FORESTED AND HERBACEOUS/SHRUB WETLAND PERMITTEE RESPONSIBLE MITIGATION PLAN

SWG-2019-00772

BURTON STATION PROJECT
CHAMBERS COUNTY, TEXAS

Prepared for:

LONE STAR NGL MONT BELVIEU, LP



February 26, 2020

Prepared By:

DELTA LAND SERVICES, LLC

Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772
February 26, 2020

TABLE OF CONTENTS

1.0	Introduction	1
	1.1 Mitigation Property Location	1
	1.2 Property Ownership/Qualifications	
	1.3 Description of the Property	
	1.4 Recorded Liens, Encumbrances, Easements, Servitudes or Restrictions	2
2.0	Goals and Objectives	2
3.0	Site Selection	4
4.0	Site Protection Instrument	4
5.0	Mitigation Area Baseline Information	5
	5.1 Land Use	
	5.1.1 Historical Land Use	
	5.1.2 Current Land Use	
	5.2 Soils	6
	5.3 Hydrology	6
	5.4 Vegetation	7
6.0	Determination of Compensatory Mitigation Requirement	7
7.0	Mitigation Work Plan	10
	7.1 Hydrology Restoration	10
	7.2 Restoration of Plant Community	11
8.0	Maintenance Plan	12
9.0	Performance Standards	13
	9.1 Initial Success Criteria (Year 1)	13
	9.1.1 Hydrology	
	9.1.2 Vegetation (Year 1)	13
	9.2 Interim Success Criteria (Year 3 and Year 5 for PFO)	14
	9.2.1 Hydrology	14
	9.2.2 Vegetation	
	9.3 Long-term Success Criteria (Year 5 for PEM/PSS and Year 15 for PFO)	
	9.3.1 Hydrology	
40.	9.3.2 Vegetation	
10.0	8 1 8	
	10.1 Monitoring	
	10.2 As-built Report	
11 4	10.3 Initial and Interim Success Criteria Reporting	
11.0	6 6	
12.0		
13.0		
14.0	References	22

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

LIST OF TABLES

- Table 1. Restoration by Resource Type
- Table 2: Soil Mapping Components Occurring Within the PRMA, Liberty County, Texas
- Table 3. Wetland Mitigation by Acreage and Function
- Table 4. Wetland Mitigation by Acreage and Function
- Table 5. Wetland Impacts and Wetland Mitigation Summary by Function and Acreage

LIST OF ATTACHMENTS

Attachment A. Figures

- Figure 1. Vicinity, Watershed, and Ecoregion Map
- Figure 2. Topographic Map
- Figure 3. Aerial Map with Soil and Floodplain
- Figure 4. Mitigation Features Map
- Figure 5. Pre-construction Hydrology
- Figure 6. Post Construction Hydrology
- Attachment B. Riverine Forested and Herbaceous/Shrub Hydrogeomorphic Interim Model Workbooks
- Attachment C. PRMA Perimeter Coordinates
- Attachment D. Texas Land Conservancy Letter of Intent
- Attachment E. AJD and Wetland Delineation Summary
- Attachment F. Planting List
- Attachment G. Construction, Establishment, and Long-term Finances

Delta Land Services, LLC ii

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

1.0 Introduction

Delta Land Services, LLC (DLS) presents this riverine forested wetland (PFO) and riverine herbaceous/shrub wetland (PEM/PSS) Permittee Responsible Mitigation Plan (PRMP) for the compensation of unavoidable, permanent impacts to approximately 156.84 acres of wetlands within the U.S. Army Corps of Engineers (USACE) Galveston District (CESWG). The wetland impacts consist of 91.57 acres of PFO, 24.49 acres of PEM, 40.78 acres of PSS wetland, and 0.57 acre of a man-made pond associated with the permit number SWG-2019-00772. Lone Star NGL Mont Belvieu, LP (Lone Star or Permittee) is seeking the Permit for the proposed construction two hydrocarbon processing units (HPUs), four brine ponds, two detention ponds, and two brine disposal wells near Mont Belvieu in Chambers County, Texas.

The Project wetland impacts are located in the North Galveston Bay Subbasin (Hydrologic Unit Code 12040203). Ecologically, the impacts are located within the Northern Humid Gulf Coastal Plain Level IV Ecoregion of the Western Gulf Coast Plain Level III Ecoregion (Seaber et al. 1987, Griffith et al. 2007, EPA 2012). The Project impact site is shown on **Attachment A**, **Figure 1**.

The preparation of this PRMP was in accordance with USACE regulations for compensatory mitigation for losses of aquatic resources, codified in 33 CFR § 332. More specifically, the contents of the PRMP were designed to satisfy the requirements of 33 CFR § 332.4(c)(2)-(14). The applicant/permittee is Lone Star Mont Belvieu, LP. DLS, acting as the mitigation provider for the Permittee, will implement, monitor, and provide long-term management of the Permittee Responsible Mitigation Area (PRMA) as described in 33 CFR § 332.3(l). Ironwood Holdings, LLC is the PRMA landowner; Ironwood Holdings is a land holding subsidiary wholly owned by DLS. Lastly, the Texas Land Conservancy will hold the conservation easement. Since the site is located adjacent to Cedar Bayou and within its 100-year floodplain, the predicted functional lift on the PRMA was assessed using the USACE Galveston District (CESWG) Riverine Forested and Riverine Herbaceous/Shrub Interim Hydrogeomorphic models (iHGM) [Attachment A, Figures 2 and 3].

A 1:1 ratio (i.e., impact function to mitigation function ratio) is utilized to determine the mitigation requirements since the PRMA and impacts are both located in the North Galveston Bay Subbasin (12040203) [Attachment A, Figure 1]. The man-made pond will be offset with 1.2 acres of PEM restoration or a 2:1 ratio, justification for the type of mitigation applied for the pond impact is discussed in Section 6.0. The mitigation restoration acreages, as determined by the iHGM are approximately 183.9 acres of PFO, 64.1 acres of PSS, and 20.2 acres of PEM (Table 2 - 4 and Attachment B). By the end of Year 15, 271.3 acres of wetlands will be restored and perpetually protected.

1.1 Mitigation Property Location

The 288.6-acre PRMA is adjacent to Cedar Bayou in Liberty County, TX and is in the Bayou's 100-year floodplain (**Attachment A, Figure 3**). The PRMA is located approximately 6.6 miles northeast of Crosby, Texas within the North Galveston Bay Subbasin in the Northern Humid Gulf Coastal Plain Level IV Ecoregion within the Western Gulf Coast Plain Level III Ecoregion (Seaber et al. 1987, Griffith et al. 2007, EPA 2012). The approximate centerpoint of the PRMA is Latitude 29.923645° N and Longitude -94.980241° W (UTM 308845 E, 3311972 N).

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

To access the PRMA from Dayton, TX, travel southwest on US 90W for approximately 6.3 miles. Then turn south (left) onto FM 1413 for 2.3 miles, then right onto Hatcherville Road (County Road 486) for 1.2 miles; then right on unnamed caliche road for approximately 1.1 miles to the west.

1.2 Property Ownership/Qualifications

Ironwood Holdings/DLS own the PRMA and the property encompassing the PRMA. Established in 2009, DLS is a land management and restoration company whose technical staff includes Certified Ecological Restoration Practitioners, Certified Foresters, Certified Wildlife Biologists, and Professional Wetland Scientists

1.3 Description of the Property

The PRMA is a tract of land located near Cedar Bayou (Attachment A, Figures 2 and 3). The center point of the PRMA is located at latitude 29.923645° North and longitude -94.980241° West (NAD83). The PRMA perimeter coordinates are listed in Attachment C beginning at the northwest corner and proceeding clockwise.

1.4 Recorded Liens, Encumbrances, Easements, Servitudes or Restrictions

The PRMA is cross by a drainage easement and two pipeline easements; the easements will be excluded from the restoration acreage (**Attachment A, Figure 4**). There are no other recorded liens, encumbrances, easements, servitudes or other surface restrictions applicable to the PRMA. The owner of the PRMA does not own the mineral rights. A mineral management plan would be implemented if mineral exploration were to occur.

2.0 Goals and Objectives

The goals of the PRMP are to restore¹, re-establish² 3.1 acres of PFO wetland, rehabilitate³ 75.6 acres of PFO wetland, enhance⁴ 37.6 acres of PFO, preserve⁵ 70.7 acres of PFO, re-establish 15.0

¹Restoration is defined in 33 CFR § 332.2 as the manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/historic functions to a former or degraded aquatic resource. For tracking net gains in aquatic resource area, restoration is divided into two categories: re-establishment and rehabilitation.

²Re-establishment is defined in 33 CFR § 332.2 as the manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/historic functions to a former aquatic resource. Reestablishment results in rebuilding a former aquatic resource and results in a gain in aquatic resource area and functions.

³Rehabilitation is defined in 33 CFR §332.2 as the manipulation of the physical, chemical, or biological characteristics of a site with the goal of repairing natural/historic functions to a degraded aquatic resource. Rehabilitation results in a gain in aquatic resource function but does not result in a gain in aquatic resource area.

⁴ Enhancement is defined in 33 CFR § 332.2 as the manipulation of the physical, chemical, or biological characteristics of an aquatic resource to heighten, intensify, or improve a specific aquatic resource function(s). Enhancement results in the gain of selected aquatic resource function(s) but may also lead to a decline in other aquatic resource function(s). Enhancement does not result in a gain in aquatic resource area.

⁵ Preservation is defined in 33 CFR § 332.2 as the removal of a threat to, or preventing the decline of, aquatic resources by an action in or near those aquatic resources. This term includes activities commonly associated with the protection and maintenance of aquatic resources through the implementation of appropriate legal and physical mechanisms. Preservation does not result in a gain of aquatic resource area or functions.

acres of PSS wetland, rehabilitate 49.1 acres of PSS wetlands, re-establish 16.6 acres of PEM wetland and rehabilitate 3.6 acre of PEM wetland located in the North Galveston Bay Watershed within the Northern Humid Gulf Coastal Prairies Level IV Ecoregion. Additionally, approximately 6.2 acres of fire breaks would be established. These areas would serve as permanent fire lanes between the different habitat communities. The fire breaks are not included in the restoration/credit acreage. **Table 1** presents a summary of restoration type by tract within the PRMA.

Table 1. Restoration by Resource Type

Resource Type	Re-establishment	Rehabilitation	Enhancement	Preservation
PEM	16.6 ac	3.6 ac	0.0 ac	0.0 ac
PSS	15.0 ac	49.1 ac	0.0 ac	0.0 ac
PFO	3.1 ac	75.6 ac	37.6 ac	70.7 ac
Totals:	34.7 ac	128.3 ac	37.6 ac	70.7 ac

To meet the goals of PFO, PSS, and PEM restoration, the objectives will consist of the following:

- 1. permanent cessation of agricultural practices and mowing (except fire breaks),
- 2. removal and control of pasture grasses (e.g., Bahia grass [*Paspalum notatum*]) and invasive species (e.g., Chinese tallowtree [*Triadica sebifera*]⁶),
- 3. hydrology restoration consisting of reduce soil compaction, plugging of agricultural ditches, removing agricultural berms, and filling drainage laterals,
- 4. planting native trees in 116.3 acres of PFO restoration,
- 5. preserve 70.7 acres of high-quality forested wetland,
- 6. restoration of PSS areas through planting native shrub species in 64.1 acres of the PRMA and seeding of native herbaceous species along with the use of periodic fire to suppress fire intolerant invasive species,
- 7. seeding 20.2 acres of PEM habitat with native herbaceous species and use of herbicide/fire to manage woody encroachment and establish a successional plant community,
- 8. construct, establish, and provide long-term maintenance by establishing the appropriate financial escrow accounts, and
- 9. protect the PRMA under a perpetual conservation easement.

The PRMA will be restored to historic PFO, PSS, and PEM wetland conditions to offset impacts to aquatic resources associated with the permit described in **Section 1.0**. Due to industrial development and historic agriculture uses, the watershed has experienced degraded water quality, loss of wildlife habitat and limited conservation lands, which define the needs of the watershed. The watershed needs are further defined in the 2015 *Cedar Bayou Watershed Protection Plan*.

The following functions would be improved and/or restored at the PRMA and contribute to the health of the ecologically significant North Galveston Bay watershed:

• re-establish native vegetation, providing sustainable food sources for wildlife,

⁶ The aforementioned and subsequent plant scientific nomenclature is from National Wetland Plant List (2018).

- provide increased native bird and pollinator habitat through the restoration of 178.0 acres of PFO, preservation of 70.7 acres of mature forested wetland, restoration of 64.1 acres of PSS, and restoration of 20.2 acres of PEM wetlands;
- improve natural biological diversity through native plant restoration;
- improve water quality through the cessation of agricultural activities, reducing nutrient loading in Cedar Bayou;
- protect mature floodplain forests along Cedar Bayou;
- improve nonpoint source pollution through vegetation restoration and permanent protection of 271.3 acres of PFO/PSS/PEM wetlands; and
- improve floodwater attenuation through the removal of agricultural ditches and restoration and protection of 271.3 acres of PFO/PSS/PEM wetland.

3.0 Site Selection

The proposed wetland impacts are in the primary service area of Gin City (SWG-2011-01181), and Gin City has the appropriate credit type for forested impacts (Riverine Forested). However due to recent credit reservations and executed transactions, Gin City does not have sufficient riverine forested credits available to offset impacts as a result of the proposed Project. Additionally, Gulf Coastal Plains also services the watershed with non-forested credits but does not have sufficient inventory. Therefore, since no approved bank with available in-kind credits or an approved in-lieu fee program exists, the Permittee proceeded with a strategy of pursuing an offsite PRM under and in accordance with 33 CFR § 332.3(b). An onsite PRM is not feasible due to the lack of available land; the Permittee has plans of full site development, and no adjacent undeveloped land is available for purchase. Thus, the Permittee proceeded with an offsite PRM within the same 8-digit HUC North Galveston Bay Subbasin (Attachment A, Figure 1). The PRMA is located approximately 4.9 miles upstream of the impact site.

The nature and location of the PRMA within the landscape provides a high degree of confidence for successful restoration. The PRMA is highly suitable and restorable as functional PFO, PSS, and PEM habitat. The sustainable hydrology of the restored wetlands will be driven by overbank flooding and secondarily localized watershed runoff (re-established sheet flow from the north). Therefore, hydrologic re-establishment will utilize natural processes (passive water flow) and will not rely on active water management (i.e., pumping, diversion, impoundment or removal of water through artificial means from a river, stream, or reservoir).

4.0 Site Protection Instrument

Ironwood Holdings, LLC (Landowner) will allow Texas Land Conservancy to place a perpetual conservation easement covering the PRMA to a Conservation Easement Holder (Holder) in accordance with Chapter 183, Subchapter A of the Texas Natural Resources Code. Pursuant to 33 CFR § 332.7(a)(5), the Landowner, acting through the Permittee, will seek CESWG approval of the conservation easement instrument.

As contemplated in 33 CFR § 332.7(a)(1), the conservation easement instrument will establish the right of the Holder to enforce site protections and provide the resources necessary to monitor and enforce these site protections to the extent practicable. In addition, pursuant to 33 CFR

§ 332.7(a)(2), to the extent appropriate and practicable, the conservation easement instrument will prohibit incompatible uses that might otherwise jeopardize the objectives of the compensatory mitigation project. Furthermore, in accordance with 33 CFR § 332.7(a)(3).

Texas Land Conservancy has been identified as the Holder for the conservation easement (Attachment D). Texas Land Conservancy is a non-profit conservation organization that is accredited by the National Land Trust Alliance and is a member of the Texas Land Trust Council. Texas Land Conservancy will conduct annual inspections to verify that there are no activities occurring on the PRMA which are inconsistent with the purpose of preserving the conservation values of the restored area.

After recordation in the real property records of Liberty County, a copy of the recorded conservation easement, clearly showing the book, page, and date of filing, will be provided to the CESWG, typically within 6 months of permit issuance. In addition to the regular reporting, compliance with the terms and conditions of the easement will be verified by the Holder annually by field monitoring and reporting. Upon execution of the conservation easement previously described, the Holder will hold and enforce the conservation easement placed on the PRMA, protecting the site in perpetuity as a wetland mitigation conservation site.

5.0 Mitigation Area Baseline Information

The PRMA and impact site both drain to the upper reaches of Galveston Bay via Cedar Bayou. The watershed in which the impacts and the PRMA are situated has experienced tremendous industrial and residential growth in recent years due to the proximity to the City of Houston and the Mont Belvieu area. Houston-Galveston Area Council projects over a 46% population increase in Harris County by 2045 (HGAC 2017); the eastern portion of Harris County comprises approximately half of the North Galveston Bay watershed. Additionally, the site restoration is consistent with and helps the Cedar Bayou Watershed Partnership achieve the water quality goals stated in the 2015 *Cedar Bayou Watershed Protection Plan* (Cedar Bayou Watershed Partnership 2015).

The PRMA currently consists of floodplain forests and agricultural land near the banks of Cedar Bayou. Following the guidelines of the U. S. Army Corps of Engineers 1987 Wetland Delineation Manual (USACE 1987) and U.S. Army Corps of Engineers Regional Supplement for the Atlantic and Gulf Coastal Plain (AGCP Regional Supplement; USACE 2010), wetland delineation data was collected from the entire 1,297-acre tract. DLS requested a jurisdictional determination from the CESWG on July 17, 2018 (SWG-2018-00742). The CESWG issued an approved jurisdictional determination (AJD) on March 13, 2020. The AJD indicates the PRMA contained 236.6 acres of waters of the United States. The AJD and a wetland summary are presented in **Attachment E**.

5.1 Land Use

5.1.1 Historical Land Use

The existing mature forested portions of the PRMA appear to have been forested prior to 1940's. The open areas have been in agricultural use since the 1940's or earlier. Some open areas have remained fallow over the last 5-10 years and have been encroached by Chinese tallow. The PFO enhancement area was logged in the 2004 timeframe and since that logging tallow has heavily encroached the PFO enhancement area.

5.1.2 Current Land Use

The majority of the open land in the vicinity of the mitigation tract, including the PRMA, is used for agricultural production (e.g., sod, livestock, commodity crop, etc.). The PRMA is either forested or agricultural.

5.2 Soils

While the PRMA is not underlain with soils that have a high hydric rating, the majority of the PRMA exhibits hydric soil field indicators. The two common hydric soil indicators observed were Depleted Matrix (F3) and Redox Dark Surface (F6). **Table 2** below lists the soil mapping units that occur within the PRMA.

Table 2: Soil Mapping Components Occurring Within the PRMA, Liberty County, Texas

Symbol	Name	Ponding	Drainage Class	Hydric Conditions
LeaA	League Clay, 0 to 1 percent slopes	No	Somewhat Poorly Drained	10%
MofA	Mocarey-Yeaton Complex	No	Moderately Well Drained	2%

5.3 Hydrology

Within the PRMA, the slight topographical changes from east to west toward Cedar Bayou, microdepressions, and moderately drained soils (percolation) result in slow to moderate runoff. The PRMA receives over bank flooding from Cedar Bayou by being partially located in its floodway and almost entirely within its 100-year floodplain. Surface water flow (sheet flow) is generally north to south and westerly towards Cedar Bayou. Agriculture drainage ditches are present within the PRMA. These ditches transport water south and west to Cedar Bayou. Additionally, small laterals/furrows have been constructed in the agricultural fields to aid in the movement of water offsite into those ditches. Both the agricultural ditches and laterals have reduced the frequency and flooding duration within the proposed rehabilitation and re-establishment portions of the PRMA.

Approximately 87.2% of the restoration portion of the PRMA remains saturated to sufficiently support wetland hydrology. The most common primary indicators observed were oxidized rhizospheres (C3) and water stained leaves (B9). Common secondary indicators included the FAC-neutral test (D5) and crayfish burrows (C8).

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

5.4 Vegetation

Riverine forested wetlands (i.e., bottomland hardwoods) occur within the PRMA and are contiguous with adjacent bottomland hardwood forests along Cedar Bayou. The bottomland hardwood forest can be further divided into vegetation communities dominated by oaks (*Quercus* spp.) and those dominated by other hardwood species. Tree assemblages and densities vary in different areas of the PRMA and are to be dependent upon hydrology, soil type, and landscape position.

Oak-dominant mixed hardwood vegetation communities occur on elevations with temporarily to seasonally flooded or saturated hydrologic conditions and are classified as *Quercus phellos - Quercus nigra / Sabal minor - Ditrysinia fruticosa* Floodplain Forest (NatureServe, 2019). These forests with a wetter hydrologic regime are dominated by willow oak (*Quercus phellos*), with water oak (*Quercus nigra*), bottomland post oak (*Quercus similis*), and cherry bark oak (*Quercus pagoda*) present. Other trees found in this vegetation community include American elm (*Ulmus americana*), cedar elm (*Ulmus crassifolia*), and green ash (*Fraxinus pennsylvanica*) with some loblolly pine (*Pinus taeda*). Common shrubs in this community include small seedlings and saplings of the dominant tree species, as well as dwarf palmetto (*Sabal minor*), deciduous holly (*Ilex decidua*), and yaupon holly (*Ilex vomitoria*). Ground cover density varies, but generally is very sparse within forested areas due to a mostly closed tree canopy and high density of dwarf palmetto. Common ground cover species include seedlings of tree and shrub species with few scattered herbaceous species.

Wetland herbaceous vegetation communities occur in lower elevations of fallow crop land, active crop land, and pastures. The eastern portions of the PRMA are still actively cultivated. Dominant species within the herbaceous vegetation communities include prairie dogshade (*Limnosciadium pumilum*), Bermudagrass, perennial rye grass (*Lolium perenne*), narrow-leaf carpet grass (*Axonopus fissifolius*), bog rush (*Juncus marginatus*), and broom-sedge (*Andropogon virginicus*). Other common species include carix sedges, beaked sedges, and flat top sedges. Chinese tallow has begun to encroach areas that have remained fallow for a few years.

6.0 Determination of Compensatory Mitigation Requirement

The Permittee and DLS used the iHGM approach to assess the functions of impacted wetlands versus the functions restored wetlands associated with the Project. Specifically, the SWG Riverine Forested and Riverine Herbaceous/Shrub iHGM models were used to calculate the number of lost functions of the impacted wetlands and the number of functions proposed to be generated at the PRMA. This model uses several variables to assess three main functions that best describe and measure both forested and herbaceous wetland health in the region:

- 1. Physical Temporary Storage and Detention of Surface Water (TSSW)
- 2. Biological Maintenance of Plant and Animal Communities (MPAC)
- 3. Chemical Removal and Sequestration of Elements and Compounds (RSEC)

Based on habitat type and hydrology regime, the PRMA was divided into eight (8) restoration types or wetland assessment areas (WAAs). Each restoration type was assessed a baseline iHGM FCI score; then, the FCI scores were projected ("the lift") based on the proposed restoration

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

activities. PFO iHGM scores were predicted for Years 4 and 10, and PEM/PSS were predicted for Year 5. **Table 3** below presents the iHGM impacts and **Table 4** presents the iHGM generated at the PRMA by habitat type. **Attachment B** provides the restoration map and iHGM baseline and lift data for each restoration type/WAA within the 271.30-acre restoration footprint. A baseline description of each restoration area/WAA is included in **Attachment B**. Wetland impacts will be offset at a 1:1 ratio, since the impacts and proposed PRMA are both located in the North Galveston Bay watershed. Only wetland restoration/preservation acreage was included in the iHGM calculations. The preservation area was assessed a baseline score, and then $1/10^{th}$ or 10% of the baseline score was applied to determine credit generation. **Attachment B** provides a detailed breakdown of the iHGM for all habitat types.

For the impacts to the man-made pond, the iHGM was not used to assess mitigation requirements since the lacustrine model cannot be compared to the herbaceous/shrub model, nor is the pond large enough to assess with the lacustrine model. The pond appears to have been excavated (by others) in 2010 based on Google Earth[©] aerial photography review. The pond was excavated in an herbaceous ecological environment. The pond is shallow with little to no wetland fringe characteristics and does not provide much ecological benefit to the landscape. Since the pond was excavated in what was likely an herbaceous wetland, herbaceous wetland restoration is appropriate for the mitigation offset. A 2:1 mitigation offset ratio was applied to adjust for out-of-kind mitigation, which equates to 1.14 acres. The mitigation acreage was then rounded up to 1.2 acres or a 2.1:1 ratio.

The use of the forested wetland preservation area meets the required preservation criteria outlined in the 2008 Mitigation rule for the following reasons:

- High functioning forested wetland system that contributes to the watershed via floodplain storage, habitat diversity, forested habitat for wildlife, and filters stormwater runoff from agricultural fields.
- The forested preservation area is ecological sustainable and according to the iHGM model in **Attachment B** exhibits FCI values consistent with high quality wetlands.
- Currently, this area is under a timber tax exemption, which requires a forest management plan, and typically includes a timber harvesting schedule. The area (PRMA enhancement area) just west was logged in 2004. Additionally, mature native forests along Cedar Bayou have been heavily impacted over the last twenty years, especially due to the recent development in Mont Belvieu.
- Lastly, the site will be protected through a conservation easement, and it will be managed long-term (invasive species control).

Table 3. Wetland Impacts by Acreage and Function

Function	Wetland Impact	Impact Functional Capacity Units				
Tunction	Acreage	(FCUs)				
PFO Impacts						
TSSW	91.57	49.58				
MPAC	91.57	52.17				
RSEC	91.57	58.08				
PSS Impacts						
TSSW	40.78	18.70				
MPAC	40.78	28.87				
RSEC	40.78	20.14				
PEM Impacts						
TSSW	24.49	9.74				
MPAC	24.49	12.89				
RSEC	24.49	9.92				
Pond Impact						
	0.57	N/A				

Table 4. Wetland Mitigation by Acreage and Function

Function	Restoration Acreage	Effective Functional Capacity Index (FCI) Lift	Restored Functional Capacity Units (FCUs)		
PFO Resto	oration	·			
TSSW	187.0	0.327	61.10		
MPAC	187.0	0.284	53.20		
RSEC	187.0	0.310	58.43		
PSS Resto	ration	·			
TSSW	64.1	0.480	30.80		
MPAC	64.1	0.451	28.90		
RSEC	64.1	0.435	27.90		
PEM Restoration					
TSSW	20.2	0.532	10.75		
MPAC	20.2	0.708	14.31		
RSEC	20.2	0.527	10.64		
PRM Wet	land Acreage Total	271.3			

Per **Table 5** below and consistent with the national "no net loss" policy, the PRMA will provide overall net increase in each wetland function. The PFO, PSS, and PEM iHGM workbooks include the iHGM model spreadsheets for the total PRMA lift (**Attachment B**).

Table 5. Wetland Impacts and Wetland Mitigation Summary by Function and Acreage

Impact/Destauation	Acreage	TSSW	MPAC	RSEC	
Impact/Restoration		FCUs	FCUs	FCUs	
PFO Impacts and	PFO Impacts and Mitigation Summary				
PFO Impacts	-91.18	-49.58	-52.17	-58.08	
PFO Restoration	187.00	61.10	53.20	58.43	
Net Gain in Acreage and Function	95.82	11.52	1.03	0.35	
PSS Impacts and	Mitigation	1 Summary			
PSS Impacts	-40.78	-18.7	-28.87	-20.1	
PSS Restoration	64.10	30.80	28.90	27.90	
Net Gain in Acreage and Function	23.32	12.10	0.03	7.80	
PEM Impacts and Mitigation Summary					
PEM Impacts	-24.49	-9.70	-12.90	-9.90	
Pond Impact	-0.57	NA	NA	NA	
PEM Restoration	20.2	10.75	14.31	10.64	
Net Gain in Acreage and Function	-4.86	1.05	1.41	0.74	
Total Acreage Gain	114.28 acres				

7.0 Mitigation Work Plan

7.1 Hydrology Restoration

Prior to the commencement of mitigation work, all agricultural activities will cease. In the current condition, approximately 87.2% of the restoration portion of the PRMA has self-sustaining hydrology except for the 34.7 acres of wetland re-establishment, as indicated by the data collected from the wetland datapoints. In its current state, the non-forested portions of the PRMA are being drained by agricultural improvements, such as agricultural ditches and drainage laterals located within fields (Attachment A, Figure 5). Hydrology restoration will focus primarily on plugging of those drainages and field laterals on the eastern half/non-forested portions of the PRMA (Attachment A, Figures 5 and 6). Drainages/laterals will be plugged, and levees (farm roads) will be levelled to aid in repairing floodplain storage and restore natural movement of water across the site and thereby increasing the frequency and duration of surface hydrology (Attachment A, Figures 6 – 7E). Following the cessation of agricultural activities and removal of major drainage improvements, the PFO/PSS restoration portions of the PRMA will be disked multiple times to 1) reduce surface compaction, 2) eliminate competition from pasture grasses, and 3) level drainage laterals to remove surface features that move water offsite (Attachment A, Figures 5 and 6). The PEM restoration portions will not be disked.

The soil surface will be subsoiled in the PFO/PSS (i.e., ripped) to a depth of 14 to 16 inches using a straight shank Eco-TillTM ripper Allen et al. (2000) suggests ripping of compacted soils will increase water infiltration. Ripped furrows will be spaced 10 feet apart to correspond with plant spacing. The straight shank minimizes surface soil disturbance as opposed to a parabolic shank, which may leave air pockets below the surface. The ripper will have an attachment immediately

behind the shank, which will create a slightly elevated row of loose soil no greater than 6 inches above grade. This loose soil will settle back into the rip to ensure the rip seals and minimizes the risk of root exposure to air. Ripping will be conducted in the late summer-fall (i.e., August through October). Immediately following subsoiling, a pre-emergent herbicide will be applied in a four-foot band along each ripped furrow. Due to inherent problems of ripping and disking during wet periods on heavy clay soils, this work is planned during dry periods in the late summer and fall. Note: the subsurface subsoiling will not occur in the PEM restoration areas unless soil compaction does not allow for a seedbed that allows for germination.

7.2 Restoration of Plant Community

Fire breaks will be established between habitat types. These fire breaks will be maintained (mowed) during dry periods so that an established fire lane is present between the different fire/habitat regimes.

PFO Rehabilitation

The PRMA's historic PFO wetland community will be re-established by planting a mixture of native bottomland hardwood seedlings. The selection of planting species was based on species observed within the adjacent forested wetlands located along Cedar Bayou (Preservation Area). Immediately following subsoiling, a pre-emergent herbicide will be applied in a four-foot band along each ripped furrow. The herbicide will help eliminate herbaceous competition prior to planting, which will aid in the establishment of seedlings.

During the planting season (January to February), an aggregate of 436 hardwood seedlings will be planted per acre [i.e., hard and soft mast]. Seedlings will be pre-mixed and planted at approximately 10-foot intervals (**Attachment F**; **Table F-1**).

For herbaceous and grass species control after planting, a pre-emergent herbicide and/or disking may be used to reduce plant competition. Controlling herbaceous species in year 1 will allow the seedlings to establish and reduce weedy competition. The herbaceous species will not be controlled after Year 1. Following stem planting but prior to the planted seedlings breaking dormancy (i.e., visible signs of budding); a second application of a pre-emergent herbicide may be applied. Controlling herbaceous species in year 1 will allow the seedlings to establish and reduce weedy competition. The herbaceous species will not be controlled after year 1.

PFO Enhancement and Preservation

Within the PFO enhancement portion of the PRMA, Chinese tallow has heavily encroached. Chinese tallow will be mechanically removed, stacked and then burned. Native trees species over 5 inches in diameter will be avoided during Chinese tallow removal, if possible. Like the rehabilitation area, after removal of non-native vegetation, hardwood seedlings will be planted at a rate of 436 trees/acre. This planting number may be adjusted downward, where high counts of native trees are present within the enhancement area. Those native trees would remain in lieu of planting seedlings.

No planting will occur in the PFO preservation area. The area will be treated for invasive species.

Woody species, including tallow will be controlled with triclopyr, and for invasive herbaceous species, a glyphosate and halosulfuron-methyl based mixture will be applied. Individual stems/plants will be targeted so that desirable species are not affected by the herbicide treatment. Invasive woody species at a midstory or overstory level will be girdled/hacked and sprayed with herbicide.

PEM

To supplement the existing herbaceous cover, a seed mixture of native herbaceous species will be purchased from local plant material producers located in southeast Texas or within the Gulf Coastal Plain region. The seed planting mix will consist of commercially available facultative or wetter herbaceous species (e.g., switchgrass [Panicum virgatum], gamagrass [Tripsacum floridanum], brownseed paspalum [Paspalum plicatulum], rattlesnake master [Eryngium yuccifolium], slender blazing star [Liatris acidota], etc.) [Attachment F; Table F-2]. In the southeast Texas coastal plain, prescribed fire is a natural tool to control woody encroachment and to maintain a diverse herbaceous-shrub ecosystem. Burning will be conducted to select for fire tolerant native herbaceous species and control woody encroachment of Chinese tallow. Controlled burning will occur during favorable conditions for safety and smoke management (e.g., wind direction, wind speed). The initial burn will be applied when an adequate fuel supply (litter) is available and may occur during any season in Year 0 to Year 3. By Year 5, long-term management will consist of spot-treating with herbicides to control species such as Chinese tallowtree and prescribed fire on a three to five-year schedule to control woody and herbaceous fire-intolerant, invasive species. The Permittee/DLS will select a Certified and Insured Commercial Burn Manager (Burn Manager) licensed by the Texas Department of Agriculture.

