GLENN LUKOS ASSOCIATES

Regulatory Services

June 9, 2005

Tom Farrell
Woodfin Suite Hotels
12730 High Bluff Drive
San Diego, California 92130

SUBJECT: Jurisdictional Wetland Status of Parcel 9U, Marina del Rey, Los Angeles County, California

Dear Mr. Farrell:

This letter report summarizes our preliminary findings of U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG) jurisdiction, as well as California Coastal Commission (CCC) wetlands for the above-referenced property.[1] The subject parcel covers approximately 3.8 acres and includes an excavated depression in the southern portion of the site. The depression was created in 1984 during construction activities within an upland area that were abandoned and left unfinished. Areas outside the depression are vegetated with upland ruderal species. The excavated depression supports a mixture of plant species that exhibit a range relative to their wetland indicator status from upland (UPL) to obligate (OBL). The southern margin of the basin consists of a berm comprised of spoil materials excavated from the basin. The berm supports narrow-leaf willow (*Salix exigua*, OBL) and upland grasses. Soils below the upper 0.6 feet to two feet of existing soil profile, which consist of dredge material deposited in the 1950s and early 1960s, appear to be relictual hydric soils that formed at depth prior to excavation of the basin. Limited areas within the upper two feet exhibit hydric soil characteristics that appear to have formed in place due to ponding, consistent with the depressional topography. Exhibits 1 and 2 are regional and vicinity maps. Exhibit 3 depicts the location of wetland areas within the excavated depression. Exhibits 4-7 are historic aerials of the site from 1928, 1936, 1956, and 1962 showing changes in land use, including initial development of the site between 1928 and 1936 with further development associated with construction of the marina in the late 1950s through early 1960s.

[1] This report presents our best effort at estimating the subject jurisdictional boundaries using the most up-to-date regulations and written policy and guidance from the regulatory agencies. Only the regulatory agencies can make a final determination of jurisdictional boundaries. If a final jurisdictional determination is required, GLA can assist in getting written confirmation of jurisdictional boundaries from the agencies.

On August 18, October 22, November 3, and December 1, 2004, and January 14, 2005 Regulatory Specialists of Glenn Lukos Associates, Inc. (GLA) examined the project site to determine potential presence of (1) Corps jurisdiction pursuant to Section 404 of the Clean Water Act, (2) CDFG jurisdiction pursuant to Division 2, Chapter 6, Section 1600 of the Fish and Game Code, and (3) any wetlands as defined by the California Coastal Commission. Enclosed is a 125-scale map [Exhibit 3], which depicts the areas of potential Corps jurisdiction as well as potential wetlands as defined under the California Coastal Act. Wetland data sheets are attached as Appendix A.

I. METHODOLOGY

Prior to beginning the field delineation a 200-scale aerial photograph and 100-scale base topographic map of the property, were evaluated along with previous constraints reports prepared by PCR Service and EDAW to determine the locations of potential areas of Corps/CDFG jurisdiction and CCC-defined wetlands. Suspected jurisdictional areas were field checked for the presence of wetland vegetation, soils and hydrology using the methodology set forth in the U.S. Army Corps of Engineers 1987 Wetland Delineation Manual[2] (Wetland Manual). While in the field locations where vegetation, soils, and hydrology data were collected were recorded onto a 100-scale base topographic map using visible landmarks. The field data were recorded onto wetland data sheets.

As noted above, site visits were conducted on August 18, October 22, November 3, and December 1, 2004, with the October 22 and November 3 visits timed to evaluate the site within seven days of significant rainfall events, providing for optimal conditions for evaluating wetland hydrology. A succession of winter storms during late December and early January, which ended on January 10, 2005, resulted in record rainfall for a 15-day period. This period of rainfall that accounted for approximately 15 inches, and resulted in inundation of the depression. For purposes of determining wetland hydrology, this period does not represent a “normal” or “average” rainfall year and is not suitable for making a positive determination for wetland hydrology. As such, the limits of jurisdictional wetlands (or potential wetlands) discussed below are based on the data collected prior to the storms of late December and early January 2004/05.

[2] Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1, U.S. Army Engineer Waterways Experimental Station, Vicksburg, Mississippi.

A. Soils

The Soil Conservation Service (SCS)[3] has mapped the "Oceano" soil type as occurring in the general vicinity of the project site.[4] A review of historic aerial photographs indicate that prior to development in the late 1920s or early 1930s, the site consisted of "Tidal Flats", a soil type not included in the Los Angeles County Soil Survey. Currently, the entire site is overlain by dredge spoils/hydraulic fill that were placed behind the seawall constructed during development of the marina [Exhibit 7 shows the site following deposition of the hydraulic fill]. The fill varies from over ten feet deep on the highest portions of the site to between 0.6 and 2.0 feet in the lowest portions of the depression.[5]

Oceano

Oceano soils occur on undulating dune-like areas between sea level and 100 feet. These soils are over 60 inches deep and exhibit rapid permeability. They have grayish-brown, slightly acid and medium acid sand surface layers with strongly acid substratum also consisting of sand.

The soil series Oceano is not included in the SCS's publication, Hydric Soils of the United States[6]; and are not identified as hydric in the local hydric soils list for the Los Angeles Area, California. Previous activities on the site have included deposition of dredge spoils during construction of the adjacent marina and excavation performed during construction of commercial facilities that was halted shortly after the excavation was completed. As such, soil conditions on the site do not appear to represent the "native" condition but rather, reflect the various activities that have occurred on the site during the last four to five decades.

Tidal Flats

Tidal flats are nearly level areas adjacent to bays and lagoons along the coast. Periodically these are covered by tidal overflow. Some of the higher areas are covered only during very high tides. Tidal flats are stratified clayey to sandy deposits. They are poorly drained and high in salts. As noted above, hydraulic fill was deposited on the site, and the excavation in 1984 removed much

[3] SCS is now known as the National Resource Conservation Service or NRCS.
[4] United States Department of Agriculture, Soil Conservation Service. 1969. Report and General Soil Map, Los Angeles County, California. Foldout map accompanying report is dated 1994.
[5] Van Beveren & Butelo, Inc. Letter Report to Mr. Thomas Farrell. Subject: Surface of Natural Soil Deposits Proposed Hotel and parking Structure Site, Marina del Rey, Los Angeles County, California.
[6] United States Department of Agriculture, Soil Conservation Service. 1991. Hydric Soils of the United States, 3rd Edition, Miscellaneous Publication Number 1491. (In cooperation with the National Technical Committee for Hydric Soils.)

of this material leaving only 0.6 to 2.0 feet overlaying the native substrate that consisted presumably of tidal flats, which remain under the layer of fill.

B. Aerial Photographic Analysis

In order to better understand the site conditions and how previous activities have altered the site, GLA has conducted an analysis of historic aerial photographs of the site in conjunction with a review of the history of the site covering the period between 1927 and the present. This review includes a review of previous documentation that addresses soil/geological conditions on the site and interviews with local experts who have conducted geotechnical investigations during the previous five decades.

