant will contract with a mitigation banking provider to construct a permittee-responsible-mitigation (PRM) site within the limits of an eligible proposed bank or in-lieu-fee program. The applicant has reached out to the mitigation banks with service areas covering the project area to solicit cost estimates to cover the proposed project's mitigation requirements.

The applicant understands that that the District Engineer will not provide sign-off on a pending permit actions without an approved wetland mitigation plan in place. Therefore, once an acceptable mitigation commitment has been determined with certainty and the District Engineers approves the applicant will provide the mitigation final plan to the District Engineer. The applicant will then execute an agreement with the mitigation provider to provide this service and prepare mitigation plan to that end. The applicant will provide proof of credit purchase within the require time from following issuance of the permit.