PSS

The PSS plant community restoration will mimic the PEM restoration with the exception of shrub plantings. Shrub species will be planted at approximately 14-foot by 14-foot intervals or 222 stems per acre. Planted shrubs will consist of the species and percentages listed in **Table F-3** in **Attachment F**. By Year 5, long-term management will consist of spot-treating with herbicides to control species such as Chinese tallow and prescribed fire on a five year schedule to control woody and herbaceous fire-intolerant, invasive species. The five year cycle will allow native shrubs to sprout/regenerate after prescribed fire.

8.0 Maintenance Plan

The PRMA will be monitored and maintained by the Permittee. The Permittee will commit to restore the wetland functions and maintain wetland habitats in accordance with the provisions in this PRMP. Invasive species will be controlled on both the PFO portion and PEM/PSS portions of the PRMA. During the establishment phase for the PRMA, which is 15 years for PFO and 5 years for PEM/PSS, herbicide will be applied to invasive species bi-yearly, beginning one full year after restoration. After long-term performance standards have been met, herbicide application will be applied on a 3 to 5-year cycle, dependent on invasive species presence. Woody species, including tallow will be controlled with triclopyr, and for invasive herbaceous species, a glyphosate and halosulfuron-methyl based mixture will be applied. Individual stems/plants will

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

be targeted so that desirable species are not affected by the herbicide treatment. If an invasive woody species reaches a midstory or overstory level, it will be girdled/hacked and sprayed with herbicide. Herbicide applications will be applied during the spring/summer months. The easement holder will conduct annual site inspections to ensure the conditions within the conservation easement are being met.

9.0 Performance Standards

The following outlines the performance standards for the PRMA with a native, facultative wet or wetter PFO, PSS, and PEM community and the control of invasive species within the PRMA. The PFO preservation areas will only have an invasive species performance standard along with the commitment of no disturbances that conflict with the conservation easement.

9.1 Initial Success Criteria (Year 1)

9.1.1 Hydrology

PFO/PEM/PSS Restoration

Ground surface elevations must be conducive to the re-establishment of wetland forested, herbaceous and scrub/shrub vegetation and the maintenance of hydric soil characteristics. All alterations of the natural topography that have affected the duration and coverage of surface water will have been removed or otherwise rendered ineffective as discussed in **Section 7.1**. Hydrology success criteria apply only to the wetland rehabilitation, enhancement, and re-establishment areas. It is expected that the preservation areas would continue to exhibit wetland characteristics.

9.1.2 Vegetation (Year 1)

PFO Restoration

A minimum of 200, planted seedlings per acre must survive through the end of the second spring following the planting (i.e., year 1) for re-establishment portion of the PRMA. Those surviving seedlings must be representative both in species composition and percentage identified in **Section 7.2**. This criterion will apply to initial plantings, as well as any subsequent replanting implemented to meet this requirement. The forested preservation area and restoration areas will not exhibit more than 5% basal area per acre for woody species, and invasive species will not represent more than 5% of the herbaceous stratum.

PEM Restoration

By Year 1, vegetative monitoring data will establish the following criteria:

- The PRMA is seeded with appropriate, commercially available, facultative or wetter herbaceous species;
- herbaceous vegetation will exhibit a minimum of 60% absolute cover of facultative or wetter species;
- invasive species cover will represent less than 10% absolute cover; and

• tree strata⁷ will represent less than 5% absolute cover of the PEM restoration areas.

PSS Restoration

By Year 1, vegetative monitoring data will establish the following criteria:

- the PRMA is seeded with appropriate, commercially available, facultative or wetter herbaceous species;
- herbaceous vegetation will exhibit a minimum of 60% absolute cover of facultative or wetter species;
- shrub vegetation will exhibit a minimum of 11% absolute cover of facultative or wetter species;
- invasive species cover will represent less than 10% of absolute cover; and
- tree strata will represent less than 5% absolute cover of the PSS restoration areas.

9.2 Interim Success Criteria (Year 3 and Year 5 for PFO)

9.2.1 Hydrology

PFO Restoration

By Year 3, or two years following attainment of the one-year performance criteria, site hydrology for the re-establishment mitigation area will be restored such that the PRMA meets the wetland hydrology criterion as described in the 1987 Manual and AGCP Regional Supplement. The rehabilitation and enhancement area will continue to meet wetland hydrology criterion. By Year 5, all restored must meet the wetland hydrology criterion. For both Year 3 and Year 5, data demonstrating the presence of wetland hydrology will be collected and submitted to the CESWG in the monitoring report. If Year 5 monitoring indicates the site is not meeting interim success criteria, annual monitoring will continue until the Year 5 criteria is met for at least three consecutive years.

PEM/PSS Restoration

By Year 3, or two years following attainment of the one-year performance criteria, site hydrology for the re-establishment mitigation area will be restored such that the PRMA meets the wetland hydrology criterion as described in the 1987 Manual and AGCP Regional Supplement. Data demonstrating the presence of wetland hydrology will be collected and submitted to the CESWG in the monitoring report.

⁷ All references to strata are as defined in the AGCP Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coast Plan Region (Version 2.0). USACE 2010.

9.2.2 Vegetation

PFO Restoration (Year 3 and 5)

For PFO restoration areas, a minimum of 151 seedlings/saplings per acre must be present at the end of the second year (i.e., year three) following successful attainment of the one-year survivorship criteria. Trees, saplings, and seedlings established through natural recruitment may be included in this tally. Surviving hard mast seedlings should be representative of the species composition and percentage identified in **Section 7.2**.

By Year 5 for PFO restoration areas, four years following successful attainment of the Year 1 survivorship criteria, the PRMA will be virtually free of introduced vegetation (i.e., approximately 5% or less on an acre-by-acre basis). Developing plant community must exhibit characteristics and diversity indicative of a viable native PFO community commensurate with stand age and site conditions by Year 5. Achievement of wetland vegetation dominance is defined as a vegetation community where more than 50% of all dominant species are facultative ("FAC") or wetter as determined by the appropriate test per the AGCP Regional Supplement. Within the PFO preservation area, woody invasive species will not represent more than 5% basal area per acre, and invasive herbaceous species will comprise more than 5% of the herbaceous stratum.

PEM Restoration

By Year 3, vegetative monitoring data will establish the following criteria:

- exclusive of invasive species, herbaceous vegetation will exhibit a minimum of 70% absolute cover of facultative or wetter species;
- invasive species will represent less than 5% absolute cover; and
- tree strata will represent less than 5% absolute cover of the PEM restoration areas.

PSS Restoration

By Year 3, vegetative monitoring data will establish the following criteria:

- exclusive of invasive species, herbaceous vegetation will exhibit a minimum of 70% absolute cover;
- herbaceous vegetation will exhibit a minimum of 70% herbaceous absolute cover of facultative or wetter species;
- shrub cover will exhibit a minimum of 25% absolute cover of facultative or wetter species;
- invasive species cover will represent less than 5% absolute cover; and
- tree strata will represent less than 5% absolute cover of the PSS restoration areas.

9.3 Long-term Success Criteria (Year 5 for PEM/PSS and Year 15 for PFO)

9.3.1 Hydrology

By Year 5 and beyond, four years following successful attainment of the Year 1 performance criteria, the PRMA will meet the wetland criterion for site vegetation, soils and hydrology as described in the 1987 Manual the AGCP Regional Supplement. To ensure the restoration areas are still meeting wetland hydrology criterion, the restoration areas within the PRMA will be monitored and data demonstrating the presence of wetland hydrology will be collected and submitted to the CESWG in the monitoring report. Year 5 would conclude the hydrology monitoring for the non-forested restoration areas, and monitoring within the forested restoration areas would continue until Year 15.

9.3.2 Vegetation

PFO Restoration

By Year 15 the wetland restoration portion of the mitigation area, crown cover should be approximately 80% and the PRMA will be essentially void of introduced trees such that introduced trees are removed from the site and comprise less than 5% of the PRMA on a per acre basis (e.g., Chinese tallow). Furthermore, an active treatment program for invasive species will continue as part of the long-term maintenance program. If the CESWG determines that thinning is necessary to maintain or enhance the ecological value of the PRMA, the Permittee will develop and implement a thinning plan in coordination with approval by the CESWG. Within the PFO preservation area, woody invasive species will not represent more than 5% basal area per acre, and invasive herbaceous species will comprise more than 5% of the herbaceous stratum.

PEM Restoration

By Year 5, vegetative monitoring data will establish the following criteria:

- exclusive of invasive species, herbaceous plants will exhibit a minimum of 90% absolute cover;
- 60% of restored vegetation will exhibit FACW or obligate wetland plant indicator
- invasive species cover will represent less than 5% absolute cover; and
- tree strata will represent less than 3% absolute cover of the PEM restoration areas.

PSS Restoration

By Year 5, vegetative monitoring data will establish the following criteria:

- exclusive of invasive species, herbaceous plants will exhibit a minimum of 80% absolute cover;
- 60% of restored vegetation will exhibit FACW or obligate wetland plant indicator status;
- shrub vegetation will exhibit a minimum of 34% absolute cover;

- invasive species cover will represent less than 5% absolute cover; and
- tree strata will represent less than 3% absolute cover of the PSS restoration areas.

10.0 Monitoring and Reporting Protocols

10.1 Monitoring

The following describes the field methods and data collection that will occur during monitoring. The reporting protocol, including content, frequency, and timing is discussed in **Sections 10.2** and **10.3**.

PFO Restoration

The Permittee agrees to perform all work necessary to monitor the site to determine compliance with the success criteria established in Section 9.0. The Permittee will monitor the site in the growing season of each monitoring year to demonstrate achievement of the long-term success criteria using established protocols. Eight monitoring stations will be established in the PFO portion of the PRMA (Attachment A, Figure 4). A vegetation survey will occur immediately after planting to establish baseline data (as-built report). In Years 1, 3, 5, 7, 13, and 15, the number of stems, growth, and species of planted trees will be determined during to show establishment and development of the PFO. Additionally, absolute cover of vegetation will be documented. The forested plant community will be sampled utilizing a circular 1/10th-acre, monitoring plot (radius = 37.4 feet). The Permittee will also collect data on hydrologic conditions as necessary to document evidence of wetland hydrology in accordance with the performance standards listed in Section 9.0. Documentation will include descriptions of the upper 12 inches of the soil profile sufficient to demonstrate hydric soil properties. The monitoring plot will be identified with GPS coordinates recorded at plot center. A map depicting the location of the plot and a listing of the plot coordinates will be provided to CESWG. Station sampling will occur following tree planting to establish baseline data and then during monitoring years through Year 15.

Data collected for initial, interim and long-term monitoring will use the same sample plot as established in the as-built report. For each monitoring report, the Permittee will provide digital images taken from ground level in each cardinal direction from monitoring plot center and from elevated positions to document overall conditions.

After achieving the long-term success criteria (Year 15), permanent monitoring plot sampling will cease. Thereafter, for five years, annual inspections will occur only for monitoring and controlling invasive species. The monitoring station will provide a fixed location to monitor invasive species, native plant cover, and hydrologic conditions.

PEM/PSS Restoration

The Permittee agrees to perform all work necessary to monitor the site to demonstrate compliance with the success criteria established in **Section 9.0**. The Permittee will monitor the site in Year 1, Year 3, and Year 5 during the growing season through achievement of the long-term success criteria using monitoring protocols described in this Section. The Permittee will collect data on the percent cover and type of herbaceous and shrub vegetation to ensure successful establishment of

a hydrophytic plant community and collect data on hydrologic conditions as necessary to document evidence of wetland hydrology in accordance with the performance standards listed in **Section 9.0**. Hydrology will be monitored based on the methods described in the 1987 Manual and 2010 AGCP Regional Supplement. Wetland hydrology conditions will be documented on a monitoring datasheet and presented in the subsequent monitoring report. Documentation will include descriptions of the upper 12 inches of the soil profile sufficient to demonstrate hydric soil properties and the presence of hydric soil indicators.

Immediately after initial construction, baseline plot data will be collected. DLS will establish approximately six, 1/20th-acre continuous monitoring plot (**Attachment A, Figure 4**). Thereafter, the plot will be surveyed during the monitoring Years or until the PRMA successfully meets or exceeds established long-term criteria. The location of each monitoring plot will be identified, recorded, and reported by GPS coordinates for each plot center. A map depicting the location of the six monitoring stations with a listing of the station coordinates will be provided with the asbuilt report.

Station sampling will occur following plant material distribution to establish baseline data and then during monitoring years through Year 5. If Year 5 monitoring indicates the site is not meeting long-term success criteria, annual monitoring will continue until the Year 5 criteria is met for at least three consecutive years. The survey of the monitoring stations will provide fixed locations to evaluate percent cover of herbaceous and shrub vegetation.

10.2 As-built Report

The As-built Report will be submitted to the CESWG within 120 days following completion of all the work required to restore the PRMA. In detail, the As-built Report will describe the completed hydrologic work within the re-establishment and rehabilitation areas and an estimated tally of planted stems by species within the restoration areas. Herbaceous species re-establishment (seed distribution) will be reported and include the following information: species list, seed source, existing percent ground cover by species, and total percent ground cover. No significant deviation from the mitigation work plan described in **Section 7.0** will occur without prior approval from the CESWG. If deviation does occur, the As-built Report will include a summary of the CESWG coordination and a description of and reasons for any approved deviation.

10.3 Initial and Interim Success Criteria Reporting

Monitoring reports will be submitted to the CESWG by December 15 of the year performance / success criteria monitoring is required (i.e., as-built report, Year 1, Year 3, Year 5, Year 7, Year 10, Year 13, and Year 15). Each monitoring report will include data sufficient for comparison to the performance standards. The Permittee should also include a discussion of all activities, which took place at the site since the previous monitoring effort. At a minimum, monitoring reports should include the following:

- 1) Purpose and goals of mitigation site
- 2) Mapping of the monitoring stations
- 3) Brief summary of mitigation strategy/actions

- 4) Date mitigation action commenced
- 5) Dates of site inspections and summary of any issues of note
- 6) Dates and description of maintenance activities
 - a) identify measures to eradicate exotic/invasive species and document results of these efforts
- 7) Summary of observations and measurements
 - a) digital images taken from ground level at the monitoring station to document the overall conditions
 - b) a description of the general condition of the plant community and a discussion of likely causes for deficiency
 - c) a general discussion of hydrologic conditions at the monitoring stations
 - d) a description of wildlife usage at the monitoring stations, including any herbivory problems if applicable
 - e) a description of the generalized degree and distribution of exotic/invasive species
- 8) Assessment of success toward the performance standards or success criteria

11.0 Long-term Management Plan

To ensure the long-term sustainability of the resource, the Permittee will perform maintenance and long-term management of the site. These activities will be minimal as the project is anticipated to be a self-sustaining wetland with management activities limited primarily to items such as inspections, controlling invasive species (e.g., spot herbicide treatments), and boundary maintenance. Long-term management will generally consist of spot-treating with herbicides to control species such as Chinese tallow on a three to five-year schedule to control woody and herbaceous invasive species.

The Owner will be the Long-term Steward charged with management and maintenance responsibilities once long-term success criteria in **Section 9.0** are achieved. The Owner requests the option of appointing a different Long-term Steward in accordance with 33 CFR 332.7(d)(1). The appointment of such an entity shall be approved by the CESWG.

12.0 Adaptive Management Plan

An adaptive management plan for a compensatory mitigation project is generally described as a management strategy to address unforeseen changes in site conditions or other mitigation components of the mitigation project. Adaptive management plans facilitate the decision-making process for revising mitigation plans and instituting measures to address both foreseeable and unforeseeable circumstances that adversely affect mitigation success. An adaptive management plan, contingencies, and remedial responsibilities will be implemented if the compensatory mitigation project cannot be implemented in accordance with the approved mitigation plan or if monitoring or other information indicates that the compensatory mitigation project is not progressing towards meeting its performance standards as anticipated. If such circumstances arise, the Permittee must notify the CESWG as soon as possible. The notice will include an explanation

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

for the changes or potential deficiency and will outline proposed specific practices and measures that will guide decisions for revising the PRMP if needed.

An adaptive management plan will consist of activities that are not normally performed as general maintenance. As the PRMA matures, the Permittee/DLS will monitor as required to ensure the project is meeting the performance standards. However, as the body of ecological restoration knowledge advances, novel methods may be incorporated to improve the overall project quality. Prior to implementation of a new technique or method, it will first be approved by the CESWG.

If monitoring reveals that initial, interim, or long-term success criteria have not been met or do not continue to be met after initially being satisfied, an adaptive management plan with contingencies and remedial responsibilities will be developed and implemented. In the event of a deficiency such as poor planting survival, hydrology construction repairs, or invasive species encroachment, the Permittee shall provide a report that includes the implemented adaptive management plan to the CESWG. The report will provide an explanation for the deficiency, outline the implemented adaptive management practices and outline the implemented adaptive management practices.

If success criteria for a given monitoring period are not met, the Permittee will evaluate and implement adaptive management actions such as those outlined below. The listed potential management activities are not fully inclusive of suitable corrective measures to address any identified deficiencies at the site and do not consist of general maintenance activities such as routine, invasive species control. The potential deficiencies described below are those most likely to occur on projects of this type and scale. Identification of these potential deficiencies and the timely application of adaptive management strategies is the Permittee's effort to remain in compliance with terms set in the PRMP and work plan. The Permittee will provide the CESWG with a report detailing the deficiency, strategy, and implemented techniques.

- Invasive species If during routine monitoring or general observations, an invasive species such as Chinese tallow is encroaching on an area, the Permittee will implement an adaptive management strategy to remove / control the invasive species.
- Tree survival If during routine monitoring or general observations, tree survival performance standards are not being met, the Permittee will plant additional tree during the next planting season (winter).
- Hydrology construction repairs If during routine monitoring or general observations, wetland re-establishment areas are not meeting hydrology standards on account of erosion issues, the Permittee will take appropriate corrective measures for erosion abatement.

If the CESWG determines that the PRMA is at risk of not achieving the terms and intent of this PRMP, the CESWG will provide written notice to the Permittee that includes a detailed description of the non-compliance determination. The Permittee shall submit a written adaptive management plan to the CESWG for review and approval within forty-five (45) days of receiving written notice of non-compliance. The adaptive management plan shall identify the cause of the non-compliance, the necessary remedial measures, and a timeline for implementing said measures to bring the PRMA into compliance. To the extent practicable, the CESWG shall approve or disapprove the adaptive management plan, provided sufficient information and acceptable measures are contained in the plan.

PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

13.0 Financial Assurances

Short-term and Establishment

The total financial exposure for construction and establishment of the PRMA is \$220,654.08. The construction and establishment financial assurances will be provided by a cash escrow. The PFO and PEM/PSS construction cost estimates with 5% contingency adjustments at Year 0 are \$41,650.06 and \$63,788.55, respectively (Attachment G). The PEM/PSS establishment cost estimate for Year 1 through Year 5 is \$39,231.53, and the PFO establishment cost through Year 15 is \$75,983.94, which includes a 2.45% inflationary adjustment. To provide financial assurance protection during construction (Year 0) and establishment (Year 1 through Year 10) and per 33 CFR 332.3(n), DLS, as the Responsible Party shall establish a cash escrow to protect the PRMA's mitigation assets in the event of non-compliance or PRMA failure ensuring that sufficient funds are available to a third party. As interim success and long-term success criteria are met, release milestone monies will be released to the Permittee or its designated agent, per the Establishment Cost Table in **Attachment G**.

Long-term

Once the long-term criteria are achieved, the estimated long-term, annual cost to maintain the PRMA is \$7,942.01 per year (**Attachment G**). An analysis is presented in **Attachment G** for both the forested and PEM/PSS long-term financials. To ensure sufficient long-term funding is available for perpetual maintenance and protection of the PRMA, the Permittee/DLS will establish one cash escrow "Long-term Land Management and Maintenance" (LTMM) endowment in the approximate amount of \$226,914.57. The National Fish and Wildlife Foundation (NFWF) will manage the LTMM endowment. To structure the LTMM, the mitigation provider will enter a PRM Endowment Agreement with NFWF. Accrued interest of the account shall be used for the administration, operation, maintenance, and/or other purposes that directly benefit the PRMA.

14.0 References

- Allen, J. A., B.D. Keeland, J. A. Stanturf, A. F. Clewell, and H. E. Kennedy, Jr. (2000) (revised 2004) A Guide to Bottomland Hardwood Restoration. USDA Forest Service General Technology Report SRS-40.
- Cedar Bayou Watershed Partnership (2015). *Cedar Bayou Watershed Protection Plan*. Report prepared by Houston-Galveston Area Council in conjunction with other agencies. Accessed January 13, 2020. http://planhouston.org/sites/default/files/plans/Cedar-Bayou-WPP-7-17-15-ER.pdf
- Griffith, G., Bryce, S. Omernik, J., and A. Rogers (2007) *Ecoregions of Texas*. Project report to Texas Commission on Environmental Quality, prepared in part with funds from the U.S. Environmental Protection Agency. Accessed January 13, 2020. ftp://ftp.epa.gov/wed/ecoregions/tx/TXeco_Jan08_v8_Cmprsd.pdf.
- HGAC (2017) *Houston-Galveston Area Council 2017 Regional Growth Forecast.* Accessed January 13, 2020. http://www.h-gac.com/community/socioeconomic/2040-regional-growth-forecast/default.aspx.
- National Oceanic and Atmospheric Administration, Nation Weather Services Website accessed on January 13, 2020. https://www.ncdc.noaa.gov/cdo-web/datatools/normals
- Seaber, P.R, F.P. Kapinos, and G. L. Knapp (1987) *Hydrologic Unit Maps*. US Geological Survey. Water Supply Paper 2294.
- Natural Resources Conservation Service [NRCS] (2018) *Web Soil Survey, Version 3.3* [website]. U.S. Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey. Accessed January 13, 2020. Available URL http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm.
- United States Army Corps of Engineers [USACE] (1987) Corps of Engineers Wetland Delineation Manual. USACE Waterways Experiment Station Technical Report Y-87-1.
- United States Army Corps of Engineers [USACE] (2010) Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region (Version 2.0). United States Corps of Engineers Research and Development Center, Vicksburg, MS. ERDC/EL TR-10-20.
- United States Army Corps of Engineers [USACE] (2018) *National Wetland Plant List, version* 3.3. Accessed May 27, 2020. Available URL http://wetland-plants.usace.army.mil/.
- U.S. Environmental Protection Agency [EPA] (2012) *Level IV Ecoregions of Texas*. U.S. EPA Office of Research and Development, National Health and Environmental Effects

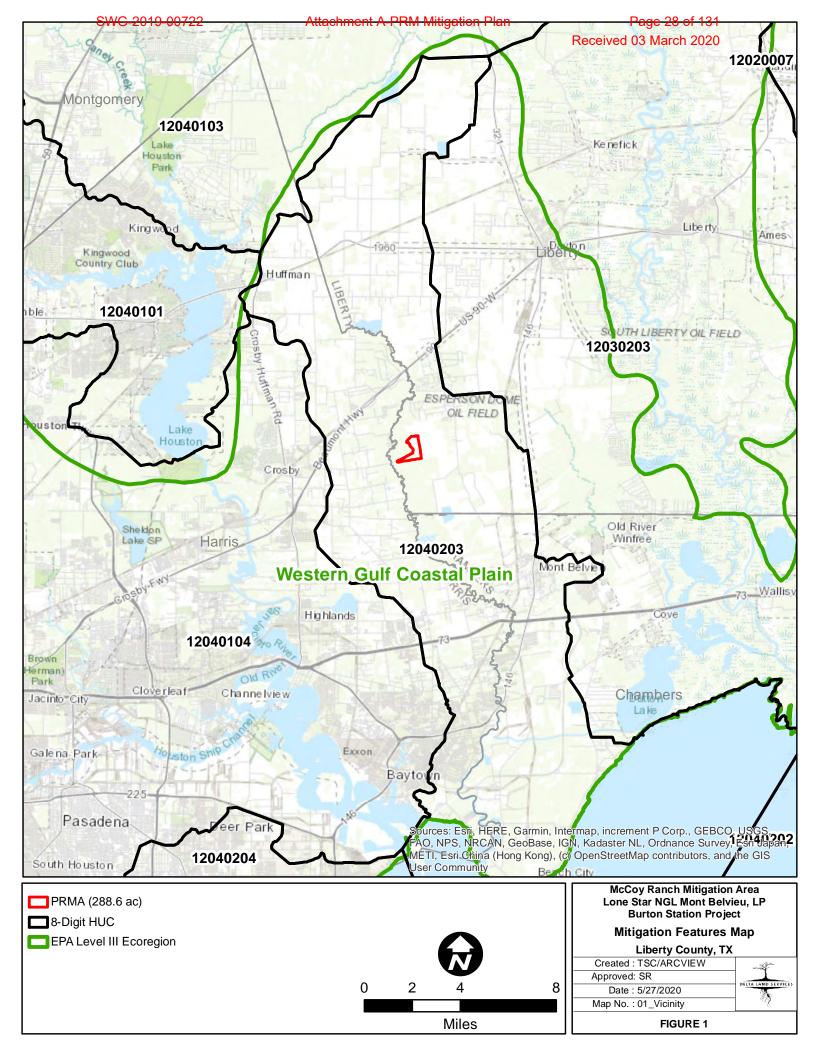
Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772 February 26, 2020

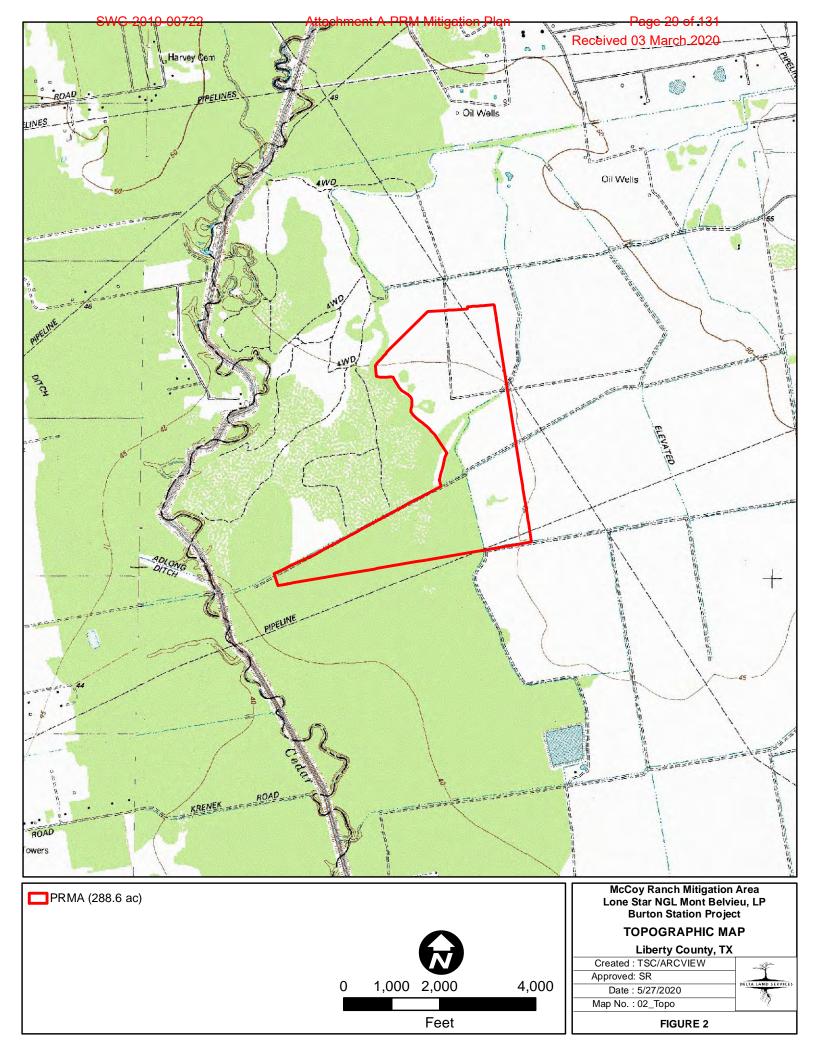
Research Laboratory. Accessed January 13, 2020. Available URL http://www.epa.gov/wed/pages/ecoregions/tx eco.htm.