II. JURISDICTION

Federal Jurisdiction

A. Army Corps of Engineers

1. Section 404 of the Clean Water Act

Pursuant to Section 404 of the Clean Water Act, the Corps regulates the discharge of dredged and/or fill material into waters of the United States. The term "waters of the United States" is defined in Corps regulations at 33 CFR Part 328.3(a) as:

> *(1) All waters which are currently used, or 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;*
> *(2) All interstate waters including interstate wetlands;*
> *(3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect foreign commerce including any such waters:*
> > *(i) Which are or could be used by interstate or foreign travelers for recreational or other purposes; or*
> > *(ii) From which fish or shell fish are or could be taken and sold in interstate or foreign commerce; or*
> > *(iii) Which are used or could be used for industrial purpose by industries in interstate commerce...*

> *(4) All impoundments of waters otherwise defined as waters of the United States under the definition;*
> *(5) Tributaries of waters identified in paragraphs (a) (1)-(4) of this section;*
> *(6) The territorial seas;*
> *(7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a) (1)-(6) of this section.*
>
> *Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 123.11(m) which also meet the criteria of this definition) are not waters of the United States.*

In the absence of wetlands, the limits of Corps jurisdiction in non-tidal waters, such as intermittent streams, extend to the OHWM which is defined at 33 CFR 328.3(e) as:

> *...that line on the shore established by the fluctuation of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.*

The term "wetlands" (a subset of "waters of the United States") is defined at 33 CFR 328.3(b) as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support...a prevalence of vegetation typically adapted for life in saturated soil conditions." In 1987 the Corps published a manual to guide its field personnel in determining jurisdictional wetland boundaries. The methodology set forth in the 1987 Wetland Delineation Manual generally requires that, in order to be considered a wetland, the vegetation, soils, and hydrology of an area exhibit at least minimal hydric characteristics. While the manual provides great detail in methodology and allows for varying special conditions, a wetland should normally meet each of the following three criteria:

- more than 50 percent of the dominant plant species at the site must be typical of wetlands (i.e., rated as facultative or wetter in the National List of Plant Species that Occur in Wetlands[7]);

[7] Reed, P.B., Jr. 1988. National List of Plant Species that Occur in Wetlands. U.S. Fish and Wildlife Service Biological Report 88(26.10).

- soils must exhibit physical and/or chemical characteristics indicative of permanent or periodic saturation (e.g., a gleyed color, or mottles with a matrix of low chroma indicating a relatively consistent fluctuation between aerobic and anaerobic conditions); and

- hydrologic characteristics must indicate that the ground is saturated to within 12 inches of the surface for at least five percent of the growing season during a normal rainfall year[8].

a. Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers, et al.

Pursuant to Article I, Section 8 of the U.S. Constitution, federal regulatory authority extends only to activities that affect interstate commerce. In the early 1980s the Corps interpreted the interstate commerce requirement in a manner that restricted Corps jurisdiction on isolated (intrastate) waters. On September 12, 1985, EPA asserted that Corps jurisdiction extended to isolated waters that are used or could be used by migratory birds or endangered species, and the definition of "waters of the United States" in Corps regulations was modified as quoted above from 33 CFR 328.3(a).

On January 9, 2001, the Supreme Court of the United States issued a ruling on *Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers, et al.* (SWANCC). In this case the Court was asked whether use of an isolated, intrastate pond by migratory birds is a sufficient interstate commerce connection to bring the pond into federal jurisdiction of Section 404 of the Clean Water Act.

The written opinion notes that the court's previous support of the Corps' expansion of jurisdiction beyond navigable waters (*United States v. Riverside Bayview Homes, Inc*.) was for a wetland that abutted a navigable water and that the court did not express any opinion on the question of the authority of the Corps to regulate wetlands that are not adjacent to bodies of open water. The current opinion goes on to state:

> *In order to rule for the respondents here, we would have to hold that the jurisdiction of the Corps extends to ponds that are not adjacent to open water. We conclude that the text of the statute will not allow this.*

Therefore, we believe that the court's opinion goes beyond the migratory bird issue and says that no isolated, intrastate water is subject to the provisions of Section 404(a) of the Clean Water Act (regardless of any interstate commerce connection). However, the Corps and EPA have issued a

[8] For most of low-lying southern California, five percent of the growing season is equivalent to 18 days.

joint memorandum which states that they are interpreting the ruling to address only the migratory bird issue and leaving the other interstate commerce clause nexuses intact..

b. Adjacency and Adjacent Wetlands

As noted in Paragraph 7 of 33 CFR 328.3, the Corps regulates wetlands that are adjacent to other jurisdictional waters. Corps regulations define adjacent to mean "bordering, contiguous, or neighboring" and further state: "Wetlands separated from other waters of the United States by man-made dikes or barriers, natural river berms, beach dunes and the like are 'adjacent wetlands'. It should be noted that the courts have interpreted the 'criterion' for adjacency broadly, and found that wetland were 'adjacent' even when separated by substantial distances or by substantial barriers. For example, one court found adjacency for lots one-half-mile from a navigable water and in another instance where a wetland was separated from a navigable water by a fifty-foot-wide paved street.

2. Section 10 of the Rivers and Harbors Act

Pursuant to Section 10 of the Rivers and Harbors Acts of 1899 (33 U.S.C. 403), the Corps regulates any obstruction or alteration to navigable waters of the United States. Navigable waters of the Pacific Ocean extend to the line on the shore reached by the mean of the higher high waters (MHHW)[9]. The MHHW reaches an elevation of about 3.0 feet near Marina del Rey.

State of California Jurisdiction

B. California Coastal Commission - California Coastal Act

1. California Coastal Act Wetland Definitions and Policy Guidance

The CCC regulates the diking, filling, or dredging of wetlands within the coastal zone. Section 30121 of the Coastal Act defines "wetlands" as land "*which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens.*" The 1981 CCC Statewide Interpretive Guidelines state that hydric soils and hydrophytic vegetation "*are useful indicators of wetland conditions, but the presence or absence of hydric soils and/or hydrophytes alone are not necessarily determinative when the Commission identifies wetlands under the Coastal Act. In the past, the Commission has considered all relevant information in making such*

[9] Corps of Engineers. Los Angeles District. November 29, 1972. Public Notice Relative to Navigable Waters Within the Los Angeles District.

determinations and relied upon the advice and judgment of experts before reaching its own independent conclusion as to whether a particular area will be considered wetland under the Coastal Act. The Commission intends to continue to follow this policy."

The 1981 CCC Statewide Interpretive Guidelines define riparian habitats as areas of riparian vegetation. Riparian vegetation is defined as "*an association of plant species which grows adjacent to freshwater watercourses, including perennial and intermittent streams, lakes, and other bodies of fresh water.*" Riparian habitats may encompass wetland areas, but may also extend beyond those areas.

As discussed above (and below), areas regulated by the Corps, CCC, and CDFG are often not coincident due to the differing goals of the respective regulatory programs and also because these agencies use different definitions for determining the extent of wetland areas. For example, the Corps requires that positive indicators for the presence of wetland hydrology, hydric soils, and a predominance of hydrophytic vegetation be present for an area to meet the Corps' wetland definition. The Coastal Commission does not necessarily require that indicators for wetland hydrology, hydric soils, and a predominance of hydrophytic vegetation be present for an area to be determined to by a "wetland"; rather, the presence of hydric soils in the absence of a predominance of hydrophytes (or vice versa) could be sufficient for a positive wetland determination.

