

APPROVED JURISDICTIONAL DETERMINATION FORM
U.S. Army Corps of Engineers

This form should be completed by following the instructions provided in Section IV of the JD Form Instructional Guidebook.

SECTION I: BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (JD): 4/17/2020

B. DISTRICT OFFICE, FILE NAME, AND NUMBER: NAB-2005-02264-P12 (Camp Hope Run Landfill)

C. PROJECT LOCATION AND BACKGROUND INFORMATION: REVIEW AREA is the area within the limit of disturbance as depicted on the approved plans.

State: Pennsylvania County: Clearfield City: south of Hyde, on the west side of Route 153, in Boggs Township, Clearfield County, Pennsylvania.

Center coordinates of site (t): Lat. 40 55' 51.03" N Long. -78 23' 39.21" W
Universal Transverse Mercator: Northing Easting

Name of nearest waterbody: an unnamed tributary to Camp Hope Run, the mainstem of Camp Hope Run and unnamed tributaries to Sanbourn Run which flow to Clearfield Creek, then to the West Branch of the Susquehanna River

Name of nearest Traditional Navigable Water (TNW) into which the aquatic resource flows: West Branch of the Susquehanna River. Clearfield Creek. Closest Interstate Navigable in fact waters is Clearfield Creek. Clearfield creek receives the leachate discharge directly.

Name of watershed or Hydrologic Unit Code (HUC):020502

- Check if map/diagram of review area and/or potential jurisdictional areas is/are available upon request.
 Check if other sites (e.g., offsite mitigation sites, disposal sites, etc...) are associated with this action and are recorded on a different JD form.

D. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):

- Office (Desk) Determination. Date:
 Field Determination. Date(s): August 13, 2012, October 24, 2012, April 27, 2018 and June 18, 2018

SECTION II: SUMMARY OF FINDINGS

A. RHA SECTION 10 DETERMINATION OF JURISDICTION.

There are **no** "navigable waters of the U.S." within Rivers and Harbors Act (RHA) jurisdiction (as defined by 33 CFR part 329) in the review area. [Required]

- Waters subject to the ebb and flow of the tide.
 Waters are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce.
Explain:

B. CWA SECTION 404 DETERMINATION OF JURISDICTION. REVIEW AREA is the area within the limit of disturbance found on the Wetland and Stream Impact Key Map, completed by Stantec.

There are **waters of the U.S.** within Clean Water Act (CWA) jurisdiction (as defined by 33 CFR part 328) in the review area. [Required]

1. Waters of the U.S.

a. Indicate presence of waters of U.S. in review area (check all that apply):¹

- TNWs, including territorial seas
 Wetlands adjacent to TNWs
 Relatively permanent waters² (RPWs) that flow directly or indirectly into TNWs
 Non-RPWs that flow directly or indirectly into TNWs
 Wetlands directly abutting RPWs that flow directly or indirectly into TNWs (Wetland 1A)
 Wetlands adjacent to but not directly abutting RPWs that flow directly or indirectly into TNWs
 Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs
 Impoundments of jurisdictional waters
 Isolated (interstate or intrastate) waters, including isolated wetlands

b. Identify (estimate) size of waters of the U.S. in the review area:

Non-wetland waters: Camp Hope Run (66 linear feet); CHR5S unnamed tributary to Camp Hope Run (77 linear feet); UNTCHR-04 unnamed tributary to Camp Hope Run (560 linear feet); and CHR9S unnamed tributary to Camp Hope Run (185 linear feet).

Wetlands: CHR10W is a PEM wetland that is 0.02 acre; Wet 11 is a PEM wetland that is 0.06 acre; and CHR10W is a PEM wetland that is 0.01 acre.

¹ Boxes checked below shall be supported by completing the appropriate sections in Section III below.