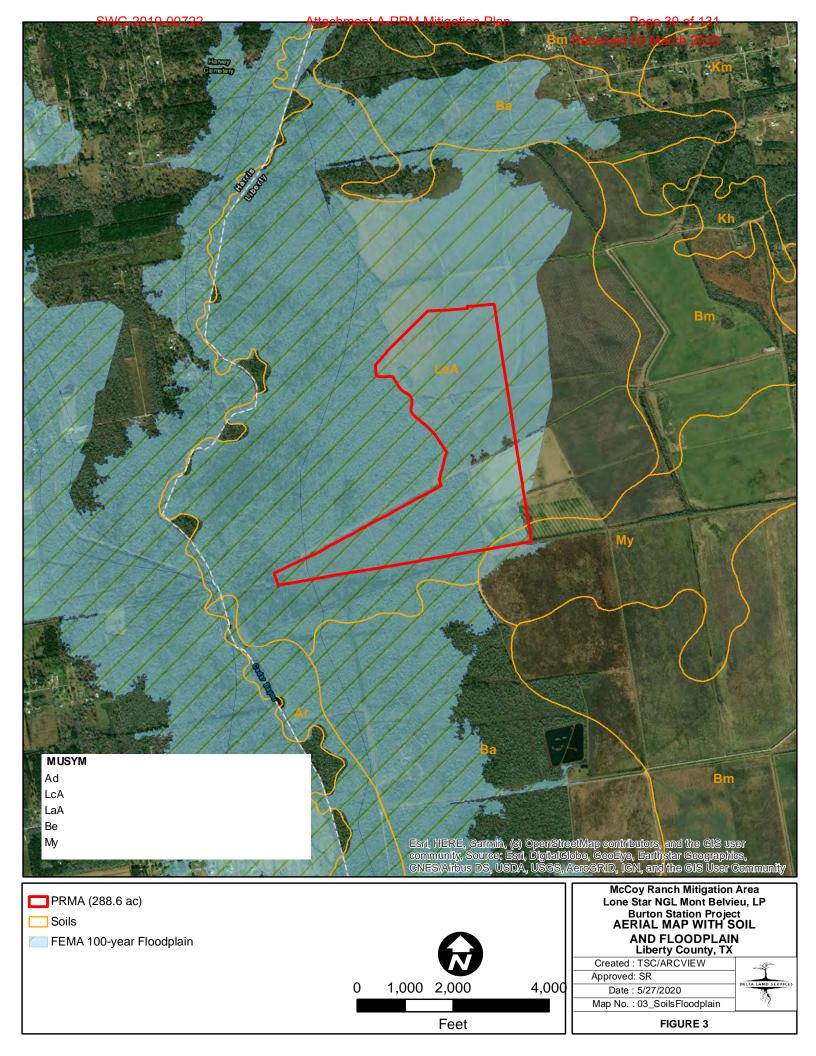
PFO, PSS, and PEM Permittee Responsible Mitigation Plan SWG-2019-00772 February 26, 2020

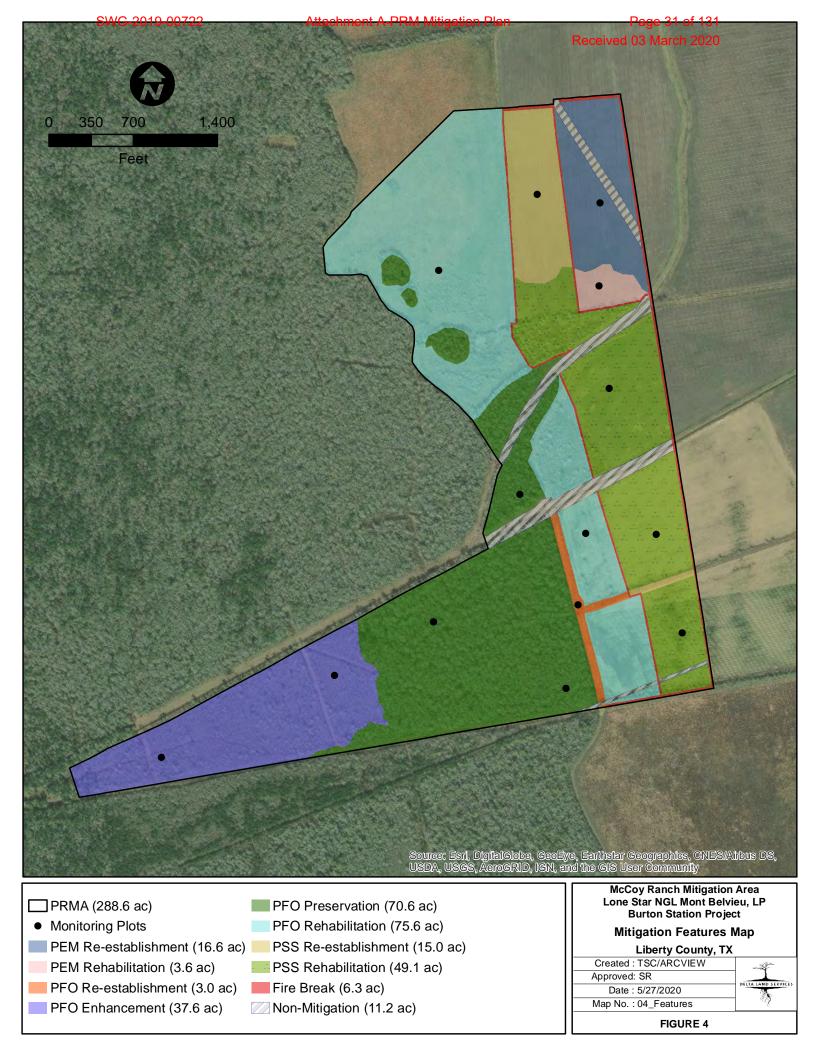
Attachment A. Figures

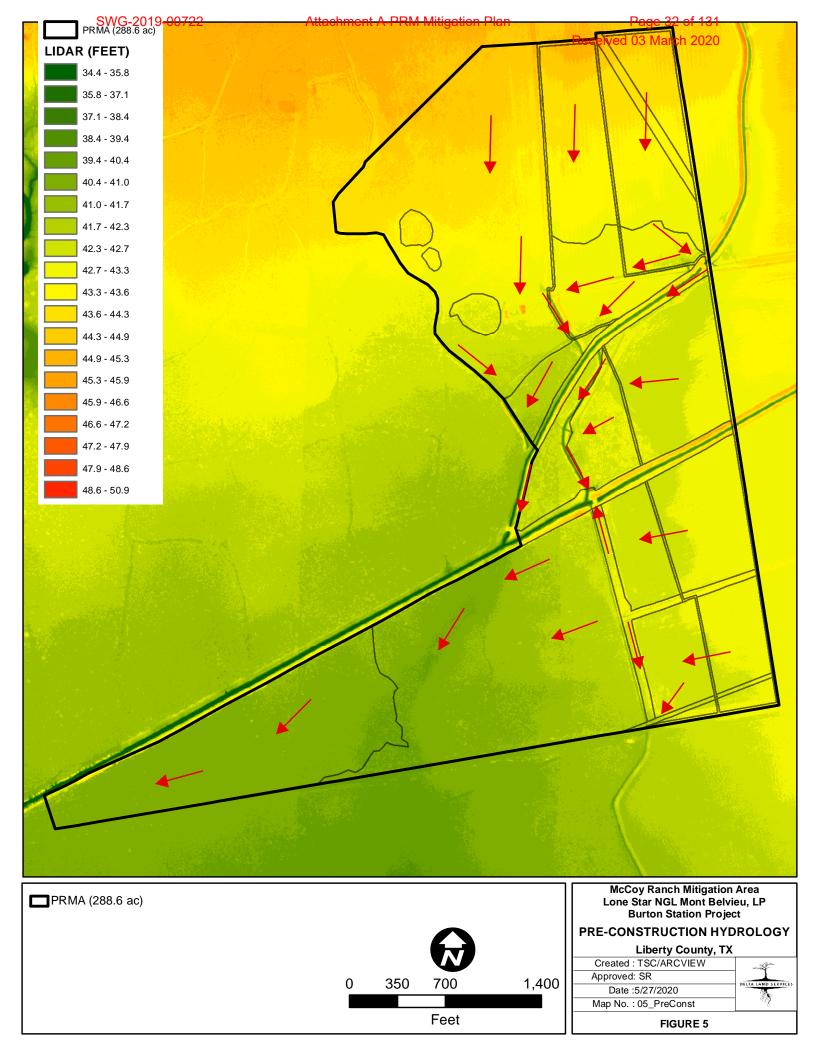
- Figure 1. Vicinity, Watershed, and Ecoregion Map
- Figure 2. Topographic Map
- Figure 3. Aerial Map with Soil and Floodplain
- Figure 4. Mitigation Features Map
- Figure 5. Pre-construction Hydrology
- Figure 6. Post Construction Hydrology
- Figure 7A-E. Plan View and Cross Sections

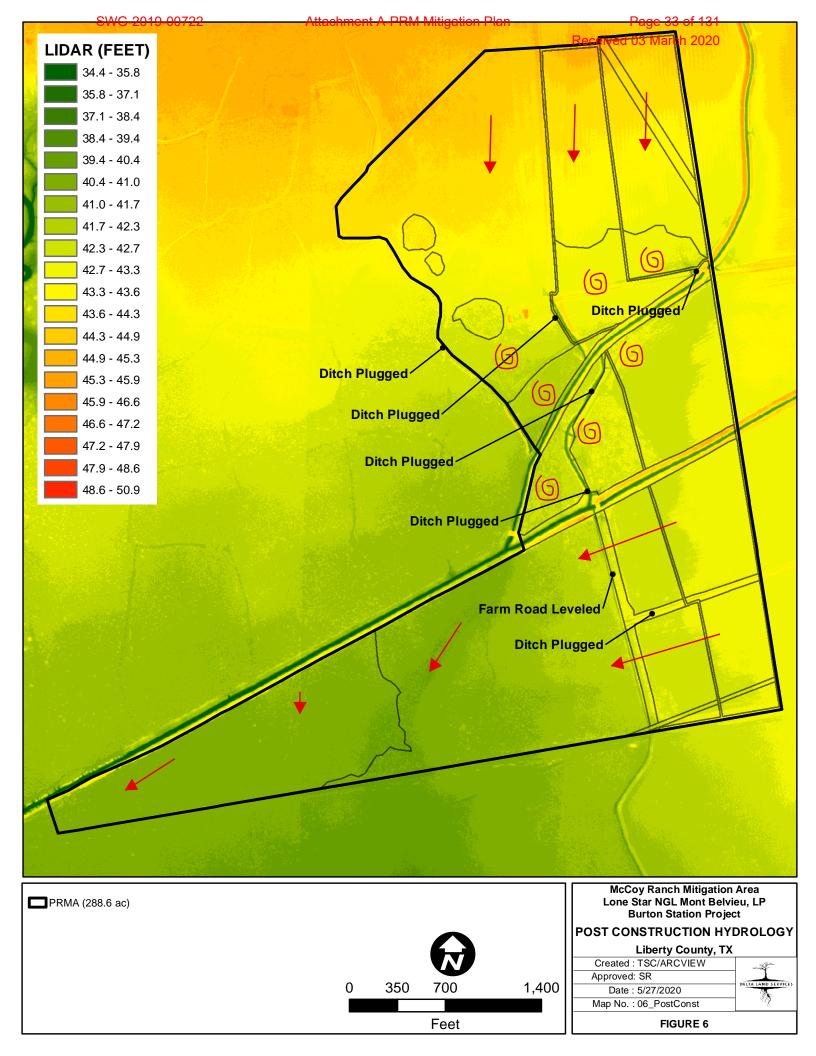


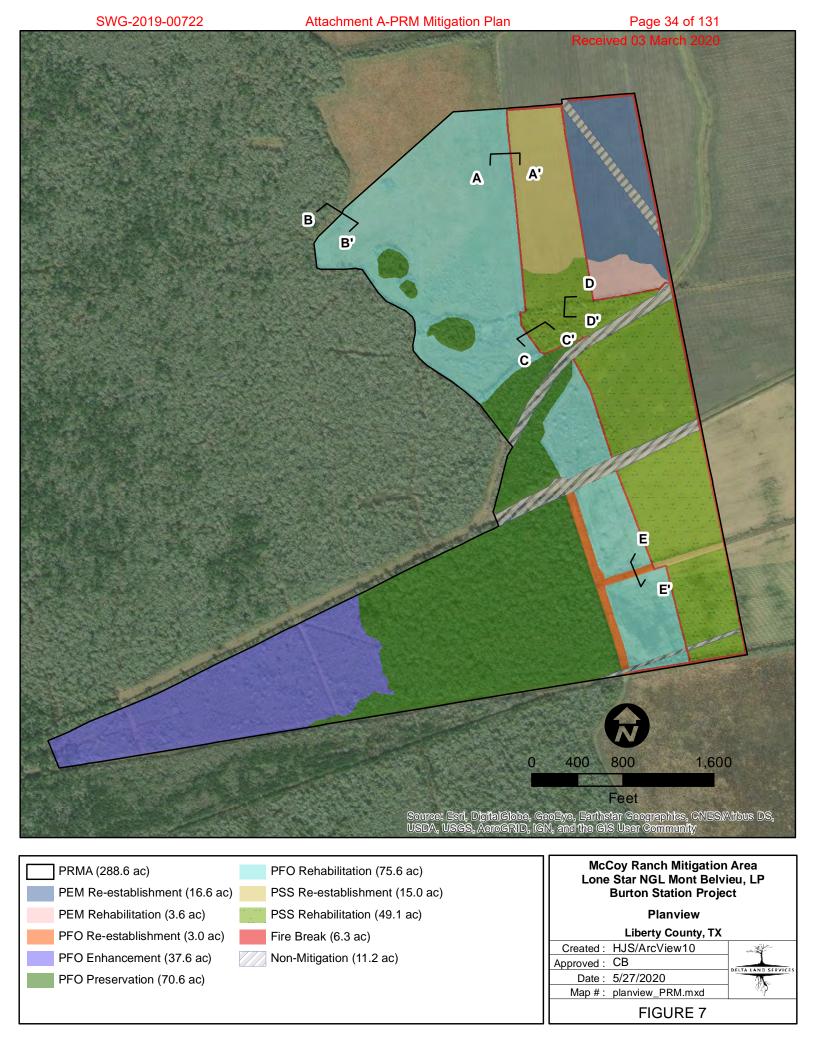




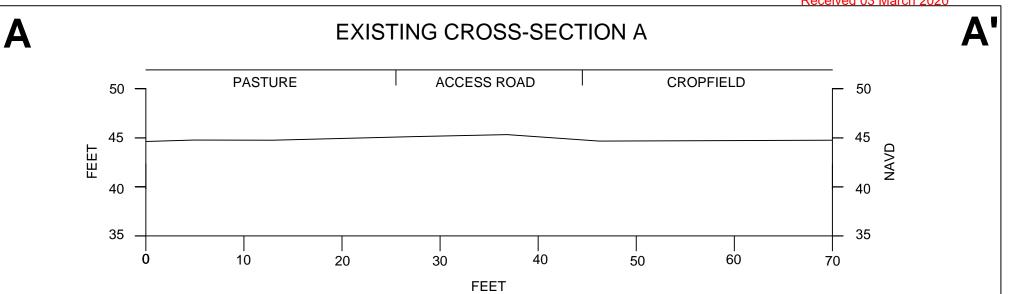


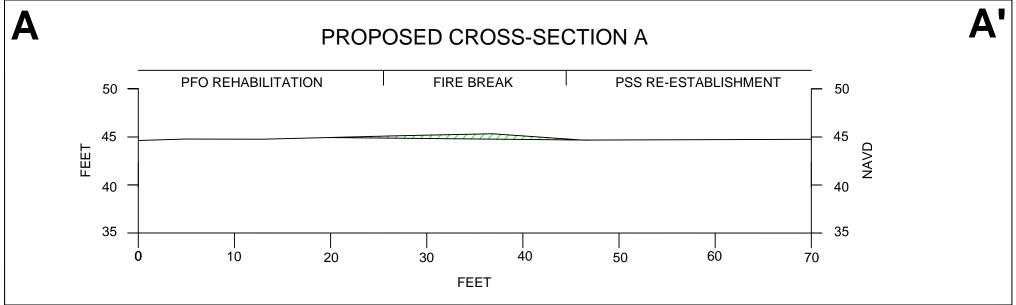


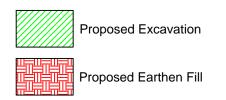




Page 35 of 131 Received 03 March 2020







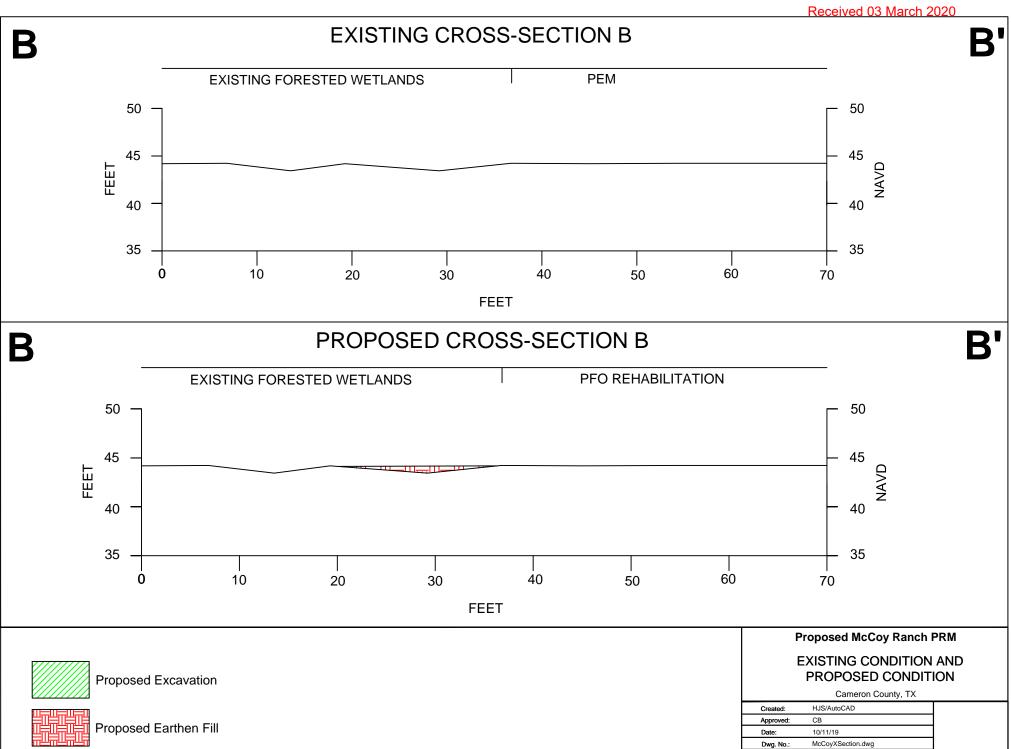
Proposed McCoy Ranch PRM

EXISTING CONDITION AND
PROPOSED CONDITION

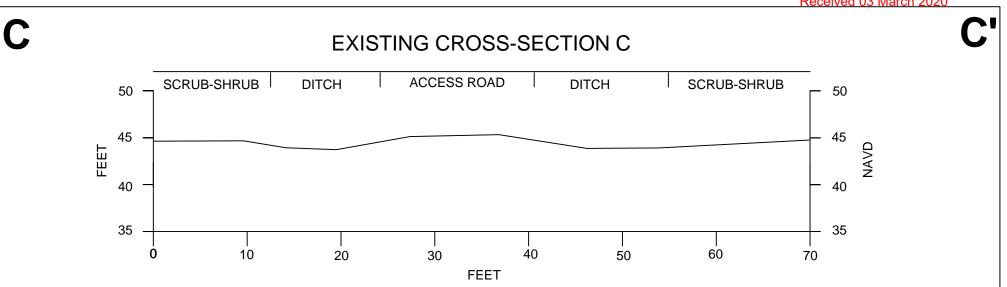
Cameron County, TX

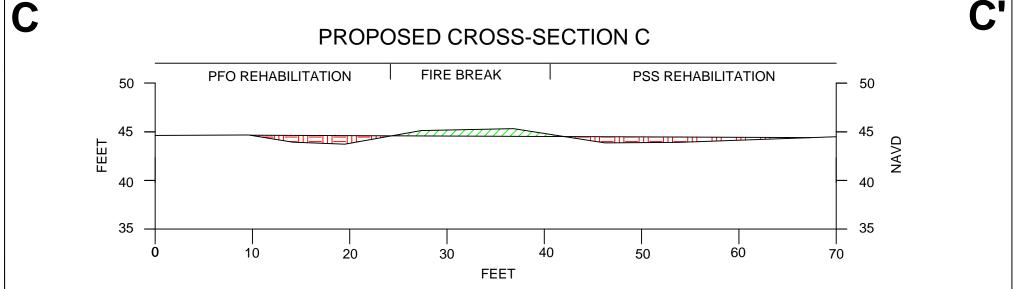
FIGURE 7A				
Dwg. No.:	McCoyXSection.dwg			
Date:	10/11/19			
Approved:	СВ			
Created:	HJS/AutoCAD			

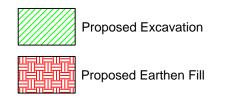
FIGURE 7B



Page 37 of 131 Received 03 March 2020





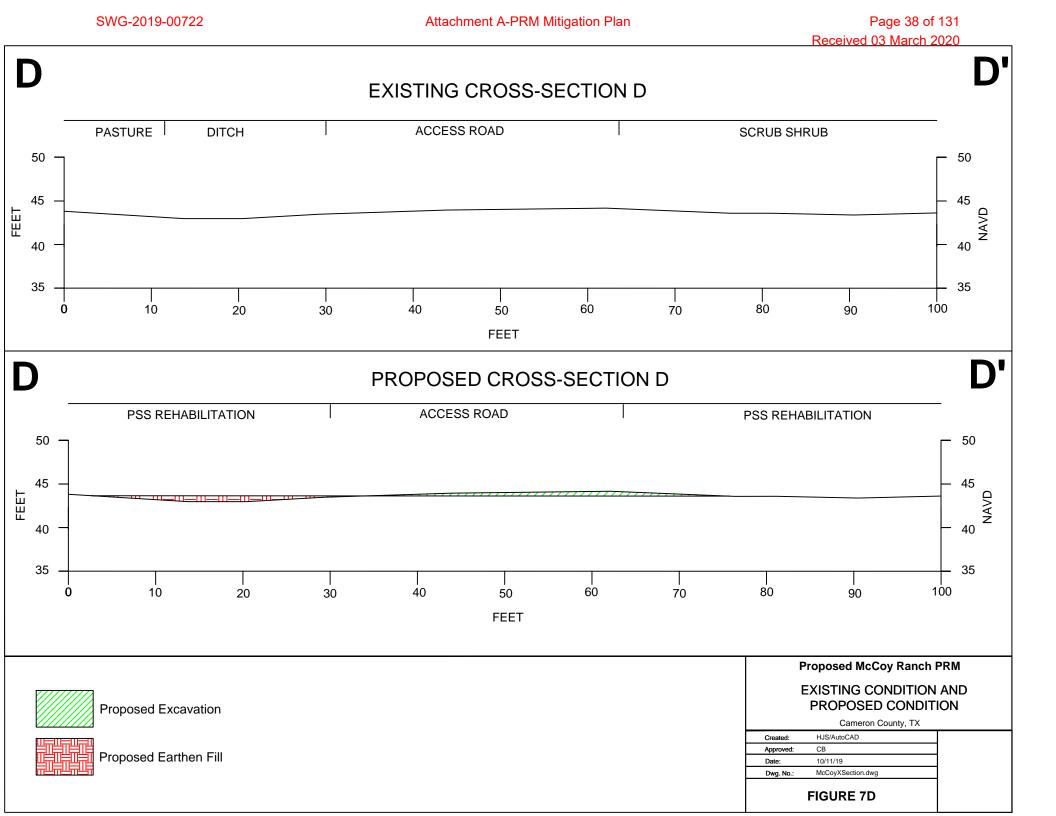


Proposed McCoy Ranch PRM

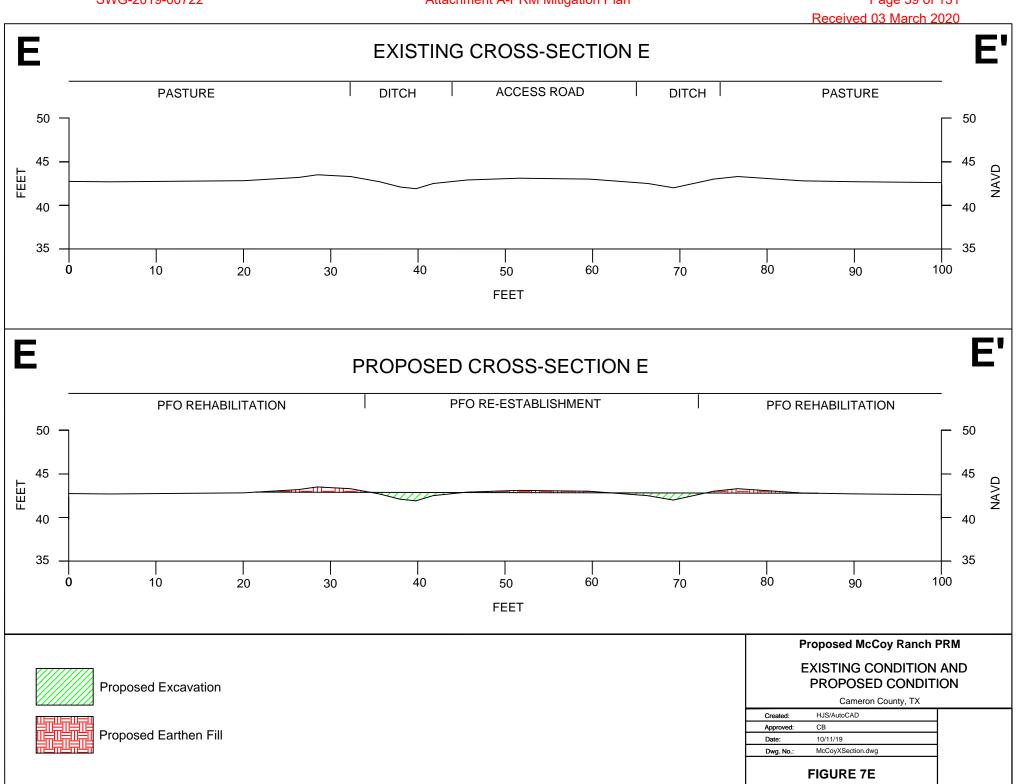
EXISTING CONDITION AND
PROPOSED CONDITION

Cameron County, TX

	FIGURE 7C	
Dwg. No.:	McCoyXSection.dwg	
Date:	10/11/19	
Approved:	CB	
Created:	HJS/AutoCAD	



Page 39 of 131



Page 40 of 131

Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772 February 26, 2020

Attachment B. Riverine Forested and Riverine Herbaceous/shrub Hydrogeomorphic Interim Model Workbooks (Tables 1 - 19)

Restoration Type Baseline Discussion

The following is a brief description of the methodology that identifies the process in which the Restoration types/Wetland Assessment Areas (WAA) were delineated for the iHGM baseline evaluation and then a general discussion of restoration. According to the NRCS, the soils are uniform across the site, consisting of clay soils; thus, soil types were not considered in delineating the restoration areas.

<u>Riverine Forested Re-establishment</u> – This area is located within the 100-year floodplain along agricultural roads and does not meet the three wetland criteria. Restoration would target the reestablishment of wetland hydrology through the removal of the roadbeds and re-establishment of native wetland forest vegetation.

<u>Riverine Forested Enhancement</u> – This area is located within the 100-year floodplain and meets the definition of a wetland. The area was timber harvested in 2004 and has been heavily encroached by Chinese Tallow with some native trees present. Restoration will target native tree/shrub restoration.

<u>Riverine Forested Rehabilitation</u> - This area is located within the 100-year floodplain and meets the definition of a wetland. The area has been impacted by agricultural drainage ditches and field drain laterals, which have reduced duration and frequency of flooding. Additionally, these areas have been impacted by agricultural production since the 1940's. Restoration would restore natural hydrology and the native forest community.

<u>Riverine Forested Preservation</u> - This area is a mature forest within the 100-year floodplain that does not appear to have had major disturbances over the last 80 years and potentially longer. This area would be protected, and invasive species would be managed/controlled.

Riverine Herbaceous Rehabilitation - This area is located within the 100-year floodplain and meets the definition of a wetland. The area has been impacted by agricultural drainage ditches and field drain laterals, which have reduced duration and frequency of flooding. Additionally, these areas have been impacted by agricultural production since the 1940's and are actively farmed. Restoration would restore natural hydrology through the removal or plugging of drainages and reestablishment of a native herbaceous community. All agricultural activities would cease.

<u>Riverine Herbaceous Re-establishment</u> – This area is located within the 100-year floodplain within active agricultural fields. Hydric soils are typically present, but the area is often devoid of vegetation due to tilling or crops are present. These areas did not meet the three wetland criteria. Restoration would target the re-establishment of wetland hydrology through the removal of agricultural drainages and re-establishment of native wetland herbaceous vegetation. All agricultural activities would cease.

<u>Riverine Shrub Rehabilitation</u> - This area is located within the 100-year floodplain and meets the definition of a wetland. The area has been impacted by agricultural drainage ditches and field drain laterals, which have reduced duration and frequency of flooding. Additionally, these areas have been impacted by agricultural production since the 1940's with periodic crop production, hay production, and cattle grazing. Restoration would restore natural hydrology through the removal or plugging of drainages and re-establishment of a native shrub and herbaceous community. All agricultural activities would cease.

<u>Riverine Shrub Re-establishment</u> – This area is located within the 100-year floodplain within active agricultural fields. Hydric soils are typically present, but the area is often devoid of vegetation due to tilling or crops are present. These areas did not meet the three wetland criteria. Restoration would target the re-establishment of wetland hydrology through the removal of agricultural drainages and re-establishment of native wetland shrub and herbaceous vegetation. All agricultural activities would cease.

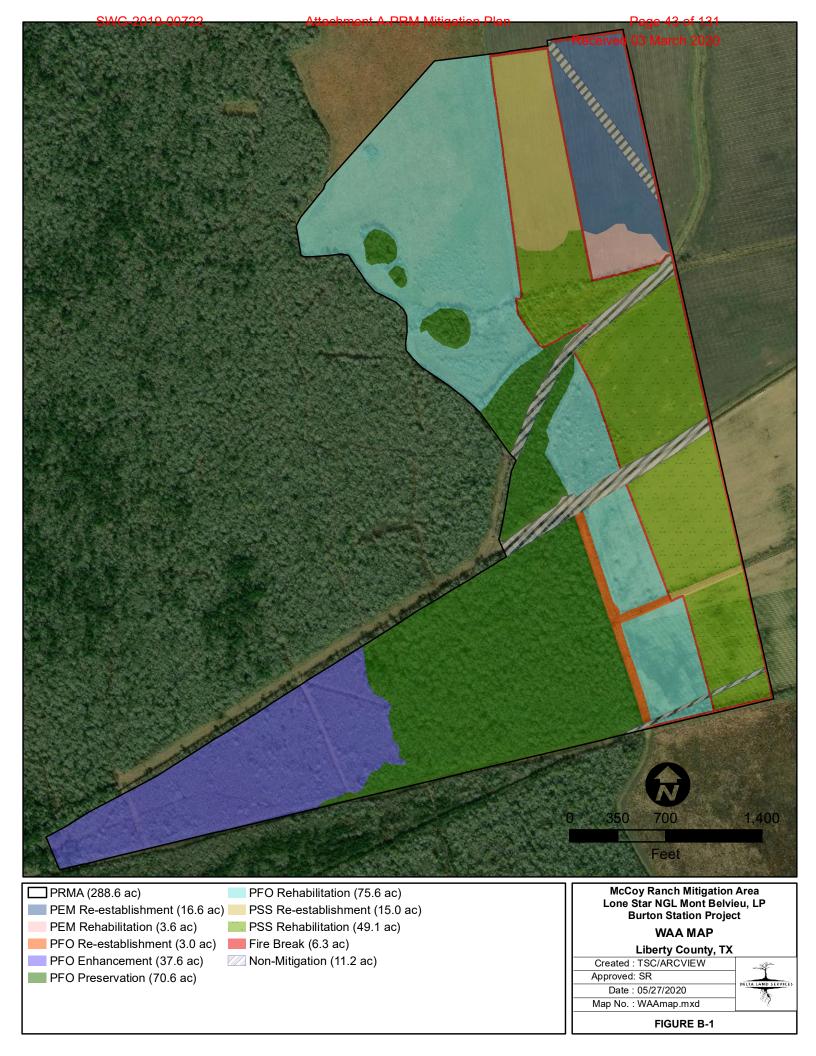


Table 1. Predicted FCU Lift by Mitigation Type.