2. California Coastal Act – Environmentally Sensitive Habitat Areas

The California Coastal Act (California Public Resources Code Division 20, Section 30240a) restricts land uses within or adjacent to environmentally sensitive habitat areas (ESHAs). The Coastal Act Section 30107.5 defines an ESHA as:

> *…any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.*

Included within this definition are wetlands, estuaries, streams, riparian habitats, lakes, and portions of open coastal waters, which meet the rare or valuable habitat criteria. Not all wetlands necessarily meet the "rare or valuable habitat criteria" and as set forth in Section 30233, "where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects" degraded or low-value

wetlands that do not which meet the rare or valuable habitat criteria may be subject to restoration in accordance with Section 30233.7. [10]

B. Regional Water Quality Control Board

Subsequent to the SWANCC decision, the Chief Counsel for the State Water Resources Control Board issued a memorandum that addressed the effects of the SWANCC decision on the Section 401 Water Quality Certification Program.[11] The memorandum states:

> *California's right and duty to evaluate certification requests under section 401 is pendant to (or dependent upon) a valid application for a section 404 permit from the Corps, or another application for a federal license or permit. Thus if the Corps determines that the water body in question is not subject to regulation under the COE's 404 program, for instance, no application for 401 certification will be required…*
>
> *The SWANCC decision does not affect the Porter Cologne authorities to regulate discharges to isolated, non-navigable waters of the states….*
>
> *Water Code section 13260 requires "any person discharging waste, or proposing to discharge waste, within any region that could affect the waters of the state to file a report of discharge (an application for waste discharge requirements)." (Water Code § 13260(a)(1) (emphasis added).) The term "waters of the state" is defined as "any surface water or groundwater, including saline waters, within the boundaries of the state." (Water Code § 13050(e).) The U.S. Supreme Court's ruling in SWANCC has no bearing on the Porter-Cologne definition. While all waters of the United States that are within the borders of California are also waters of the state, the converse is not true—waters of the United States is a subset of waters of the state. Thus, since Porter-Cologne was enacted California always had and retains authority to regulate discharges of waste into any waters of the state, regardless of whether the COE has concurrent jurisdiction under section 404. The fact that often Regional Boards opted to regulate discharges to, e.g., vernal pools, through the 401 program in lieu of or in addition to issuing waste discharge requirements (or waivers thereof) does not preclude the regions*

[10] Although ESHA policies do not exist within the LCP, this report elaborates on ESHA policies simply to demonstrate that the evidence does not suggest this area constitutes ESHA.

[11] Wilson, Craig M. January 25, 2001. Memorandum addressed to State Board Members and Regional Board Executive Officers.

> *from issuing WDRs (or waivers of WDRs) in the absence of a request for 401 certification.…*

Thus, discharge of fill material into waters of the State that do not fall under the jurisdiction of the Corps pursuant to Section 404 of the Clean Water Act, may require authorization through application for waste discharge requirements (WDRs) or through waiver of WDRs.

C. California Department of Fish and Game

Pursuant to Division 2, Chapter 6, Sections 1600-1603 of the California Fish and Game Code, the CDFG regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife.

CDFG defines a "stream" (including creeks and rivers) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." CDFG's definition of "lake" includes "natural lakes or man-made reservoirs."

CDFG jurisdiction within altered or artificial waterways is based upon the value of those waterways to fish and wildlife. CDFG Legal Advisor has prepared the following opinion:

- Natural waterways that have been subsequently modified and which have the potential to contain fish, aquatic insects and riparian vegetation will be treated like natural waterways...

- Artificial waterways that have acquired the physical attributes of natural stream courses and which have been viewed by the community as natural stream courses, should be treated by [CDFG] as natural waterways...

- Artificial waterways without the attributes of natural waterways should generally not be subject to Fish and Game Code provisions...

Thus, CDFG jurisdictional limits closely mirror those of the Corps. Exceptions are CDFG's exclusion of isolated wetlands (those not associated with a river, stream, or lake), the addition of artificial stock ponds and irrigation ditches constructed on uplands, and the addition of riparian habitat supported by a river, stream, or lake regardless of the riparian area's federal wetland status.

III. RESULTS

A. Review of Historic Conditions

An aerial photograph from 1928 [Exhibit 4] indicates that historically, the site was part of the Balloña wetland complex and likely supported salt marsh vegetation. Between 1928 and 1936 development occurred on the site, which remained generally unchanged until the extensive development associated with construction of the marina in the late 1950s through early 1960s. Exhibits 5 and 6 depict the site as developed between 1936 and 1956. Construction of the marina in the late 1950s and early 1960s included construction of a seawall that allowed for deposition of hydraulic fill behind the seawall to create a pad for future building construction.[12] Exhibit 7 is an aerial photograph from 1962 that shows the site with the sewer vent that is now located within the excavated depression.

The depression was excavated in 1984 for a development project, but was halted well before completion, leaving between 0.60 and two feet of historic fill overlaying the natural surface in the lowest portions of the excavated depression as noted in Section I.A above. The I-beam pilings installed as part of the construction operation still ring the site and a concrete foundational structure, which was installed within the excavated basin, is still intact. The excavated depression is clearly not a natural feature and is hydrologically isolated (i.e., the closed basin does not exhibit surface hydrological connections to other jurisdictional waters including the adjacent marina). Rather, the site is surrounded on all sides by existing development. While limited areas within this feature exhibit positive indicators for the presence of wetland characteristics, as discussed below under "Jurisdictional Delineation", wetland functions associated with the feature are minimal as noted below under "Wetland Functions".

B. Jurisdictional Delineation

The entire site covers approximately 3.8 acres and the excavated depression in the southern portion of the site covers little over one acre. Areas outside the depression are vegetated with upland ruderal species including riput (*Bromus diandrus*, UPL), soft chess (*Bromus hordeaceus*, UPL), bur clover (*Medicago polymorpha*, UPL), foxtail barley (*Hordeum murinum*ssp. *Leporinum*, NI), cheeseweed (*Malva parviflora*, UPL), small-flowered iceplant (*Mesembryanthemum nodiflorum*, UPL), and garland chrysanthemum (*Chrysanthemum coronarium*, UPL). The excavated depression supports a mixture of plant species that exhibit a range relative to their wetland indicator status from upland (UPL) to obligate (OBL), based at

[12] Van Beveren & Butelo, Inc. Letter Report to Mr. Thomas Farrell. Subject: Surface of Natural Soil Deposits Proposed Hotel and parking Structure Site, Marina del Rey, Los Angeles County, California.

least in part with their location in the basin. The southern margin of the basin consists of a berm made up of spoil materials, which is presumed to have been created using material from the excavated basin. The berm supports narrow-leaf willow (*Salix exigua*, OBL) and upland grasses. Data was collected at ten locations including eight locations within the depression and two on the berm. A description of the vegetation, soils, and potential hydrology are discussed for each data collection point.

1. Three Parameter Wetlands [Potential Corps and Coastal Commission Wetlands]

Data collected at Data Points 2, 4, 6, and 8 [encompassed by the polygons depicted on Exhibit 3], exhibit vegetation, soils and hydrology that are consistent with the presence of wetlands. The wettest area in the vicinity of Data Points 2 and 8, support alkali bulrush (*Scirpus maritimus*, OBL), alkali weed (*Cressa truxillensis*, FACW) with the presence of the alkali bulrush as the strongest indicator for wetland conditions. Hydric soil indicators observed at Data Points 2, 4, 6, and 8 appear to have formed in response to current site hydrological conditions including sulfidic odor in Soil Pit 2 (i.e., Data Point 2) and low chroma matrix with areas with redoxymorphic features for Data Points 4, 6, and 8. Wetland hydrology, at Data Points 2, 4, 6, and 8, was indicated by the presence of saturated lenses within the upper 12 inches of the soil.

