



Regulatory Program

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

SECTION I: BACKGROUND INFORMATION

A.COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (AJD): 28 February 2019

B.ORM NUMBER IN APPROPRIATE FORMAT (e.g., HQ-2015-00001-SMJ): NWP-2018-565

C.PROJECT LOCATION AND BACKGROUND INFORMATION:

State: Oregon County/parish/borough: Clackamas County City: Lake Oswego
Center coordinates of site (lat/long in degree decimal format): Lat. 45.395623°, Long. -122.727562°.
Map(s)/diagram(s) of review area (including map identifying single point of entry (SPOE) watershed and/or potential jurisdictional areas where applicable) is/are: attached in report/map titled
 Other sites (e.g., offsite mitigation sites, disposal sites, etc.) are associated with this action and are recorded on a different jurisdictional determination (JD) form. List JD form ID numbers (e.g., HQ-2015-00001-SMJ-1):

D.REVIEW PERFORMED FOR SITE EVALUATION:

- Office (Desk) Determination Only. Date: .
 Office (Desk) and Field Determination. Office/Desk Dates: 2/1/19 Field Date(s): 12/6/18.

SECTION II: DATA SOURCES

Check all that were used to aid in the determination and attach data/maps to this AJD form and/or references/citations in the administrative record, as appropriate.

- Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant. Title/Date: Figure 6, Wetland Delineation Map (Wetland Delineation report dated June 15, 2018).
- Data sheets prepared/submitted by or on behalf of the applicant/consultant.
- Data sheets/delineation report are sufficient for purposes of AJD form. Title/Date: Appendix B of Wetland Delineation report dated June 15, 2018.
 - Data sheets/delineation report are not sufficient for purposes of AJD form. Summarize rationale and include information on revised data sheets/delineation report that this AJD form has relied upon:
Revised Title/Date: .
- Data sheets prepared by the Corps. Title/Date: .
- Corps navigable waters study. Title/Date: .
- CorpsMap ORM map layers. Title/Date: .
- USGS Hydrologic Atlas. Title/Date: .
- USGS, NHD, or WBD data/maps. Title/Date: .
- USGS 8, 10 and/or 12 digit HUC maps. HUC number: .
- USGS maps. Scale & quad name and date: Figure 1, 2017 Lake Oswego, Wetland Delineation report dated June 15, 2018 .
- USDA NRCS Soil Survey. Citation: Figure 4, 2018 NRCS web soil survey, downloaded May 25, 2018, Wetland Delineation report dated June 15, 2018.
- USFWS National Wetlands Inventory maps. Citation: Figure 3, NWI map, downloaded May 25, 2018, Wetland Delineation report dated June 15, 2018.
- State/Local wetland inventory maps. Citation: .

- FEMA/FIRM maps. Citation: .
- Photographs: Aerial. Citation: . or Other. Citation: .
- LiDAR data/maps. Citation: .
- Previous JDs. File no. and date of JD letter: .
- Applicable/supporting case law: .
- Applicable/supporting scientific literature: .
- Other information (please specify): .

SECTION III: SUMMARY OF FINDINGS

A. RIVERS AND HARBORS ACT (RHA) SECTION 10 DETERMINATION OF JURISDICTION:

- “navigable waters of the U.S.” within RHA jurisdiction (as defined by 33 CFR part 329) in the review area.

- **Complete Table 1 - Required**

NOTE: If the navigable water is not subject to the ebb and flow of the tide or included on the District’s list of Section 10 navigable waters list, DO NOT USE THIS FORM TO MAKE THE DETERMINATION. The District must continue to follow the procedure outlined in 33 CFR part 329.14 to make a Section 10 RHA navigability determination.

B. CLEAN WATER ACT (CWA) SECTION 404 DETERMINATION OF JURISDICTION: “waters of the U.S.” within CWA jurisdiction (as defined by 33 CFR part 328.3) in the review area. Check all that apply.

- (a)(1): All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (Traditional Navigable Waters (TNWs))
 - **Complete Table 1 - Required**
 - This AJD includes a case-specific (a)(1) TNW (Section 404 navigable-in-fact) determination on a water that has not previously been designated as such. Documentation required for this case-specific (a)(1) TNW determination is attached.
- (a)(2): All interstate waters, including interstate wetlands.
 - **Complete Table 2 - Required**
- (a)(3): The territorial seas.
 - **Complete Table 3 - Required**
- (a)(4): All impoundments of waters otherwise identified as waters of the U.S. under 33 CFR part 328.3.
 - **Complete Table 4 - Required**
- (a)(5): All tributaries, as defined in 33 CFR part 328.3, of waters identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.
 - **Complete Table 5 - Required**
- (a)(6): All waters adjacent to a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3, including wetlands, ponds, lakes, oxbows, impoundments, and similar waters.
 - **Complete Table 6 - Required**
 - Bordering/Contiguous.
 - Neighboring:
 - (c)(2)(i): All waters located within 100 feet of the ordinary high water mark (OHWM) of a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3.
 - (c)(2)(ii): All waters located within the 100-year floodplain of a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3 and not more than 1,500 feet of the OHWM of such water.
 - (c)(2)(iii): All waters located within 1,500 feet of the high tide line of a water identified in paragraphs (a)(1) or (a)(3) of 33 CFR part 328.3, and all waters within 1,500 feet of the OHWM of the Great Lakes.
- (a)(7): All waters identified in 33 CFR 328.3(a)(7)(i)-(v) where they are determined, on a case-specific basis, to have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.
 - **Complete Table 7 for the significant nexus determination. Attach a map delineating the SPOE watershed boundary with (a)(7) waters identified in the similarly situated analysis. - Required**

- Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.
- (a)(8): All waters located within the 100-year floodplain of a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3 not covered by (c)(2)(ii) above and all waters located within 4,000 feet of the high tide line or OHWM of a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3 where they are determined on a case-specific basis to have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.
 - **Complete Table 8 for the significant nexus determination. Attach a map delineating the SPOE watershed boundary with (a)(8) waters identified in the similarly situated analysis. - Required**
- Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.

C. NON-WATERS OF THE U.S. FINDINGS:

Check all that apply.

- The review area is comprised entirely of dry land.
- Potential-(a)(7) Waters: Waters that DO NOT have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.
 - **Complete Table 9 and attach a map delineating the SPOE watershed boundary with potential (a)(7) waters identified in the similarly situated analysis. - Required**
- Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.
- Potential-(a)(8) Waters: Waters that DO NOT have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.
 - **Complete Table 9 and attach a map delineating the SPOE watershed boundary with potential (a)(8) waters identified in the similarly situated analysis. - Required**
- Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.
- Excluded Waters (Non-Waters of U.S.), even where they otherwise meet the terms of paragraphs (a)(4)-(a)(8):
 - **Complete Table 10 - Required**
 - (b)(1): Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of the CWA.
 - (b)(2): Prior converted cropland.
 - (b)(3)(i): Ditches with ephemeral flow that are not a relocated tributary or excavated in a tributary.
 - (b)(3)(ii): Ditches with intermittent flow that are not a relocated tributary, excavated in a tributary, or drain wetlands.
 - (b)(3)(iii): Ditches that do not flow, either directly or through another water, into a water identified in paragraphs (a)(1)-(a)(3).
 - (b)(4)(i): Artificially irrigated areas that would revert to dry land should application of water to that area cease.
 - (b)(4)(ii): Artificial, constructed lakes and ponds created in dry land such as farm and stock watering ponds, irrigation ponds, settling basins, fields flooded for rice growing, log cleaning ponds, or cooling ponds.
 - (b)(4)(iii): Artificial reflecting pools or swimming pools created in dry land.¹
 - (b)(4)(iv): Small ornamental waters created in dry land.¹
 - (b)(4)(v): Water-filled depressions created in dry land incidental to mining or construction activity, including

¹ In many cases these excluded features will not be specifically identified on the AJD form, unless specifically requested. Corps Districts may, in case-by-case instances, choose to identify some or all of these features within the review area.

pits excavated for obtaining fill, sand, or gravel that fill with water.

- (b)(4)(vi): Erosional features, including gullies, rills, and other ephemeral features that do not meet the definition of tributary, non-wetland swales, and lawfully constructed grassed waterways.¹
- (b)(4)(vii): Puddles.¹
- (b)(5): Groundwater, including groundwater drained through subsurface drainage systems.¹
- (b)(6): Stormwater control features constructed to convey, treat, or store stormwater that are created in dry land.¹
- (b)(7): Wastewater recycling structures created in dry land; detention and retention basins built for wastewater recycling; groundwater recharge basins; percolation ponds built for wastewater recycling; and water distributary structures built for wastewater recycling.
- Other non-jurisdictional waters/features within review area that do not meet the definitions in 33 CFR 328.3 of (a)(1)-(a)(8) waters and are not excluded waters identified in (b)(1)-(b)(7).
 - **Complete Table 11 - Required.**

D.ADDITIONAL COMMENTS TO SUPPORT AJD: .

Jurisdictional Waters of the U.S.

Default field entry is "N/A". Delete "N/A" and fill out all fields in the table where applicable for waters/features present in the review area.

Table 1. (a)(1) Traditional Navigable Waters

(a)(1) Waters Name	(a)(1) Criteria	Rationale to Support (a)(1) Designation Include High Tide Line or Ordinary High Water Mark indicators, when applicable.
N/A	Choose an item.	N/A

Table 2. (a)(2) Interstate Waters

(a)(2) Waters Name	Rationale to Support (a)(2) Designation
N/A	N/A

Table 3. (a)(3) Territorial Seas

(a)(3) Waters Name	Rationale to Support (a)(3) Designation
N/A	N/A

Table 4. (a)(4) Impoundments

(a)(4) Waters Name	Rationale to Support (a)(4) Designation
N/A	N/A
N/A	N/A

Table 5. (a)(5) Tributaries

(a)(5) Waters Name	Flow Regime	(a)(1)-(a)(3) Water Name to which this (a)(5) Tributary Flows	Tributary Breaks	Rationale for (a)(5) Designation and Additional Discussion. Identify flowpath to (a)(1)-(a)(3) water or attach map identifying the flowpath; explain any breaks or flow through excluded/non-jurisdictional features, etc.
N/A	Choose an item.	N/A	Choose an item.	N/A
N/A	Choose an item.	N/A	Choose an item.	N/A
N/A	Choose an item.	N/A	Choose an item.	N/A
N/A	Choose an item.	N/A	Choose an item.	N/A

Table 6. (a)(6) Adjacent Waters

(a)(6) Waters Name	(a)(1)-(a)(5) Water Name to which this Water is Adjacent	Rationale for (a)(6) Designation and Additional Discussion. Identify the type of water and how the limits of jurisdiction were established (e.g., wetland, 87 Manual/Regional Supplement); explain how the 100-year floodplain and/or the distance threshold was determined; whether this water extends beyond a threshold; explain if the water is part of a mosaic, etc.
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A

Table 7. (a)(7) Waters

SPOE Name	(a)(7) Waters Name	(a)(1)-(a)(3) Water Name to which this Water has a Significant Nexus	Significant Nexus Determination Identify SPOE watershed; discuss whether any similarly situated waters were present and aggregated for SND; discuss data, provide analysis, and summarize how the waters have more than speculative or insubstantial effect on the physical, chemical, or biological integrity of the (a)(1)-(a)(3) water, etc.
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Table 8. (a)(8) Waters

SPOE Name	(a)(8) Waters Name	(a)(1)-(a)(3) Water Name to which this Water has a Significant Nexus	Significant Nexus Determination Identify SPOE watershed; explain how 100-yr floodplain and/or the distance threshold was determined; discuss whether waters were determined to be similarly situated to subject water and aggregated for SND; discuss data, provide analysis, and then summarize how the waters have more than speculative or insubstantial effect the on the physical, chemical, or biological integrity of the (a)(1)-(a)(3) water, etc.
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Non-Jurisdictional Waters

Default field entry is "N/A". Delete "N/A" and fill out all fields in the table where applicable for waters/features present in the review area.

Table 9. Non-Waters/No Significant Nexus

Waters_Name	State	Cowardin Code	Meas Type	Amount	Units	Waters_Type	Latitude	Longitude
NWP-2018-565 Wetland C	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.98	ACRES	OTHERA8F	45.39557	-122.727
NWP-2018-565 Wetland F	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.09	ACRES	OTHERA8F	45.39572	-122.725
NWP-2018-565 Wetland H	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.4	ACRES	OTHERA8F	45.39665	-122.724
NWP-2018-565 Wetland I	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.29	ACRES	OTHERA8F	45.39686	-122.725
NWP-2018-565 Wetland J	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.08	ACRES	OTHERA8F	45.39685	-122.726
NWP-2018-565 Wetland K	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.01	ACRES	OTHERA8F	45.39691	-122.726

SPOE Name	Non-(a)(7)/(a)(8) Waters Name	(a)(1)-(a)(3) Water Name to which this Water DOES NOT have a Significant Nexus	Basis for Determination that the Functions DO NOT Contribute Significantly to the Chemical, Physical, or Biological Integrity of the (a)(1)-(a)(3) Water. Identify SPOE watershed; explain how 100-yr floodplain and/or the distance threshold was determined; discuss whether waters were determined to be similarly situated to the subject water; discuss data, provide analysis, and summarize how the waters did not have more than a speculative or insubstantial effect on the physical, chemical, or biological integrity of the (a)(1)-(a)(3) water.

<p>NWP-2018-565 SPOE 1</p>	<p>Wetlands C, F, H, I, J, and K</p>	<p>Willamette River</p>	<p>A significant nexus determination was conducted for these six features. In order to complete the significant nexus determination, “similarly situated” waters were identified to evaluate their cumulative effect on the chemical, physical, and biological integrity of the downstream a1 – a3 water. Two concepts are used to determine which wetlands within a SPOE (Single Point of Entry) are “similarly situated”:</p> <ol style="list-style-type: none"> 1) Waters perform similar functions, <ol style="list-style-type: none"> a) Determination: All six wetlands are palustrine emergent. Wetlands with similar vegetation types will have similar functions. 2) Waters are “sufficiently close” to each other or a water of the U.S. (WOUS) such that they alone or in combination affect the nearest downstream a1 – a3 water. There are two considerations when determining whether waters are “sufficiently close”: <ol style="list-style-type: none"> a) Waters are “sufficiently close” to each other <ol style="list-style-type: none"> i) Determination: The six palustrine wetlands (Wetlands C, F, H, I, J, and K) were all within the same contiguous area of land with homogenous soils, vegetation, and landform. b) Waters are “sufficiently close” to a WOUS <ol style="list-style-type: none"> ii) Determination: These six palustrine emergent wetlands were the only potentially a8 emergent wetlands known to exist within the SPOE watershed and within 4,000 feet of the ordinary high water mark of an a1 - a5 water (determined by known wetlands on and near the project site, and using NWI map). <p>Therefore, Wetlands C, F, H, I, J and K were evaluated together to determine their cumulative effect on the chemical, physical, or biological integrity of the downstream a1 – a3 water.</p> <p>These six “similarly situated” features do not have a significant nexus to the Willamette River. The distance between Wetlands C, F, H, I, J and K and the nearest a(5) stream, Oswego Canal, is approximately between 2,000 and 3,000 feet. These six wetlands have a relatively small drainage area which consists mostly of the school grounds, and potentially a small portion of the surrounding residential developments. The landscape position of these wetlands do not appear to be conducive to contributing flow downslope during normal conditions. These wetlands are mostly flat, while a few small areas could be considered minor concave surfaces. For these reasons, Wetland C, F, H, I, J and K do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River.</p>
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<p>NWP-2018-565 SPOE 1</p>	<p>Wetlands C, F, H, I, J, and K</p>	<p>Willamette River</p>	<ol style="list-style-type: none"> (1) Sediment trapping – Due to distance, drainage area, and landscape setting factors, sediment trapping within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (2) Nutrient recycling – The effect these wetlands have on the Willamette River, in terms of nutrient recycling, is considered speculative or insubstantial. Due to distance and landscape setting factors, nutrient recycling within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (3) Pollutant trapping, transformation, filtering, and transport – The effect these wetlands have on the Willamette River, in terms of pollutant trapping, transformation, filtering, and transport, is considered speculative or insubstantial. Due distance, drainage area, and landscape setting factors, pollutant trapping, transformation, filtering, and transport within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (4) Retention and attenuation of flood waters – Due to distance, drainage area, and landscape setting factors, retention and attenuation of flood waters within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (5) Runoff storage – The effect these wetlands have on the Willamette River, in terms of runoff storage, is considered speculative or insubstantial. Due to distance, drainage area, and landscape setting factors, runoff storage within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (6) Contribution of flow – Due to distance and landscape setting factors, contribution of flow within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (7) Export of organic matter – Due to distance and landscape setting factors, export of organic matter within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (8) Export of food resources – Due to distance and landscape setting factors, export of food resources within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. (9) Provision of life cycle dependent aquatic habitat for species located in a(1) – a(3) water - Due to the distance factor, provision of life cycle dependent aquatic habitat within these wetlands do not contribute significantly to the chemical, physical, or biological integrity of the Willamette River. <p>These factors were used to determine that Wetlands C, F, H, I, J and K are not significantly contributing to the chemical, physical, or biological integrity of the Willamette River, and therefore lack a significant nexus to an a(1) – a(3) water.</p>
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Table 10. Non-Waters/Excluded Waters and Features

Waters_Name	State	Cowardin Code	Meas Type	Amount	Units	Waters_Type	Latitude	Longitude
NWP-2018-565 Wetland A	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.17	ACRES	EXCLDB4I	45.39454	-122.728
NWP-2018-565 Wetland B	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.02	ACRES	EXCLDB4I	45.39478	-122.727
NWP-2018-565 Wetland D	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.01	ACRES	EXCLDB4I	45.39568	-122.726
NWP-2018-565 Wetland E	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.2	ACRES	EXCLDB4I	45.39557	-122.726
NWP-2018-565 Wetland G	OR	PEM-PALUSTRINE, EMERGENT	AREA	0.12	ACRES	EXCLDB4I	45.39606	-122.724

Paragraph (b) Excluded Feature/Water Name	Rationale for Paragraph (b) Excluded Feature/Water and Additional Discussion.
NWP-2018-565 Wetland A	(b)(4)(i) – Wetland A is considered an artificially irrigated area that would revert to dry land should application of water to that area cease. Wetland A is located in and adjacent to one of the maintained baseball fields in the southern portion of the site. As documented in Datapoint 2, this area exhibited wetland hydrology in the form of saturation (0-5 inches) and oxidized rhizospheres. There was no high water table observed at this datapoint. Hydric soils and hydrophytic vegetation were also present at the time of field work. The Lake Oswego School District Engineering Department stated that the south fields are irrigated from June to September, every night, for 11 – 22 minutes per zone (there are 22 zones on the property). Geomorphic position was not listed as a secondary indicator, therefore this area is not expected to retain natural hydrology. It is expected that if artificial irrigation were to cease, this area would revert to dry land.
NWP-2018-565 Wetland B	(b)(4)(i) – Wetland B is considered an artificially irrigated area that would revert to dry land should application of water to that area cease. Wetland B is located adjacent to two of the maintained baseball fields in the southern portion of the site. As documented in Datapoint 4, this area exhibited wetland hydrology in the form of saturation to 12 inches, oxidized rhizospheres, and geomorphic position (secondary indicator). There was no high water table observed at this datapoint. Hydric soils and hydrophytic vegetation were also present at the time of field work. The Lake Oswego School District Engineering Department stated that the south fields are irrigated from June to September, every night, for 11 – 22 minutes per zone (there are 22 zones on the property). Also, in the hydrology section of Datapoint 3 (the upland datapoint in this datapoint pair) mentioned that this area was irrigated. It is expected that if artificial irrigation were to cease, this area would revert to dry land.
NWP-2018-565 Wetland D	(b)(4)(i) – Wetland D is considered an artificially irrigated area that would revert to dry land should application of water to that area cease. The yard drains that were constructed in the nearby Wetland E appear to have been designed to remove stormwater that is diverted to this area from the downspouts on the school building. The maintenance staff at Lakeridge Junior High School stated that the yard drains are clogged, and have been for some time. It is expected that if the yard drains were draining properly, this area would revert to dry land.
NWP-2018-565 Wetland E	(b)(4)(i) – Wetland E is considered an artificially irrigated area that would revert to dry land should application of water to that area cease. The yard drains that were constructed in this area appear to have been designed to remove stormwater that is diverted here from the downspouts on the school building. The maintenance staff at Lakeridge Junior High School stated that the yard drains are clogged, and have been for some time. It is expected that if the yard drains were draining properly, this area would revert to dry land.

Paragraph (b) Excluded Feature/Water Name	Rationale for Paragraph (b) Excluded Feature/Water and Additional Discussion.
NWP-2018-565 Wetland G	(b)(4)(i) – Wetland G is considered an artificially irrigated area that would revert to dry land should application of water to that area cease. Wetland G is located adjacent to one of the maintained baseball fields and the parking lot in the eastern portion of the site. As documented in Datapoint 15, this area exhibited wetland hydrology in the form of surface water (1 inch deep in places), saturation (0-3 inches), oxidized rhizospheres, and geomorphic position. There was no observed high water table at this datapoint. Hydric soils and hydrophytic vegetation were also present at the time of field work. The Lake Oswego School District Engineering Department stated that the east fields are irrigated from June to September, every night, for 11 – 22 minutes per zone (there are 22 zones on the property). It is expected that if artificial irrigation were to cease, this area would revert to dry land.

Table 11. Non-Waters/Other

Other Non-Waters of U.S. Feature/Water Name	Rationale for Non-Waters of U.S. Feature/Water and Additional Discussion.
N/A	N/A