Riverine Forested Re-	Year 0	Year 10	Total Lift by	Total PFO	Lift
establishment 3.1 Acres	Baseline	Lift	Function	TotalTFO	Liit
Physical	0.0	2.3	2.3	61.87	
Biological	0.0	2.2	2.2	53.18	
Chemical	0.0	2.6	2.6	58.43	
Riverine Forested	Year 0	Year 10	Total Lift by	Total	
Enhancement 37.6 Acres	Baseline	Lift	Function	Herbaceous	Lift
Physical	12.7	19.6	6.9	10.75	
Biological	15.0	20.3	5.4	14.31	
Chemical	14.6	20.9	6.3	10.64	
Riverine Forested	Year 0	Year 10	Total Lift by	Total Shru	L T :f4
Rehabilitation 75.6 Acres	Baseline	Lift	Function	Total Silru	ը բու
Physical	9.5	56.1	46.6	30.8	
Biological	15.1	54.5	39.4	28.9	
Chemical	20.9	64.0	43.1	27.9	
Riverine Forested	Year 0	Year 10	Total Lift by		
Preservation 70.7 Acres	Baseline	Lift	Function*		
Preservation 70.7 Acres Physical	Baseline 61.2	Lift NA	Function* 6.1		

^{*}PFO preservation, 10% of baseline FCU was used for credit generation

Riverine Herbaceous Re- establishment 16.6 Acres	Year 0 Baseline	Year 5 Lift	Total Lift by Function
Physical	0.0	9.3	9.3
Biological	0.0	12.5	12.5
Chemical	0.0	9.6	9.6
Riverine Herbaceous Re- establishment 3.6 Acres	Year 0 Baseline	Year 5 Lift	Total Lift by Function
Physical	0.57	2.02	1.4
Biological	0.84	2.70	1.9
Chemical	1.01	2.08	1.1
Riverine Shrub Rehabilitation 49.1 Acres	Year 0 Baseline	Year 5 Lift	Total Lift by Function
Physical	13.4	36.2	22.8
Biological	24.6	40.9	16.4
Chemical	17.7	36.7	19.0
Riverine Shrub Re-	Year 0	Year 5	Total Lift by
establishment 15.0	Baseline	Lift	Function
Physical	0.0	8.0	8.0
Biological	0.0	12.5	12.5
Chemical	0.0	8.9	8.9

Table 2. PFO Re-establishment Year O/Baseline iHGM Burton Station PRMASSMGe2019M977722020

Riverine Forested Re-establishment Year 0	PFO
Acreage	3.10
Variable	Baseline
Vdur: Duration of flooding	0.00
Vfreq: Frequency of flooding	0.00
Vtopo: Topography	0.00
Vcwd: Course woody debris	0.00
Vwood: Woody vegetation	0.00
Vtree: Tree species	0.00
Vrich: Tree richness/diversity	0.00
Vbasal: Tree basal area	0.00
Vdesity: Tree density	0.00
Vmid: Midstory (Shrub/sapling/woody vines)	0.00
Vherb: Herbaceous layer	0.00
Vdetritus: Detritus	0.00
Vredox: Redoximorphic process	0.00
Vsorpt: Sorptive Soil Properties	0.00
Vconnect: Connectivity to other habitat types	0.00
Physical FCI: Temporary Storage & Detention of Storage Water	0.000
Biological FCI: Maintain Plant and Animal Community	0.000
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.000
Dhysical ECU. Tamperary Storage & Detention of Storage Water	0.0
Physical FCU: Temporary Storage & Detention of Storage Water	
Biological FCU: Maintain Plant and Animal Community	0.0
Chemical FCU: Removal & Sequestration of Elements & Compounds	0.0

1.640

2.211

Table 3. PFO Re-establishment Year 4 iHGM Burton Station PRMA SWE-2019:00772 arch 2020

Riverine Forested Re-establishment Year 4	PFO
Acreage	3.10
Variable	Baseline
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	0.40
Vcwd: Course woody debris	0.30
Vwood: Woody vegetation	0.75
Vtree: Tree species	0.50
Vrich: Tree richness/diversity	0.60
Vbasal: Tree basal area	0.40
Vdesity: Tree density	0.40
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	0.50
Vdetritus: Detritus	0.50
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.75
Physical FCI: Temporary Storage & Detention of Storage Water	0.602
Biological FCI: Maintain Plant and Animal Community	0.529
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.713
Physical FCU: Temporary Storage & Detention of Storage Water	1.866
Biological FCU: Maintain Plant and Animal Community	1.640
Chemical FCU: Removal & Sequestration of Elements & Compounds	2.211
Total Lift	
Physical FCU: Temporary Storage & Detention of Storage Water	1.866
- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	1.000

Biological FCU: Maintain Plant and Animal Community

Chemical FCU: Removal & Sequestration of Elements & Compounds

Table 4. PFO Re-establishment Year 10 iHGM Burton Station PRMA SWIGE 2019 1007 72 rch 2020

Riverine Forested Re-establishment Year 10	PFO
Acreage	3.10
Variable	Baseline
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	0.70
Vcwd: Course woody debris	0.50
Vwood: Woody vegetation	1.00
Vtree: Tree species	0.80
Vrich: Tree richness/diversity	0.80
Vbasal: Tree basal area	0.60
Vdesity: Tree density	0.60
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	1.00
Vdetritus: Detritus	1.00
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.75
DI : LEGIT G. O.D. C. CG. W.	0.742
Physical FCI: Temporary Storage & Detention of Storage Water	0.742
Biological FCI: Maintain Plant and Animal Community	0.721
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.847
Physical FCU: Temporary Storage & Detention of Storage Water	2.299
Biological FCU: Maintain Plant and Animal Community	2.235
Chemical FCU: Removal & Sequestration of Elements & Compounds	2.625
Total Lift	
Physical FCU: Temporary Storage & Detention of Storage Water	2.299
Biological FCU: Maintain Plant and Animal Community	2.235

Physical FCU: Temporary Storage & Detention of Storage Water	2.299
Biological FCU: Maintain Plant and Animal Community	2.235
Chemical FCU: Removal & Sequestration of Elements & Compounds	2.625

Table 5. PFO Enhancement Year O/Baseline iHGM Burton Station PRMA SWGr2019-00772h 2020

Riverine Forested Enhancement Year 0	PFO
Acreage	37.60
Variable	Baseline
Vdur: Duration of flooding	0.50
Vfreq: Frequency of flooding	0.50
Vtopo: Topography	0.70
Vcwd: Course woody debris	0.50
Vwood: Woody vegetation	0.50
Vtree: Tree species	0.50
Vrich: Tree richness/diversity	0.80
Vbasal: Tree basal area	0.60
Vdesity: Tree density	0.60
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	1.00
Vdetritus: Detritus	1.00
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.50
Physical FCI: Temporary Storage & Detention of Storage Water	0.532
Biological FCI: Maintain Plant and Animal Community	0.629
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.613
Physical FCU: Temporary Storage & Detention of Storage Water	12.669
Biological FCU: Maintain Plant and Animal Community	14.974
Chemical FCU: Removal & Sequestration of Elements & Compounds	14.597

Table 6. PFO Enhancement Year O/Baseline iHGM Burton Station PRMA SWG; 2019:00772h 2020

Riverine Forested Enhancement Year 4	PFO
Acreage	37.60
Variable	Baseline
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	0.70
Vcwd: Course woody debris	0.50
Vwood: Woody vegetation	0.75
Vtree: Tree species	0.50
Vrich: Tree richness/diversity	0.80
Vbasal: Tree basal area	0.60
Vdesity: Tree density	1.00
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	1.00
Vdetritus: Detritus	1.00
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.75
Physical FCI: Temporary Storage & Detention of Storage Water	0.698
Biological FCI: Maintain Plant and Animal Community	0.704
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.780
Physical FCU: Temporary Storage & Detention of Storage Water	16.617
Biological FCU: Maintain Plant and Animal Community	16.759
Chemical FCU: Removal & Sequestration of Elements & Compounds	18.564
Total Lift	
Physical FCU: Temporary Storage & Detention of Storage Water	3.949
Biological FCU: Maintain Plant and Animal Community	1.785
	- 1

Physical FCU: Temporary Storage & Detention of Storage Water	3.949
Biological FCU: Maintain Plant and Animal Community	1.785
Chemical FCU: Removal & Sequestration of Elements & Compounds	3.967

Table 7. PFO Enhancement Year 10 iHGM Burton Station PRMA SWG-2012/18 Avience 2020

Riverine Forested Enhancement Year 10	PFO
Acreage	37.60
Variable	Baseline
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	0.70
Vcwd: Course woody debris	1.00
Vwood: Woody vegetation	1.00
Vtree: Tree species	0.80
Vrich: Tree richness/diversity	0.80
Vbasal: Tree basal area	0.80
Vdesity: Tree density	1.00
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	1.00
Vdetritus: Detritus	1.00
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.75
Physical FCI: Temporary Storage & Detention of Storage Water	0.822
Biological FCI: Maintain Plant and Animal Community	0.854
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.880
Physical FCU: Temporary Storage & Detention of Storage Water	19.554
Biological FCU: Maintain Plant and Animal Community	20.329
Chemical FCU: Removal & Sequestration of Elements & Compounds	20.944
Total Lift	

Physical FCU: Temporary Storage & Detention of Storage Water	6.885
Biological FCU: Maintain Plant and Animal Community	5.355
Chemical FCU: Removal & Sequestration of Elements & Compounds	6.347

Table 8. PFO Rehabilitation Year 0/Baseline iHGM Burton Station PRMA SWG 2019:00772h 2020

Riverine Forested Rehabilitation Year 0	PFO
Acreage	75.60
Variable	Baseline
Vdur: Duration of flooding	0.10
Vfreq: Frequency of flooding	0.25
Vtopo: Topography	0.10
Vcwd: Course woody debris	0.10
Vwood: Woody vegetation	0.10
Vtree: Tree species	0.10
Vrich: Tree richness/diversity	0.10
Vbasal: Tree basal area	0.10
Vdesity: Tree density	0.10
Vmid: Midstory (Shrub/sapling/woody vines)	0.10
Vherb: Herbaceous layer	0.50
Vdetritus: Detritus	0.50
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.50
Physical FCI: Temporary Storage & Detention of Storage Water	0.126
Biological FCI: Maintain Plant and Animal Community	0.200
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.277
	T
Physical FCU: Temporary Storage & Detention of Storage Water	9.5
Biological FCU: Maintain Plant and Animal Community	15.1
Chemical FCU: Removal & Sequestration of Elements & Compounds	20.9

Table 9. PFO Rehabilitation Year 0/Baseline iHGM Burton Station PRMA SWG 2019:00772h 2020

Riverine Forested Rehabilitation Year 4	PFO
Acreage	75.60
Variable	Baseline
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	0.40
Vcwd: Course woody debris	0.30
Vwood: Woody vegetation	0.50
Vtree: Tree species	0.50
Vrich: Tree richness/diversity	0.60
Vbasal: Tree basal area	0.40
Vdesity: Tree density	0.40
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	0.50
Vdetritus: Detritus	0.50
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.75
Physical FCI: Temporary Storage & Detention of Storage Water	0.548
Biological FCI: Maintain Plant and Animal Community	0.529
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.529
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.047
Physical FCU: Temporary Storage & Detention of Storage Water	41.4
Biological FCU: Maintain Plant and Animal Community	40.0
Chemical FCU: Removal & Sequestration of Elements & Compounds	48.9
Total Lift	
Physical FCU: Temporary Storage & Detention of Storage Water	31.902
Biological FCU: Maintain Plant and Animal Community	24.885

Physical FCU: Temporary Storage & Detention of Storage Water	31.902
Biological FCU: Maintain Plant and Animal Community	24.885
Chemical FCU: Removal & Sequestration of Elements & Compounds	27.972

Table 10. PFO Rehabilitation Year 10 iHGM Burton Station PRMA SWGe2012-00770 arch 2020

Riverine Forested Rehabilitation Year 10	PFO
Acreage	75.60
Variable	Baseline
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	0.70
Vcwd: Course woody debris	0.50
Vwood: Woody vegetation	1.00
Vtree: Tree species	0.80
Vrich: Tree richness/diversity	0.80
Vbasal: Tree basal area	0.60
Vdesity: Tree density	0.60
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	1.00
Vdetritus: Detritus	1.00
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	0.75
Physical FCI: Temporary Storage & Detention of Storage Water	0.742
Biological FCI: Maintain Plant and Animal Community	0.721
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.847
Physical FCU: Temporary Storage & Detention of Storage Water	56.1
Biological FCU: Maintain Plant and Animal Community	54.5
Chemical FCU: Removal & Sequestration of Elements & Compounds	64.0

Total Lift

Physical FCU: Temporary Storage & Detention of Storage Water	46.560
Biological FCU: Maintain Plant and Animal Community	39.375
Chemical FCU: Removal & Sequestration of Elements & Compounds	43.092

Table 11. PFO Preservation Baseline iHGM Burton Station PRMA SWG-2019-0077@larch 2020

Riverine Forested Preservation Baseline	PFO
Acreage	70.70
Variable	Baseline
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	1.00
Vcwd: Course woody debris	1.00
Vwood: Woody vegetation	1.00
Vtree: Tree species	0.80
Vrich: Tree richness/diversity	0.80
Vbasal: Tree basal area	1.00
Vdesity: Tree density	0.60
Vmid: Midstory (Shrub/sapling/woody vines)	0.75
Vherb: Herbaceous layer	1.00
Vdetritus: Detritus	1.00
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
Vconnect: Connectivity to other habitat types	1.00
Physical FCI: Temporary Storage & Detention of Storage Water	0.866
Biological FCI: Maintain Plant and Animal Community	0.879
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.900
F	
Physical FCU: Temporary Storage & Detention of Storage Water	61.2
Biological FCU: Maintain Plant and Animal Community	62.2
Chemical FCU: Removal & Sequestration of Elements & Compounds	63.6

Table 12. PEM Re-establishment Year O/Baseline iHGM Burton Station PRMAeSWG42019-00772

PEM Re-establishment 15.4 acres Year 0	
Acreage	16.60
Variable	Index Value
Vdur: Duration of flooding	0.00
Vfreq: Frequency of flooding	0.00
Vtopo: Topography	0.00
Vwood: Woody vegetation	0.00
Vmid: Midstory (Shrub/sapling/woody vines)	0.00
Vherb: Herbaceous layer	0.00
Vconnect: Connectivity to other habitat types	0.00
Vdetritus: Detritus	0.00
Vredox: Redoximorphic process	0.00
Vsorpt: Sorptive Soil Properties	0.00

Physical FCI: Temporary Storage & Detention of Storage Water	0.000
Biological FCI: Maintain Plant and Animal Community	0.000
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.000
Physical FCU: Temporary Storage & Detention of Storage Water	0.0
Biological FCU: Maintain Plant and Animal Community	0.0
Chemical FCU: Removal & Sequestration of Elements & Compounds	0.0

Table 13. PEM Re-establishment Year 5 iHGM Burton Station PRMAe SWG-2019-0077220

PEM Re-establishment 15.4 acres Year 5	
Acreage	16.60
Variable	Index Value
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.50
Vtopo: Topography	0.40
Vwood: Woody vegetation	0.25
Vmid: Midstory (Shrub/sapling/woody vines)	0.25
Vherb: Herbaceous layer	1.00
Vconnect: Connectivity to other habitat types	1.00
Vdetritus: Detritus	0.50
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00

Physical FCI: Temporary Storage & Detention of Storage Water	0.560
Biological FCI: Maintain Plant and Animal Community	0.750
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.577
Physical FCU: Temporary Storage & Detention of Storage Water	9.3
Biological FCU: Maintain Plant and Animal Community	12.5
Chemical FCU: Removal & Sequestration of Elements & Compounds	9.6

Total Lift

Total Life	
Physical FCU: Temporary Storage & Detention of Storage Water	9.300
Biological FCU: Maintain Plant and Animal Community	12.450
Chemical FCU: Removal & Sequestration of Elements & Compounds	9.573

Table 14. PSS Rehabilitation Year 0/Baseline iHGM Burton Station PRMA SW 03-2019-000772

PSS Rehabilitation 49.1 acres Year 0		
Acreage	49.10	
Variable	Index Value	
Vdur: Duration of flooding	0.25	
Vfreq: Frequency of flooding	0.25	
Vtopo: Topography	0.10	
Vwood: Woody vegetation	0.10	
Vmid: Midstory (Shrub/sapling/woody vines)	0.25	
Vherb: Herbaceous layer	0.75	
Vconnect: Connectivity to other habitat types	0.50	
Vdetritus: Detritus	0.50	
Vredox: Redoximorphic process	1.00	
Vsorpt: Sorptive Soil Properties	1.00	

Physical FCI: Temporary Storage & Detention of Storage Water	0.274
Biological FCI: Maintain Plant and Animal Community	0.500
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.360
Physical FCU: Temporary Storage & Detention of Storage Water	13.4
Biological FCU: Maintain Plant and Animal Community	24.6
Chemical FCU: Removal & Sequestration of Elements & Compounds	17.7

Table 15. PSS Rehabilitation Year 5 iHGM Burton Station PRMA Service 2019 M0077 2020

PSS Rehabilitation 49.1 acres Year 5	
Acreage	49.10
Variable	Index Value
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.75
Vtopo: Topography	0.70
Vwood: Woody vegetation	0.50
Vmid: Midstory (Shrub/sapling/woody vines)	0.50
Vherb: Herbaceous layer	1.00
Vconnect: Connectivity to other habitat types	1.00
Vdetritus: Detritus	1.00
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00

Physical FCI: Temporary Storage & Detention of Storage Water	0.737
Biological FCI: Maintain Plant and Animal Community	0.833
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.747
Physical FCU: Temporary Storage & Detention of Storage Water	36.2
Biological FCU: Maintain Plant and Animal Community	40.9
Chemical FCU: Removal & Sequestration of Elements & Compounds	36.7

Total Lift

Total Ent	
Physical FCU: Temporary Storage & Detention of Storage Water	22.759
Biological FCU: Maintain Plant and Animal Community	16.367
Chemical FCU: Removal & Sequestration of Elements & Compounds	18.985

Table 16. PSS Re-establishment Year 0/Baseline iHGM Burton Station PRANASWGW2019200772

PSS Re-establishment 15.0 acres Year 0	
Acreage	15.00
Variable	Index Value
Vdur: Duration of flooding	0.00
Vfreq: Frequency of flooding	0.00
Vtopo: Topography	0.00
Vwood: Woody vegetation	0.00
Vmid: Midstory (Shrub/sapling/woody vines)	0.00
Vherb: Herbaceous layer	0.00
Vconnect: Connectivity to other habitat types	0.00
Vdetritus: Detritus	0.00
Vredox: Redoximorphic process	0.00
Vsorpt: Sorptive Soil Properties	0.00

Physical FCI: Temporary Storage & Detention of Storage Water	0.000
Biological FCI: Maintain Plant and Animal Community	0.000
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.000
Physical FCU: Temporary Storage & Detention of Storage Water	0.000
Biological FCU: Maintain Plant and Animal Community	0.000
Chemical FCU: Removal & Sequestration of Elements & Compounds	0.000

Table 17. PSS Re-establishment Year 5 iHGM Burton Station PRMA SWG: 2019-00772020

PSS Re-establishment 15.0 acres Year 5	
Acreage	15.00
Variable	Index Value
Vdur: Duration of flooding	0.50
Vfreq: Frequency of flooding	0.50
Vtopo: Topography	0.40
Vwood: Woody vegetation	0.50
Vmid: Midstory (Shrub/sapling/woody vines)	0.50
Vherb: Herbaceous layer	1.00
Vconnect: Connectivity to other habitat types	1.00
Vdetritus: Detritus	0.50
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00

Physical FCI: Temporary Storage & Detention of Storage Water	0.536
Biological FCI: Maintain Plant and Animal Community	0.833
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.593
Physical FCU: Temporary Storage & Detention of Storage Water	8.043
Biological FCU: Maintain Plant and Animal Community	12.500
Chemical FCU: Removal & Sequestration of Elements & Compounds	8.900

Total Lift

Physical FCU: Temporary Storage & Detention of Storage Water	8.043
Biological FCU: Maintain Plant and Animal Community	12.500
Chemical FCU: Removal & Sequestration of Elements & Compounds	8.900

Table 18. PEM Rehabilitation Year 0/Baseline iHGM Burton Station PRMA\SWG-\2019-00772

PEM Rehabilitation 3.6 acres Year 0	
Acreage	3.60
Variable	Index Value
Vdur: Duration of flooding	0.25
Vfreq: Frequency of flooding	0.25
Vtopo: Topography	0.10
Vwood: Woody vegetation	0.10
Vmid: Midstory (Shrub/sapling/woody vines)	0.10
Vherb: Herbaceous layer	0.10
Vconnect: Connectivity to other habitat types	0.50
Vdetritus: Detritus	0.10
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00
	•
Physical FCI: Temporary Storage & Detention of Storage Water	0.158
Riological ECI: Maintain Plant and Animal Community	0.233

Physical FCI: Temporary Storage & Detention of Storage Water	0.158
Biological FCI: Maintain Plant and Animal Community	0.233
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.280
Physical FCU: Temporary Storage & Detention of Storage Water	0.569
Biological FCU: Maintain Plant and Animal Community	0.840
Chemical FCU: Removal & Sequestration of Elements & Compounds	1.008

Table 19. PEM Rehabilitation Year 5 iHGM Burton Station PRMARSWG-2019400772020

PEM Rehabilitation 3.6 acres Year 5	
Acreage	3.60
Variable	Index Value
Vdur: Duration of flooding	0.75
Vfreq: Frequency of flooding	0.50
Vtopo: Topography	0.40
Vwood: Woody vegetation	0.25
Vmid: Midstory (Shrub/sapling/woody vines)	0.25
Vherb: Herbaceous layer	1.00
Vconnect: Connectivity to other habitat types	1.00
Vdetritus: Detritus	0.50
Vredox: Redoximorphic process	1.00
Vsorpt: Sorptive Soil Properties	1.00

Physical FCI: Temporary Storage & Detention of Storage Water	0.560
Biological FCI: Maintain Plant and Animal Community	0.750
Chemical FCI: Removal & Sequestration of Elements & Compounds	0.577
Physical FCU: Temporary Storage & Detention of Storage Water	2.017
Biological FCU: Maintain Plant and Animal Community	2.700
Chemical FCU: Removal & Sequestration of Elements & Compounds	2.076

Total Lift

Physical FCU: Temporary Storage & Detention of Storage Water	1.448
Biological FCU: Maintain Plant and Animal Community	1.860
Chemical FCU: Removal & Sequestration of Elements & Compounds	1.068

Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772 February 26, 2020

Attachment C. PRMA Perimeter Coordinates

PRMA Perimeter Coordinates

Longitude	Latitude	Longitude	Latitude	Longitude	Latitude
-94.978778	29.931394	-94.987736	29.918244	-94.982448	29.926747
-94.978612	29.931409	-94.987316	29.918454	-94.982508	29.926882
-94.978546	29.931416	-94.987160	29.918533	-94.982684	29.927030
-94.977406	29.931523	-94.986557	29.918822	-94.982758	29.927067
-94.977353	29.931528	-94.986351	29.918921	-94.982782	29.927079
-94.977077	29.931554	-94.985975	29.919112	-94.982966	29.927169
-94.977002	29.931560	-94.985564	29.919320	-94.983140	29.927253
-94.976977	29.931416	-94.985362	29.919422	-94.983333	29.927457
-94.975335	29.923240	-94.985085	29.919562	-94.983458	29.927644
-94.975262	29.922879	-94.984443	29.919867	-94.983564	29.927795
-94.975256	29.922846	-94.983822	29.920169	-94.983714	29.928010
-94.975070	29.921920	-94.983623	29.920266	-94.983880	29.928051
-94.975047	29.921807	-94.982994	29.920584	-94.984126	29.928025
-94.974887	29.921009	-94.982530	29.920822	-94.984553	29.928019
-94.974864	29.920897	-94.982087	29.921025	-94.984726	29.928024
-94.974717	29.920166	-94.981902	29.921109	-94.984809	29.928058
-94.974707	29.920113	-94.981717	29.921198	-94.984886	29.928651
-94.974670	29.919932	-94.981315	29.921392	-94.984775	29.928818
-94.974653	29.919848	-94.981046	29.921521	-94.984386	29.929194
-94.974427	29.918719	-94.980712	29.921682	-94.984210	29.929363
-94.976002	29.918459	-94.980579	29.921747	-94.984163	29.929475
-94.976080	29.918446	-94.980419	29.921825	-94.983613	29.929945
-94.977423	29.918224	-94.980566	29.922178	-94.983536	29.930010
-94.978268	29.918085	-94.980545	29.922229	-94.981411	29.931823
-94.978424	29.918059	-94.980465	29.922512	-94.980267	29.931906
-94.981528	29.917547	-94.980409	29.922711	-94.980219	29.931910
-94.981974	29.917474	-94.980396	29.922766	-94.980181	29.931913
-94.984545	29.917049	-94.980210	29.923515	-94.980171	29.931914
-94.984765	29.917013	-94.980085	29.923742	-94.979841	29.931940
-94.987271	29.916599	-94.980217	29.923888	-94.979806	29.931943
-94.987440	29.916571	-94.980888	29.924766	-94.979652	29.931955
-94.990044	29.916142	-94.981145	29.924991	-94.979425	29.931973
-94.990289	29.916101	-94.981239	29.925075	-94.979374	29.931977
-94.990429	29.916078	-94.981424	29.925212	-94.979026	29.932005
-94.990466	29.916072	-94.981573	29.925321	-94.978955	29.932011
-94.991040	29.915984	-94.981771	29.925454	-94.978950	29.932011
-94.991306	29.916651	-94.981856	29.925510	-94.978950	29.932011
-94.990827	29.916850	-94.982156	29.925706	-94.978950	29.932011
-94.990570	29.916976	-94.982332	29.925875	-94.978871	29.932018
-94.990297	29.917110	-94.982492	29.926052	-94.978782	29.931423
-94.989319	29.917508	-94.982495	29.926195	-94.978778	29.931394
-94.988686	29.917770	-94.982456	29.926423		
-94.988141	29.918042	-94.982443	29.926497		

Page 64 of 131

Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772 February 26, 2020

Attachment D. Texas Land Conservancy Letter of Intent



Chad Butler
Delta Land Services, LLC
Texas Regulatory Manager
6750 West Loop South, Suite 780
Bellaire, TX 77401

January 22, 2020

Re: Letter of Intent for Holding a Conservation Easement

Dear Mr. Butler,

Thank you for the opportunity to collaborate on being a partner on the McCoy Ranch Mitigation Bank (USACE permit number is **SWG-2019-00772**). This proposed project is an excellent opportunity to establish a conservation area that will benefit future generations of Texans. Please accept this non-binding Letter of Intent by the Texas Land Conservancy ("TLC") to work toward placing a conservation easement on this property being approximately 1,300 acres of land in Liberty County, Texas (the "Property"), including a 288.6-acre permittee responsible mitigation (PRM) area, subject to the approval of TLC's Board of Directors.

The required due diligence for this project would be as follows:

- 1. **Baseline Documentation Report:** Grantor to obtain a qualified baseline documentation report at its cost.
- 2. **Survey:** Grantor to obtain a current survey at its cost, which will be used to determine the total acreage and legal description of the Property.
- 3. **Title Policy:** Grantor to pay for the Title Policy premium.
- 4. **Title Review & Property Inspection:** Adequate time shall be permitted for title review and inspection of the property.
- 5. **Approval:** The completion of the conservation easement is subject to approval of TLC's Board of Directors.

This is a Letter of Intent and is not a binding agreement. This Letter of Intent represents the good faith intention of TLC to work towards the execution of a perpetual conservation easement in conjunction with the creation of the McCoy Ranch Mitigation Bank.

Thank you for your consideration, and please do not hesitate to contact me if you have any questions.

Sincerely,

Mark Steinbach
Executive Director

Met Stulas

P. CREDITA NO TRUSTICAS

Page 66 of 131

Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772 February 26, 2020

Attachment E. AJD and Wetland Delineation Summary



U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT P. O. BOX 1229

P. O. BOX 1229 GALVESTON, TEXAS 77553-1229

March 13, 2020

Compliance Branch

SUBJECT: **SWG-2018-00742**; Delta Land Services, LLC. Approved Jurisdictional Determination, 1,318-Acre Tract, Crosby, Liberty County, Texas

Mr. Chris Little DESCO 26902 Nichols Sawmill Magnolia, Texas 77355

Dear Mr. Little:

This letter is in response to the DESCO request, on behalf of the Delta Land Services, LLC, received on July 17, 2018, for an approved jurisdictional determination on a 1,318-acre tract. The site is located approximately four miles east of Crosby, Liberty County, Texas.

Based on the review of the information provided, our site visits, and off-site data, we determined that there are thirty-two wetlands plus the wetlands in fifty-one percent of the mosaic area on the site totaling approximately 710.1 acres. These wetlands were identified using the Regional Supplement to the 1987 Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region (Version 2.0), which requires under normal circumstances, a predominance of hydrophytic vegetation, hydric soils, and sufficient hydrology at/or near the surface for adequate duration and frequency to support this aquatic ecosystem.

We determined that nineteen of the wetlands; specifically, Wetland 5, Wetland 12, Wetland 13, Wetland 14, Wetland 15, Wetland 16, Wetland 17, Wetland 18, Wetland 19, Wetland 20, Wetland 22, Wetland 24, Wetland 25, Wetland 26, Wetland 27, Wetland 28, Wetland 29, Wetland 30, Wetland 31, plus a portion of the mosaic wetland totaling 258.3 acres have a significant nexus to the downstream Traditional Navigable Water, Cedar Bayou, and are waters of the United States subject to Section 404.

In addition, we determined that thirteen of the wetlands, specifically, Wetland 1, Wetland 2, Wetland 3, Wetland 4, Wetland 6, Wetland 7, Wetland 8, Wetland 9, Wetland 10, Wetland 11, Wetland 21, Wetland 23, Wetland 32, plus the southern portion of the mosaic wetland totaling 451.8 acres are adjacent to the Traditional Navigable Water, Cedar Bayou, and are waters of the United States subject to Section 404. Any discharge of dredged and/or fill material into the thirty-three wetlands require a Department of the Army permit.

-2-

We also determined that there is approximately 9,902 linear feet of the Unnamed Tributary to Cedar Bayou is within the project area. This non-navigable tributary is a relatively permanent water which flows either directly or indirectly into a traditional navigable water, Cedar Bayou; therefore, this tributary is a water of the United States subject to Section 404 of the Clean Water Act. Any discharge of dredged and/or fill material into this tributary would require a Department of the Army permit.

Areas of Federal Interests (federal projects, and/or work areas) may be located within this proposed project area. Any activities in these federal interest areas would also be subject to federal regulations under the authority of Section 14 of the Rivers and Harbors Act (aka Section 408). Section 408 makes it unlawful for anyone to alter in any manner, in whole or in part, any work (ship channel, flood control channels, seawalls, bulkhead, jetty, piers, etc.) built by the United States unless it is authorized by the Corps of Engineers (i.e., Navigation and Operations Division).

This determination has been conducted to identify the limits of the United States Army Corps of Engineers (USACE) CWA jurisdiction for the site identified in this request. However, this determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985 as amended. If you or your tenant are USDA program participants or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service prior to starting work.

This letter contains an AJD for your subject site. If you wish to appeal the AJD, please see the enclosed sheets regarding the administrative appeal process for jurisdictional determinations: Notification of Appeals Process (NAP) fact sheet and Request for Appeal (RFA) form. If you object to this determination, you may request an administrative appeal under USACE regulations at 33 CFR Part 331. If you request to appeal this determination, you must submit a completed RFA form to the Southwestern Division Office at the following address:

Mr. Elliott Carman
Appeal Review Officer, CESWD-PD-O
U.S. Army Corps of Engineer Division,
Southwestern
1100 Commerce Street, Room 831
Dallas, Texas 75242-1731
Telephone: 469-487-7061; FAX: 469-487-7199

-3-

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete; that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within **60 days** of the date of the NAP; noting the letter date is considered day 1. It is not necessary to submit an RFA form to the Division office if you do not object to the determination in this letter.

This AJD is valid for 5 years from the date of this letter unless new information warrants a revision prior to the expiration date. If you have any questions concerning this jurisdictional determination, please reference file number **SWG-2018-00742** and contact Ms. Lynne Ray at the letterhead address or by telephone at 409-766-6322. To assist us in improving our service to you, please complete the survey found at http://corpsmapu.usace.army.mil/cm_apex/f?p=136:4:0 and/or if you would prefer a hard copy of the survey form, please let us know, and one will be mailed to you.

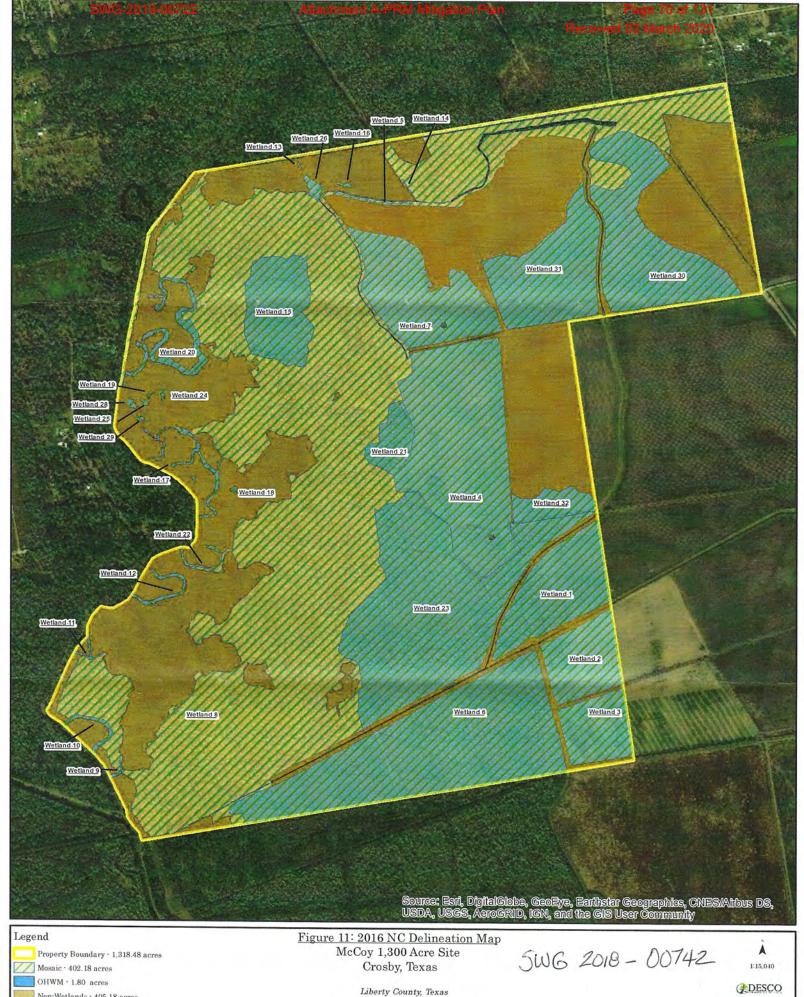
Sincerely,

John Davidson Team Lead

al and

Compliance Branch

Enclosures



Non-Wetlands · 405.18 acres Wetlands · 501.45 acres

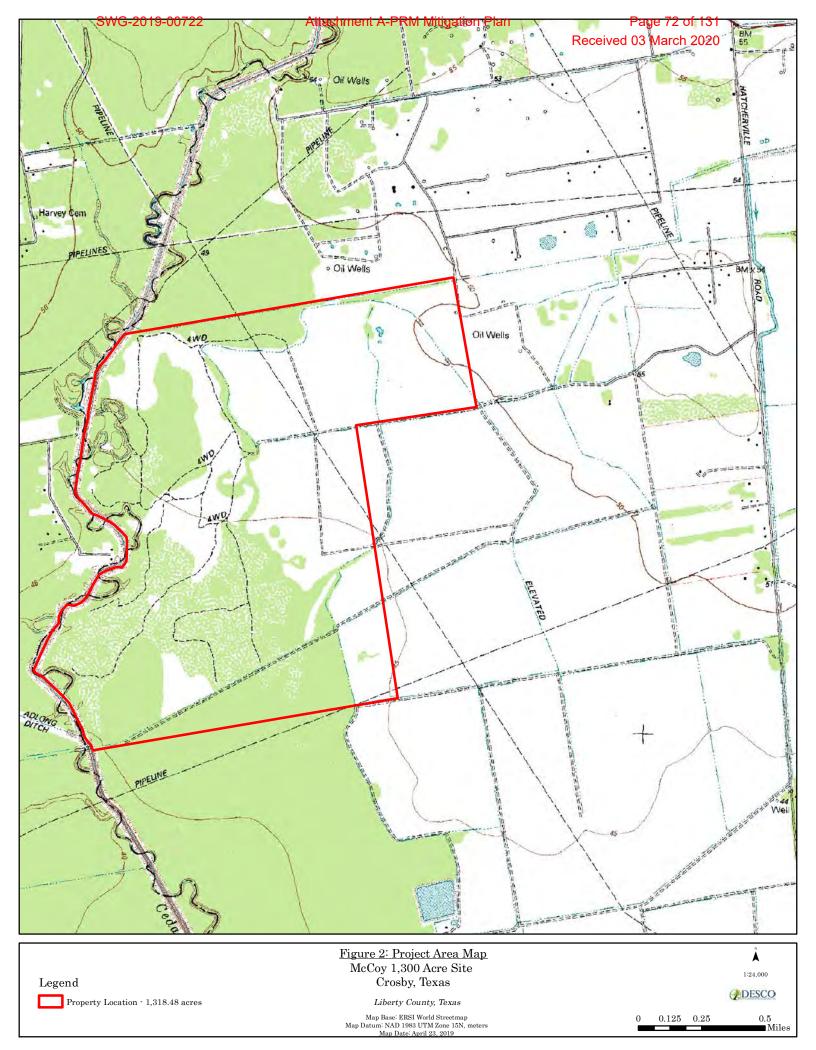
Map Base: 2016 NC Aerial Imagery from TNRIS Map Datum: NAD 1983 UTM Zone 15N, meters Map Date: January 2, 2020