As noted above, the Corps requires that all three parameters be present in order to make a positive wetland determination. Because the area encompassed by the polygons that include data points 2, 4, 6, and 8 satisfy all three criteria, the area could be determined to be a jurisdictional wetland if the Corps determines that the wetland area is adjacent to the jurisdictional waters associated with Marina del Rey. The area encompassed by the two polygons covers approximately 0.26 acre.

The 0.26-acre area that exhibits positive indicators for wetland hydrology, hydric soils and hydrophytic vegetation is not connected hydrologically to other navigable waters (i.e., Marina del Rey/Pacific Ocean). As discussed in II.A.1.b above, the Corps could assert jurisdiction over the 0.26-acre area based on adjacency to other navigable waters (i.e., Marina del Rey/Pacific Ocean), and given the proximity of the 0.26-acre area to the marina (approximately 85 feet) it is expected that the Corps will in fact assert jurisdiction over this feature.

2. Single Parameter Wetlands [Potential Coastal Commission Wetlands]

Data collected at Data Points 1, 5, and 9 [encompassed by the polygon on Exhibit 3], do not exhibit all three parameters; however, they do exhibit positive indicators for hydric soils [Data Point 1] or hydrophytic vegetation [Data Points 1, 5, and 9]. These areas lacked wetland hydrology during the field visits conducted in October, November and early December 2004, although rainfall totals were above average during this period. Subsequently, following the

extreme storms of late December 2004 and early January 2005, the area became inundated; however the approximately 15 inches of rain in a two week period do not represent "normal" conditions and would not be used in determining whether the site exhibits wetland hydrology. Nevertheless, the presence of hydric soils (potentially relictual) and/or hydrophytic vegetation may be sufficient for the Coastal Commission to make a wetland determination for this portion of the site and as such it is identified as an area with hydric soils and hydrophytic vegetation. The area encompassed by this polygon covers approximately 0.21 acre. Combined, the 0.26 acre area that exhibits characteristics consistent with the presence of a three-parameter wetland and 0.21-acre area that exhibits at least one parameter would both be regulated as wetland by the Coastal Commission for a total of 0.47 acre of Coastal Commission jurisdiction.

3. California Department of Fish and Game

The excavated depression does not meet the definition of either a lake or a stream in accordance with the California Fish and Game Code, and would not be subject to regulation by CDFG pursuant to Section 1602 of the California Fish and Game Code.

4. Regional Water Quality Control Board

If the Corps asserts jurisdiction over the 0.26-acre portion of the isolated depression, it will be necessary to obtain a Section 401 Water Quality Certification from the Regional Board as a condition of the Section 404 from the Corps. If the Corps does not assert jurisdiction over this feature, then the Regional Board would assert jurisdiction in accordance with the Porter Cologne Act and require a waste discharge permit (WDR).

C. Wetland Functions Associated with Portions of Excavated Basin

As noted above, approximately 0.26 acre of the excavated basin meets the Corps definition of wetland as it exhibits positive indicators (albeit minimally) for wetland hydrology, hydric soils and a predominance of hydrophytes. An additional 0.21 acre exhibits positive indicators for the presence of hydric soils and/or hydrophytes and could be considered wetland under the California Coastal Act.

It does not follow from the mere presence of wetland indicators, that the 0.26 acre area or 0.21 acre area exhibit important or even measurable wetland functions. In fact, the excavated basin exhibits minimal wetland function as it supports very limited areas of native vegetation and includes a large percentage of non-native species. The site does not support or have the potential to support state- or federally listed plants or animals or other special-status plants or animals. Additionally, as noted above, the small site (less than four acres with the potential wetland areas totaling less than 0.50 acre combined) is completely surrounded by development and supports

only wildlife species that are adapted to the urban environment. Because the potential wetland areas are associated with a closed depression the potential for hydrologic or water quality functions are very limited.

If you have any questions about this letter report, please contact Tony Bomkamp at (949) 837-0404.

Sincerely,

GLENN LUKOS ASSOCIATES, INC.

Tony Bomkamp
Regulatory Specialist

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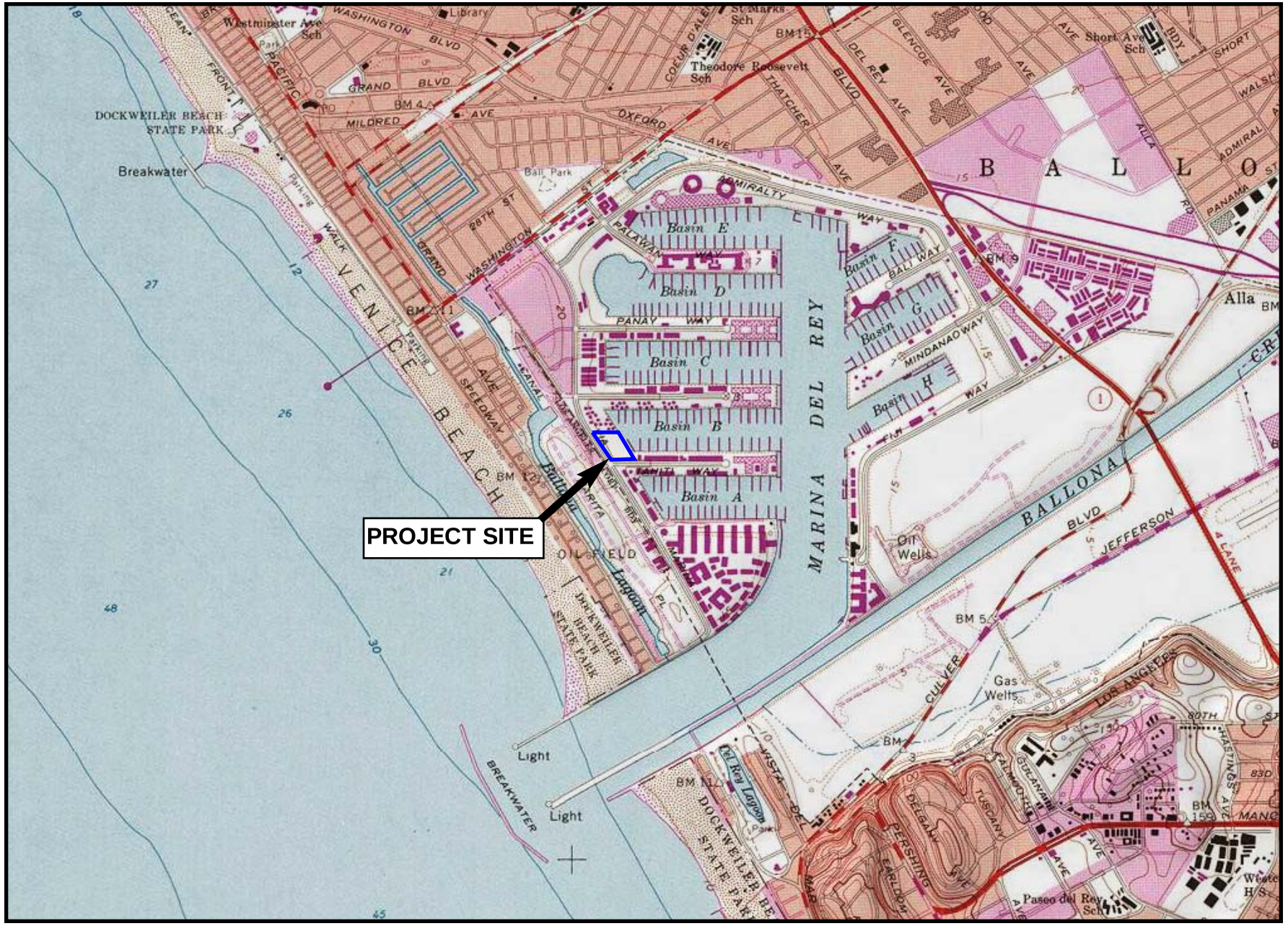
PARCEL 9U

