



June 17, 2022

SERAC Capital Partners  
ATTN: Evan Wagner, Development Manager  
5051 Westheimer Road, Suite 1700  
Houston, TX 77056

SENT VIA EMAIL TO: [ewagner@seraccapital.com](mailto:ewagner@seraccapital.com)

**RE: Lot 3 of Steamboat Village Commercial Center Replat F – Wetland Delineation**

Dear Evan:

At your request I visited the subject parcel on June 16, 2022, to establish whether wetlands exist that may be subject to federal jurisdiction under Section 404 of the Clean Water Act (CWA). Wetlands had previously been delineated on the subject parcel in 2004, within a ditch that traverses the parcel between Pine Grove Road and Central Park Drive. During my site visit I examined vegetation, soil, and hydrological characteristics according to protocol set forth in the 1987 COE Wetland Delineation Manual<sup>1</sup> and the 2010 Regional Supplement for the Western Mountains, Valleys, and Coast Region<sup>2</sup>. Vegetation growing on the site was referenced to the National Wetland Plant List, v3.5<sup>3</sup>.

The previously delineated wetland was dominated by reed canarygrass, with subdominants including Nebraska sedge and Colorado rush. These species are all considered as weak indicators of wetlands. Hydric soils were observed at each of the 3 sample plots examined. However, evidence of saturation within the root zone was notably absent within each plot. Regulations implementing the CWA define wetlands as: *...areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.* For an area to be a federally jurisdictional wetland, the 1987 Wetland Delineation Manual and 2010 Supplement require for it to be dominated by hydrophytic vegetation, exhibit hydric soils, and possess wetland hydrology. If any one of these indicators is absent, the site is not subject to federal jurisdiction under the CWA.

While the ditch is dominated by hydrophytic vegetation and presents hydric soils, it does not exhibit evidence of wetland hydrology. Based on the defining characteristics of wetlands presented in the 1987 Wetland Delineation Manual and the 2010 Supplement, the site therefore fails to meet the COE definition of wetland and is not subject to federal jurisdiction under Section 404 of the CWA. There is no further communication required with the COE prior to developing the parcel.

If I can be of further assistance, please do not hesitate to contact me.

Sincerely,  
**Western Bionomics Inc.**

**Kelly Colfer**  
President

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<sup>1</sup> U.S. Army Corps of Engineers. 1987. Technical Report Y-87-1, U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS.

<sup>2</sup> U.S. Army Corps of Engineers. 2010. US Army Engineer Research and Development Center, Environmental Laboratory, ERDC/EL TR-10-3, Vicksburg, MS.

<sup>3</sup> U.S. Army Corps of Engineers. 2020. National Wetland Plant List, version 3.5, <http://wetland-plants.usace.army.mil/>