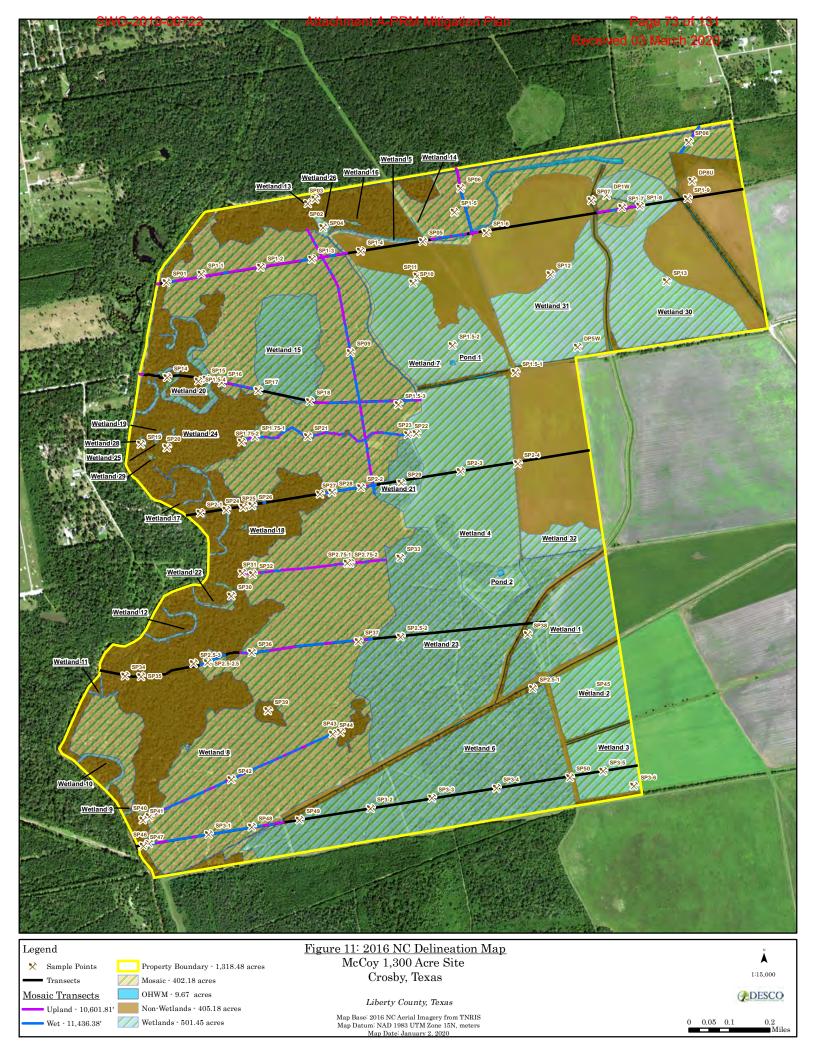
DESCO

0 0.05 0.1

Aquatic Resource Table - McCoy 1,300 Acre Site, Liberty County, Texas

	Latitude	Longitude	Cowardin	Area/Acres
Wetland 1	3312084.100	309065.456	PEM/PFO	29.662
Wetland 2	3311807.960	309170.465	PEM	19.370
Wetland 3	3311534.707	309224.736	PEM	15.805
Wetland 4	3312640.269	308688.611	PFO/PEM	75.908
Wetland 5	3313617.284	308351.442	PEM	0.535
Wetland 6	3311451.147	308578.756	PFO	93.340
Wetland 7	3313221.967	308537.604	PEM	37.004
Wetland 8	3311597.342	307565.825	PFO	0.053
Wetland 9	3311352.722	307334.156	PFO	0.172
Wetland 10	3311523.112	307244.688	PFO	1.006
Wetland 11	3311827.429	307220.906	PFO	0.300
Wetland 12	3312078.319	307516.230	PFO	1.032
Wetland 13	3313755.572	308046.723	PFO	0.033
Wetland 14	3313659.174	308480.031	PEM	0.084
Wetland 15	3313185.758	307967.132	PFO	24.373
Wetland 16	3313681.926	308221.819	PFO	0.170
Wetland 17	3312570.434	307638.691	PFO	1.965
Wetland 18	3312474.407	307792.864	PFO	0.096
Wetland 19	3312843.446	307457.395	PFO	0.053
Wetland 20	3313075.314	307550.931	PFO	5.717
Wetland 21	3312671.746	308416.807	PFO	8.171
Wetland 22	3312203.899	307672.850	PFO	0.521
Wetland 23	3312015.579	308564.564	PFO	94.373
Wetland 24	3312849.175	307508.963	PFO	0.120
Wetland 25	3312817.103	307440.332	PFO	0.103
Wetland 26	3313669.105	308101.431	PEM	0.922
Wetland 27	3312517.695	307631.224	PFO	0.045
Wetland 28	3312810.725	307386.680	PFO	0.230
Wetland 29	3312752.060	307423.526	PFO	0.100
Wetland 30	3313471.711	309411.535	PEM	46.023
Wetland 31	3313335.009	309037.374	PEM	36.327
Wetland 32	3312419.781	309044.019	PEM	7.835
Ditches and Ponds (OHWM)	3313209.174	308872.422	NA	9.67
Mosaic/Wetland	3312557.018	308072.924	PFO	208.71
Total Po	otentially Jurisdic	tional Features Deli	ineated	719.83





Project/Site: McCoy 1300 Acre Site	City/County: Liberty County	Sampling Date: 5/2/18
Applicant/Owner: Delta Land Services	State	Sampling Date: 5/2/18 E: Texas Sampling Point: SP2-3
DECCC (A (I D II A C) I I I I I I	Section, Township, Range:	
		e): _none Slope (%): _0
Subregion (LRR or MLRA): T Lat: 33°	2696.88182058 Long. 3086	649.074922141 Datum: NAD 83
Soil Map Unit Name: League Clay, 0 to 1 % slopes	Long	NWI classification: None NAD 83
Are climatic / hydrologic conditions on the site typical for this time o	Typar2 Vas X No (If no	o evoluin in Remarks)
Are Vegetation $\frac{N}{N}$, Soil $\frac{N}{N}$, or Hydrology $\frac{N}{N}$ significant		
Are Vegetation N, Soil N, or Hydrology N naturally	itiy disturbed? Are Normal Cit	cumstances present: res No
SUMMARY OF FINDINGS – Attach site map show	ng sampling point locations	, transects, important features, etc.
Hydrophytic Vegetation Present? Yes X No	Is the Sampled Area	
Hydric Soil Present? Yes X No		Yes ^X No
Wetland Hydrology Present? Yes X No		resNo
Remarks:	·	
Sample point is in a fallow field/improved pa	sture. Field is grazed.	
	J	
HYDROLOGY	0	
Wetland Hydrology Indicators:		condary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that app		Surface Soil Cracks (B6)
Surface Water (A1) Aquatic Fauna	· · ·	Sparsely Vegetated Concave Surface (B8)
High Water Table (A2) Marl Deposits (I	_	Drainage Patterns (B10)
Saturation (A3) Hydrogen Sulfic		Moss Trim Lines (B16)
	spheres along Living Roots (C3)	Dry-Season Water Table (C2)
Sediment Deposits (B2) Drift Deposits (B3) Presence of Re	duction in Tilled Soils (C6)	Crayfish Burrows (C8) Saturation Visible on Aerial Imagery (C9)
Algal Mat or Crust (B4) Thin Muck Surface	_	Geomorphic Position (D2)
Iron Deposits (B5) Other (Explain i	` ′	Shallow Aquitard (D3)
Inundation Visible on Aerial Imagery (B7)	Tremane)	FAC-Neutral Test (D5)
Water-Stained Leaves (B9)	ä	Sphagnum moss (D8) (LRR T, U)
Field Observations:		
Surface Water Present? Yes No X Depth (inch	nes):	
Water Table Present? Yes No X Depth (inch		
Saturation Present? Yes No X Depth (inch		ology Present? Yes X No
(includes capillary fringe) Describe Recorded Data (stream gauge, monitoring well, aerial pl	nation provides increasions) if evallable	
Describe Recorded Data (stream gauge, monitoring well, aerial pr	lotos, previous inspections), ii avaliabi	e.
Remarks:		
The field/pasture has adjacent drainage ditc	nes.	

Sampling Point: SP2-3

T 0: (D) : 30'		Dominant		Dominance Test worksheet:	
<u>Tree Stratum</u> (Plot size: 30') 1)	% Cover			Number of Dominant Species That Are OBL, FACW, or FAC: 2 (A))
2.					
3.				Total Number of Dominant Species Across All Strata: 2 (B))
4				Percent of Dominant Species	
5				That Are OBL, FACW, or FAC: 100 % (A/	B)
6				Prevalence Index worksheet:	
7				Total % Cover of: Multiply by:	
8				OBL species 12	
	=	= Total Cov	er er	FACW species $\frac{21}{x^2} = \frac{42}{x^2}$	
50% of total cover:	20% of	total cover	:	FAC species 61 x 3 = 183	
Sapling/Shrub Stratum (Plot size: 30')				FACU species x 4 =	
1				UPL species x 5 =	
2				0.4	٥١
3				Column Totals: 94 (A) 237 (E	٥)
4				Prevalence Index = $B/A = 2.52$	
5				Hydrophytic Vegetation Indicators:	
6				1 - Rapid Test for Hydrophytic Vegetation	
7				✓ 2 - Dominance Test is >50%	
8	-			3 - Prevalence Index is ≤3.0 ¹	
	=	= Total Cov	ver .	Problematic Hydrophytic Vegetation ¹ (Explain)	
50% of total cover:	20% of	total cover	:		
Herb Stratum (Plot size: 30')				¹ Indicators of hydric soil and wetland hydrology must	
1. Andropogon virginicus	30	Υ	FAC	be present, unless disturbed or problematic.	
2. Dichanthelium acuminatum	25	Υ	FAC	Definitions of Four Vegetation Strata:	
3. Limnosciadium pumilum	10		OBL	Tree – Woody plants, excluding vines, 3 in. (7.6 cm)	or
4. Rhynchospora inexpansa	10		FACW	more in diameter at breast height (DBH), regardless	
5. Axonopus fissifolius	10		FACW	height.	
6. Albizia julibrissin	3		NI	Sapling/Shrub – Woody plants, excluding vines, less	S
7. Rhynchospora glomerata	2		OBL	than 3 in. DBH and greater than 3.28 ft (1 m) tall.	
8. Phyla nodiflora	2		FAC	Herb – All herbaceous (non-woody) plants, regardles	22
9. Verbena brasiliensis	2		NI	of size, and woody plants less than 3.28 ft tall.	,0
10. Rubus argutus	2		FAC	Woody vine All woody vines greater than 2.29 ft in	
11. Ambrosia trifida	2		FAC	Woody vine – All woody vines greater than 3.28 ft in height.	1
12. Plantago heterophylla	1		FACW		
	99	= Total Cov	er		
50% of total cover: 49.5	20% of	total cover	19.8		
Woody Vine Stratum (Plot size: 30')					
1					
2.					
3					
4.					
5				Hydrophytic	
		= Total Cov	er	Vegetation	
50% of total cover:				Present? Yes X No	
Remarks: (If observed, list morphological adaptations belo				_	
	,				

Page 76 of 131

Received 03 March 2020 Sampling Point: SP2-3 **SOIL**

nches)	Matrix Color (moist)	%	Color (moist)	x Features	Type ¹	Loc ²	Texture	Domorko
-5	10yr4/2	97	10yr5/8	3	Type ¹ C	M	Clay	Remarks
								
-20	10yr3/2	95	10yr5/8	_ 5	С	<u>M</u>	Clay	
			Reduced Matrix, M			ains.		PL=Pore Lining, M=Matrix.
		cable to all	LRRs, unless othe					or Problematic Hydric Soils ³ :
Histosol	oipedon (A2)		Polyvalue Be					uck (A9) (LRR O) uck (A10) (LRR S)
	stic (A3)		Loamy Muck					d Vertic (F18) (outside MLRA 150A
	en Sulfide (A4)		Loamy Gley			σ,		nt Floodplain Soils (F19) (LRR P, S,
	d Layers (A5)		Depleted Ma		,			ous Bright Loamy Soils (F20)
	Bodies (A6) (LRR	P, T, U)	✓ Redox Dark	Surface (F6	6)			A 153B)
	ucky Mineral (A7) (I		Depleted Da	rk Surface ((F7)		Red Par	rent Material (TF2)
	esence (A8) (LRR		Redox Depr	` ')			allow Dark Surface (TF12)
	ıck (A9) (LRR P, T		Marl (F10) (I	,			U Other (E	Explain in Remarks)
	d Below Dark Surfa	ice (A11)	Depleted Oc				_ 3	
	ark Surface (A12)	(NII DA 450	Iron-Mangar					tors of hydrophytic vegetation and
	rairie Redox (A16) lucky Mineral (S1)	•	· =			U)		and hydrology must be present, ss disturbed or problematic.
	Bleyed Matrix (S4)	(LKK U, 3)	☐ Delta Ochric			0Δ 150R)		ss disturbed or problematic.
	Redox (S5)		Piedmont Fl					
	Matrix (S6)						A 149A, 153C,	153D)
	rface (S7) (LRR P,	S, T, U)	_	Ü		, ,	,	•
strictive I	Layer (if observed	l):						
Туре:								
							Hydric Soil F	Present? Yes X No
Depth (inc	ches):						-	
	ches):							
	ches):							
	ches):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
Depth (ind	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							
	cnes):							



Photo 31: SP2-3 Soil Profile



Photo 32: SP2-3 Habitat

Received 03 March 2020

Project/Site: McCoy 1300 Acre Site	City/County: Liberty County	Sampling Date: 5/2/18
Applicant/Owner: Delta Land Services	City/County: Liberty County State: Texas	Sampling Point: SP2-4
Investigator(s): DESCO (Arthur Perkins & Chris Little)		<u> </u>
Landform (hillslope, terrace, etc.): Flat		Slope (%): 0
	727.15 Long: 308877.067	
Soil Map Unit Name: League Clay, 0 to 1 % slopes	NWI class	sification: None
Are climatic / hydrologic conditions on the site typical for this time of y	ear? Yes X No (If no. explain i	n Remarks.)
Are Vegetation \underline{Y} , Soil \underline{Y} , or Hydrology \underline{Y} significantly		
Are Vegetation Y , Soil N , or Hydrology Y naturally pr	roblematic? (If needed, explain any any	swers in Remarks)
SUMMARY OF FINDINGS – Attach site map showin		
-		
Hydrophytic Vegetation Present? Yes X No	Is the Sampled Area	
Hydric Soil Present? Wetland Hydrology Present? Yes X You You Yes X No You Yes X You Yes X		No
Wetland Hydrology Present? Yes X No No	·	
Sample point is in a planted soybean field.		
HYDROLOGY		
Wetland Hydrology Indicators:	Secondary Inc	dicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)	Surface S	Soil Cracks (B6)
Surface Water (A1) Aquatic Fauna (B	13) Sparsely	Vegetated Concave Surface (B8)
High Water Table (A2) Marl Deposits (B1	5) (LRR U) Drainage	Patterns (B10)
Saturation (A3) Hydrogen Sulfide		m Lines (B16)
	heres along Living Roots (C3) 📙 Dry-Seas	on Water Table (C2)
Sediment Deposits (B2)	<u> </u>	Burrows (C8)
		n Visible on Aerial Imagery (C9)
Algal Mat or Crust (B4)		hic Position (D2)
☐ Iron Deposits (B5) ☐ Other (Explain in I		Aquitard (D3) tral Test (D5)
Inundation Visible on Aerial Imagery (B7) Water-Stained Leaves (B9)	=	m moss (D8) (LRR T, U)
Field Observations:	<u>—</u> Эрпауни	m moss (Do) (LKK 1, O)
Surface Water Present? Yes No X Depth (inches	s):	
Water Table Present? Yes No _X Depth (inches		
Saturation Present? Yes No _X Depth (inches		sent? Yes X No
(includes capillary fringe)		36H: 163 H0
Describe Recorded Data (stream gauge, monitoring well, aerial pho	os, previous inspections), if available:	
Remarks:		
The field has adjacent drainage ditches. Furro	ws are created in the field whe	n planted to drain
excess water, so oxidized rhizospheres that w		•
cxccss water, so oxidized mizospheres that w	odia typically be present are in	or correctity.

Sampling Point: SP2-4

VEGETATION (Four Strata) – Use scientific names of plants.

		Dominant		Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: 30') 1.		Species?		Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)
2				Total Number of Dominant
3				Species Across All Strata: 0 (B)
4				Descent of Deminent Charles
5				Percent of Dominant Species That Are OBL, FACW, or FAC: (A/B)
6				
7				Prevalence Index worksheet:
8				Total % Cover of: Multiply by:
		= Total Co		OBL species x 1 =
50% of total cover:	· ·			FACW species x 2 =
Sapling/Shrub Stratum (Plot size: 30')				FAC species x 3 =
1				FACU species x 4 =
				UPL species x 5 =
2				Column Totals: (A) (B)
3				
4				Prevalence Index = B/A =
5				Hydrophytic Vegetation Indicators:
6				1 - Rapid Test for Hydrophytic Vegetation
7				2 - Dominance Test is >50%
8				3 - Prevalence Index is ≤3.0 ¹
		= Total Co		✓ Problematic Hydrophytic Vegetation¹ (Explain)
50% of total cover:	20% of	total cover	:	Soybeans planted in agricultural field.
Herb Stratum (Plot size: 30')				¹ Indicators of hydric soil and wetland hydrology must
1. Glycine max	10	<u>Y</u>	NI	be present, unless disturbed or problematic.
2				Definitions of Four Vegetation Strata:
3				Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or
4				more in diameter at breast height (DBH), regardless of
5				height.
6				Sapling/Shrub – Woody plants, excluding vines, less
7.				than 3 in. DBH and greater than 3.28 ft (1 m) tall.
8.				Harb All barbaccasa (non woods) planta regardless
9.				Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.
10.				
11.	_			Woody vine – All woody vines greater than 3.28 ft in height.
12.				neight.
12.	10	= Total Co		
50% of total cover: ⁵				
	20% 01	total cover	· -	
Woody Vine Stratum (Plot size: 30')				
1				
2				
3				
4				
5				Hydrophytic
		= Total Co	ver	Vegetation
50% of total cover:	20% of	total cover	:	Present? Yes X No
Remarks: (If observed, list morphological adaptations be	low).			•

Hydrologic indicators are not present to support prevalence index use. The field was recently plowed and planted with soybeans. Native vegetation is very sparse. Adjacent edge vegetation is upland in nature; however the field is slightly lower in elevation.

Page 80 of 131

Received 03 March 2020 Sampling Point: SP2-4 SOIL

unches)	Matrix Color (moist)	%	Color (moist)	x Feature %		Loc ²	Toytura	Domorko
(inches) 0-6	10yr4/1	%	Color (moist)	<u>%</u>	Type ¹	LOC	<u>Texture</u> Clay	Remarks
6-20		90	10\rE/9	10	С	N/		
0-20	10yr4/1	_ 90	10yr5/8	10		<u>M</u>	Clay	
							 .	
				_				
				_	-, - <u>-</u>			
vpe: C=Co	oncentration. D=De	oletion. RM	=Reduced Matrix, M	S=Maske	d Sand G	rains.	² Location:	PL=Pore Lining, M=Matrix.
			LRRs, unless othe					or Problematic Hydric Soils ³ :
Histosol	(A1)		Polyvalue Be	elow Surfa	ice (S8) (LRR S, T,	U) <u>Π</u> 1 cm Μ	uck (A9) (LRR O)
= '	pipedon (A2)		Thin Dark Su					uck (A10) (LRR S)
Black His	stic (A3) en Sulfide (A4)		Loamy Muck			R O)		d Vertic (F18) (outside MLRA 150A,Int Floodplain Soils (F19) (LRR P, S, T
_	d Layers (A5)		Loamy Gleye ✓ Depleted Ma		(Г2)			ous Bright Loamy Soils (F20)
	Bodies (A6) (LRR I	P, T, U)	Redox Dark		- 6)			A 153B)
	ıcky Mineral (A7) (L) 🔲 Depleted Da	rk Surface	e (F7)			rent Material (TF2)
	esence (A8) (LRR		Redox Depre	•	(8)			nallow Dark Surface (TF12)
	ick (A9) (LRR P, T) d Below Dark Surfa		Marl (F10) (L		(MI DA	51)	U Other (Explain in Remarks)
	ark Surface (A12)	ce (ATT)	Iron-Mangan				, T) ³ Indica	ators of hydrophytic vegetation and
	rairie Redox (A16) (MLRA 150						and hydrology must be present,
	lucky Mineral (S1)	LRR O, S)	Delta Ochric					ss disturbed or problematic.
	Gleyed Matrix (S4)		Reduced Ve					
_	Redox (S5) Matrix (S6)		Piedmont Flo				49A) RA 149A, 153C,	153D)
	rface (S7) (LRR P,	S, T, U)	/tilomalous i	Jilgili Loo	my cons	(1 20) (IIIL I	1404, 1000,	1005)
	Layer (if observed)							
Туре:								
Type: Depth (inc	ches):						Hydric Soil I	Present? Yes X No
Depth (inc		ın to an	nrovimatoly 6	inchos	.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches).		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	3.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches).		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	S.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	3.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	3.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	S.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	3.		Hydric Soil I	Present? Yes X No
Depth (inc		rn to ap	proximately 6	inches	3.		Hydric Soil F	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	S.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	;.		Hydric Soil F	Present? Yes X No
Depth (inc		rn to ap	proximately 6	inches	3.		Hydric Soil F	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	3.		Hydric Soil I	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	;.		Hydric Soil F	Present? Yes X No
Depth (inc		rn to ap	proximately 6	inches	3.		Hydric Soil F	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	3.		Hydric Soil F	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	;.		Hydric Soil F	Present? Yes X No
Depth (inc		n to ap	proximately 6	inches	3.		Hydric Soil F	Present? Yes X No
Depth (inc		rn to ap	proximately 6	inches	3.		Hydric Soil F	Present? Yes X No



Photo 33: SP2-4 Soil Profile



Photo 34: SP2-4 Habitat

Received 03 March 2020

Project/Site: McCoy 1300 Acre Site	City/County: Liberty County Sampling Date: 5/4/18
Applicant/Owner: Delta Land Services	City/County: Liberty County Sampling Date: 5/4/18 State: Texas Sampling Point: SP2.5-1
DECCC (A.U. D. II. A.O. I. I.U.)	Section, Township, Range:
	Local relief (concave, convex, none): Convex Slope (%): 0-2
Subregion (LRR or MLRA): T Lat: 3311	1836.039 Long: 308937.024 Datum: NAD 83
Soil Map Unit Name: League Clay, 0 to 1 % slopes	NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of	year? Yes X No (If no, explain in Remarks.)
	ly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation N, Soil N, or Hydrology N naturally p	
	ng sampling point locations, transects, important features, etc.
Hydrophytic Vegetation Present? Yes No X	
Hydric Soil Present? Yes No X	- Is the Sampled Area
Hydrophytic Vegetation Present? Yes No X Hydric Soil Present? Yes No X Wetland Hydrology Present? Yes No X	within a Wetland? Yes No X
Remarks:	
Sample point is on the upland edge of a man-	-made drainage ditch, which empties into Cedar Bayou
to the west.	and the sign of th
HYDROLOGY	
Wetland Hydrology Indicators:	Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply	· · · · · · · · · · · · · · · · · · ·
Surface Water (A1)	
High Water Table (A2) Marl Deposits (B	
Saturation (A3) Hydrogen Sulfide	
	pheres along Living Roots (C3) Dry-Season Water Table (C2)
Sediment Deposits (B2) Drift Deposits (B3) Presence of Reduce the	uced Iron (C4) Crayfish Burrows (C8) uction in Tilled Soils (C6) Saturation Visible on Aerial Imagery (C9)
Algal Mat or Crust (B4) Thin Muck Surface	
Iron Deposits (B5) Other (Explain in	
Inundation Visible on Aerial Imagery (B7)	FAC-Neutral Test (D5)
Water-Stained Leaves (B9)	Sphagnum moss (D8) (LRR T, U)
Field Observations:	
Surface Water Present? Yes No X Depth (inche	es):
Water Table Present? Yes No X Depth (inche	es):
Saturation Present? Yes No X Depth (inche	es): Wetland Hydrology Present? Yes No X
(includes capillary fringe) Describe Recorded Data (stream gauge, monitoring well, aerial pho	otos, previous inspections), if available:
g	, , , , , , , , , , , , , , , , , , , ,
Remarks:	
1	

Sampling Point: SP2.5-1

T 0: (D) : 30'		Dominant		Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: 30') 1.	% Cover			Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)
2				Total New Act Devices of
3.				Total Number of Dominant Species Across All Strata: 3 (B)
4				Percent of Dominant Species
5				That Are OBL, FACW, or FAC: 0% (A/B)
6				Prevalence Index worksheet:
7				
8				
	:	= Total Cov	er er	OBL species x 1 =
50% of total cover:	20% of	total cover	:	FACW species $\frac{2}{4}$ $x = \frac{4}{12}$ FAC species $\frac{4}{3}$ $x = \frac{12}{3}$
Sapling/Shrub Stratum (Plot size: 30'				FAC species 4 $x 3 = 12$ FACU species 53 $x 4 = 212$
1				
2				UPL species $x 5 = $ Column Totals: 59 (A) 228 (B)
3				Column Totals: 59 (A) 228 (B)
4				Prevalence Index = B/A = 3.86
5				Hydrophytic Vegetation Indicators:
6				1 - Rapid Test for Hydrophytic Vegetation
7				2 - Dominance Test is >50%
8				☐ 3 - Prevalence Index is ≤3.0 ¹
	:	= Total Cov	er er	Problematic Hydrophytic Vegetation ¹ (Explain)
50% of total cover:	20% of	total cover	·	
Herb Stratum (Plot size: 30')				¹ Indicators of hydric soil and wetland hydrology must
1. Sorghum helepense	15	<u>Y</u>	FACU	be present, unless disturbed or problematic.
2. Paspalum notatum	10	<u>Y</u>	FACU	Definitions of Four Vegetation Strata:
3. Monarda punctata	10	<u>Y</u>	FACU	Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or
4. Cynodon dactylon	5		FACU	more in diameter at breast height (DBH), regardless of
5. Rubus trivialis	_ 5		FACU	height.
6. Lolium perenne	_ 5		FACU	Sapling/Shrub – Woody plants, excluding vines, less
7. Oenothera speciosa	_ 3		NI	than 3 in. DBH and greater than 3.28 ft (1 m) tall.
8. Phalaris caroliniana	_ 2		FACW	Herb – All herbaceous (non-woody) plants, regardless
9. Mimosa strigillosa	_ 2		FAC	of size, and woody plants less than 3.28 ft tall.
10. Sida spinosa	_ 2		FACU	Woody vine – All woody vines greater than 3.28 ft in
11. Paspalum urvillei	_ 2		FAC	height.
12. Oxalis dillenii	_ 1		FACU	
24		= Total Cov		
50% of total cover: 31	20% of	total cover	12.4	
Woody Vine Stratum (Plot size: 30')				
1				
2				
3				
4				
5				Hydrophytic
		= Total Cov		Vegetation Present? Yes No X
50% of total cover:		total cover		100 100
Remarks: (If observed, list morphological adaptations bel	ow).			

Page 84 of 131
Received 03 March 2020
Sampling Point: SP2.5-1

SOIL Sampling Point

inches))-5	Color (moist)	<u>(</u>	Redox Color (moist)	x Features %Typ	e ¹ Loc ²	Texture	Remarks	
	10yr4/1	% -	Color (moist)	<u>% Typ</u>	e Loc	Silty clay	Remarks	
	10yr6/3	10				Only clay		
5-11	10yr4/1	60				Clay		
		 -				Clay		
	10yr6/3	40	10 7/0					
1-22	10yr4/1	 -	10yr5/6	5		Clay		
	10yr6/3	35						
Histosol Histic Ep Black Hi Hydroge Stratified Organic 5 cm Mu Muck Pr 1 cm Mu Depleted Thick Da Coast Pr Sandy M Sandy G	(A1) pipedon (A2) stic (A3) en Sulfide (A4) d Layers (A5) Bodies (A6) (LRF acky Mineral (A7) esence (A8) (LRR ack (A9) (LRR P, 1) d Below Dark Surf ark Surface (A12) rairie Redox (A16) flucky Mineral (S1) Gleyed Matrix (S4)	R P, T, U) (LRR P, T, U) R U) (T) face (A11)) (MLRA 150A) (LRR O, S)	Thin Dark Su Loamy Mucky Loamy Gleye Depleted Mat Redox Dark S Depleted Dar Redox Depre Marl (F10) (L Depleted Och Iron-Mangane Delta Ochric (Reduced Veri	low Surface (S8 rface (S9) (LRF rface (S9) (LRF rface (F1) (Id Matrix (F2) rrix (F3) (Surface (F6) rface (F6) rface (F1) (MLR rface (F13) (LRR rface (F13) (LRR rface (F17) (MLRA fface (F18) (M	A 151) 2) (LRR O, P, T, U) 51) A 150A, 150B)	1 cm Muc 2 cm Muc Reduced Piedmont Anomalou (MLRA Red Pare Very Shal Other (Ex	r Problematic Hydric S ck (A9) (LRR O) ck (A10) (LRR S) Vertic (F18) (outside N Floodplain Soils (F19) us Bright Loamy Soils (F 153B) nt Material (TF2) llow Dark Surface (TF12 cplain in Remarks) ors of hydrophytic vegeta d hydrology must be pro-	ILRA 150A,I (LRR P, S, 1 (20) 2) ation and esent,
	Redox (S5)			odplain Soils (F		9A)		
= ''	Matrix (S6)		Anomalous B	right Loamy So	ils (F20) (MLR	A 149A, 153C, 15	53D)	
	rface (S7) (LRR F Layer (if observe					T		
Type:	Layer (ir observe	a):						
	ches):					Hydric Soil Pro	esent? Yes	No X
emarks:								



Photo 35: SP2.5-1 Soil Profile



Photo 36: SP2.5-1 Habitat

Received 03 March 2020 WETLAND DETERMINATION DATA FORM – Atlantic and Gulf Coastal Plain Region

Project/Site: McCoy 1300 Acre Site	City/County: Liberty County Sampling Date: 5/2/18
Applicant/Owner: Delta Land Services	City/County: Liberty County Sampling Date: 5/2/18 State: Texas Sampling Point: SP3-2
DECCC (A (I) D II	Section, Township, Range:
	Local relief (concave, convex, none): None Slope (%): 0-1
	1360.419 Long: 308292.735 Datum: NAD 83
Soil Map Unit Name: League Clay, 0 to 1 % slopes	NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of y	
	ly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation N, Soil N, or Hydrology N naturally p	
	g sampling point locations, transects, important features, etc.
Hydrophytic Vegetation Present? Yes X No	
Hydrophytic Vegetation Present? Yes X No No	- Is the Sampled Area
Wetland Hydrology Present? Yes X No	
HYDROLOGY	
Wetland Hydrology Indicators:	Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply	
Surface Water (A1) Aquatic Fauna (B	
High Water Table (A2) Marl Deposits (B	
Saturation (A3) Hydrogen Sulfide	Odor (C1) Moss Trim Lines (B16)
☐ Water Marks (B1) ☐ Oxidized Rhizosp	heres along Living Roots (C3) Dry-Season Water Table (C2)
Sediment Deposits (B2)	· ' ' · ' · ' · ' · ' · ' · ' · ' · ' ·
	uction in Tilled Soils (C6) Saturation Visible on Aerial Imagery (C9)
Algal Mat or Crust (B4)	_ · · · · · · · · · · · · · · · · · · ·
☐ Iron Deposits (B5) ☐ Other (Explain in	=
☐ Inundation Visible on Aerial Imagery (B7) Water-Stained Leaves (B9)	FAC-Neutral Test (D5)
✓ Water-Stained Leaves (B9) Field Observations:	☐ Sphagnum moss (D8) (LRR T, U)
Surface Water Present? Yes No X Depth (inche	is).
Water Table Present? Yes No X Depth (inche	
Saturation Present? Yes No X Depth (inche	
(includes capillary fringe) Describe Recorded Data (stream gauge, monitoring well, aerial pho	tos previous inspections) if available:
Besonbe recorded bata (stream gauge, monitoring wen, denar pric	too, provided inspections), ii dvalidatio.
Remarks:	

Sampling Point: SP3-2

T 0: (D) : 30'		Dominant		Dominance Test worksheet:	
<u>Tree Stratum</u> (Plot size: 30') 1 Triadica sebifera	% Cover 70	Species?	<u>Status</u> FAC	Number of Dominant Species	
··	10	<u> </u>	FACW	That Are OBL, FACW, or FAC: 5 (A)	
Quercus phellos .			-	Total Number of Dominant Species Across All Strata: 5 (B)	
4				Percent of Dominant Species	
5				That Are OBL, FACW, or FAC: 100 (A/E	3)
6					_
7				Prevalence Index worksheet:	
8				Total % Cover of: Multiply by:	
	80	= Total Cov	er	OBL species $\frac{2}{176}$ $\times 1 = \frac{2}{176}$	
50% of total cover: 40	20% of	total cover:	16	FACW species $\frac{88}{400}$ x 2 = $\frac{176}{200}$	
Sapling/Shrub Stratum (Plot size: 30')				FAC species $\frac{103}{}$ $\times 3 = \frac{309}{}$	
1. Sabal minor	70	Υ	FACW	FACU species 1 x 4 = 4	
2. Triadica sebifera	20	Υ	FAC	UPL species x 5 =	
3. Fraxinus pennsylvanica	5		FACW	Column Totals: <u>194</u> (A) <u>491</u> (B)
4. Ilex vomitoria	2		FAC	Drawalanaa laday D/A 253	
5. Chironanthus virginicus	1		FACU	Prevalence Index = B/A = 2.53	
6. Rubus argutus	1		FAC	Hydrophytic Vegetation Indicators:	
7. Viburnum dentatum	1		FAC	1 - Rapid Test for Hydrophytic Vegetation	
				2 - Dominance Test is >50%	
8	100 -	Tatal Car		3 - Prevalence Index is ≤3.0 ¹	
500		= Total Cov		Problematic Hydrophytic Vegetation ¹ (Explain)	
<u></u>	20% of	total cover	20		
Herb Stratum (Plot size: 30')	5	V	EAC	¹ Indicators of hydric soil and wetland hydrology must	
1. Rubus argutus	2	$\frac{Y}{Y}$	FAC	be present, unless disturbed or problematic.	
2. Ilex vomitoria		<u>Y</u>	FAC	Definitions of Four Vegetation Strata:	
3. Carex caroliniana	1		FACW	Tree – Woody plants, excluding vines, 3 in. (7.6 cm) of	or
4. Rhynchospera caduca			OBL	more in diameter at breast height (DBH), regardless of	f
5. Dichanthelium acuminatum	1		FAC	height.	
6. Carex longii	1		OBL	Sapling/Shrub - Woody plants, excluding vines, less	
7. Carex flacosperma			FACW	than 3 in. DBH and greater than 3.28 ft (1 m) tall.	
8. Carex abscondita	1		FACW	Herb – All herbaceous (non-woody) plants, regardless	3
9. Hypericum hypericoides	1		FAC	of size, and woody plants less than 3.28 ft tall.	
10				Woody vine – All woody vines greater than 3.28 ft in	
11				height.	
12					
	14 _	= Total Cov	er		
50% of total cover: 7	20% of	total cover:	2.8		
Woody Vine Stratum (Plot size: 30')					
1					
2.					
3.					
4.					
5				Hudnonbudio	
<u> </u>		= Total Cov		Hydrophytic Vegetation	
50% of total cover:				Present? Yes X No	
		total cover.	<u> </u>		
Remarks: (If observed, list morphological adaptations beliance)	ow).				