Regional Map

GLENN LUKOS ASSOCIATES

EXHIBIT 1

Adapted from USGS Venice quadrangle



PARCEL 9U

Vicinity Map

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EXHIBIT 2

PARCEL 9U MARINA DEL REY

Potential Wetland Areas

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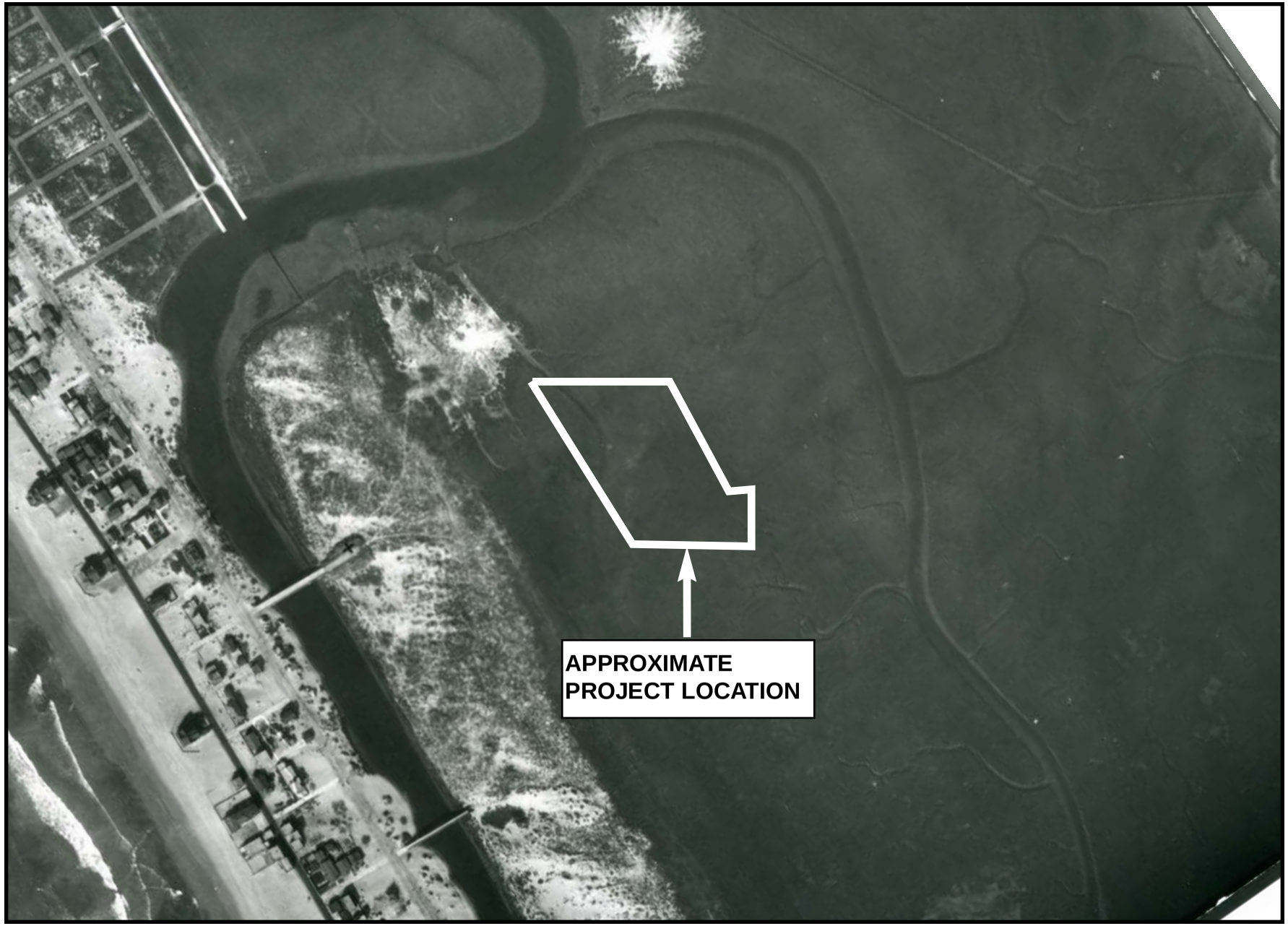
February 2, 2005



Adapted from Fairchild Aerial Photography Collection Flight C-164 Frame 14

NORTH

PARCEL 9U

1928 Historic Aerial Photograph

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Exhibit 4

GLENN LUKOS ASSOCIATES

Exhibit 5

PARCEL 9U

1936 Historic Aerial Photograph

Adapted from Fairchild Aerial Photography Collection
Flight C-3847 Frame 11

NORTH

GLENN LUKOS ASSOCIATES

Exhibit 6

PARCEL 9U

1956 Historic Aerial Photograph

Adapted from Fairchild Aerial Photography Collectioin
Flight C-22403A Frame 11

NORTH

GLENN LUKOS ASSOCIATES

Exhibit 7

PARCEL 9U

1962 Historic Aerial Photograph

Adapted from Fairchild Aerial Photography Collection
Flight C-24400 Frame 16:101

NORTH

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9u - Marina del Rey
Applicant/Owner: Woodfin Suites
Investigator: TBonkemp

Date: 10-22-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: Ruderal
Transect ID:
Plot ID: 1

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Cressa truxillensis	H	FACW
2. Bassia hyssopifolia	H	FAC
3. Paraphalis incurva	H	OBL
4.		
5.		
6.		
7.		
8.		

Dominant Plant Species	Stratum	Indicator
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
- ___ Stream, Lake, or Tide Gauge
- ___ Aerial Photographs
- ___ Other

X No Recorded Data Available

Field Observations:

Depth of Surface Water: None (in.)
Depth to Free Water in Pit: None (in.)
Depth to Saturated Soil: None (in.)

