SAJ-2023-00198 (AJD-VEK)

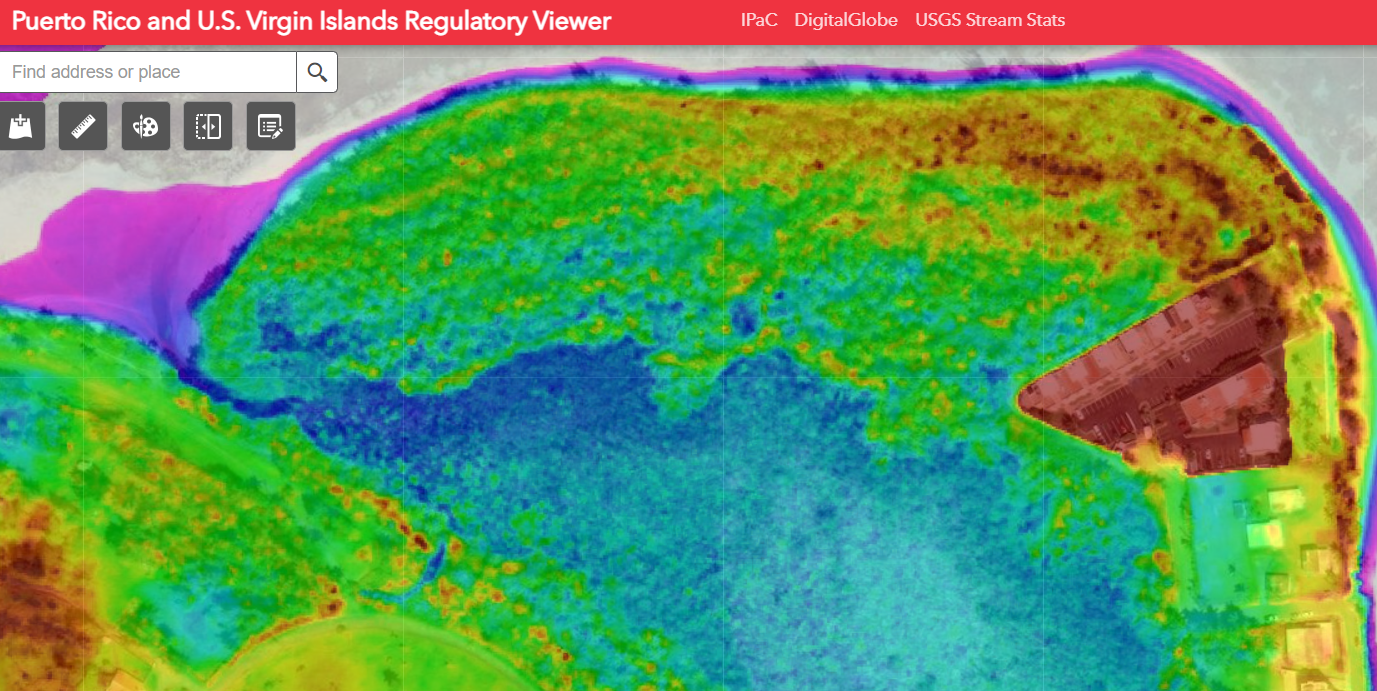
PM: Virginia King

Date received by the PDT: 7 April 2023

Comments Due to the PM: 13 April 2023

Comments:

1. Aquatic Resources Figure: Please denote a(1) and a(3) waters on the figure. Also, please show the location of Mata de Platano Creek.
2. Mata de Platano Creek is identified as an a(3) tributary. Is Mato de Platano located within the review area? Is Mata de Platano a relatively permanent water or non-relatively permanent water?
3. Do we have any information, data and/or figure that supports the statement that Mata de Platano Creek directly influences the hydrologic regime of the riparian mangrove wetland through an unbroken surface and/or shallow subsurface connection?
4. Wetland Data Sheets: I would recommend encouraging the use of the Automated Datasheets for the Caribbean Islands Region for consultants and for review of datasheets. Additionally, the order to determine the presence or absence of a hydrophytic vegetation community is the Rapid Test, Dominance Test, and then the Prevalence Test. A Prevalence Test cannot be used to debunk a Rapid Test or Dominance Test. The following species noted on the datasheets are considered problematic vegetation in Chapter 5 of the Caribbean Islands Region Supplement: tropical almond (Terminalia catappa), coconut palm (Cocos nucifera).
   1. SP1
      1. Vegetation: *Dalbergia ecastaphyllum* is a dominate species, Not dominate was selected.
      2. Hydrology: Surface water recorded in field observations but A1 was not selected on the datasheet. Also, the sample point met the FAC Neutral Test (D6).
      3. Soils: Soils not sampled because dominate species were OBL and FACW. The 1987 USACE Wetland Delineation Manual states that soils do not need to be characterized in areas were all dominate plant species are OBL or FACW and the wetland boundary is abrupt. There is no indication in the consultant’s delineation report that the boundary is abrupt.
   2. SP2
      1. Vegetation: The wetland indicator status of *Terminalia catappa* is FACU rather than FAC. *Dalbergia ecastaphyllum* is a dominate species, Not dominate was selected. The Dominance Test was not calculated.
      2. Soil: Texture is incorrect. Should be sandy or loamy clayey rather than sandy loam.
   3. SP3
      1. Vegetation: *Dalbergia ecastaphyllum* is a dominate species, Not dominate was selected.
      2. Hydrology: Surface water recorded in field observations but A1 was not selected on the datasheet. Also, the sample point met the FAC Neutral Test (D6).
      3. Soils: Soils not sampled because dominate species were OBL and FACW. The 1987 USACE Wetland Delineation Manual states that the soil is assumed to be hydric and soils do not need to be characterized in areas were all dominate plant species are OBL or FACW and the wetland boundary is abrupt. There is no indication in the consultant’s delineation report that the boundary is abrupt.
   4. SP4
      1. Vegetation: The wetland indicator status of *Calophyllum inophyllum* is UPL rather than FAC. The Dominance Test was not used and the Prevalance Index was incorrectly calculated. The Dominance Test results in a Percent Dominant Species of 66.7%; therefore, Hydrophytic Vegetation is present at this sample location.
      2. Soil: Texture is incorrect. Should be sandy or loamy clayey rather than sandy loam.
   5. SP5
      1. Soils: Texture is incorrect and should be loamy clayey for F hydric soil indicators area selected. Does not meet the indicator selected (F3-Depleted Matrix). F3-Depleted Matrix requires a minimum thickness of either a) 2 inches if the 2 inches start at a depth of 4 inches or less from the soil surface OR b) 6 inches starting at depth of 10 or less inches from the soil surface. The profile meets this requirement; however, redox concentrations, including soft iron including soft iron--manganese masses and/or pore linings, are required in soils with matrix colors of 4/1, 4/2, or manganese masses and/or pore linings, are required in soils with matrix colors of 4/1, 4/2, or 5/2. No redox concentrations were noted on the data sheet. 10YR 3/1 could be indicative of an iron/manganese complex; however, the consultant chose depletion rather than concentration.
      2. Hydrology: Saturation was recorded in the field observations; however, A3-Saturation was not selected on the data sheet. Additionally, use of A3-Saturation must be associated with an existing water table located immediately below the saturated zone; however, this requirement is waived under episaturated conditions if there is a restrictive soil layer or bedrock within 12 in. (30 cm) of the surface. Neither of these conditions were noted on the datasheet. Also, the sample point met the FAC Neutral Test (D6).
   6. SP6
      1. Vegetation: The Dominance Test was not calculated.
      2. Soils: Texture is incorrect. Should be sandy or loamy clayey rather than sandy loam. In the second layer the 10YR 4/2 20% should be in redox features and classified as a depletion.
      3. Hydrology: Please run the APT to determine if the sample was taken during the dry season. If it was the dry season or a period of drought, hydrology indicator C2-Dry Season Water Table may apply.
   7. SP7
      1. Vegetation: The wetland indicator status of *Laguncularia racemose* is OBL, rather than FACW.
      2. Soils: Soils not sampled; however, soils should have been sampled at this location. Hydric soils are assumed and soil sampling does not have to occur in the following situations: a) All dominant species are OBL, **OR** b) All dominants are OBL or FACW and the wetland boundary is abrupt. *Cocos nucifera* has an wetland indicator status of FACU.
      3. Hydrology: Surface water recorded in field observations but A1 was not selected on the datasheet. Also, the sample point met the FAC Neutral Test (D6).
   8. SP8
      1. Vegetation: The Dominance Test was not calculated. C*alophyllum inophyllum* is not a dominate species. The Dominance Test indicates that the sampling point is located within a Hydrophytic Vegetation Community.
      2. Soils: Texture is incorrect. Should be sandy or loamy clayey rather than sandy loam. In the second layer the 10YR 4/2 20% should be in redox features and classified as a depletion.
5. I recommend using the DEM available in the NRV (see screen shot below). There may be wetland areas missed along the northern boundary of the propose wetland line. Additionally sample points SP2, SP4 and SP8 have errors that may indicate that these points were taken in wetlands.



1.  The NOAA Sea Level Rise Tool (<https://coast.noaa.gov/slr/>) is a great tool to look at areas that are susceptible to shallow coastal flooding. This may help identify areas were datasheets should be collected.
2. Please ensure documents used to make AJD determination are located in the Jurisdictional Determination Folder in the project E-File.
3. A site inspection is recommended to verify the wetland delineation and support the AJD determination.