Page 88 of 131

Received 03 March 2020 Sampling Point: SP3-2 SOIL

(inches)	Color (moist)		Color (moist)	lox Features %	s _Type ¹	Loc ²	Texture	Remarks
0-4	10yr4/2	98	10yr5/6	2	C	_ <u></u>	Silty clay	I/GIIIGI//2
4-6	10yr4/2	80	10yr5/8	20	C	M	Silty clay	
6-24	10yr5/2	25	10yr5/8		<u>C</u>		Silty clay	
)- 24	10913/2		10913/0			101	Only clay	
								
					-			
			=Reduced Matrix, N			rains.		Problematic Hydric Scile ³
Histosol		olicable to al	Polyvalue E		•	IDDCT		Problematic Hydric Soils ³ : (A9) (LRR O)
	ipedon (A2)		Thin Dark S					(A9) (LRR 0) (A10) (LRR S)
Black His			Loamy Muc					ertic (F18) (outside MLRA 150A,I
	n Sulfide (A4)		Loamy Gley	ed Matrix (F2)			Floodplain Soils (F19) (LRR P, S, T
	Layers (A5)		✓ Depleted M					s Bright Loamy Soils (F20)
	Bodies (A6) (LRI		Redox Dark	,			(MLRA 1	53B) t Material (TF2)
	cky Mineral (A7) esence (A8) (LR I		Depleted Dep					t Material (1F2) ow Dark Surface (TF12)
	ck (A9) (LRR P,		Marl (F10)		0)			lain in Remarks)
_	l Below Dark Sur		Depleted O	` '	(MLRA	151)	` ` '	,
	rk Surface (A12)		Iron-Manga					s of hydrophytic vegetation and
	airie Redox (A16							hydrology must be present,
	lucky Mineral (S1 leyed Matrix (S4		Delta Ochri Reduced V					disturbed or problematic.
	edox (S5))	Piedmont F					
_	Matrix (S6)						, .RA 149A, 153C, 15	3D)
	face (S7) (LRR I			_	-			•
estrictive L	ayer (if observe	ed):						
Туре:								Y
	ches):						Hydric Soil Pre	sent? Yes X No
emarks:								



Photo 43: SP3-2 Soil Profile



Photo 44: SP3-2 Habitat

Received 03 March 2020 WETLAND DETERMINATION DATA FORM – Atlantic and Gulf Coastal Plain Region

Project/Site: McCoy 1300 Acre Site	С	ty/County: Liberty County	Sampling Date: 5/2/18
Applicant/Owner: Delta Land Service			exas Sampling Point: SP3-3
Investigator(s): DESCO (Arthur Perk		ection, Township, Range:	
Landform (hillslope, terrace, etc.): Flat		ocal relief (concave, convex, none):	None Slope (%): 0
	Lat: 331140	0.899 Long: 308536.	145NAD 83
Soil Map Unit Name: League Clay, 0	to 1 % slopes	NW	I classification: PEM
Are climatic / hydrologic conditions on th		? Yes X No (If no. ex	plain in Remarks.)
Are Vegetation N , Soil N , or H	Hydrology N significantly di	sturbed? Are "Normal Circums	stances" present? Yes X No
Are Vegetation $\frac{N}{}$, Soil $\frac{N}{}$, or H	Hydrology N naturally prob	ematic? (If needed, explain ar	ny answers in Remarks.)
SUMMARY OF FINDINGS - At	tach site map showing s	sampling point locations, tra	insects, important features, etc.
Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes X No No Yes X No	Is the Sampled Area within a Wetland?	/es <u>X</u> No
HYDROLOGY			
Wetland Hydrology Indicators:		Seconda	ary Indicators (minimum of two required)
Water Table Present? Yes	Aquatic Fauna (B13) Marl Deposits (B15) (Hydrogen Sulfide Od Oxidized Rhizospher Presence of Reduced Recent Iron Reduction Thin Muck Surface (C Other (Explain in Rer Try (B7) No X Depth (inches): No Depth (inches):	Spa (LRR U) Or (C1) es along Living Roots (C3) d Iron (C4) on in Tilled Soils (C6) C7) marks) Spa Spa Dra Mos Cra Sati C7 Spa Spa Spa Spa Spa Spa Dra Mos Spa Spa Spa Spa Spa Spa Spa Sp	face Soil Cracks (B6) arsely Vegetated Concave Surface (B8) inage Patterns (B10) as Trim Lines (B16) -Season Water Table (C2) yfish Burrows (C8) uration Visible on Aerial Imagery (C9) comorphic Position (D2) allow Aquitard (D3) C-Neutral Test (D5) nagnum moss (D8) (LRR T, U)
Saturation Present? Yes (includes capillary fringe)	No X Depth (inches):	Wetland Hydrolog	y Present? Yes X No
Describe Recorded Data (stream gaug	e, monitoring well, aerial photos,	previous inspections), if available:	

Sampling Point: SP3-3

Trace Christians (Districts 30'		Dominant		Dominance Test worksheet:	
<u>Tree Stratum</u> (Plot size: 30') 1 Triadica sebifera	% Cover 80	Species?	FAC	Number of Dominant Species	
· ·	2			That Are OBL, FACW, or FAC: 7	A)
2. Querccus phellos			FACW	Total Number of Dominant	
3. Liquidambar styraciflua	2		FAC		В)
4				Percent of Dominant Species	
5					A/B)
6					. ,
7				Prevalence Index worksheet:	
8				Total % Cover of: Multiply by:	
	0.4	= Total Cov	er	OBL species <u>5</u> x 1 = <u>5</u>	
50% of total cover: 42				FACW species 48 $\times 2 = 96$	
Sapling/Shrub Stratum (Plot size: 30')	20 /0 01	total cover.		FAC species 129 x 3 = 387	
1 Triadica sebifera	30	Υ	FAC	FACU species x 4 =	
2. Sabal minor	25	· Y	FACW	UPL species x 5 =	
	8	<u> </u>	FACW	Column Totals: 182 (A) 488	(B)
•	4		FAC		` '
4. Acer rubrum				Prevalence Index = $B/A = 2.68$	
5. Viburnum dentatum			FAC	Hydrophytic Vegetation Indicators:	
6				1 - Rapid Test for Hydrophytic Vegetation	
7				2 - Dominance Test is >50%	
8				3 - Prevalence Index is ≤3.0¹	
	68	= Total Cov	er	Problematic Hydrophytic Vegetation ¹ (Explain)	
50% of total cover: 34	20% of	total cover:	13.6	<u> </u>	
Herb Stratum (Plot size: 30')				¹ Indicators of hydric soil and wetland hydrology mu	ct
1. Rhynchospora inexpansa	8	Υ	FACW	be present, unless disturbed or problematic.	SI.
2. Rubus argutus	5	Υ	FAC	Definitions of Four Vegetation Strata:	
3. Persicaria hydropiperoides	3	Υ	OBL		
4. Agalinis purpurea	2		FACW	Tree – Woody plants, excluding vines, 3 in. (7.6 cm more in diameter at breast height (DBH), regardles:	
5. Crinum americanum	2		OBL	height.	3 01
6. Hypericum hypericoides	2		FAC		
7. Toxicodendron radicans	2		FAC	Sapling/Shrub – Woody plants, excluding vines, lethan 3 in. DBH and greater than 3.28 ft (1 m) tall.	ess
8. Mikania scandens	1		FACW		
For the contract of the state	1		FACW	Herb – All herbaceous (non-woody) plants, regardle	ess
9. Fraxinus pennsyivanica 10. Acer rubrum	1		FAC	of size, and woody plants less than 3.28 ft tall.	
	1		FACW	Woody vine - All woody vines greater than 3.28 ft	in
11. Eleocharis montevidensis				height.	
12. Viburnum dentatum	1		FAC		
		= Total Cov			
50% of total cover: 14.5	20% of	total cover:	5.8		
Woody Vine Stratum (Plot size: 30'					
1. Ampelopsis arborea	1	Υ	FAC		
2					
3					
4					
5.				Hydrophytic	
	1 ,	= Total Cov	er	Vegetation	
50% of total cover: 0.5				Present? Yes X No	
		total cover.	<u> </u>		
50% of total cover: 0.5 Remarks: (If observed, list morphological adaptations below	20% of	= Total Cov total cover:		Vegetation Present? Yes X No	

Page 92 of 131

Received 03 March 2020 Sampling Point: SP3-3 **SOIL**

	Color (moist)	%	Color (moist)	x Features	Typo ¹	oc ²	Texture	Domarka
nches) -4	10yr3/1	<u>%</u> 95	10yr5/8		Type ¹ L C M	UC _	Clay loam	Remarks
						 .		
-16	10yr4/1	90	10yr5/8	10	<u>C</u> <u>M</u>		Clay	
	_				· ·			
	_							
			Reduced Matrix, M					PL=Pore Lining, M=Matrix.
		icable to all	LRRs, unless othe			C T III		for Problematic Hydric Soils ³ :
Histosol	oipedon (A2)		Polyvalue Be					luck (A9) (LRR O) luck (A10) (LRR S)
	istic (A3)		Loamy Muck			')		ed Vertic (F18) (outside MLRA 150A
	en Sulfide (A4)		Loamy Gley					ont Floodplain Soils (F19) (LRR P, S,
	d Layers (A5)		✓ Depleted Ma		,			lous Bright Loamy Soils (F20)
Organic	Bodies (A6) (LRR	P, T, U)	✓ Redox Dark	Surface (F6))			(A 153B)
	ucky Mineral (A7) (Depleted Da	rk Surface (I	F7)		Red Pa	arent Material (TF2)
	esence (A8) (LRR		Redox Depr	` '				hallow Dark Surface (TF12)
	uck (A9) (LRR P, T						U Other (Explain in Remarks)
	d Below Dark Surfa	ace (A11)	Depleted Oc	. , .			- 3	
	ark Surface (A12)	(MI DA 450)	Iron-Mangar					ators of hydrophytic vegetation and
	rairie Redox (A16) /lucky Mineral (S1)	•	· =					and hydrology must be present, ess disturbed or problematic.
	Bleyed Matrix (S4)	(LKK U, 3)	☐ Delta Ochric			150R)	unie	ess disturbed of problematic.
	Redox (S5)		Piedmont Fl				(Δ)	
	Matrix (S6)						л., \ 149А, 153С,	153D)
	rface (S7) (LRR P	, S, T, U)		5 ,	, (-,	•	,,	,
strictive	Layer (if observed	<i>a)</i> .						
	Layer (if observed	•						
Туре:		•	<u> </u>				Hydric Soil	Present? Yes X No
Type: Depth (in		•	_				Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No
Type: Depth (in		•					Hydric Soil	Present? Yes X No
Type: Depth (in		•					Hydric Soil	Present? Yes X No No
Type: Depth (in		•					Hydric Soil	Present? Yes X No No
strictive I		•					Hydric Soil	Present? Yes X No No
Type: Depth (in		•					Hydric Soil	Present? Yes X No No
Type: Depth (in		•					Hydric Soil	Present? Yes X No
Type: Depth (in		•					Hydric Soil	Present? Yes X No No
Type: Depth (in		•					Hydric Soil	Present? Yes X No No
Гуре: Depth (in		•					Hydric Soil	Present? Yes X No No



Photo 45: SP3-3 Soil Profile



Photo 46: SP3-3 Habitat

Received 03 March 2020

Project/Site: McCoy 1300 Acre Site	City/County: Liberty County Sampling Date: 5/2/18
Applicant/Owner: Delta Land Services	State: Texas Sampling Point: SP3-4
Investigator(s): DESCO (Arthur Perkins & Chris Little)	Section, Township, Range:
	Local relief (concave, convex, none): None Slope (%): 0
Subregion (LRR or MLRA): T Lat: 3311	439.327 Long: 308793.535 Datum: NAD 83
Soil Map Unit Name: League Clay, 0 to 1 % slopes	NWI classification: PFO
Are climatic / hydrologic conditions on the site typical for this time of y	rear? Yes X No (If no, explain in Remarks.)
Are Vegetation \underline{N} , Soil \underline{N} , or Hydrology \underline{N} significantle	y disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation \underline{N} , Soil \underline{N} , or Hydrology \underline{N} naturally p	roblematic? (If needed, explain any answers in Remarks.)
SUMMARY OF FINDINGS - Attach site map showin	g sampling point locations, transects, important features, etc.
Hydrophytic Vegetation Present? Yes X No Hydric Soil Present? Yes X No	· · · · · · · · · · · · · · · · · · ·
Wetland Hydrology Present? Yes X No	
HYDROLOGY	
Wetland Hydrology Indicators:	Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)	` ′
Surface Water (A1) Aquatic Fauna (B	
High Water Table (A2) Saturation (A3) Hydrogen Sulfide	
	heres along Living Roots (C3) Dry-Season Water Table (C2)
Sediment Deposits (B2) Presence of Redu	
	ction in Tilled Soils (C6) Saturation Visible on Aerial Imagery (C9)
Algal Mat or Crust (B4) Thin Muck Surfac	
Iron Deposits (B5)	Remarks)
Inundation Visible on Aerial Imagery (B7)	FAC-Neutral Test (D5)
✓ Water-Stained Leaves (B9)	☐ Sphagnum moss (D8) (LRR T, U)
Field Observations: Surface Water Present? Yes No _X Depth (inche	
Surface Water Present? Yes No _X Depth (inche Water Table Present? Yes No _X Depth (inche	
Saturation Present? Yes No X Depth (inche	
(includes capillary fringe)	
Describe Recorded Data (stream gauge, monitoring well, aerial pho	tos, previous inspections), if available:
Remarks:	
1	

Sampling Point: SP3-4

To 20 (20 to 20 (20 to 20 30)		Dominant		Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: 30') 1 Triadica sebifera	% Cover 20	Species?	FAC	Number of Dominant Species
2. Fraxinus pennsylvanica	10	Y	FACW	That Are OBL, FACW, or FAC: $\frac{7}{}$ (A)
3. Acer rubrum	10	<u>Y</u>	FAC	Total Number of Dominant
4. Liquidambar styraciflua	10	Y	FAC	Species Across All Strata: 7 (B)
5. Ulmus americana	8	<u>'</u>	FAC	Percent of Dominant Species
	5		FAC	That Are OBL, FACW, or FAC: 100% (A/B)
6. Ulmus rubra 7. Querccus phellos	5		FACW	Prevalence Index worksheet:
			TACV	Total % Cover of: Multiply by:
8	68			OBL species $\frac{4}{x}$ $1 = \frac{4}{x}$
24		= Total Cov		FACW species 48 x 2 = 96
	20% of	total cover:	13.0	FAC species 71 x 3 = 213
Sapling/Shrub Stratum (Plot size: 30')	20	V	EACIA/	FACU species $\frac{1}{x}$ $\frac{4}{x}$
1. Sabal minor	8	<u>Y</u>	FACW FAC	UPL species x 5 =
2. Triadica sebifera	5		FACW	Column Totals: 124 (A) 317 (B)
3. Acer rubrum				(1)
4. Querccus phellos	3		FAC	Prevalence Index = B/A = 2.56
5. Ditrysinia fruticosa			FAC	Hydrophytic Vegetation Indicators:
6				1 - Rapid Test for Hydrophytic Vegetation
7				2 - Dominance Test is >50%
8				3 - Prevalence Index is ≤3.0¹
		= Total Cov		Problematic Hydrophytic Vegetation ¹ (Explain)
50% of total cover: 18.5	20% of	total cover:	7.4	
Herb Stratum (Plot size: 30')	_			¹ Indicators of hydric soil and wetland hydrology must
1. Rhynchospora inexpansa	5	<u>Y</u>	FACW	be present, unless disturbed or problematic.
2. Carex leptalea	4	Υ	OBL	Definitions of Four Vegetation Strata:
3. Sabal minor	1		FACW	Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or
4. Rubus argutus	1		FACW	more in diameter at breast height (DBH), regardless of
5. Lonicera japonica	1		FACU	height.
6. Triadica sebifera	1		FAC	Sapling/Shrub – Woody plants, excluding vines, less
7. Toxicodendron radicans	1		FAC	than 3 in. DBH and greater than 3.28 ft (1 m) tall.
8. Acer rubrum	1		FAC	Herb – All herbaceous (non-woody) plants, regardless
9. Fraxinus pennsylvanica	1		FACW	of size, and woody plants less than 3.28 ft tall.
10. Liquidambar styraciflua	1		FAC	Woody vine – All woody vines greater than 3.28 ft in
11. Hypericum hypericoides	1		FAC	height.
12. Dichanthelium acuminatum	1		FAC	
	19 .	= Total Cov	er	
50% of total cover: 9.5	20% of	total cover:	3.8	
Woody Vine Stratum (Plot size: 30')				
1				
2				
3				
4				
5				Hydrophytic
		= Total Cov	er	Vegetation
50% of total cover:	20% of	total cover:		Present? Yes X No
Remarks: (If observed, list morphological adaptations belo				

Page 96 of 131

Received 03 March 2020 Sampling Point: SP3-4 SOIL

(inchas)	Color (moist)	<u>(</u>	Color (moist)	lox Features %	Type ¹	Loc ²	Texture	Remarks
inches))-2	10yr4/2	<u>%</u> 98	10yr5/6		C	M	Clay	Remarks
2-17	10yr4/1	80	10yr5/8		C	M	Clay	
-17	10 91 47 1		10915/0			171	Clay	
ype: C=C	oncentration, D=D	epletion, RM	=Reduced Matrix, N	//S=Masked	Sand Gra	ins.	² Location: PL:	=Pore Lining, M=Matrix.
			LRRs, unless oth					Problematic Hydric Soils ³ :
Histosol	(A1)			Below Surface			U) 📙 1 cm Muck	(A9) (LRR O)
= '	pipedon (A2)			Surface (S9)				(A10) (LRR S)
	stic (A3) en Sulfide (A4)			cky Mineral (F yed Matrix (F		0)		/ertic (F18) (outside MLRA 150A,
	d Layers (A5)		✓ Depleted M		(2)			Floodplain Soils (F19) (LRR P, S, T s Bright Loamy Soils (F20)
=	Bodies (A6) (LRF	R P, T, U)		Surface (F6	5)		(MLRA 1	
5 cm Μι	ucky Mineral (A7)	(LRR P, T, U	Depleted D	ark Surface ((F7)			nt Material (TF2)
_	esence (A8) (LRF		`	ressions (F8))			ow Dark Surface (TF12)
_	uck (A9) (LRR P,		Marl (F10)	(LRR U) chric (F11) (I	MI DA 46	:4\	U Other (Exp	plain in Remarks)
_	d Below Dark Surf ark Surface (A12)			nese Masses		-	T) ³ Indicator	rs of hydrophytic vegetation and
	rairie Redox (A16			face (F13) (L				hydrology must be present,
	lucky Mineral (S1			c (F17) (MLF		•		disturbed or problematic.
	Sleyed Matrix (S4)			ertic (F18) (N				
_	Redox (S5)			loodplain So				op)
	l Matrix (S6) rface (S7) (LRR F) S T II)	Anomaious	Bright Loam	iy Solis (i	-20) (WIL F	RA 149A, 153C, 15	30)
	Layer (if observe							
Type:	•	,						
Depth (in	ches):						Hydric Soil Pre	esent? Yes X No
emarks:								



Photo 47: SP3-4 Soil Profile



Photo 48: SP3-4 Habitat

Received 03 March 2020

Project/Site: McCoy 1300 Acre Site City	//County: Liberty County	_ Sampling Date: 5/4/18
Applicant/Owner: Delta Land Services	State: Texas	
Investigator(s): DESCO (Arthur Perkins & Chris Little) Se	ction, Township, Range:	
	cal relief (concave, convex, none): Convex	Slope (%): 0-1
Subregion (LRR or MLRA): T Lat: 3311506	.618 Long: 309215.725	Datum: NAD 83
Soil Map Unit Name: League Clay, 0 to 1 % slopes	NWI classit	fication: None
Are climatic / hydrologic conditions on the site typical for this time of year?	Yes X No (If no, explain in	Remarks.)
Are Vegetation N , Soil N , or Hydrology N significantly dis	turbed? Are "Normal Circumstances"	present? Yes No X
Are Vegetation $\underline{\underline{N}}$, Soil $\underline{\underline{N}}$, or Hydrology $\underline{\underline{N}}$ naturally proble	matic? (If needed, explain any answ	vers in Remarks.)
SUMMARY OF FINDINGS - Attach site map showing sa	ampling point locations, transect	s, important features, etc.
Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present? Remarks: Sample point is in a fallow crop field that has been		No
Sample point is in a fallow crop field that has bee	en piowed with in the last year	OF LWO.
HYDROLOGY		
Wetland Hydrology Indicators:		cators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)		il Cracks (B6)
Surface Water (A1) High Water Table (A2) Aquatic Fauna (B13) Marl Deposits (B15) (L		egetated Concave Surface (B8) Patterns (B10)
Saturation (A3) Hydrogen Sulfide Odo		Lines (B16)
Water Marks (B1) Water Marks (B1) Water Marks (B1)		n Water Table (C2)
Sediment Deposits (B2) Presence of Reduced		* *
Drift Deposits (B3)	in Tilled Soils (C6) Saturation	Visible on Aerial Imagery (C9)
Algal Mat or Crust (B4)	· —	c Position (D2)
☐ Iron Deposits (B5) ☐ Other (Explain in Rem	· · · · · · · · · · · · · · · · · · ·	
Inundation Visible on Aerial Imagery (B7)	=	al Test (D5)
Water-Stained Leaves (B9)	<u>∐</u> Sphagnum	moss (D8) (LRR T, U)
Field Observations:		
Surface Water Present? Yes No X Depth (inches):		
Water Table Present? Yes No X Depth (inches):		X
Saturation Present? Yes No _X Depth (inches): _ (includes capillary fringe)	Wetland Hydrology Prese	ent? Yes ^ No
Describe Recorded Data (stream gauge, monitoring well, aerial photos, p	previous inspections), if available:	
Remarks:		
The fallow field has adjacent drainage ditches.		

Sampling Point: SP3-5

Tree Stratum (Plot size: 30)		Dominant		Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: 30') 1.	% Cover			Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)
2				Total Number of Dominant
3				Species Across All Strata: 1 (B)
4				Percent of Dominant Species
5				That Are OBL, FACW, or FAC: 100% (A/B)
6				Prevalence Index worksheet:
7				Total % Cover of: Multiply by:
8				OBL species 65 x 1 = 65
		= Total Cov		FACW species $\frac{6}{}$ x 2 = $\frac{12}{}$
50% of total cover:	20% of	total cover	:	FAC species x 3 =
Sapling/Shrub Stratum (Plot size: 30')				FACU species 10 $x 4 = 40$
1				UPL species x 5 =
2				Column Totals: 81 (A) 117 (B)
3				
4				Prevalence Index = B/A = 1.44
5				Hydrophytic Vegetation Indicators:
6				1 - Rapid Test for Hydrophytic Vegetation
7				2 - Dominance Test is >50%
8				3 - Prevalence Index is ≤3.0 ¹
50% (* * *)		= Total Cov		Problematic Hydrophytic Vegetation ¹ (Explain)
50% of total cover:	20% of	total cover	:	
Herb Stratum (Plot size: 30') 1 Limnosciadium pumilum	60	Υ	OBL	¹ Indicators of hydric soil and wetland hydrology must
2. Lolium perenne	10		FACU	be present, unless disturbed or problematic.
2. Steinchisma hians	3		OBL	Definitions of Four Vegetation Strata:
Juncus marginatus	2		FACW	Tree - Woody plants, excluding vines, 3 in. (7.6 cm) or
The same of the sa	2		OBL	more in diameter at breast height (DBH), regardless of height.
0	1		FACW	noight.
6. Cyperus virens 7. Phalaris caroliniana	1		FACW	Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.
- · · · · ·	1		FACW	than 3 iii. DBH and greater than 3.20 it (1 iii) tall.
Eragrostis retracta Plantago heterophylla	1		FACW	Herb – All herbaceous (non-woody) plants, regardless
0			FACW	of size, and woody plants less than 3.28 ft tall.
10				Woody vine – All woody vines greater than 3.28 ft in
11				height.
12	01			
50% of total cover: 40.5	81 :			
50% of total cover. 40.0	20% of	total cover	: 10.2	
Woody Vine Stratum (Plot size: 30')				
Woody Vine Stratum (Plot size: 30')				
Woody Vine Stratum (Plot size: 30') 1				
Woody Vine Stratum (Plot size: 30') 1				
Woody Vine Stratum (Plot size: 30') 1	·			
				Hydrophytic
Woody Vine Stratum (Plot size: 30')	· ————————————————————————————————————	= Total Cov	/er	Hydrophytic Vegetation Present? Yes X No

Page 100 of 131

Received 03 March 2020 Sampling Point: SP3-5 **SOIL**

nches) -4 16 6-20	Color (moist) 10yr3/1 10yr3/1	%	Color (moist)	x Feature %	Type ¹	Loc ²	Texture	Remarks
-16		100	COIOI (IIIOISI)		<u>i ype</u>	LUC	Clay	Remarks
		97	10yr5/8	3	С	PL	Clay	
<u>6-20</u>					-			
	10yr3/1	95	10yr5/8	5	<u>D</u>	M,PL	Clay	
					. <u> </u>			
vpe: C=C	oncentration. D=D	epletion. RM	=Reduced Matrix, M	S=Masked	d Sand G	ains.	² Location: Pl	L=Pore Lining, M=Matrix.
			LRRs, unless othe					r Problematic Hydric Soils³:
Histosol	(A1)		Polyvalue Be	elow Surfa	ice (S8) (I	RR S, T, U	J) 🔲 1 cm Mud	ck (A9) (LRR O)
	oipedon (A2)		Thin Dark Su					ck (A10) (LRR S)
Black Hi			Loamy Muck			₹ 0)		Vertic (F18) (outside MLRA 150A,
=	en Sulfide (A4)		Loamy Gley		(F2)			t Floodplain Soils (F19) (LRR P, S, T
=	d Layers (A5) Bodies (A6) (LRR	P T II)	Redox Dark	` '	- 6)		(MLRA	us Bright Loamy Soils (F20)
	icky Mineral (A7) (•	,			ent Material (TF2)
	esence (A8) (LRR		Redox Depre					illow Dark Surface (TF12)
	ıck (A9) (LRR P, T		Marl (F10) (I	,			U Other (E)	kplain in Remarks)
	d Below Dark Surfa	ace (A11)	Depleted Oc				3	
=	ark Surface (A12)	(MI DA 450	Iron-Mangar					ors of hydrophytic vegetation and
=	rairie Redox (A16) lucky Mineral (S1)	•	A) Umbric Surfa			, 0)		nd hydrology must be present, s disturbed or problematic.
	Gleyed Matrix (S4)	(LIKIT O, O)	Reduced Ve			50A. 150B)		disturbed of problematic.
	Redox (S5)		Piedmont Flo					
	Matrix (S6)		Anomalous I	Bright Loa	my Soils	(F20) (MLF	RA 149A, 153C, 1	53D)
	rface (S7) (LRR P							
	Layer (if observed	•						
Type:	-h \.						Undein Cail De	resent? Yes X No
Depth (inc	cnes):						Hydric Soil Pr	resent? Yes ^ No
emarks:								



Photo 49: SP3-5 Soil Profile



Photo 50: SP3-5 Habitat

Project/Site: McCoy 1300 Acre Site	City/County: Liberty County	Sampling Date: 5/4/18
Applicant/Owner: Delta Land Services	City/County: Liberty County State: Texa	as Sampling Point: SP3-6
Investigator(s): DESCO (Arthur Perkins & Chris Little)		Camping Fourt.
Landform (hillslope, terrace, etc.): Flat		nvex Slope (%): 0-1
Subregion (LRR or MLRA): T	448.23663003 Long. 309338.418	3735929 Datum: NAD 83
Subregion (LRR or MLRA): $\frac{T}{Soil}$ Map Unit Name: $\frac{T}{Soil}$ Mocarey-Yeaton Complex, 0 to 1 % slope:	3 NWI cl	assification: None
Are climatic / hydrologic conditions on the site typical for this time of y		
Are Vegetation $\frac{N}{N}$, Soil $\frac{N}{N}$, or Hydrology $\frac{N}{N}$ significantly		
Are Vegetation N, Soil N, or Hydrology N naturally pr		answers in Remarks)
SUMMARY OF FINDINGS – Attach site map showing		
-		
Hydrophytic Vegetation Present? Yes X No	Is the Sampled Area	
Hydric Soil Present? Yes X No		. X No
Wetland Hydrology Present? Yes X No No		
Sample point is in a fallow crop field that has I	peen plowed with in the last y	ear or two.
HYDROLOGY		
Wetland Hydrology Indicators:		Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)		e Soil Cracks (B6)
Surface Water (A1) Aquatic Fauna (B)		ely Vegetated Concave Surface (B8)
High Water Table (A2) Marl Deposits (B1		ge Patterns (B10)
Saturation (A3) Hydrogen Sulfide Outdined Phinagel	· · ·	Frim Lines (B16)
☐ Water Marks (B1) ☑ Oxidized Rhizospl ☐ Sediment Deposits (B2) ☐ Presence of Redu		eason Water Table (C2) sh Burrows (C8)
		tion Visible on Aerial Imagery (C9)
Algal Mat or Crust (B4) Thin Muck Surface		orphic Position (D2)
Iron Deposits (B5) Other (Explain in I	` ′	w Aquitard (D3)
Inundation Visible on Aerial Imagery (B7)		leutral Test (D5)
Water-Stained Leaves (B9)	-	num moss (D8) (LRR T, U)
Field Observations:		
Surface Water Present? Yes No X Depth (inches	s):	
Water Table Present? Yes No X Depth (inches		
Saturation Present? Yes No X Depth (inches	s): Wetland Hydrology P	Present? Yes X No
(includes capillary fringe) Describe Recorded Data (stream gauge, monitoring well, aerial photos	cos, previous inspections), if available:	
Remarks:		
The fallow field has adjacent drainage ditches	. When in cultivation, drainag	e furrows are used to
drain the field of excess water.		

Sampling Point: SP3-6

30'		Dominant		Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: 30') 1.	% Cover			Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)
2				Total Number of Dominant
3				Species Across All Strata: 2 (B)
4				Percent of Dominant Species
5				That Are OBL, FACW, or FAC: 50 % (A/B)
6				Prevalence Index worksheet:
7				Total % Cover of: Multiply by:
8				OBL species 22 x 1 = 22
EOO/ of total course		= Total Cov		FACW species $\frac{23}{}$ x 2 = $\frac{46}{}$
50% of total cover: Sapling/Shrub Stratum (Plot size: 30')	20% 01	total cover	·	FAC species x 3 =
				FACU species $\frac{35}{}$ x 4 = $\frac{140}{}$
1				UPL species x 5 =
2				Column Totals: <u>80</u> (A) <u>208</u> (B)
3				5 50 . 26
5.				Prevalence Index = B/A = 2.6
6.				Hydrophytic Vegetation Indicators:
7				1 - Rapid Test for Hydrophytic Vegetation 2 - Dominance Test is >50%
8.				2 - Dominance Test is >50% ✓ 3 - Prevalence Index is ≤3.0¹
		= Total Cov		Problematic Hydrophytic Vegetation ¹ (Explain)
50% of total cover:	20% of	total cover	:	Froblematic Hydrophytic vegetation (Explain)
Herb Stratum (Plot size: 30')				¹ Indicators of hydric soil and wetland hydrology must
1. Lolium perenne	25	Υ	FACU	be present, unless disturbed or problematic.
2. Limnosciadium pumilum	20	Y	OBL	Definitions of Four Vegetation Strata:
3. Cynodon dactylon	10		FACU	Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or
4. Eragrostis refracta	10		FACW	more in diameter at breast height (DBH), regardless of
5. Juncus marginatus	8		FACW	height.
6. Cyperus virens	5		FACW	Sapling/Shrub – Woody plants, excluding vines, less
7. Juncus acuminatus	_ 2		OBL	than 3 in. DBH and greater than 3.28 ft (1 m) tall.
8				Herb – All herbaceous (non-woody) plants, regardless
9				of size, and woody plants less than 3.28 ft tall.
10				Woody vine – All woody vines greater than 3.28 ft in
11				height.
12				
		= Total Cov		
50% of total cover: 40	20% of	total cover	: 10	
Woody Vine Stratum (Plot size: 30')				
1				
2				
3				
4				
5				Hydrophytic Vegetation
FOO/ of total cover:		= Total Cov		Present? Yes X No
50% of total cover:		total cover	•	
Remarks: (If observed, list morphological adaptations be Hydrologic and hydric soils indicators a	low).			1

Page 104 of 131

Received 03 March 2020 Sampling Point: SP3-6 **SOIL**

achca)	Matrix Color (moist)	%	Color (moist)	ox Feature		Loc ²	Texture	Domorko
nches) -4	10yr3/1	<u>%</u> 98	10yr5/8	_ <u>%</u> 2	Type ¹	M	Clay	Remarks
-18	10yr4/1	75	10yr5/8	5	<u>C</u>	_ <u>M</u>	Clay	
			10yr6/1	20	_ <u>D</u>	M	Clay	
				_				
	-			_	_			
	-			_	-			
			=Reduced Matrix, M			rains.		PL=Pore Lining, M=Matrix.
_		Cable to all	LRRs, unless othe					for Problematic Hydric Soils ³ :
Histosol	pipedon (A2)		Polyvalue Be					uck (A9) (LRR O) uck (A10) (LRR S)
=	istic (A3)		Loamy Muck					ed Vertic (F18) (outside MLRA 150A,
	en Sulfide (A4)		Loamy Gley			,		ent Floodplain Soils (F19) (LRR P, S,
	d Layers (A5)		Depleted Ma		,			lous Bright Loamy Soils (F20)
	Bodies (A6) (LRR		Redox Dark	Surface (F6)			A 153B)
	ucky Mineral (A7) (I) 🔲 Depleted Da	rk Surfac	e (F7)			rent Material (TF2)
	resence (A8) (LRR		Redox Depr	`	F8)			nallow Dark Surface (TF12)
	uck (A9) (LRR P, T)		<u> </u>	,			U Other (I	Explain in Remarks)
•	d Below Dark Surfa	ce (A11)	Depleted Oc		•	•	-) 31p	tono effection by the constation and
=	ark Surface (A12)	/MI DA 450	Iron-Mangar				•	ators of hydrophytic vegetation and
=	rairie Redox (A16) Mucky Mineral (S1)	•	A) Umbric SurfaDelta Ochric					and hydrology must be present, ss disturbed or problematic.
-	Gleyed Matrix (S4)	(LIXIX O, 3)	Reduced Ve					as disturbed of problematic.
_	Redox (S5)		Piedmont Fl					
-	Matrix (S6)						RA 149A, 153C,	153D)
	rface (S7) (LRR P,	S, T, U)		Ü	,	`		,
J Daik Su	······ (• ·) (— · · · ·)							
	Layer (if observed							
):						
estrictive l	Layer (if observed):					Hydric Soil I	Present? Yes X No
Type: Depth (in	Layer (if observed):					Hydric Soil I	Present? Yes X No
Type: Depth (inc	Layer (if observed):					Hydric Soil I	Present? Yes X No
estrictive I Type: Depth (in	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (in	Layer (if observed):					Hydric Soil I	Present? Yes ^X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (in	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (in	Layer (if observed):					Hydric Soil I	Present? Yes X No
strictive I Type: Depth (in	Layer (if observed):					Hydric Soil	Present? Yes X No
Type: Depth (inc	Layer (if observed):					Hydric Soil	Present? Yes X No
estrictive I Type:	Layer (if observed):					Hydric Soil	Present? Yes X No
Type: Depth (inc	Layer (if observed):					Hydric Soil	Present? Yes X No
estrictive I Type: Depth (in	Layer (if observed):					Hydric Soil	Present? Yes X No
strictive I Type: Depth (in	Layer (if observed):					Hydric Soil	Present? Yes X No
strictive I Type: Depth (ind	Layer (if observed):					Hydric Soil I	Present? Yes X No



Photo 51: SP3-6 Soil Profile



Photo 52: SP3-6 Habitat

Project/Site: McCoy 1300 Acre Site	City/County: Libe	erty County	Sampling Dat	:e: 21-May-19				
Applicant/Owner: Delta Land Services	Stat	te: Texas	Sampling Point: SP38					
Investigator(s): DESCO-Chris Little & Thomas Wilder	Section, Townshi	ip, Range: S	т .	R				
Landform (hillslope, terrace, etc.):	Local relief (conca	ve, convex, none):	Slope:	0.0 % / 0.0°				
	-	, , ,		Datum: NAD 83				
	3312051.295	Long.: 30						
Soil Map Unit Name: League Clay, 0 to 1 percent slopes			NWI classification: none	=				
Are climatic/hydrologic conditions on the site typical for this time of y	oui .	(2.1.1.0	o, explain in Remarks.)	A O				
Are Vegetation . , Soil . , or Hydrology . significan	ntly disturbed?	Are "Normal Circur	mstances" present?	es • No O				
Are Vegetation , Soil , or Hydrology naturally	problematic?	(If needed, explain	n any answers in Remarks	.)				
SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.								
Hydrophytic Vegetation Present? Yes No No Hydric Soil Present? Yes No No		mpled Area	● No ○					
Wetland Hydrology Present? Yes ● No ○	within a W	vetiand?						
HYDROLOGY								
Wetland Hydrology Indicators:		Seco	ndary Indicators (minimum of	² 2 required)				
Primary Indicators (minimum of one required; check all that apply	·)	S	Surface Soil Cracks (B6)					
Surface Water (A1) Aquatic Fauna (I	□ S	Sparsely Vegetated Concave Surface (B8)						
High Water Table (A2) Marl Deposits (B		Drainage Patterns (B10)						
☐ Saturation (A3) ☐ Hydrogen Sulfide		Moss Trim Lines (B16)						
☐ Water Marks (B1) ☑ Oxidized Rhizosp	• • =	☐ Dry Season Water Table (C2)						
Sediment Deposits (B2) Presence of Red	` ,		✓ Crayfish Burrows (C8)					
	duction in Tilled Soils (C6		Saturation Visible on Aerial Imp	agery (C9)				
☐ Algal Mat or Crust (B4) ☐ Thin Muck Surfa☐ Iron Deposits (B5) ☐ Other (Explain in			Geomorphic Position (D2) Shallow Aquitard (D3)					
Inundation Visible on Aerial Imagery (B7)	ii Remarks)		AC-Neutral Test (D5)					
✓ Water-Stained Leaves (B9)			Sphagnum moss (D8) (LRR T,	II)				
Field Observations:			priagram moss (50) (Errix 1)	<u> </u>				
Surface Water Present? Yes No Depth (inches)):							
Water Table Present? Yes No Depth (inches)	\.							
	· — I	Wetland Hydrology	Present? Yes 💿 I	No O				
(includes capillary fringe) Yes V No Depth (inches)								
Describe Recorded Data (stream gauge, monitoring well, aerial pho	otos, previous inspect	tions), if available:						

Page 107 of 131 Received 03 March 2020 Sampling Point: SP38

SWG-2019-00722 Attachment A-PRM Mitigation Plan **VEGETATION** (Five/Four Strata) - Use scientific names of plants.

	Species?			· · · · · · · · · · · · · · · · · · ·			
(Districts 201 and a second				Indicator	Dominance Test worksheet:		
Tree Stratum (Plot size: 30' radius)	% Cover		Cover	Status	Number of Dominant Species		
1 Celtis laevigata	20	✓	36.4%	FACW	That are OBL, FACW, or FAC: 6 (A)		
2. Quercus phellos	20	~	36.4%	FACW			
			1		Total Number of Dominant		
3. Ulmus americana	_ <u>10</u>		18.2%	FAC	Species Across All Strata: 7 (B)		
4. Fraxinus pennsylvanica	5		9.1%	FACW			
5	0		0.0%		Percent of dominant Species		
6			0.0%		That Are OBL, FACW, or FAC: 85.7% (A/B)		
-		$\overline{}$	0.0%		Barrier - Tadar - Adam		
			1		Prevalence Index worksheet:		
8	0		0.0%		Total % Cover of: Multiply by:		
50% of Total Cover: 27.5 20% of Total Cover: 11	55	= T	otal Cover	•	0BL species 0 x 1 = 0		
Sapling or Sapling/Shrub Stratum (Plot size: 30' radius	1				FACW species 80 x 2 = 160		
			1				
1. Sabal minor		Y	57.1%	FACW	FAC species $\underline{20}$ x 3 = $\underline{60}$		
2. Ilex vomitoria	5		14.3%	FAC	FACU species $2 \times 4 = 8$		
3. Ilex decidua	5		14.3%	FACW	UPL species $0 \times 5 = 0$		
4. Quercus phellos	5		14.3%	FACW			
			0.0%		Column Totals: <u>102</u> (A) <u>228</u> (B)		
		Н	1		Prevalence Index = $B/A = 2.235$		
6	0		0.0%				
7	0		0.0%		Hydrophytic Vegetation Indicators:		
8	0		0.0%		1 - Rapid Test for Hydrophytic Vegetation		
50% of Total Cover: 17.5 20% of Total Cover: 7	35	– т	otal Cover				
20% of Total Cover			otai covei		✓ 2 - Dominance Test is > 50%		
Shrub Stratum (Plot size:)					✓ 3 - Prevalence Index is ≤3.0 ¹		
1	0		0.0%		Problematic Hydrophytic Vegetation ¹ (Explain)		
2.			0.0%				
		$\overline{}$	0.0%		¹ Indicators of hydric soil and wetland hydrology must		
3					be present, unless disturbed or problematic.		
4	0_		0.0%				
5	0		0.0%		Definition of Vegetation Strata:		
6	0		0.0%		Tree - Woody plants, excluding woody vines,		
50% of Total Cover: 0 20% of Total Cover: 0	0	= T	otal Cover		approximately 20 ft (6 m) or more in height and 3 in.		
					(7.6 cm) or larger in diameter at breast height (DBH).		
Herb Stratum (Plot size: <u>30' radius</u>)					Configuration and an Association and a second a second and a second and a second and a second and a second an		
1. Toxicodendron radicans	5	✓	41.7%	FAC	Sapling - Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less		
2. Parthenocissus quinquefolia	2	V	16.7%	FACU	than 3 in. (7.6 cm) DBH.		
3. Quercus phellos		V	16.7%	FACW			
		✓			Sapling/Shrub - Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1m) tall.		
4 Sabal minor	2	_	1	FACW			
5. Carex caroliniana	1		8.3%	FACW			
6	0		0.0%		Shrub - Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.		
7	0		0.0%				
8	0		0.0%				
		П	0.0%		Herb - All herbaceous (non-woody) plants, including		
9			1		herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately		
10	0_		0.0%				
11	0		0.0%		3 ft (1 m) in height.		
12	0		0.0%				
50% of Total Cover: 6 20% of Total Cover: 2.4	12	= T	otal Cover		Woody vine - All woody vines, regardless of height.		
		-					
Woody Vine Stratum (Plot size: 30' radius)							
1	0		0.0%				
2.			0.0%				
10		$\overline{\Box}$	0.0%				
•		Н	1				
4			0.0%		Hydrophytic		
5	0		0.0%		Vegetation		
50% of Total Cover: 0 20% of Total Cover: 0	0	= T	otal Cover		Present? Yes No		
Remarks: (If observed, list morphological adaptations below).							

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

SOIL Sampling Point: Sp38

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)									
Depth	Denth Matrix Redox Features					_			
(inches)	Color (moist)	<u></u> %	Color (moist)	%	Tvpe 1	Loc2	Texture	Remarks	
0-14	10YR 3/1	97	10YR 5/6	3	С	М	Clay		
				-					
¹ Type: C=Con	centration. D=Depletio	n. RM=Reduce	d Matrix, CS=Covered	d or Coate	ed Sand Gr	ains ²Loca	tion: PL=Pore Lining. M=Ma	atrix	
Hydric Soil 1	indicators:						Indicators for Proble	ematic Hydric Soils ³ :	
Histosol (A1)		Polyvalue Belo	w Surface	(S8) (LRR	S, T, U)	1 cm Muck (A9) (L		
Histic Epi	pedon (A2)		Thin Dark Surf	ace (S9) (LRR S, T,	J)	2 cm Muck (A10) (LRR S)		
Black Hist	ic (A3)		Loamy Mucky				Reduced Vertic (F18) (outside MLRA 150A,B)		
Hydrogen	Sulfide (A4)		Loamy Gleyed					in Soils (F19) (LRR P, S, T)	
Stratified	Layers (A5)		✓ Depleted Matri		,			Loamy Soils (F20) (MLRA 153B)	
	odies (A6) (LRR P, T, U	J)	Redox Dark Su		١				
	ky Mineral (A7) (LRR P		Depleted Dark	` '			Red Parent Materia		
	sence (A8) (LRR U)	, , -,	Redox Depress	-	-		☐ Very Shallow Dark		
	k (A9) (LRR P, T)		☐ Marl (F10) (LR				Other (Explain in R	emarks)	
	Below Dark Surface (A	11)	Depleted Ochri		MIDA 151\				
	k Surface (A12)	/							
	irie Redox (A16) (MLRA	۱ 150۵)	☐ Iron-Manganes						
	ick Mineral (S1) (LRR C	-	Umbric Surface)			
		, 3)	Delta Ochric (F			.===\	³ Indicators o	f hydrophytic vegetation and	
	eyed Matrix (S4)		Reduced Vertic				wetland hy	drology must be present,	
☐ Sandy Re			☐ Piedmont Floo					disturbed or problematic.	
	Matrix (S6)		Anomalous Bri	ght Loamy	Soils (F20) (MLRA 149	9A, 153C, 153D)		
☐ Dark Surf	ace (S7) (LRR P, S, T,	J)							
Restrictive L	ayer (if observed):								
Type:	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,								
Depth (inc	hes):						Hydric Soil Present?	Yes No	
Remarks:				_					
Kemarks.									



Photo 19: SP38 Soil Profile



Photo 20: SP38 Habitat

WETLAND DETERMINATION DATA FORM - Atlantic and Gulf Coastal Plain Region

Project / Site: McCov 1200 Acro Site	City/County: Liber	rty County		Sampling Date	u 21 May 10
Project/Site: McCoy 1300 Acre Site					21-May-19
Applicant/Owner: Delta Land Services		e: Texas	_ Sampling Poi		
Investigator(s): DESCO-Chris Little & Thomas Wilder	Section, Township	p, Range: S	T	R	
Landform (hillslope, terrace, etc.): Flat	Local relief (concav	e, convex, none	e): none	Slope:	0.0 % / 0.0 °
Subregion (LRR or MLRA): LRR T Lat.:	3311818.866	Long.:	309162.893	ı	Datum: NAD 83
Soil Map Unit Name: League Clay, 0 to 1 percent slopes			NWI classific	cation: none	-
Are climatic/hydrologic conditions on the site typical for this time of y	ear? Yes •	No O	f no, explain in F		
	cui.	(s O No •
Are Vegetation 🗹 , Soil 🗌 , or Hydrology 📙 significar	ntly disturbed?	Are "Normal Cir	rcumstances" pr	esent?	, O NO O
Are Vegetation ✓ , Soil ☐ , or Hydrology ☐ naturally	problematic?	(If needed, exp	lain any answer	s in Remarks.)	1
SUMMARY OF FINDINGS - Attach site map showing sa	ampling point lo	cations, trar	isects, impo	rtant featur	es, etc.
Hydrophytic Vegetation Present? Yes No •					
Hydric Soil Present? Yes No •	Is the Sam	-	s • No O		
Wetland Hydrology Present? Yes No	within a W	etland? Ye	s • No ·		
Remarks: possible hay field, dominant grass could not be positively identified	l due to lack of seed l	hoads			
possible hay held, dominant grass could not be positively identified	due to lack of seed i	ricaus			
HYDROLOGY					
HTDROLOGI					
Wetland Hydrology Indicators:		Se	econdary Indicator	rs (minimum of 2	2 required)
Primary Indicators (minimum of one required; check all that apply)	•		Surface Soil Cra	icks (B6)	
Surface Water (A1) Aquatic Fauna (E	-	L		ated Concave Sui	rface (B8)
High Water Table (A2) Marl Deposits (B		L	□ Drainage Patter □		
☐ Saturation (A3) ☐ Hydrogen Sulfide	` ,		☐ Moss Trim Lines	• •	
	oheres along Living Roots	s (C3)	Dry Season Wat	. ,	
Sediment Deposits (B2) Presence of Red	` '	· \	Crayfish Burrow	` '	(00)
	luction in Tilled Soils (C6)	, _		ole on Aerial Imag	jery (C9)
	• •		Geomorphic Pos		
☐ Iron Deposits (B5) ☐ Other (Explain in Inundation Visible on Aerial Imagery (B7)	i Remarks)				
Water-Stained Leaves (B9)			_	st (D3) ss (D8) (LRR T, U	1)
			Spriagrium mos	5 (D6) (LRR 1, U	')
Field Observations: Surface Water Present? Yes No Depth (inches)	٠,				
, ,					
Water Table Present? Yes No Depth (inches)	: _v	Wetland Hydrolo	nav Brocont?	Yes • N	0
Saturation Present? (includes capillary fringe) Yes No • Depth (inches)):	vecialia riyaroic	gy Fresent:	103 0 11	0
Describe Recorded Data (stream gauge, monitoring well, aerial pho	otos, previous inspecti	ions), if availab	le:		
Remarks:					
Remarks.					

Page 111 of 131 Received 03 March 2020 Sampling Point: SP45

SWG-2019-00722 Attachment A-PRM Mitigation Plan **VEGETATION** (Five/Four Strata) - Use scientific names of plants.

Į	Do	mi	naı	nt

	Absolute		cies? <u> </u>	dicator	Dominance Test worksheet:		
Tree Stratum (Plot size: 30' radius)	% Cover	Cov	ver S	Status	Number of Dominant Species		
1	0	o	0.0%		That are OBL, FACW, or FAC: 0 (A)		
2	0		0.0%		Takal Namahan of Bandaran		
3	0_		0.0%		Total Number of Dominant Species Across All Strata: 1 (B)		
4	_ 0_		0.0%				
5			0.0%		Percent of dominant Species That Are OBL_FACW_or_FAC: 0.0% (A/B)		
6	0		0.0%		That Are OBL, FACW, or FAC: 0.0% (A/B)		
7			0.0%		Prevalence Index worksheet:		
8	•		0.0%		Total % Cover of: Multiply by:		
		= Total	l Cover		0BL species 0 x 1 = 0		
Sapling or Sapling/Shrub Stratum (Plot size: 30' radius					FACW species 2 x 2 = 4		
4	•		0.0%		FAC species 0 x 3 = 0		
2		\neg	0.0%		I		
		\neg	0.0%				
3		\neg	0.0%		O Species		
4		\neg	0.0% 0.0%		Column Totals: <u>97</u> (A) <u>384</u> (B)		
5		=	0.0%		Prevalence Index = B/A = 3.959		
6		=			Hydrophytic Vegetation Indicators:		
7			0.0%		Tryarophytic Vegetation Indicators.		
8	0_		0.0%		1 - Rapid Test for Hydrophytic Vegetation		
50% of Total Cover:0 20% of Total Cover:0	=	= Total	l Cover		2 - Dominance Test is > 50%		
Shrub Stratum (Plot size:)					☐ 3 - Prevalence Index is ≤3.0 ¹		
1	0		0.0%		Problematic Hydrophytic Vegetation ¹ (Explain)		
2.	0		0.0%				
3.	_		0.0%		¹ Indicators of hydric soil and wetland hydrology must		
4.			0.0%		be present, unless disturbed or problematic.		
5.			0.0%		Definition of Vegetation Strata:		
6.	0	=	0.0%		Tree - Woody plants, excluding woody vines,		
50% of Total Cover: 0 20% of Total Cover: 0	0 =	 = Total	l Cover		approximately 20 ft (6 m) or more in height and 3 in.		
					(7.6 cm) or larger in diameter at breast height (DBH).		
Herb Stratum (Plot size: 30' radius)					Sapling - Woody plants, excluding woody vines,		
1. Paspalum notatum		✓ _9:	97.9% F	ACU	approximately 20 ft (6 m) or more in height and less		
2. Carex flaccosperma	_ 1	<u></u> _	1.0% F	ACW	than 3 in. (7.6 cm) DBH.		
3. Eleocharis montevidensis	1	<u>1</u>	1.0% F	ACW			
4	0	<u> </u>	0.0%		Sapling/Shrub - Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1m) tall.		
5	0	<u> </u>	0.0%		and the best and greater than 0.20 it (1111) tall.		
6		<u></u> _	0.0%		Shrub - Woody plants, excluding woody vines,		
7	0	<u></u> _	0.0%		approximately 3 to 20 ft (1 to 6 m) in height.		
8	0	<u> </u>	0.0%				
9	0	<u> </u>	0.0%		Herb - All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody		
10	0_	<u></u> _	0.0%		plants, except woody vines, less than approximately		
11	0	0	0.0%		3 ft (1 m) in height.		
12	_ 0_		0.0%				
50% of Total Cover: 48.5 20% of Total Cover: 19.4	97 =	= Total	l Cover		Woody vine - All woody vines, regardless of height.		
Woody Vine Stratum (Plot size: 30' radius)							
1.	0		0.0%				
2.			0.0%				
			0.0%				
3 4		$\overline{}$	0.0%				
5		=			Hydrophytic		
			0.0%		Vegetation		
50% of Total Cover: 0 20% of Total Cover: 0	=	= Total	l Cover		Present? Yes O NO O		
Remarks: (If observed, list morphological adaptations below).							
*Indicator suffix = National status or professional decision assigned because Re	egional status i	not defin	ned by FWS.				

SOIL Sampling Point: SP45

Profile Desci	ription: (De	scribe to t	he depth	needed to	locument	the indic	ator or co	onfirm the	absence of indicators.)		
Denth Matrix Redox Features									_		
(inches)	Color (moist)	%	Color (moist)	%	Type 1	Loc2	Texture	Remarks	
0-4	10YR	3/1	80	10YR	4/6	5	С	М	Clay		
	10YR	5/2	15								
4-12	10YR	3/1	90	10YR	4/6	10	С	M	Clay		
12-20	10YR	3/1	95	10YR	4/6	5	C		Clay		
	- 1011					- —			Cidy		
¹ Type: C=Concentration. D=Depletion. RM=Reduced Matrix, CS=Covered or Coated Sand Grains ² Location: PL=Pore Lining. M=Matrix											
Hydric Soil 1				,							
Histosol (Pol	value Belo	w Surface	(CQ) (I DD	C T II)	Indicators for Problems		
_ `	pedon (A2)				n Dark Sur				1 cm Muck (A9) (LRR	•	
Black Hist					my Mucky				2 cm Muck (A10) (LR		
	n Sulfide (A4)				my Gleyed	-		,		(outside MLRA 150A,B)	
	Layers (A5)				oleted Matr		-)			Soils (F19) (LRR P, S, T)	
	Bodies (A6) (I	RR P T II)		lox Dark Si					amy Soils (F20) (MLRA 153B)	
_	cky Mineral (A			=		` '			Red Parent Material (
	sence (A8) (L		1,0)		oleted Dark		-7)		☐ Very Shallow Dark Su		
	ck (A9) (LRR	-			lox Depres 1 (F10) (LF				Other (Explain in Rem	ıarks)	
	Below Dark S		1)			•	41 DA 151\				
	k Surface (A:	•	1)		oleted Ochi	. , .	,				
	•	•	1504)		n-Mangane						
	nirie Redox (A		-		bric Surfac)			
	uck Mineral (S		5)		ta Ochric (-		³ Indicators of h	ydrophytic vegetation and	
	eyed Matrix (54)			luced Verti			-	wetland hydrology must be present,		
☐ Sandy Re								ILRA 149A)		turbed or problematic.	
	Matrix (S6)			∟ And	malous Br	ight Loamy	Soils (F20	0) (MLRA 14	9A, 153C, 153D)		
☐ Dark Surf	face (S7) (LR	R P, S, 1, U)								
Restrictive L	ayer (if obs	erved):									
Type:						_					
Depth (inc	:hes):					_			Hydric Soil Present?	Yes ○ No •	
Remarks:	-										
remarks.											



Photo 149: SP45 Soil Profile



Photo 150: SP45 Habitat

WETLAND DETERMINATION DATA FORM - Atlantic and Gulf Coastal Plain Region

Project/Site: McCoy 1300 Acre Site	City/County: Liberty Cour	nty Sampling D	Date: 21-May-19
Applicant/Owner: Delta Land Services	State: Tex	as Sampling Point: SP49	
Investigator(s): DESCO-Chris Little & Thomas Wilder	Section, Township, Rang	ge: S T	R
Landform (hillslope, terrace, etc.): Flat	Local relief (concave, conv	vex, none): none Slope	: 0.0 % / 0.0°
	-		Datum: NAD 83
	3311314.507	Long.: 308010.954	
Soil Map Unit Name: League Clay, 0 to 1 percent slopes	yes ● No C		one
Are climatic/hydrologic conditions on the site typical for this time of ye		(11 no, explain in itemation)	v (a) v (
Are Vegetation . , Soil . , or Hydrology . significan	tly disturbed? Are "No	ormal Circumstances" present?	Yes ● No ○
Are Vegetation \square , Soil \square , or Hydrology \square naturally	problematic? (If nee	eded, explain any answers in Remar	rks.)
SUMMARY OF FINDINGS - Attach site map showing sa	ımpling point location	ns, transects, important fea	itures, etc.
Hydrophytic Vegetation Present? Yes ● No ○	Is the Sampled A	rea	
Hydric Soil Present? Yes ● No ○		Vas (Na (
Wetland Hydrology Present? Yes No	within a Wetland	7 165 0 110 0	
Remarks:			
HYDROLOGY			
Wetland Hydrology Indicators:		Secondary Indicators (minimum	n of 2 required)
Primary Indicators (minimum of one required; check all that apply)		Surface Soil Cracks (B6)	
Surface Water (A1) Aquatic Fauna (B	13)	Sparsely Vegetated Concave	e Surface (B8)
High Water Table (A2) Marl Deposits (B:	15) (LRR U)	Drainage Patterns (B10)	
Saturation (A3) Hydrogen Sulfide	Odor (C1)	Moss Trim Lines (B16)	
Water Marks (B1) Oxidized Rhizosp	heres along Living Roots (C3)	Dry Season Water Table (Ca	2)
Sediment Deposits (B2)	ıced Iron (C4)	✓ Crayfish Burrows (C8)	
☐ Drift Deposits (B3) ☐ Recent Iron Redu	uction in Tilled Soils (C6)	Saturation Visible on Aerial	Imagery (C9)
Algal Mat or Crust (B4)	:e (C7)	Geomorphic Position (D2)	
☐ Iron Deposits (B5) ☐ Other (Explain in	Remarks)	Shallow Aquitard (D3)	
Inundation Visible on Aerial Imagery (B7)		✓ FAC-Neutral Test (D5)	
✓ Water-Stained Leaves (B9)		Sphagnum moss (D8) (LRR	T, U)
Field Observations:			
Surface Water Present? Yes No Depth (inches):			
Water Table Present? Yes No Depth (inches):			
Saturation Present? (includes capillary frings) Yes No Depth (inches):	Wetland	d Hydrology Present? Yes •	No O
(includes capillary fringe) Describe Recorded Data (stream gauge, monitoring well, aerial pho		f available	
Describe Recorded Data (stream gauge, monitoring well, denai prior	.os, previous inspections), i	r available.	
Remarks:			

Page 115 of 131 Received 03 March 2020 Sampling Point: SP49

SWG-2019-00722 Attachment A-PRM Mitigation Plan **VEGETATION** (Five/Four Strata) - Use scientific names of plants.

Dominant	

(Plot size: 20' radius	Absolute % Cover		l.Strat. Cover	Indicator	Dominance Test worksheet:
Tree Stratum (Plot size: 30' radius)		_		Status	Number of Dominant Species
1. Triadica sebifera		_ _	76.9%	FAC	That are OBL, FACW, or FAC:6(A)
2. Quercus phellos	_ <u>10</u>	Ц.	15.4%	FACW	Total Number of Dominant
3. Fraxinus pennsylvanica	5	\sqcup	7.7%	FACW	Species Across All Strata:6(B)
4	0	\square	0.0%		
5	0_		0.0%		Percent of dominant Species That Are OBL_FACW_or_FAC: 100.0% (A/B)
6	0		0.0%		That Are OBL, FACW, or FAC: 100.0% (A/B)
7	-		0.0%	-	Prevalence Index worksheet:
8.	0		0.0%		Total % Cover of: Multiply by:
50% of Total Cover: 32.5 20% of Total Cover: 13	 65 =	- To:	tal Cover		0BL species 0 x 1 = 0
					FACW species 40 x 2 = 80
Sapling or Sapling/Shrub Stratum (Plot size: 30' radius			60.00/	F4.0	
1. Triadica sebifera		_ _	60.0%	FAC	FAC species $91 \times 3 = 273$
2. Fraxinus pennsylvanica		∠ _	40.0%	FACW	FACU species $2 \times 4 = 8$
3	0_	닖-	0.0%		UPL speci es x 5 =
4		닏.	0.0%		Column Totals: <u>133</u> (A) <u>361</u> (B)
5	_ 0	Ш.	0.0%		Prevalence Index = B/A = 2.714
6	0	\square	0.0%		Prevalence Index = B/A = <u>2.714</u>
7	_		0.0%		Hydrophytic Vegetation Indicators:
8	0		0.0%		1 - Rapid Test for Hydrophytic Vegetation
50% of Total Cover: 25 20% of Total Cover: 10	50 =	= Toi	tal Cover		1
					✓ 2 - Dominance Test is > 50%
Shrub Stratum (Plot size:)					У 3 - Prevalence Index is ≤3.0 1
1		\sqcup	0.0%		☐ Problematic Hydrophytic Vegetation ¹ (Explain)
2		\square	0.0%		
3	0		0.0%		Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
4	^		0.0%		be present, unless disturbed or problematic.
5	0		0.0%		Definition of Vegetation Strata:
6.	0		0.0%		Tree - Woody plants, excluding woody vines,
50% of Total Cover: 0 20% of Total Cover: 0	0 =	- To:	tal Cover		approximately 20 ft (6 m) or more in height and 3 in.
					(7.6 cm) or larger in diameter at breast height (DBH).
Herb Stratum (Plot size: 30' radius)		_			Sapling - Woody plants, excluding woody vines,
1. Rubus argutus	5	_	27.8%	FAC	approximately 20 ft (6 m) or more in height and less
2. Fraxinus pennsylvanica	4	✓_	22.2%	FACW	than 3 in. (7.6 cm) DBH.
3. Scleria oligantha	4	✓	22.2%	FAC	
4. Ulmus alata	2		11.1%	FACU	Sapling/Shrub - Woody plants, excluding vines, less
5. Carex flaccosperma	_ 1		5.6%	FACW	than 3 in. DBH and greater than 3.28 ft (1m) tall.
6. Dichanthelium commutatum	1		5.6%	FAC	Shrub - Woody plants, excluding woody vines,
7 Bignonia capreolata	1		5.6%	FAC	approximately 3 to 20 ft (1 to 6 m) in height.
8		\Box	0.0%		
9		$\overline{\Box}$	0.0%		Herb - All herbaceous (non-woody) plants, including
		\Box	0.0%		herbaceous vines, regardless of size, and woody
10		\Box	0.0%		plants, except woody vines, less than approximately 3 ft (1 m) in height.
11	=	Η-			
12	0	Ш_	0.0%		Woody vine - All woody vines, regardless of height.
50% of Total Cover: 9 20% of Total Cover: 3.6	18=	= To	tal Cover	•	Woody vine - All woody vines, regardless of fleight.
Woody Vine Stratum (Plot size: _30' radius)					
1	0		0.0%		
2.		\Box	0.0%		
3		\Box	0.0%		
		\Box	0.0%		
4		Η-			Hydrophytic
5	-	Ш_	0.0%		Vegetation
50% of Total Cover: 0 20% of Total Cover: 0	0 =	= To	tal Cover	•	Present? Yes No O
Remarks: (If observed, list morphological adaptations below).					
Remarks. (11 observed, list morphological adaptations below).					
*Indicator suffix - National status or professional desision assigned because D			-6 l b D	NC	

SOIL Sampling Point: SP49

Profile Descri	iption: (Des	scribe to	the depth	needed to d	ocument	the indic	ator or co	onfirm the	absence of indicators.)		
Depth		Matrix			_						
(inches) Color (moist) %		Color (ı	moist)	%	Type 1	Loc ²	Texture	Remarks			
0-3	10YR	3/1	90	10YR	4/6	5	С	М	Clay		
	10YR	4/1	5								
3-16	10YR	4/1	85	10YR	4/6	- 5			Clay		
			- 03		4/0				Clay		
	10YR	3/1									
		-	-								
					-			-			
¹ Type: C=Cond	entration. D	=Depletio	n. RM=Red	duced Matrix, C	S=Covere	ed or Coate	ed Sand Gr	ains ² Loca	ation: PL=Pore Lining. M=	Matrix	
Hydric Soil I	ndicators:								Indicators for Prob	olematic Hydric Soils ³ :	
Histosol (A	\1)			Poly	value Belo	ow Surface	(S8) (LRR	S, T, U)	1 cm Muck (A9)		
Histic Epip	edon (A2)						LRR S, T,		2 cm Muck (A10	` '	
Black Histi							1) (LRR O	•			
	Sulfide (A4)					d Matrix (F		,		F18) (outside MLRA 150A,B)	
	_ayers (A5)				leted Mati		-)			olain Soils (F19) (LRR P, S, T)	
	odies (A6) (L	RR P. T. L	1)	_		urface (F6	١			nt Loamy Soils (F20) (MLRA 153B)	
	ky Mineral (A					k Surface ('		Red Parent Mate		
	ence (A8) (L		, ., 0,							rk Surface (TF12)	
	k (A9) (LRR F					ssions (F8)			Other (Explain in	Remarks)	
	Below Dark S		11)		l (F10) (LF						
		-	11)				MLRA 151)				
	Surface (A1		1504)				(F12) (LR				
	rie Redox (A						RR P, T, U)			
	ck Mineral (S		, 5)			F17) (MLR			³ Indicators of hydrophytic vegetation and wetland hydrology must be present,		
	yed Matrix (S	54)					ILRA 150A,				
Sandy Red								LRA 149A)		s disturbed or problematic.	
Stripped M				Ano	malous Br	ight Loam	y Soils (F20)) (MLRA 14	9A, 153C, 153D)		
☐ Dark Surfa	ice (S7) (LRF	R P, S, T, l	J)								
Restrictive La	wor (if obs	omrod)i									
	iyer (ii obs	ervea):									
Type:						_			Hydric Soil Present?	Yes No	
Depth (inch	nes):					_			,		
Remarks:											



Photo 157: SP49 Soil Profile



Photo 158: SP49 Habitat

WETLAND DETERMINATION DATA FORM - Atlantic and Gulf Coastal Plain Region

Project/Site: McCoy 1300 Acre Site	City/County: Liberty Co	ounty	Sampling Date: 21-May-19
Applicant/Owner: Delta Land Services	State: Te	exas Sampling Poi	nt: SP50
Investigator(s): DESCO-Chris Little & Thomas Wilder	Section, Township, Ra	nge: S T	R
Landform (hillslope, terrace, etc.): Flat	Local relief (concave, co	onvex, none): none	Slope: 0.0 % / 0.0 °
0.1 1 (IDD 141DA) 1555	-		Datum: NAD 83
	3311482.303	Long.: 309083.741	
Soil Map Unit Name: League Clay, 0 to 1 percent slopes	ar? Yes • No	NWI classific	-
Are climatic/hydrologic conditions on the site typical for this time of year		(11 no) explain in i	· v · A · · · ·
Are Vegetation . , Soil . , or Hydrology . significant	tly disturbed? Are "	Normal Circumstances" pr	resent? Yes • No ·
Are Vegetation \square , Soil \square , or Hydrology \square naturally p	oroblematic? (If ne	eeded, explain any answer	s in Remarks.)
SUMMARY OF FINDINGS - Attach site map showing sa	mpling point location	ons, transects, impor	rtant features, etc.
Hydrophytic Vegetation Present? Yes No	To the Complet	Avon	
Hydric Soil Present? Yes No	Is the Sampled	Vas O Na 🔍	
Wetland Hydrology Present? Yes ○ No ●	within a Wetlan	ıd? fes 🔾 NO 🕓	
Remarks: HYDROLOGY			
Wetland Hydrology Indicators:		Socondary Indicator	rs (minimum of 2 required)
Primary Indicators (minimum of one required; check all that apply)		Surface Soil Cra	· · · · ·
Surface Water (A1) Aquatic Fauna (B1)	 13)		ated Concave Surface (B8)
High Water Table (A2) Marl Deposits (B1	•	Drainage Patter	·
Saturation (A3) Hydrogen Sulfide		Moss Trim Lines	` '
☐ Water Marks (B1) ☐ Oxidized Rhizosph	neres along Living Roots (C3)		
Sediment Deposits (B2)	ced Iron (C4)	Crayfish Burrow	rs (C8)
☐ Drift Deposits (B3) ☐ Recent Iron Redu	ction in Tilled Soils (C6)	Saturation Visib	le on Aerial Imagery (C9)
Algal Mat or Crust (B4) Thin Muck Surface	e (C7)	Geomorphic Pos	sition (D2)
☐ Iron Deposits (B5) ☐ Other (Explain in	Remarks)	Shallow Aquitare	
Inundation Visible on Aerial Imagery (B7)		✓ FAC-Neutral Tes	
☐ Water-Stained Leaves (B9)		Sphagnum mos	s (D8) (LRR T, U)
Field Observations: Surface Water Present? Yes No Depth (inches):			
Salidee Water Frederic			
Water Table Present? Yes No Depth (inches):		and Hydrology Present?	Yes ○ No •
Saturation Present? (includes capillary fringe) Yes No Depth (inches):		na riyarology Fresent:	ics of No o
Describe Recorded Data (stream gauge, monitoring well, aerial phot Remarks:	os, previous inspections)	, if available:	

Page 119 of 131 Received 03 March 2020 Sampling Point: SP50

SWG-2019-00722 Attachment A-PRM Mitigation Plan **VEGETATION** (Five/Four Strata) - Use scientific names of plants.

nants.	
Dominant	

Tree Stratum (Plot size: _30' radius)				Indicator Status	Dominance Test worksheet:			
Tree Stratum (Plot size: <u>30' radius</u>)	% Cover			Status	Number of Dominant Species			
1	0	Η-	0.0%		That are OBL, FACW, or FAC: 4 (A)			
2		Ц_	0.0%		Total Number of Dominant			
3	0	\sqcup_{-}	0.0%		Species Across All Strata: 4 (B)			
4	0_	\square_{-}	0.0%					
5	_ 0_	\square_{\perp}	0.0%		Percent of dominant Species That Are OBL_FACW_or_FAC: 100.0% (A/B)			
6			0.0%		That Are OBL, FACW, or FAC:			
7	_ 0		0.0%		Prevalence Index worksheet:			
8.	0		0.0%		Total % Cover of: Multiply by:			
50% of Total Cover: 0 20% of Total Cover: 0	0 =	= Tota	al Cover		0BL species 3 x 1 = 3			
					FACW speciles x 2 =			
Sapling or Sapling/Shrub Stratum (Plot size: 30' radius	_'		22.20/	510				
1. Morella cerifera		-	33.3%	FAC	FAC species $7 \times 3 = 21$			
2. Triadica sebifera		-	33.3%	FAC	FACU speciles $\frac{12}{}$ x 4 = $\frac{48}{}$			
3. Diospyros virginiana	1	∠ _	33.3%	FAC	UPL speci es0 x 5 =0			
4	0_	\sqcup_{-}	0.0%		Column Totals: <u>73</u> (A) <u>174</u> (B)			
5	0	\square _	0.0%		Dravalance Index D/A 2 204			
6	0		0.0%		Prevalence Index = B/A = 2.384			
7	0		0.0%		Hydrophytic Vegetation Indicators:			
8			0.0%		1 David Took for Undroubratic Variation			
50% of Total Cover: 1.5 20% of Total Cover: 0.6		= Tota	al Cover		1 - Rapid Test for Hydrophytic Vegetation			
		- 100	ui covci		✓ 2 - Dominance Test is > 50%			
Shrub Stratum (Plot size:)					✓ 3 - Prevalence Index is ≤3.0 ¹			
1	0	\sqcup_{-}	0.0%		☐ Problematic Hydrophytic Vegetation ¹ (Explain)			
2	0	$\sqcup_{_}$	0.0%					
3	0		0.0%		¹ Indicators of hydric soil and wetland hydrology must			
4			0.0%		be present, unless disturbed or problematic.			
5	0		0.0%		Definition of Vegetation Strata:			
6.	0		0.0%		Tree - Woody plants, excluding woody vines,			
50% of Total Cover: 0 20% of Total Cover: 0	0 =	= Tota	al Cover		approximately 20 ft (6 m) or more in height and 3 in.			
					(7.6 cm) or larger in diameter at breast height (DBH).			
Herb Stratum (Plot size: 30' radius)					Sanling Woody plants, evaluding woody vines			
1. Carex cherokeensis	40	✓ _	57.1%	FACW	Sapling - Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less			
2. Ambrosia artemisiifolia	10		14.3%	FACU	than 3 in. (7.6 cm) DBH.			
3. Cyperus virens	5		7.1%	FACW				
4. Rhynchospora caduca	3		4.3%	OBL	Sapling/Shrub - Woody plants, excluding vines, less			
5. Axonopus fissifolius	3	\Box	4.3%	FACW	than 3 in. DBH and greater than 3.28 ft (1m) tall.			
6 Triadica sebifera	3	\Box	4.3%	FAC	Charle Manda alondo avaledina viva advivina			
7 Solidago sempervirens		$\overline{\Box}$	2.9%	FACW	Shrub - Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.			
8. Sorghum halepense		$\overline{\Box}$	2.9%	FACU	approximately of to 20 it (1 to 0 iii) iii iielgitii			
		<u> </u>	1.4%	FAC	Herb - All herbaceous (non-woody) plants, including			
			1.4%	FACW	herbaceous vines, regardless of size, and woody			
		<u> </u>		FACVV	plants, except woody vines, less than approximately 3 ft (1 m) in height.			
11		<u>H</u> –	0.0%					
12	0_	Ш_	0.0%		Mandy wine All woody wines regardless of height			
50% of Total Cover: 35 20% of Total Cover: 14	=	= Tota	al Cover	'	Woody vine - All woody vines, regardless of height.			
Woody Vine Stratum (Plot size: _30' radius)								
1	0	П	0.0%					
2.		\Box^-	0.0%					
			0.0%					
3		H-						
4		<u>-</u>	0.0%		Hydrophytic			
5		Ш_	0.0%		Vegetation			
50% of Total Cover: 0 20% of Total Cover: 0		= Tota	al Cover		Present? Yes No			
Remarks: (If observed, list morphological adaptations below).								
*Indicator suffix = National status or professional decision assigned because Re	onional status i	not def	fined by FI	NS				

SOIL Sampling Point: SP50

Profile Descri	ption: (Des	scribe to	the depth	needed to	locument	the indic	ator or co	onfirm the	absence of indicators.)		
Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.) Depth Matrix Redox Features											
(inches) Color (moist) %		%	Color (moist)	%	Tvpe 1	Loc2	Texture	Remarks		
0-4	10YR	3/1	90	10YR	5/6	5	С	М	Clay		
	10YR	4/1	5								
4.10				10\/D	4/6	10			Clave		
4-18	10YR	3/1	90	10YR	4/6	10	C	M	Clay		
								-			
		-	-	-	-						
¹ Type: C=Concentration. D=Depletion. RM=Reduced Matrix, CS=Covered or Coated Sand Grains ² Location: PL=Pore Lining. M=Matrix											
Hydric Soil I	ndicators:								Indicators for Prof	plematic Hydric Soils ³ :	
Histosol (A	(1)			Pol	vvalue Belo	ow Surface	e (S8) (LRR	S, T, U)	1 cm Muck (A9)		
Histic Epip	edon (A2)						(LRR S, T,				
Black Histi							1) (LRR O	-	2 cm Muck (A10		
	Sulfide (A4)					d Matrix (F		,		(F18) (outside MLRA 150A,B)	
	ayers (A5)				oleted Mati		۷)			plain Soils (F19) (LRR P, S, T)	
_	odies (A6) (L	RRPTI	n			urface (F6)	`			nt Loamy Soils (F20) (MLRA 153B)	
	ky Mineral (A					• •	•		Red Parent Mate		
_	ence (A8) (L		, 1, 0)			Surface (rk Surface (TF12)	
_	c (A9) (LRR F					ssions (F8)			Other (Explain in	n Remarks)	
	Selow Dark S		11)		1 (F10) (LF						
		-	11)				MLRA 151)				
	Surface (A1		1504)				(F12) (LR				
	rie Redox (A						RR P, T, U)			
	ck Mineral (S		, 5)			F17) (MLR			³ Indicators	s of hydrophytic vegetation and	
	yed Matrix (S	54)					ILRA 150A,		wetland hydrology must be present,		
Sandy Red								ILRA 149A)		s disturbed or problematic.	
Stripped M				And	omalous Br	ight Loam	y Soils (F20	0) (MLRA 14	9A, 153C, 153D)		
☐ Dark Surfa	ice (S7) (LRF	R P, S, T, I	J)								
Restrictive La	ver (if obs	arvod):									
	iyei (ii obse	erveu).									
Type:									Hydric Soil Present?	Yes ○ No ●	
Depth (inch	les):					_			,	1.00 - 1.00 -	
Remarks:											



Photo 159: SP50 Soil Profile



Photo 160: SP50 Habitat

Page 122 of 131

Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772 February 26, 2020

Attachment F. Planting List

Table F-1. PRM Forested Project Planting List¹

Common Name ²	Scientific Name	AGCP Wetland Indicator ³	Percent Range of Composition
PFO Restoration		•	
Hard Mast (approximately 65-75)	%) <u> </u>		
water hickory	Carya aquatica	OBL	15-20
willow oak	Quercus phellos	FACW	15-20
water oak	Quercus nigra	FAC	15-20
cherrybark oak	Quercus pagoda	FACW	15-20
overcup oak	Quercus lyrata	FACW	<1-5
bottomland post oak	Quercus similis	FACW	<1-5
Soft Mast (approximately 15-25%	()	-!	1
sugarberry	Celtis laevigata	FACW	3-10
green ash	Fraxinus pennsylvanica	FACW	3-10
red maple	Acer rubrum	FAC	3-10
American elm	Ulmus americana	FAC	3-10
cedar elm	Ulmus crassifolia	FAC	3-10
black gum	Nyssa sylvatica	FAC	<1-5
parsley hawthorn	Crateagus marhsali	FAC	<1-5
arrowwood	Viburnum dentatum	FAC	<1-5
possumhaw	Ilex decidua	FACW	<1-5
green hawthorn	Crateagus viridus	FACW	<1-5
red mulberry	Morus rubra	FACU	<1-5

¹ The exact species and quantities for planting will be determined by the availability of such species from commercial nurseries providing localized ecotype seedlings.

 $^{^{2}}$ The above-referenced and subsequent scientific plant names are from NRCS 2020.

³ The wetland plant indicator status for the Atlantic and Gulf Coastal Plain per the 2016 National Wetland Plant List (Lichvar et al)

Table F-2. Potential herbaceous seed distribution list

Scientific Name	Common Name
Agalinis heterophylla	prairie algalinis
Ageratina altissima	snakeroot
Andropogon glomeratus	bushy bluestem
Andropogon virginicus	broomsedge bluestem
Aristida divaricata	poverty threeawn
Asteraceae	aster
Centaurea americana	American basket-flower
Coreopsis tinctoria	plains coreopsis
Elionurus sp.	balsamscale grass
Eragrostis trichodes	sand lovegrass
Eryngium yuccifolium	rattlesnake master
Helianthus sp.	sunflower
Koeleria macrantha	prairie Junegrass
Liatris pycnostachya	gayfeather blazing star
Monarda citridora	lemon mint
Muhlenbergia filipes	Gulf Coast muhly
Panicum virgatum	switchgrass
Paspalum floridanum	Florida paspalum
Paspalum plicatulum	brownseed paspalum
Persicaria sp.	smartweed
Rudbeckia maxima	giant coneflower
Solidago altissima	tall goldenrod
Sorghastrum nutans	Indiangrass
Sporobolus compositus	tall dropseed
Sporobolus cryptandrus	sand dropseed
Sporobolus clandestinus	rough dropseed
Sporobolus silveanus	Silveanus' dropseed
Guara longiflora	tall guara

^{*}Species may vary dependent on commercial availability

Table F-3. PRM Shrub Project Planting List¹

Common Name ²	Scientific Name	AGCP Wetland Indicator ³	Percent Range of Composition
parsley hawthorn	Crateagus marhsali	FAC	10-30%
arrowwood	Viburnum dentatum	FAC	10-30%
possumhaw	Ilex decidua	FACW	10-30%
green hawthorn	Crateagus viridus	FACW	10-30%
common buttonbush	Cephalanthus occidentalis	OBL	10-30%

¹ The exact species and quantities for planting will be determined by the availability of such species from commercial nurseries providing localized ecotype seedlings.

² The above-referenced and subsequent scientific plant names are from NRCS 2020.

³ The wetland plant indicator status for the Atlantic and Gulf Coastal Plain per the 2016 National Wetland Plant List (Lichvar et al)

Page 125 of 131

Received 03 March 2020
PFO, PSS, and PEM Permittee Responsible Mitigation Plan
SWG-2019-00772 February 26, 2020

Attachment G. Construction, Establishment, and Long-term Finances

Attachment A-PRM Mitigation Plan Costs Analysis COE SWG-2019-00772

Page 126 of 131 Received 03 March 2020

Item	Units	Unit Values	Price Per Unit	Total Cost
Boundary Maintenance	Mile	5.5	\$ 150.00	\$ 825.00
Mow Fire Lane	Mile	3.0	\$ 175.00	\$ 525.00
PFO Invasive Species Control	Acre	187.0	\$ 20.00	\$ 3,740.00
PFO Invasive Species Control Mobilization	Fixed	Fixed	Fixed	\$ 100.00
PEM/PSS Invasive Species Control	Acre	84.3	\$ 20.00	\$ 1,686.00
PEM/PSS Invasive Species Control Mobilization	Fixed	Fixed	Fixed	\$ 100.00
PFO Inspections (rate and per diem)	Day	1.0	\$ 700.00	\$ 700.00
PEM/PSS Inspections (rate and per diem)	Day	1.0	\$ 700.00	\$ 700.00
Taxes on PFO Project Acreage	Acre	187.0	\$ 10.00	\$ 1,870.00
Taxes on PEM Project Acreage	Acre	99.0	\$ 10.00	\$ 990.00
Herbaceous Planting Acreage	Acre	84.3	NA	NA
Herbaceous Planting Materials and Distribution	Seeds	10.0	\$ 50.00	\$ 42,150.00
Prescribed Fire (PEM/PSS)	Acre	84.3	\$ 50.00	\$ 4,215.00
Forest Planting Acreage	Acre	116.3	NA	NA
Site Prep per Acre (disking and ripping)	Acre	116.3	\$ 40.00	\$ 4,652.00
Site Prep per Acres (herbicides)	Acre	187.0	\$ 40.00	\$ 7,480.00
Seedling Planting Rate	Trees/Acre	436.0	NA	NA
Seedling Cost	Seedling	50706.8	\$ 0.22	\$ 11,155.50
Seedling Installation Rate	Seedling	50706.8	\$ 0.17	\$ 8,620.16
Seedling and Planting Cost	Seedling	50706.8	\$ 0.39	\$ 19,775.65
Shrub Planting Rate	shrub/acre	222.0	NA	
Shrub Costs	shrub	14230.2	\$ 0.22	\$ 3,130.64
Shrub Installation Rate	shrub	14230.2	\$ 0.17	\$ 2,419.13
Shrub and Planting Cost	shrub	14230.2	\$ 0.39	\$ 5,549.78
Hydrology Restoration (Earth Moving; blade/disk)	Cubic Yard	10000	\$ 0.50	\$ 5,000.00
Site Prep and Pre-emergent Spray (PFO)	Acre	187.0	\$ 100.00	\$ 18,700.00
Site Prep Herbaceous/PSS	Acre	84.3	\$ 40.00	\$ 3,372.00
Conservation Easement Acreage	Acre	276.6	NA	NA
PFO Mitigation Acres	Acre	187.0	100%	
PEM/PSS Mitigation Acres	Acre	84.3		

PFO and PEM Construction Costs COE SWG-2019-00722

PFO Construction Costs

Item	Units	Unit Values	Price Per Unit	Percent	Cost	
Hydrology Restoration	Cubic Yards	5000		100%	\$	2,500.00
PFO Invasive Species Control	Herbicide	187.0	\$ 40.00	100%	\$	7,480.00
PFO Invasive Species Mobilization	Application	100	-	100%	\$	100.00
PFO Site Prep (disking, ripping, and pre- emergent herbicide)	Acres	116.3	\$ 80.00	100%	\$	9,304.00
Planting (Seedlings and Installation)	Seedlings	50707	\$ 0.40	100%	\$	20,282.72
PFO Subtotal					\$	39,666.72
PFO Construction Cost with 5% Contingency					\$	41,650.06

Total PFO Construction \$ 41,650.06

Total PFO Construction and

Establishment \$ 117,634.00

PEM/PSS Construction Costs

Item	Units	Unit	Price	Percent	Cost	
110111	Onno	Values	Per Unit	. 0.00111		
Hydrology Restoration	Cubic Yards	5000	\$ 0.50	100%	\$	2,500.00
PEM/PSS Invasive Species Control	Herbicide	84.3	\$ 40.00	100%	\$	3,372.00
PEM/PSS Invasive Species Mobilizatio	Application	100	-	100%	\$	100.00
PEM/PSS Site Prep	Acres	84.3	40	100%	\$	3,372.00
Planting Materials and Distribution	Seeds	830	50	100%	\$	41,500.00
Prescribed Fire	Acres	84.3	50	100%	\$	4,215.00
Shrub Planting	seedlings	14230.0	0	100%	\$	5,692.00
PEM Subtotal					\$	60,751.00
PEM Construction Cost with 5%					\$	63,788.55
Contingency					Ф	03,700.33

Total PEM/PSS Construction \$ 63,788.55

Total PEM/PSS Construction and

Establishment \$ 103,020.08

Total PFO and PEM/PSS

Construction and Establishment

Costs \$ 220,654.08

PFO Establishment Costs for COE SWG-2019-00772

Year	Event	E	event Cost	Percent	Occurences /Year	Ye	ear 0 Cost	Inflationary Adjustment from Year 0	Percent of Cost
1	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
1	Replant (30%)	\$	19,775.65	30%	1	\$	5,932.70		
1	Invasive Species Control (100%)	\$	3,740.00	100%	1	\$	3,740.00		
1	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
1	Property Taxes Subtotal	\$ \$	1,870.00 24,215.65	100%	1	\$	1,870.00 12,342.70	\$ 12,645.09	19.0%
2	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00	\$ 12,045.05	19.076
2	Replant (10%)	\$	19,775.65	10%	1	\$	1,977.57		
2	Invasive Species Control (25%)	\$	3,740.00	100%	1	\$	3,740.00		
2	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
2	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
2	Subtotal	\$	26,185.65			\$	8,387.57	\$ 8,803.59	12.9%
3	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
3	Invasive Species Control (20%)	\$	3,740.00	50%	1	\$	1,870.00		
3	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
3	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00	A 4004.00	7.00/
3	Subtotal	\$	6,410.00	4000/	4	\$	4,540.00	\$ 4,881.93	7.0%
4	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
4	Invasive Species Control (10%) Invasive Species Mobilization	\$	3,740.00 100.00	50% 100%	1	\$	1,870.00		
4	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
4	Subtotal	\$	6,410.00	100/0		\$	4,540.00	\$ 5,001.54	7.0%
5	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00	5,001.04	11.570
5	Invasive Species Control (5%)	\$	3,740.00	40%	1	\$	1,496.00		
5	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
5	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
5	Subtotal	\$	6,410.00			\$	4,166.00	\$ 4,701.96	6.4%
6	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
6	Invasive Species Control (5%)	\$	3,740.00	30%	1	\$	1,122.00		
6	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
6	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
6	Subtotal	\$	6,410.00			\$	3,792.00	\$ 4,384.70	5.8%
7	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
7	Invasive Species Control (5%)	\$	3,740.00	20%	1	\$	748.00		
7	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
7 7	Property Taxes Subtotal	\$ \$	1,870.00	100%	1	\$ \$	1,870.00	\$ 4,049.07	5.3%
	Monitoring/ Inspection	\$	6,410.00 700.00	100%	1	\$	3,418.00 700.00	\$ 4,049.07	3.3%
8	Invasive Species Control (5%)	\$	3,740.00	100%	1	\$	374.00		
8	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
8	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
8	Subtotal	\$	6,410.00			\$	3,044.00	\$ 3,694.37	4.7%
9	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
9	Invasive Species Control (5%)	\$	3,740.00	5%	1	\$	187.00		
9	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
9	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
9	Subtotal	\$	6,410.00			\$	2,857.00	\$ 3,552.37	4.4%
10	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
	Invasive Species	\$	3,740.00	5%	1	\$	187.00		
	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
10	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
	Boundary Maintenance	\$	825.00	100%	1	\$	825.00	6 4000.00	E 70/
10	Subtotal Manitoring/Inspection	\$	7,235.00	100%	1	\$	3,682.00	\$ 4,690.33	5.7%
	Monitoring/ Inspection	\$	700.00 3,740.00	5%	1	\$	700.00 187.00		
11	Invasive Species Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
11	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
11	Subtotal	\$	13,645.00	100%	,	\$	2,857.00	\$ 3,728.57	4.4%
	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00	. 5,. 25.51	
12	Invasive Species	\$	3,740.00	5%	1	\$	187.00		
12	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
12	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
12	Subtotal	\$	20,055.00	100%		\$	2,857.00	\$ 3,819.92	4.4%
13	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
13	Invasive Species	\$	3,740.00	5%	1	\$	187.00		
13	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00		
13	Property Taxes	\$	1,870.00	100%	1	\$	1,870.00		
13	Subtotal	\$	26,465.00	100%		\$	2,857.00	\$ 3,913.50	4.4%
14	Monitoring/ Inspection	\$	700.00	100%	1	\$	700.00		
14	Invasive Species	\$	3,740.00	5%	1	\$	187.00		
14	Invasive Species Mobilization	\$	100.00	100%	1	\$	100.00	j	

PFO Establishment Costs for COE SWG-2019-00772

14	Property Taxes	\$ 1,870.00	100%	1	\$ 1,870.00		
14	Subtotal	\$ 32,875.00	100%		\$ 2,857.00	\$ 4,009.38	4.4%
15	Monitoring/ Inspection	\$ 700.00	100%	1	\$ 700.00		
15	Invasive Species	\$ 3,740.00	5%	1	\$ 187.00		
15	Invasive Species Mobilization	\$ 100.00	100%	1	\$ 100.00		
15	Property Taxes	\$ 1,870.00	100%	1	\$ 1,870.00		
15	Subtotal	\$ 39,285.00	100%		\$ 2,857.00	\$ 4,107.61	4.4%
	Inflationary rate (2001-2011)		2.45%			•	
	Total Establishment Cost			_	\$ 65.054.26	\$ 75.983.94	100.0%

Year	Event	Event Cost	Percent of Event Cost	Occurences Per Year	Cost		Percent of Cost	Release Milestone
1	Monitoring/ Inspection	\$ 100.00	100%	1	\$	100.00		
1	PEM/PSS Seed Replanting	\$ 42,150.00	30%	1	\$	12,645.00		
1	Invasive Species Mobilization/Contro	\$ 1,686.00	100%	1	\$	1,686.00		
1	Property Taxes	\$ 990.00	100%	1	\$	990.00		Initial Success
1	Subtotal				\$	15,421.00	39.3%	\$15,421.00
2	Monitoring/ Inspection	\$ 200.00	100%	1	\$	200.00		
2	PEM/PSS Seed Replanting	\$ 42,150.00	10%	1	\$	4,215.00		
2	Invasive Species Mobilization/Contro	\$ 1,786.00	100%	1	\$	1,786.00		
2	Mow Fire Lane	\$ 525.00	100%	1	\$	525.00		
2	Precribed Fire	\$ 4,215.00	100%	1	\$	4,215.00		
2	Property Taxes	\$ 990.00	100%	1	\$	990.00		
2	Subtotal				\$	11,931.00	30.4%	
3	Monitoring/ Inspection	\$ 200.00	100%	1	\$	200.00		
3	Invasive Species Mobilization/Contro	\$ 1,786.00	50%	1	\$	893.00		
3	Shrub Replanting	\$ 5,549.78	30%	1	\$	1,664.93		
3	Property Taxes	\$ 990.00	100%	1	\$	990.00		Interim Success
3	Subtotal				\$	3,747.93	9.6%	\$15,678.93
4	Monitoring/ Inspection	\$ 200.00	100%	1	\$	200.00		
4	Invasive Species Mobilization/Contro	\$ 1,686.00	40%	1	\$	674.40		
4	Property Taxes	\$ 990.00	100%	1	\$	990.00		
4	Subtotal				\$	1,864.40	4.8%	
5	Monitoring/ Inspection	\$ 200.00	100%	1	\$	200.00		
5	Invasive Species Mobilization/Contro	\$ 1,686.00	20%	1	\$	337.20		
5	Mow Fire Lane	\$ 525.00	100%	1	\$	525.00		
5	Precribed Fire	\$ 4,215.00	100%	1	\$	4,215.00		
5	Property Taxes	\$ 990.00	100%	1	\$	990.00		Long-term Success
5	Subtotal				\$	6,267.20	16.0%	\$8,131.60
	Total Establishment Cost				\$	39,231.53	100.00%	
. <u> </u>	Total PEM/PSS Construction and I	Establishment	Cost		\$	103,020.08		

PFO Long-term Land Management and Maintenance

Item	Units	Unit Values	Price Per Unit	Unit Percent		Cost	Years	A	Annualized Cost
Boundary Maintenance (5-year event)	Miles	5.50	\$ 150.00	100.0%	\$	825.00	5	\$	165.00
Annual Invasive Species Control	Acre	187.00	\$ 50.00	10.0%	\$	935.00	1	\$	935.00
Annual Inspection	Day	1.00	\$ 700.00	100.0%	\$	700.00	1	\$	700.00
Taxes (annual event)	Acre	187.00	\$ 10.00	100.0%	\$	1,870.00	1	\$	1,870.00
Average Ann	Average Annual Cost (Starting at Year 15)								3,670.00
Long-term La	nd Manage	ement and I	Ma <mark>intena</mark> nc	e Endowm	ent	(cap rate 3	.5%)	\$	104,857.14

PEM/PSS Long-term Land Management and Maintenance

Item	Units	Unit Values	Price Per Unit	Unit Percent	Cost		Years	A	nnualized Cost
Taxes on Project Acreage*	Acres	101.60	\$ 10.00	100.0%	\$	1,016.00	1	\$	1,016.00
Invasive Species Control*	Acres	101.60	\$ 50.00	25.0%	\$	1,270.00	1	\$	1,270.00
Prescribed Fire	Acres	84.30	\$ 40.00	33.0%	\$	1,112.76	1	\$	1,112.76
Mow Fire Lane	Mile	3.00	\$ 175.00	33.0%	\$	173.25	1	\$	173.25
Inspections (rate and per diem)	Day	1.00	\$ 700.00	100.0%	\$	700.00	1	\$	700.00
Average Annual Cost (Starting at Year 6)							\$	4,272.01	
Long-term La	e Endowm	ent	(cap rate 3	.5%)	\$	122,057.43			

^{*}Includes non-credit acres