Wetland Hydrology Indicators:

Primary Indicators:
- ___ Inundated
- ___ Saturated in Upper 12 Inches
- NONE ___ Water Marks
- ___ Drift Lines
- ___ Sediment Deposits
- ___ Drainage Patterns in Wetlands

Secondary Indicators (2 or more required):
- ___ Oxidized Root Channels in Upper 12 Inches
- ___ Water-Stained Leaves
- NONE ___ Local Soil Survey Data
- ___ FAC-Neutral Test
- ___ Other (Explain in Remarks)

Remarks: Rain on 10/16 + 10/20
Pit to 14" - no saturation - only slightly moist

SOILS

Map Unit Name (Series and Phase): Oceano

Drainage Class: Excessive

Taxonomy (Subgroup): N/A

Field Observations
Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
		See Data Sheet From 8-18-04			

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks:

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? Yes (No)
Hydric Soils Present? Yes (No)

(Circle)
Is this Sampling Point Within a Wetland? Yes (No) #6

Remarks: Meets single parameter Potential wetland for CCC.

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9U - Marina del Rey Applicant/Owner: City OF L.A. Investigator: T Bornkamp	Date: 8-18-04 County: LA State: CA
Do Normal Circumstances exist on the site? (Yes) No Is the site significantly disturbed (Atypical Situation)? Yes (No) Is the area a potential Problem Area? Yes (No) (If needed, explain on reverse.)	Community ID: BulRush Transect ID: Plot ID: 2

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
1. Cressa truxillensis	H	FACW	9.		
2. Scirpus Maritimus	H	OBL	10.		
3.			11.		
4.			12.		
5.			13.		
6.			14.		
7.			15.		
8.			16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
- ___ Stream, Lake, or Tide Gauge
- ___ Aerial Photographs
- ___ Other

X No Recorded Data Available

Field Observations:

Depth of Surface Water: / (in.)

Depth to Free Water in Pit: / (in.)

Depth to Saturated Soil: ((in.)

Wetland Hydrology Indicators:

Primary Indicators:
- ___ Inundated
- ___ Saturated in Upper 12 Inches
- ___ Water Marks
- ___ Drift Lines
- ___ Sediment Deposits
- ___ Drainage Patterns in Wetlands

Secondary Indicators (2 or more required):
- ___ Oxidized Root Channels in Upper 12 Inches
- ___ Water-Stained Leaves
- ___ Local Soil Survey Data
- X FAC-Neutral Test
- ___ Other (Explain in Remarks)

Remarks: Dry at 18"

One secondary indicator

SOILS

Map Unit Name (Series and Phase): Oceano — Drainage Class: Well

Taxonomy (Subgroup): N/A — Field Observations Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-2		10YR 3/2	NONE		
2-9		2.5Y 3/2	7.5YR 4/6	Common/Distinct	Sandy loam
9-18		3/N	7.5YR	" "	

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks: Hydric soils appear to have formed under Regime of Groundwater Saturation - NOT Present currently - Further investigation needed to determine whether it is existing.

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? Yes No TBD
Hydric Soils Present? (Yes)* No

Is this Sampling Point Within a Wetland? (Circle) TBD Yes No

Remarks: * May be relictual - TBD

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9 V
Applicant/Owner: Woodfin Suites
Investigator: Mountcastle

Date: 10-22-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: EMERGENT MARSH
Transect ID:
Plot ID: 2

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Scirpus maritimus	H	OBL
2. Cressa truxillensis	H	FACW
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
- ___ Stream, Lake, or Tide Gauge
- ___ Aerial Photographs
- ___ Other

X No Recorded Data Available

Field Observations:

Depth of Surface Water: NONE (in.)
Depth to Free Water in Pit: 7-8" (in.)
Depth to Saturated Soil: 6-7" (in.)

Wetland Hydrology Indicators:
Primary Indicators:
- ___ Inundated
- X Saturated in Upper 12 Inches
- ___ Water Marks
- ___ Drift Lines
- ___ Sediment Deposits
- ___ Drainage Patterns in Wetlands

Secondary Indicators (2 or more required):
- ___ Oxidized Root Channels in Upper 12 Inches
- ___ Water-Stained Leaves
- ___ Local Soil Survey Data
- ___ FAC-Neutral Test
- ___ Other (Explain in Remarks)

Remarks:

SOILS

Map Unit Name (Series and Phase): Oceano

Drainage Class: Excessive

Taxonomy (Subgroup): _____

Field Observations
Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
		~~See Data Sheet~~			
		~~From 8-18-04~~			

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- X Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks: Saturation at 6-7 inches is likely cause of depleted / Gleyed Matrix

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? (Yes) No
Hydric Soils Present? (Yes) No

Is this Sampling Point Within a Wetland? (Yes) No (Circle)

Remarks:

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9U Marina del Rey
Applicant/Owner: City of LA
Investigator: TBrinkman
Date: 8-18-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: Ruderal
Transect ID:
Plot ID: 3

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Salix exigua	S	OBL
2. Bromus diandrus	H	UPL
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 50 %

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:
Depth of Surface Water: Dry (in.)
Depth to Free Water in Pit: Dry (in.)
Depth to Saturated Soil: Dry (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
None ___ Saturated in Upper 12 Inches
___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
None ___ Water-Stained Leaves
___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

Remarks: Pit to 18" - very Dry

SOILS

Map Unit Name (Series and Phase): Oceano

Drainage Class: Null

Taxonomy (Subgroup): NA

Field Observations Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-18		2.5Y 3/3	7.5Y 4/6	Few Distinct	Clay areas Mixed w/ sand

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks: Soils Relictual

WETLAND DETERMINATION

		(Circle)
Hydrophytic Vegetation Present?	Yes (No)	
Wetland Hydrology Present?	Yes (No)	
Hydric Soils Present?	Yes (No)	
Is this Sampling Point Within a Wetland?	Yes (No)	

Remarks:

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9V
Applicant/Owner: Woodfin
Investigator: TBowkamp

Date: 10-22-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: Willows
Transect ID:
Plot ID: 3

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Salix exigua	S	OBL
2. Bromus diandrus	H	UPL
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 50%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:

Depth of Surface Water: NONE (in.)
Depth to Free Water in Pit: NONE (in.)
Depth to Saturated Soil: NONE (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
___ Saturated in Upper 12 Inches
NONE ___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
___ Water-Stained Leaves
NONE ___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

Remarks:

SOILS

Map Unit Name
(Series and Phase): _____ Drainage Class: _____

Taxonomy (Subgroup): _____ Field Observations
Confirm Mapped Type? Yes No

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-18		2.5Y 3/3	7.5 Y 4/6	Few / DISTINCT	

Hydric Soil Indicators:

___ Histosol
___ Histic Epipedon
___ Sulfidic Odor
___ Aquic Moisture Regime
___ Reducing Conditions
___ Gleyed or Low-Chroma Colors
___ Concretions
___ High Organic Content in Surface Layer in Sandy Soils
___ Organic Streaking in Sandy Soils
___ Listed on Local Hydric Soils List
___ Listed on National Hydric Soils List
___ Other (Explain in Remarks)

Remarks: Does not meet as MUST have chroma OF 2 OR less w/ MOTTLES. LIKELY indicates Relictual character OF MOTTLES which were transported FROM excavated Material

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	Yes (No)	(Circle)
Wetland Hydrology Present?	Yes (No)	
Hydric Soils Present?	Yes (No)	
Is this Sampling Point Within a Wetland?	Yes (No)	(Circle)

Remarks:

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9 v Marina del Rey Applicant/Owner: City of LA Investigator: T Bottenkamp	Date: 8-18-04 County: LA State: CA
Do Normal Circumstances exist on the site? (Yes) No Is the site significantly disturbed (Atypical Situation)? Yes (No) Is the area a potential Problem Area? Yes (No) (If needed, explain on reverse.)	Community ID: Ruderal Transect ID: Plot ID: 4

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
1. Cressa truxillensis	H	FACW	9.		
2.			10.		
3.			11.		
4.			12.		
5.			13.		
6.			14.		
7.			15.		
8.			16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-).

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:

Depth of Surface Water: None (in.)
Depth to Free Water in Pit: None (in.)
Depth to Saturated Soil: None (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
None ___ Saturated in Upper 12 Inches
___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
None ___ Oxidized Root Channels in Upper 12 Inches
___ Water-Stained Leaves
___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

Remarks: Pit dry to 18"

SOILS

Map Unit Name (Series and Phase): Oceano

Drainage Class: Well

Taxonomy (Subgroup): NA

Field Observations
Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-4		Sand			
	Sandy Intermediate	5Y 4/3	Alternating w/		
4-7		2.5Y 4/1	NONE		
		2.5Y 3/2			
7-12		10YR 3/6	NONE		
12-18		Layers of Gleyed sand + clay			

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks: Potential Redox Formation

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? Yes (No)
Hydric Soils Present? (Yes) No * Potential

Is this Sampling Point Within a Wetland? (Circle) Yes (No)

Remarks:

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9V Applicant/Owner: WestFin Suites Investigator: T Bomkamp	Date: 10-22-04 County: LA State: CA
Do Normal Circumstances exist on the site? (Yes) No Is the site significantly disturbed (Atypical Situation)? Yes (No) Is the area a potential Problem Area? Yes (No) (If needed, explain on reverse.)	Community ID: Ruderal Transect ID: Plot ID: 4

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
1. Cressa truxillensis	H	FACW	9.		
2.			10.		
3.			11.		
4.			12.		
5.			13.		
6.			14.		
7.			15.		
8.			16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-): 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
- ___ Stream, Lake, or Tide Gauge
- ___ Aerial Photographs
- ___ Other

X No Recorded Data Available

Field Observations:

Depth of Surface Water:	NONE	(in.)
Depth to Free Water in Pit:	11-12	(in.)
Depth to Saturated Soil:	11-12	(in.)

Wetland Hydrology Indicators:

Primary Indicators:
- ___ Inundated
- X Saturated in Upper 12 Inches
- ___ Water Marks
- ___ Drift Lines
- ___ Sediment Deposits
- ___ Drainage Patterns in Wetlands

Secondary Indicators (2 or more required):
- ___ Oxidized Root Channels in Upper 12 Inches
- ___ Water-Stained Leaves
- ___ Local Soil Survey Data
- ___ FAC-Neutral Test
- ___ Other (Explain in Remarks)

Remarks: Saturated zone at 11-12 inches on top of clay area

SOILS

Map Unit Name (Series and Phase): Oceano — Drainage Class: Exessive

Taxonomy (Subgroup): NA — Field Observations Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
			See sheet from 8-18-04		

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks: Redox observed on 8-18-04 Consistent w/ shallow perched water at 11-12 inches

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? (Yes) No
Hydric Soils Present? (Yes) No

Is this Sampling Point Within a Wetland? (Circle) (Yes) No

Remarks:

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9U - Marina del Rey Applicant/Owner: CITY OF LA Investigator: TBornkamp	Date: 8-18-04 County: LA State: CA
Do Normal Circumstances exist on the site? (Yes) No Is the site significantly disturbed (Atypical Situation)? Yes (No) Is the area a potential Problem Area? Yes (No) (If needed, explain on reverse.)	Community ID: Ruderal Transect ID: Plot ID: 5

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
1. Cynodon dactylon	H	FAC	9.		
2. Bromus diandrus	H	UPL	10.		
3. Paraphalis incurva	H	OBL	11.		
4.			12.		
5.			13.		
6.			14.		
7.			15.		
8.			16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 66/67%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:

Depth of Surface Water: Dry (in.)
Depth to Free Water in Pit: Dry (in.)
Depth to Saturated Soil: Dry (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
___ Saturated in Upper 12 Inches
NONE ___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
___ Water-Stained Leaves
NONE ___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

Remarks: Dry to 18"

SOILS

Map Unit Name (Series and Phase): Oceano — Drainage Class: well

Taxonomy (Subgroup): NA — Field Observations Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-8	Sandy	2.5Y 3/2	-3/3	NO MOTTLES	
8-12		2.5Y 3/1	NONE		

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks:

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? Yes (No)
Hydric Soils Present? Yes (No)

Is this Sampling Point Within a Wetland? (Circle) Yes (No)

Remarks:

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9V
Applicant/Owner: WOODFIN Suites
Investigator: TBonnKamp

Date: 10-22-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: Ruderal
Transect ID:
Plot ID: 5

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Cynodon dactylon	H	FAC
2. Bromus diandrus	H	UPL
3. Parapholis incurva	H	OBL
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 67%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:
Depth of Surface Water: Dry to 18" (in.)
Depth to Free Water in Pit: Dry to 18" (in.)
Depth to Saturated Soil: Dry To 18" (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
___ Saturated in Upper 12 Inches
NONE ___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
NONE ___ Water-Stained Leaves
___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

Remarks:

SOILS

Map Unit Name
(Series and Phase): _____ Drainage Class: _____

Taxonomy (Subgroup): _____ Field Observations
Confirm Mapped Type? Yes No

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-8	Sandy	2.5Y 3/2	-3/3	No Redox	
8-12		2.5Y 3/1	NONE		

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks:

WETLAND DETERMINATION

			(Circle)
Hydrophytic Vegetation Present?	(Yes)	No	
Wetland Hydrology Present?	Yes	(No)	
Hydric Soils Present?	Yes	(No)	
Is this Sampling Point Within a Wetland?	Yes	(No)	

Remarks: NO For Three Parameter - Potentially at Boundary For CCC wetland

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9 U
Applicant/Owner: Woodfin Suites
Investigator: TBontamp

Date: 10-22-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: Ruderal
Transect ID:
Plot ID: 6

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Cressa truxillensis	H	FACW
2. Bassia hyssopifolia	H	FAC
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:
Depth of Surface Water: NONE (in.)
Depth to Free Water in Pit: * 12-13 (in.)
Depth to Saturated Soil: * 12-13 (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
X Saturated in Upper 12 Inches
___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
___ Water-Stained Leaves
___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)
None

Remarks:
* Perched zone of saturation between 12 and 13 inches

SOILS

Map Unit Name (Series and Phase): Oceano — Drainage Class: Excessive

Taxonomy (Subgroup): N/A — Field Observations Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-8		10YR 2/2	7.5YR 4/6	Common/distinct	Sandy Loam
8-18		2.5Y 3/2	Same	" "	" "
		Mottles may be Relict/wet			

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- X Aquic Moisture Regime – narrow pinched zone
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks:

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? (Yes) No
Hydric Soils Present? (Yes) No

Is this Sampling Point Within a Wetland? (Circle) (Yes) No

Remarks:

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9V
Applicant/Owner: WoodFin Suites
Investigator: E. Bornkamp / F. Hoffman

Date: 12-1-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: Willow Scrub
Transect ID:
Plot ID: 7

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Salix exigua	S	OBL
2. Cynodon dactylon	H	FAC
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:
Depth of Surface Water: Dry to 16" (in.)
Depth to Free Water in Pit: 11 (in.)
Depth to Saturated Soil: 0 (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
___ Saturated in Upper 12 Inches
___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
___ Water-Stained Leaves
___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

Remarks: Pit ≈ 1/2 way up slope

SOILS

Map Unit Name (Series and Phase): Oceano

Drainage Class: Excessive

Taxonomy (Subgroup): NA

Field Observations
Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-16		2.5Y3/2	NONE		Sand + SILT

Hydric Soil Indicators:

NONE
- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors

NONE
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks:

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? Yes (No)
Hydric Soils Present? Yes (No)

Is this Sampling Point Within a Wetland? (Yes) No (Circle)

Remarks: Sampling Point at Wetland Boundary

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9U
Applicant/Owner: Woodfin Suites
Investigator: E Bonkamp / F Hoffman

Date: 12-1-04
County: LA
State: CA

Do Normal Circumstances exist on the site? Yes No
Is the site significantly disturbed (Atypical Situation)? Yes No
Is the area a potential Problem Area? Yes No
(If needed, explain on reverse.)

Community ID: Willow Scrub
Transect ID:
Plot ID: 8

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Salix exigua	S	OBL
2. Cressa truxillensis	H	FACW
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-): 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:

Depth of Surface Water: NONE (in.)
Depth to Free Water in Pit: 11-12 (in.)
Depth to Saturated Soil: 11-12 (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
X Saturated in Upper 12 Inches
___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
___ Water-Stained Leaves
___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

Remarks:

SOILS

Map Unit Name (Series and Phase): Oceano

Drainage Class: Excessive

Taxonomy (Subgroup): NA

Field Observations Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-4		2.5Y 5/2	10YR 5/8		
4-16		2.5Y 3/1	NONE		

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- X Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Potentially Relictual though could be from Subsurface Hydrology.

Remarks:

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)

Wetland Hydrology Present? (Yes) No

Hydric Soils Present? (Yes) No

Is this Sampling Point Within a Wetland? (Circle) (Yes) No

Remarks: Potentially Relictual but presumed in due to presence of subsurface hydrology

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9 U Applicant/Owner: WOODFin Suites Investigator: T Bomkamp	Date: 10-22-04 County: LA State: CA
Do Normal Circumstances exist on the site? Yes No Is the site significantly disturbed (Atypical Situation)? Yes No Is the area a potential Problem Area? Yes No (If needed, explain on reverse.)	Community ID: Ruderal Transect ID: Plot ID: 9

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
1. Cressa truxillensis	H	FACW	9.		
2. Bassia hyssopifolia	H	FAC	10.		
3.			11.		
4.			12.		
5.			13.		
6.			14.		
7.			15.		
8.			16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-). 100%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
- ___ Stream, Lake, or Tide Gauge
- ___ Aerial Photographs
- ___ Other

X No Recorded Data Available

Field Observations:

Depth of Surface Water: Dry to 18" (in.)

Depth to Free Water in Pit: Dry to 16" (in.)

Depth to Saturated Soil: Dry to 18" (in.)

Wetland Hydrology Indicators:

Primary Indicators:
- ___ Inundated
- ___ Saturated in Upper 12 Inches
- ___ Water Marks
- ___ Drift Lines
- ___ Sediment Deposits
- ___ Drainage Patterns in Wetlands

NONE

Secondary Indicators (2 or more required):
- ___ Oxidized Root Channels in Upper 12 Inches
- ___ Water-Stained Leaves
- ___ Local Soil Survey Data
- ___ FAC-Neutral Test
- ___ Other (Explain in Remarks)

NONE

Remarks:

SOILS

Map Unit Name (Series and Phase): Oceano — Drainage Class: Excessive

Taxonomy (Subgroup): NA — Field Observations Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-16		2.5Y 3/3	None - Clean Brown Soil on Small Rise at elevation 2.5		

Hydric Soil Indicators:

None
- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors

None
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks:

WETLAND DETERMINATION

Hydrophytic Vegetation Present? (Yes) No (Circle)
Wetland Hydrology Present? Yes (No)
Hydric Soils Present? Yes (No)

Is this Sampling Point Within a Wetland? * (Circle) (Yes) No

Remarks:

* Area lacks hydrology and soil clearly different and more "upland" than in areas around Pits 1 and 4. However based on vege - Potential CCC wetland

Approved by HQUSACE 3/92

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 COE Wetlands Delineation Manual)

Project/Site: Parcel 9V Marina del Rey
Applicant/Owner: Woodfin Suites
Investigator: TBornkamp

Date: 10-22-04
County: LA
State: CA

Do Normal Circumstances exist on the site? (Yes) No
Is the site significantly disturbed (Atypical Situation)? Yes (No)
Is the area a potential Problem Area? Yes (No)
(If needed, explain on reverse.)

Community ID: Ruderal
Transect ID:
Plot ID: 10

VEGETATION

Dominant Plant Species	Stratum	Indicator
1. Mesembryanthemum nodiflorum	H	UPL
2. Bromus rubens	H	UPL
3. Cressa truxillensis	H	FACW
4.		
5.		
6.		
7.		
8.		

Dominant Plant Species	Stratum	Indicator
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		

Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-): 33%

Remarks:

HYDROLOGY

___ Recorded Data (Describe in Remarks):
___ Stream, Lake, or Tide Gauge
___ Aerial Photographs
___ Other
X No Recorded Data Available

Field Observations:

Depth of Surface Water: None (in.)
Depth to Free Water in Pit: None (in.)
Depth to Saturated Soil: None (in.)

Wetland Hydrology Indicators:
Primary Indicators:
___ Inundated
___ Saturated in Upper 12 Inches
___ Water Marks
___ Drift Lines
___ Sediment Deposits
___ Drainage Patterns in Wetlands
Secondary Indicators (2 or more required):
___ Oxidized Root Channels in Upper 12 Inches
___ Water-Stained Leaves
___ Local Soil Survey Data
___ FAC-Neutral Test
___ Other (Explain in Remarks)

None
None

Remarks: Rain on 10/16 + 10/20
Pit TD 14" no saturation - Some Moisture in Profile

SOILS

Map Unit Name (Series and Phase): Ollano

Drainage Class: Excessive

Taxonomy (Subgroup): —

Field Observations
Confirm Mapped Type? Yes (No)

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-8		2.5Y 3/3	NONE		Sandy loam
8-12		2.5Y 3/1	NONE		Sandy loam

Hydric Soil Indicators:

- ___ Histosol
- ___ Histic Epipedon
- ___ Sulfidic Odor
- ___ Aquic Moisture Regime
- ___ Reducing Conditions
- ___ Gleyed or Low-Chroma Colors
- ___ Concretions
- ___ High Organic Content in Surface Layer in Sandy Soils
- ___ Organic Streaking in Sandy Soils
- ___ Listed on Local Hydric Soils List
- ___ Listed on National Hydric Soils List
- ___ Other (Explain in Remarks)

Remarks:

WETLAND DETERMINATION

Hydrophytic Vegetation Present? Yes (No) (Circle)
Wetland Hydrology Present? Yes (No)
Hydric Soils Present? Yes (No)

Is this Sampling Point Within a Wetland? (Circle) Yes (No)

Remarks: