

Request for Additional Information

SAJ-2023-00198

Please see the comments below requesting additional information to assist in the processing of the Approved Jurisdictional Determination associated with the parcels at Punta la Bandera in Luquillo, PR (SAJ-2023-00198).

- 1.) Data Sheets:** The comments below correspond to specific data sheets that were provided with the application materials. Please either correct these items or provide the missing information and resubmit the data sheets for the administrative record.

a. Sampling Point 1 (SP1)

Vegetation:

- i. *Dalbergia ecastaphyllum* is a dominate species, but Not dominate (N) was selected. Please correct this to a dominate species (Y) for the woody vine stratum.
- ii. As all dominant species across all strata are OBL or FACW, the rapid test for hydrophytic vegetation is met. Therefore, please delete the input included in the box for the dominance test since it is not necessary.

Hydrology:

- i. Surface water was recorded in field observations but A1 was not selected on the datasheet. Please select A1.
- ii. This sample point met the FAC Neutral Test (D6), but it was not selected on the datasheet. Please select D5.
- iii. Please select any other wetland hydrology indicators that were observed. For example, based on the data provided in the report, it is likely that Geomorphic Position (D2) was also met based on the change in topography along the wetland/upland boundary.

Soils:

- i. Soils were 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 where all dominate plant species are OBL or FACW and the wetland boundary is abrupt. There is no indication in the data sheets that the boundary is abrupt, but the delineation report did suggest changes in topography along the wetland/upland boundary. Please include this observation in the remarks to justify why soils were not sampled in this location.

b. Sampling Point 2 (SP2)

Vegetation:

- i. The wetland indicator status of *Terminalia catappa* is FACU rather than FAC. Please correct this on the data sheet.
- ii. *Dalbergia ecastaphyllum* is a dominate species, Not dominate was selected. Please correct this to dominant for the woody wine stratum.
- iii. The Dominance Test was not calculated. Please update this box in the datasheet to show that the plot does not pass the dominance test.

- iv. Since *Terminalia catappa* is FACU rather than FAC, please correct the calculations for the Prevalence Index. Note that based on these changes your Prevalence Index should tally to 3.45 and still not indicate that hydrophytic vegetation is present.

Soils:

- i. Soil texture is incorrect for both layers per the categories of textures within the Caribbean Supplement. "Sandy soils" refers to soil materials with a USDA soil texture of loamy fine sand and coarser. Therefore, please clarify whether these soils were either "sandy" or "loamy clayey" on the data sheet rather than sandy loam.

c. Sampling Point 3 (SP3)

Vegetation:

- i. *Dalbergia ecastaphyllum* is a dominate species, Not dominate was selected. Please correct this to dominant for the woody vine stratum.
- ii. As all dominant species across all strata are OBL or FACW, the rapid test for hydrophytic vegetation is met. Therefore, please delete the input included in the box for the dominance test since it is not necessary.

Hydrology:

- i. Surface water was recorded in field observations but A1 was not selected on the datasheet. Please select A1.
- ii. This sample point met the FAC Neutral Test (D6), but it was not selected on the datasheet. Please select D5.
- iii. Please select any other wetland hydrology indicators that were observed. For example, based on the data provided in the report, it is likely that Geomorphic Position (D2) was also met based on the change in topography along the wetland/upland boundary.

Soils:

- i. Soils were 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 where all dominate plant species are OBL or FACW and the wetland boundary is abrupt. There is no indication in the data sheets that the boundary is abrupt, but the delineation report did suggest changes in topography along the wetland/upland boundary. Please include this observation in the remarks to justify why soils were not sampled in this location.

d. Sampling Point 4 (SP4)

Vegetation:

- i. The wetland indicator status of *Calophyllum inophyllum* is UPL rather than FAC. Please correct this on the data sheet.
- ii. The Dominance Test was not calculated. Please update this box in the datasheet to show that the plot does not pass the dominance test.
- iii. Since *Calophyllum inophyllum* is UPL rather than FAC, please correct the calculations for the Prevalence Index. Note that based on these changes your

Prevalence Index should tally to 3.3 and still not indicate that hydrophytic vegetation is present.

Soils:

- i. Soil texture is incorrect for both layers per the categories of textures within the Caribbean Supplement. "Sandy soils" refers to soil materials with a USDA soil texture of loamy fine sand and coarser. Therefore, please clarify whether these soils were either "sandy" or "loamy clayey" on the data sheet rather than sandy loam.

e. Sampling Point 5 (SP5)

Soils:

- i. Soil texture is incorrect for both layers per the categories of textures within the Caribbean Supplement. "Sandy soils" refers to soil materials with a USDA soil texture of loamy fine sand and coarser. Therefore, please clarify whether these soils were either "sandy" or "loamy clayey" on the data sheet rather than sandy loam. Note that S hydric soil indicators can only be applied to soils with sandy textures and F hydric soil indicators can only be applied to soils with fine textures (such as loamy very fine sand and finer like clayey soil materials)
- ii. The soil profile provided 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. In order to meet F3, the soil texture would have to be fine and the 10YR 3/1 noted in the second soil layer would have to be a concentration rather than a depletion. If this is the case, please correct the errors on the data sheet.

Hydrology:

- i. 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. If these conditions apply, please correct the data sheet to select A3 and provide remarks supporting this information.
- ii. This sample point met the FAC Neutral Test (D6), but it was not selected on the datasheet. Please select D5.
- iii. Please select any other wetland hydrology indicators that were observed. For example, based on the data provided in the report, it is likely that Geomorphic Position (D2) was also met based on the change in topography along the wetland/upland boundary

f. Sampling Point 6 (SP6)

Vegetation:

- i. The Dominance Test was not calculated. Please update this box in the datasheet to show that the plot does not pass the dominance test.

Soils:

- i. Soil texture is incorrect for both layers per the categories of textures within the Caribbean Supplement. "Sandy soils" refers to soil materials with a USDA soil texture of loamy fine sand and coarser. Therefore, please clarify whether these soils were either "sandy" or "loamy clayey" on the data sheet rather than sandy loam.
- ii. In the second layer the 10YR 4/2 20% should be documented under the redox features boxes and classified as a depletion. It is currently incorrectly documented as another matrix color.

g. Sampling Point 7 (SP7)

Vegetation:

- i. The wetland indicator status of *Laguncularia racemosa* is OBL, rather than FACW. Please correct this on the data sheet.
- ii. A percentage of 20 for total cover was entered for the woody vine stratum but no species was entered. If this is simply a typo, please remove the 20% from the data sheet.

Hydrology:

- i. Surface water was recorded in field observations but A1 was not selected on the datasheet. Please select A1.
- ii. This sample point met the FAC Neutral Test (D6), but it was not selected on the datasheet. Please select D5.
- iii. Please select any other wetland hydrology indicators that were observed. For example, based on the data provided in the report, it is likely that Geomorphic Position (D2) was also met based on the change in topography along the wetland/upland boundary.

h. Sampling Point 8 (SP8)

Vegetation:

- i. *Calophyllum inophyllum* is not a dominate species in the tree stratum since it is not 50% or 20% of the total cover.
- ii. The Dominance Test was not calculated. Please update this box in the datasheet to show that the plot passes the dominance test.
- iii. Please delete the Prevalence Index calculations since the plot passes the dominance test
- iv. Please select "Yes" that hydrophytic vegetation is present in the two locations (summary of findings section and vegetation section) on the first page of SP8

Soils:

- i. Soil texture is incorrect for both layers per the categories of textures within the Caribbean Supplement. "Sandy soils" refers to soil materials with a USDA soil texture of loamy fine sand and coarser. Therefore, please clarify whether these

soils were either “sandy” or “loamy clayey” on the data sheet rather than sandy loam.

- ii. In the second layer the 10YR 4/2 20% should be documented under the redox features boxes and classified as a depletion. It is currently incorrectly documented as another matrix color.

2.) Additional Information: The comments below correspond to additional information that requires clarity for the administrative record associated with the AJD. Please either correct these items or provide the missing information and resubmit.

a. Lidar data obtained by the Corps (see Figure A below) indicates that there is a direct surface water connection from the Atlantic Ocean (a Section 10 Water) to the north of the review area into the wetlands delineated in the report provided. The report also noted this tidal connection between the Atlantic Ocean and wetlands in the review area is known as Mata de Platano Creek. It is unclear from the delineation map provided (see Figure B below) whether portions of Mata de Platano Creek are included within the review area for the Approved Jurisdictional Determination, and where the potential boundary between Section 10 Waters and Section 404 Waters is located. Therefore, please provide the following:

- i. Map or graphic clearly depicting the location of the review area for the AJD and surrounding tidal waters, including the MHWL limits of the Atlantic Ocean and Mata de Platano Creek in relation to the wetland area. This graphic should clearly illustrate whether Mata de Platano Creek is in the review area for the AJD.
- ii. Please provide a graphic of the OHWM and the MHWL for the tidally influenced Mata de Platano Creek.
- iii. Please confirm whether Mata de Platano Creek is a relatively permanent water or a non-relatively permanent water.

b. Please provide a shape file (such as a Google Earth kmz file) of the wetland delineation polygon as depicted in Figure B below.

c. If available, please provide any photographs taken during the site visit(s) when data sheets were collected. Any photographs of the wetland/ upland boundary and the interaction between Mata de Platano Creek, the Atlantic Ocean, and the wetlands delineated will assist in supporting the AJD.

Figure A: Lidar Data

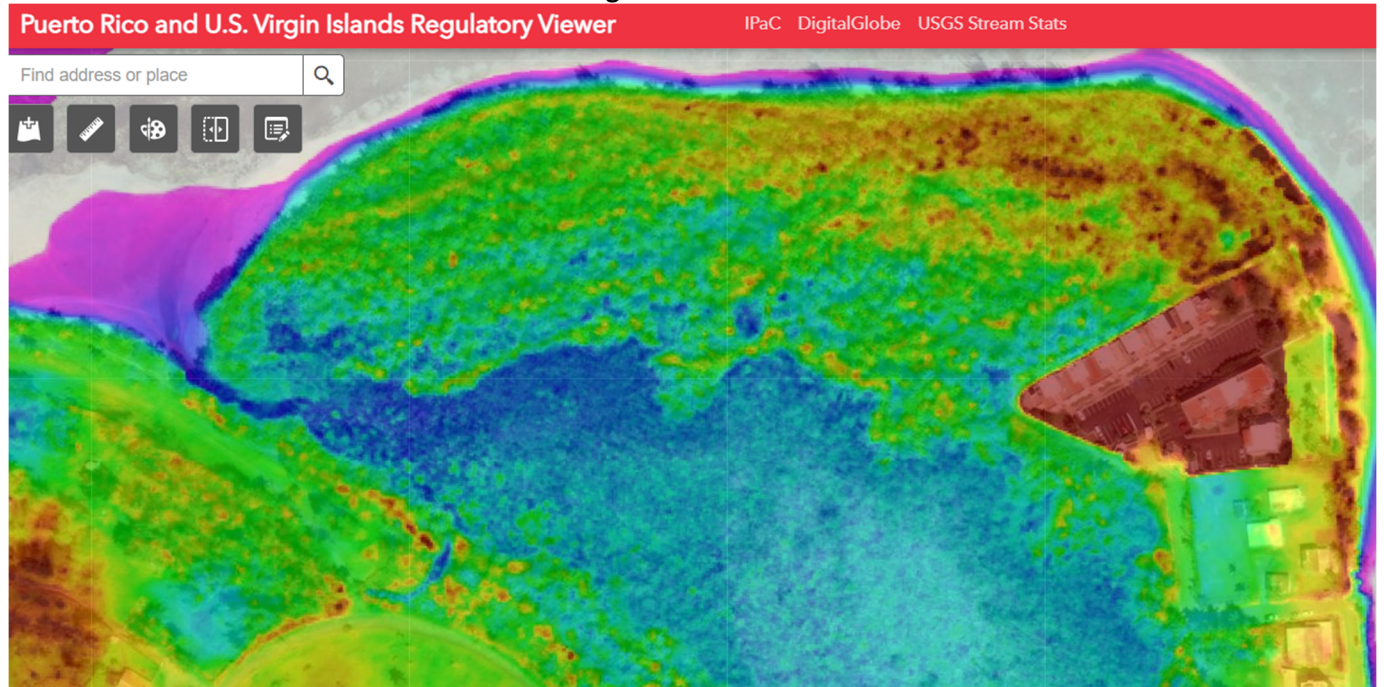


Figure B: Delineation Map