² For purposes of this form, an RPW is defined as a tributary that is not a TNW and that typically flows year-round or has continuous flow at least "seasonally" (e.g., typically 3 months).

c. Limits (boundaries) of jurisdiction based on:
Elevation of established OHWM (if known):

2. Non-regulated waters/wetlands (check if applicable):³

Potentially jurisdictional waters and/or wetlands were assessed within the review area and determined to be not jurisdictional. Explain: A vast majority of the site has been impacted by past surface mining and reclamation activities. Stormwater Basins SB-2 and SB-4 were constructed during the mining reclamation period and have not been abandoned according to DEP's Office of Mining. None of these basins are jurisdictional. During my field view, I noted no surface connections to waterways nor are they adjacent to any jurisdictional waterways. Wetlands 3A1 and 3A2 located at the outlet of SB-4, had no visible above ground connection to any waterbodies nor were adjacent to any jurisdictional waterways. Numerous mining roads go through the site and some of the wetlands appear to occur as a result of the construction of these roads. They include Wetland 1-G1, 1-G2, 1-G3 and 1-H1. During my field view I observed no visible above ground connections to these sites nor were they adjacent to any jurisdictional waterways. Wetland 5, 1-2, 2-3, 2-3A, CHR5W, CHR8W and CHR9W were found on the side slopes and during my field view I saw no visible above ground connections to any jurisdictional waterways nor were they adjacent to any waterways. CHR6S is an ephemeral channel that appears to be a man-made linear feature (constructed in uplands) that does not appear to receive any subsurface flow and thus only flows during rain events. The destruction of all the above mentioned waters would not appear to effect the chemical, physical, and biological integrity of a TNW (no significant nexus to a TNW), since they have no surface connections to waters.

SECTION III: CWA ANALYSIS

A. TNWs AND WETLANDS ADJACENT TO TNWs

The agencies will assert jurisdiction over TNWs and wetlands adjacent to TNWs. If the aquatic resource is a TNW, complete Section III.A.1 and Section III.D.1. only; if the aquatic resource is a wetland adjacent to a TNW, complete Sections III.A.1 and 2 and Section III.D.1.; otherwise, see Section III.B below.

1. TNW

Identify TNW:

Summarize rationale supporting determination:

2. Wetland adjacent to TNW

Summarize rationale supporting conclusion that wetland is "adjacent":

B. CHARACTERISTICS OF TRIBUTARY (THAT IS NOT A TNW) AND ITS ADJACENT WETLANDS (IF ANY):

This section summarizes information regarding characteristics of the tributary and its adjacent wetlands, if any, and it helps determine whether or not the standards for jurisdiction established under Rapanos have been met.

The agencies will assert jurisdiction over non-navigable tributaries of TNWs where the tributaries are "relatively permanent waters" (RPWs), i.e. tributaries that typically flow year-round or have continuous flow at least seasonally (e.g., typically 3 months). A wetland that directly abuts an RPW is also jurisdictional. If the aquatic resource is not a TNW, but has year-round (perennial) flow, skip to Section III.D.2. If the aquatic resource is a wetland directly abutting a tributary with perennial flow, skip to Section III.D.4.

A wetland that is adjacent to but that does not directly abut an RPW requires a significant nexus evaluation. Corps districts and EPA regions will include in the record any available information that documents the existence of a significant nexus between a relatively permanent tributary that is not perennial (and its adjacent wetlands if any) and a traditional navigable water, even though a significant nexus finding is not required as a matter of law.

If the waterbody⁴ is not an RPW, or a wetland directly abutting an RPW, a JD will require additional data to determine if the waterbody has a significant nexus with a TNW. If the tributary has adjacent wetlands, the significant nexus evaluation must consider the tributary in combination with all of its adjacent wetlands. This significant nexus evaluation that combines, for analytical purposes, the tributary and all of its adjacent wetlands is used whether the review area identified in the JD request is the tributary, or its adjacent wetlands, or both. If the JD covers a tributary with adjacent wetlands, complete Section III.B.1 for the tributary, Section III.B.2 for any onsite wetlands, and Section III.B.3 for all wetlands adjacent to that tributary, both onsite and offsite. The determination whether a significant nexus exists is determined in Section III.C below.

1. Characteristics of non-TNWs that flow directly or indirectly into TNW

³ Supporting documentation is presented in Section III.F.

⁴ Note that the Instructional Guidebook contains additional information regarding swales, ditches, washes, and erosional features generally and in the arid West.

(i) General Area Conditions:

Watershed size: _____
Drainage area: _____
Average annual rainfall: _____ inches
Average annual snowfall _____ inches

(ii) Physical Characteristics:

(a) Relationship with TNW:

- Tributary flows directly into TNW.
- Tributary flows through tributaries before entering TNW.

Project waters are _____ river miles from TNW.
Project waters flow into an RPW within the project site.
Project waters are _____ aerial (straight) miles from TNW.
Project waters are _____ aerial (straight) miles from RPW.
Project waters cross or serve as state boundaries. Explain:

Identify flow route to TNW⁵: .

Tributary stream order, if known:

(b) General Tributary Characteristics (check all that apply):

Tributary is: Natural
 Artificial (man-made). Explain:
 Manipulated (man-altered). Explain:

Tributary properties with respect to top of bank (estimate):

Average width: feet
Average depth: feet to top of bank
Average side slopes:

Primary tributary substrate composition (check all that apply):

- Silts Sands Concrete
- Cobbles Gravel Muck
- Bedrock Vegetation. Type % cover:
- Other. Explain:

Tributary condition/stability [e.g., highly eroding, sloughing banks]. Explain: highly erodible vertical banks on the east side of Route 74

Presence of run/riffle/pool complexes. Explain:

Tributary geometry:

Tributary gradient (approximate average slope):

(c) Flow:

Tributary provides for:

Estimate average number of flow events in review area/year:

Describe flow regime:.

Other information on duration and volume:

Surface flow is: Characteristics: Surface flow is confined to between bed and banks a majority of the time.

Subsurface flow: Explain findings:

- Dye (or other) test performed:

Tributary has (check all that apply):

- Bed and banks
- OHWM⁶ (check all indicators that apply):
 clear, natural line impressed on the bank the presence of litter and debris

⁵ Flow route can be described by identifying, e.g., tributary a, which flows through the review area, to flow into tributary b, which then flows into TNW.
⁶A natural or man-made discontinuity in the OHWM does not necessarily sever jurisdiction (e.g., where the stream temporarily flows underground, or where the OHWM has been removed by development or agricultural practices). Where there is a break in the OHWM that is unrelated to the waterbody's flow regime (e.g., flow over a rock outcrop or through a culvert), the agencies will look for indicators of flow above and below the break

- changes in the character of soil destruction of terrestrial vegetation
- shelving the presence of wrack line
- vegetation matted down, bent, or absent sediment sorting

- | | | | |
|--------------------------|--------------------------------------|--------------------------|--|
| <input type="checkbox"/> | leaf litter disturbed or washed away | <input type="checkbox"/> | scour |
| <input type="checkbox"/> | sediment deposition | <input type="checkbox"/> | multiple observed or predicted flow events |
| <input type="checkbox"/> | water staining | <input type="checkbox"/> | abrupt change in plant community |
| <input type="checkbox"/> | other (list): | | |
- Discontinuous OHHM.⁷ Explain:

If factors other than the OHHM were used to determine lateral extent of CWA jurisdiction (check all that apply):

- | | |
|--|--|
| <input type="checkbox"/> High Tide Line indicated by: | <input type="checkbox"/> Mean High Water Mark indicated by: |
| <input type="checkbox"/> oil or scum line along shore objects | <input type="checkbox"/> survey to available datum; |
| <input type="checkbox"/> fine shell or debris deposits (foreshore) | <input type="checkbox"/> physical markings; |
| <input type="checkbox"/> physical markings/characteristics | <input type="checkbox"/> vegetation lines/changes in vegetation types. |
| <input type="checkbox"/> tidal gauges | |
| <input type="checkbox"/> other (list): | |

(iii) Chemical Characteristics:

Characterize tributary (e.g., water color is clear, discolored, oily film; water quality; general watershed characteristics, etc.).
Explain:

(iv) Biological Characteristics. Channel supports (check all that apply):

- Riparian corridor. Characteristics (type, average width):
- Wetland fringe. Characteristics: forested
- Habitat for:
 - Federally Listed species. Explain findings:
 - Fish/spawn areas. Explain findings:
 - Other environmentally-sensitive species. Explain findings:
 - Aquatic/wildlife diversity. Explain findings:

2. Characteristics of wetlands adjacent to non-TNW that flow directly or indirectly into TNW.

(i) Physical Characteristics:

(a) General Wetland Characteristics:

Properties:

- Wetland size: .
- Wetland type. Explain:
- Wetland quality. Explain:.

Project wetlands cross or serve as state boundaries. Explain:

(b) General Flow Relationship with Non-TNW:

Flow is: _____ Explain:

Surface flow is: _____
Characteristics:

Subsurface flow: _____ Explain findings:

- Dye (or other) test performed:

(c) Wetland Adjacency Determination with Non-TNW:

- Directly abutting
- Not directly abutting
 - Discrete wetland hydrologic connection. Explain:
 - Ecological connection. Explain:
 - Separated by berm/barrier. Explain:

(d) Proximity (Relationship) to TNW

Project wetlands are _____ river miles from TNW.
Project waters are _____ aerial (straight) miles from TNW.

⁷Ibid.

Flow is from: _____
Estimate approximate location of wetland as within the _____ floodplain.

(ii) Chemical Characteristics:

Characterize wetland system (e.g., water color is clear, brown, oil film on surface; water quality; general watershed characteristics; etc.). Explain:

Identify specific pollutants, if known:

(iii) **Biological Characteristics. Wetland supports (check all that apply):**

- Riparian buffer. Characteristics (type, average width): Forested
- Vegetation type/percent cover. Explain: the wetland is a mix of forested, scrub-shrub and herbaceous cover
- Habitat for:
 - Federally Listed species. Explain findings:
 - Fish/spawn areas. Explain findings:
 - Other environmentally-sensitive species. Explain findings:
 - Aquatic/wildlife diversity. Explain findings:

3. Characteristics of all wetlands adjacent to the tributary (if any)

All wetland(s) being considered in the cumulative analysis: _____

Approximately () acres in total are being considered in the cumulative analysis.

For each wetland, specify the following:

Directly abuts? (Y/N)	Size (in acres)	Directly abuts? (Y/N)	Size (in acres)
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Summarize overall biological, chemical and physical functions being performed:

C. SIGNIFICANT NEXUS DETERMINATION

A significant nexus analysis will assess the flow characteristics and functions of the tributary itself and the functions performed by any wetlands adjacent to the tributary to determine if they significantly affect the chemical, physical, and biological integrity of a TNW. For each of the following situations, a significant nexus exists if the tributary, in combination with all of its adjacent wetlands, has more than a speculative or insubstantial effect on the chemical, physical and/or biological integrity of a TNW. Considerations when evaluating significant nexus include, but are not limited to the volume, duration, and frequency of the flow of water in the tributary and its proximity to a TNW, and the functions performed by the tributary and all its adjacent wetlands. It is not appropriate to determine significant nexus based solely on any specific threshold of distance (e.g. between a tributary and its adjacent wetland or between a tributary and the TNW). Similarly, the fact an adjacent wetland lies within or outside of a floodplain is not solely determinative of significant nexus.

Draw connections between the features documented and the effects on the TNW, as identified in the *Rapanos* Guidance and discussed in the Instructional Guidebook. Factors to consider include, for example:

- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to carry pollutants or flood waters to TNWs, or to reduce the amount of pollutants or flood waters reaching a TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), provide habitat and lifecycle support functions for fish and other species, such as feeding, nesting, spawning, or rearing young for species that are present in the TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to transfer nutrients and organic carbon that support downstream foodwebs?
- Does the tributary, in combination with its adjacent wetlands (if any), have other relationships to the physical, chemical, or biological integrity of the TNW?

Note: the above list of considerations is not inclusive and other functions observed or known to occur should be documented below:

1. Significant nexus findings for non-RPW that has no adjacent wetlands and flows directly or indirectly into TNWs. Explain findings of presence or absence of significant nexus below, based on the tributary itself, then go to Section III.D:

2. Significant nexus findings for non-RPW and its adjacent wetlands, where the non-RPW flows directly or indirectly into TNWs. Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D:

3. Significant nexus findings for wetlands adjacent to an RPW but that do not directly abut the RPW. Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D:

D. DETERMINATIONS OF JURISDICTIONAL FINDINGS. THE SUBJECT WATERS/WETLANDS ARE (CHECK ALL THAT APPLY):

1. TNWs and Adjacent Wetlands. Check all that apply and provide size estimates in review area:

- TNWs: linear feet width (ft), Or, acres.
 Wetlands adjacent to TNWs: acres.

2. RPWs that flow directly or indirectly into TNWs.

Tributaries of TNWs where tributaries typically flow year-round or have continues flow at least seasonally (e.g. typically three months) are jurisdictional. Provide data and rationale indicating that tributary is perennial or intermittent: The following waterbodies have been identified as perennial: Non-wetland waters: Camp Hope Run, CHR5S unnamed tributary to Camp Hope Run, UNTCHR-04 unnamed tributary to Camp Hope Run where found to have flowing water during my field investigation and the consultant noted that he never saw any of the above /listed waters dry. Camp Hope Run is listed in DEP's Chapter 93, as a cold water fisheries and is shown as a blue line on the topographical map. CHR9S is identified as intermittent. This waterway receives flow from wetland 14A and the consultant stated that at times was seen dry.

Provide estimates for jurisdictional waters in the review area (check all that apply):

Tributary waters: all above mentioned waterways total approximately 888 linear feet total (see attached spreadsheet for individual waterway lengths and widths).

- Other non-wetland waters: acres.
Identify type(s) of waters:

3. Non-RPWs⁸ that flow directly or indirectly into TNWs.

- Waterbody that is not a TNW or an RPW, but flows directly or indirectly into a TNW, and it has a significant nexus with a TNW is jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional waters within the review area (check all that apply):

- Tributary waters: linear feet width (ft).
 Other non-wetland waters: acres.
Identify type(s) of waters:

4. Wetlands directly abutting an RPW that flow directly or indirectly into TNWs.

- Wetlands directly abut RPW and thus are jurisdictional as adjacent wetlands.

- Wetlands directly abutting an RPW where tributaries typically flow year-round. Provide data and rationale indicating that tributary is perennial in Section III.D.2, above. Provide rationale indicating that wetland is directly abutting an RPW: The following wetlands were all viewed

during my field views and I saw each individual wetland directly abutting an RPW waterway: CHR10W is a PEM wetland that is 0.02 acre; Wet 11 is a PEM wetland that is 0.06 acre; and CHR10W is a PEM wetland that is 0.01 acre.

- Wetlands directly abutting an RPW where tributaries typically flow "seasonally." Provide data indicating that tributary is seasonal in Section III.B and rationale in Section III.D.2, above
Provide rationale indicating that wetland is directly abutting an RPW

Provide acreage estimates for jurisdictional wetlands in the review area acres in project review area.

5. Wetlands adjacent to but not directly abutting an RPW that flow directly or indirectly into TNWs.

- Wetlands that do not directly abut an RPW, but when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide acreage estimates for jurisdictional wetlands in the review area: acres.

6. Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs.

- Wetlands adjacent to such waters, and have when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional wetlands in the review area: acres.

⁸ See Footnote # 3.

7. Impoundments of jurisdictional waters.⁹

As a general rule, the impoundment of a jurisdictional tributary remains jurisdictional.

- Demonstrate that impoundment was created from "waters of the U.S.," or
 Demonstrate that water meets the criteria for one of the categories presented above (1-6), or
 Demonstrate that water is isolated with a nexus to commerce (see E below).

E. ISOLATED [INTERSTATE OR INTRA-STATE] WATERS, INCLUDING ISOLATED WETLANDS, THE USE, DEGRADATION OR DESTRUCTION OF WHICH COULD AFFECT INTERSTATE COMMERCE, INCLUDING ANY SUCH WATERS (CHECK ALL THAT APPLY):¹⁰

- which are or could be used by interstate or foreign travelers for recreational or other purposes.
- from which fish or shellfish are or could be taken and sold in interstate or foreign commerce.
- which are or could be used for industrial purposes by industries in interstate commerce.
- Interstate isolated waters. Explain:
- Other factors. Explain:

Identify water body and summarize rationale supporting determination:

Provide estimates for jurisdictional waters in the review area (check all that apply):

- Tributary waters: linear feet width (ft).
- Other non-wetland waters: acres.
- Identify type(s) of waters:
- Wetlands: acres.

F. NON-JURISDICTIONAL WATERS, INCLUDING WETLANDS (CHECK ALL THAT APPLY):

- If potential wetlands were assessed within the review area, these areas did not meet the criteria in the 1987 Corps of Engineers Wetland Delineation Manual and/or appropriate Regional Supplements.
- Review area included isolated waters with no substantial nexus to interstate (or foreign) commerce.
 - Prior to the Jan 2001 Supreme Court decision in "SWANCC," the review area would have been regulated based solely on the "Migratory Bird Rule" (MBR).
- Waters do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction. Explain:
- Other: (explain, if not covered above):

Provide acreage estimates for non-jurisdictional waters in the review area, where the sole potential basis of jurisdiction is the MBR factors (i.e., presence of migratory birds, presence of endangered species, use of water for irrigated agriculture), using best professional judgment (check all that apply):

- Non-wetland waters (i.e., rivers, streams): Lakes/ponds:
- Other non-wetland waters: acres. List type of aquatic resource:
- Wetlands:

Provide acreage estimates for non-jurisdictional waters in the review area that do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction (check all that apply):

- Non-wetland waters (i.e., rivers, streams): CHR6S is 43 linear feet of ephemeral channel.

Lakes/ponds: acre.

- Other non-wetland waters: SB-2 (0.81 acre) and SB-4 (0.93 acre) List type of aquatic resource: Currently serviceable stormwater basins

- Wetlands: 1-2 (0.10 acre), 2-3 (0.07 acre), 2-3A (0.01 acre), 3A1 (0.01 acre), 3A2 (0.07 acre), 1-G1 (0.03 acre), 1-G2 (0.04 acre), 1-G3 (0.01 acre), 1-H1 (0.02 acre), 5 (0.02 acre), CHR5W (0.02 acre), CHR8W (0.01 acre) and CHR9W (0.01 acre)

SECTION IV: DATA SOURCES.

A. SUPPORTING DATA. Data reviewed for JD (check all that apply - checked items shall be included in case file and, where checked and requested, appropriately reference sources below):

- Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant: PA Waste Camp Hope Run Landfill – Wetland and Stream Impact Location Map.
- Data sheets prepared/submitted by or on behalf of the applicant/consultant.
 - Office concurs with data sheets/delineation report.
 - Office does not concur with data sheets/delineation report.

⁹ To complete the analysis refer to the key in Section III.D.6 of the Instructional Guidebook.

¹⁰ Prior to asserting or declining CWA jurisdiction based solely on this category, Corps Districts will elevate the action to Corps and EPA HQ for review consistent with the process described in the Corps/EPA Memorandum Regarding CWA Act Jurisdiction Following Rapanos.

- Data sheets prepared by the Corps:
- Corps navigable waters' study:
- U.S. Geological Survey Hydrologic Atlas:
 - USGS NHD data.
 - USGS 8 and 12 digit HUC maps.

- U.S. Geological Survey map(s). Cite scale & quad name:1:24,000 (Glen Ritchey and Wallaceton)
- USDA Natural Resources Conservation Service Soil Survey. Citation: Clearfield County Soil Survey
- National wetlands inventory map(s). Cite name: Glen Ritchey and Wallaceton
- State/Local wetland inventory map(s):
- FEMA/FIRM maps:
- 100-year Floodplain Elevation is: (National Geodetic Vertical Datum of 1929)
- Photographs: Aerial (Name & Date):Various
- or Other (Name & Date): Photos submitted in JD and taken during my field view
- Previous determination(s). File no. and date of response letter:2005-02264 approved JD dated July 18, 2013
- Applicable/supporting case law:
- Applicable/supporting scientific literature:
- Other information (please specify):

B. ADDITIONAL COMMENTS TO SUPPORT JD: