January 15, 2021

Ogden 3, LLC c/o Wade Rumsey & Igor Maksymiw 1835 West 1500 South Salt Lake City, UT 84104

**Subject:** Ogden 3 West Weber Property Preliminary Wetlands Assessment

Property Parcel #15:078:0002

Approximately 40.8-acre Project Area, West Weber, Weber County, Utah

Section 28, Township 6 North, Range 2 West, SLB&M

Dear Sirs:

Per your request, Frontier Corporation USA (Frontier) completed a preliminary wetlands assessment for an approximately 40.8-acre Project Area located in West Weber, Weber County, Utah (Figure 1). The Project Area consists of property parcel #15:078:0002. The Project Area is located on the east side of 3500 West, the south side 1800 South, and the north side of Taylor Canal in Section 28, Township 6 North, Range 2 West, Salt Lake Base and Meridian (SLB&M) (Figures 2a and 2b). The approximate street address for the Project Area is 1800 South 3600 West.

The Project Area is situated on the flat lake plain of the Great Salt Lake eastern shorelands. Surface topography ranges between approximately 4,248 feet and 4,236 feet and includes three topographically distinct lake terraces: a high lake terrace located in the southwest portion of the Project Area; a middle lake terrace located in the northeast and northwest portions of the Project Area; and a low lake terrace located in the central portion of the Project Area.

A buried storm drain runs along 1800 South paralleling the north Project Area boundary. A lateral irrigation ditch runs along the west Project Area boundary and appears to convey water diverted from the buried storm drain. There also appears to be remnants of an excavated stock pond located along 1800 South in the northeast corner of the Project Area. Flowing water was observed in the buried storm drain, and frozen water was observed in the irrigation ditch and remnants of the excavated stock pond when the site inspection for the preliminary wetlands assessment was completed on December 29, 2020.

The high and middle lake terraces contain upland plant communities on ground that appears to have been flood irrigated in the past. The low lake terrace contains a saline wet meadow plant community dominated by saltgrass.

The National Wetlands Inventory (NWI) mapping data shows the presence of two palustrine emergent persistent, seasonally flooded (PEM1C) wetlands (Figure 3). One of the PEM1C

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wetlands generally corresponds to the saline wet meadow that occurs on the low lake terrace and one is located on the high lake terrace in the southeast corner of the Project Area. PEM1C wetlands are commonly associated with farm fields and pastures that are flood irrigated.

Wetlands, streams, canals, ponds, and other types of water bodies can be regulated by the U.S. Army Corps of Engineers (USACE) as waters of the U.S. (WoUS) under Section 404 of the federal Clean Water Act if they have a jurisdictional nexus to a traditional navigable water (i.e., the Great Salt Lake). However, the USACE will not regulate irrigation-induced wetlands if they would not exist in the absence of irrigation water.

The purpose of this preliminary wetlands assessment is to identify the presence (or absence) of potential wetlands and/or other water bodies within the Project Area that may fall under the USACE's Section 404 permitting regulations. Objectives are twofold:

- 1. Identify and preliminarily map the locations of potential wetlands and/or other aquatic resource features within the Project Area that exist under current site conditions, and
- 2. Assess whether such features may have jurisdictional connections to the Great Salt Lake and/or other potential WoUS in accordance with the 2020 Navigable Waters Protection Rule (NWPR) (Dept. Army, Corps of Engineers 33 CFR Part 328).

This preliminary wetlands assessment is for planning purposes only. The assessment was not done at a level of detail necessary for a formal USACE wetland delineation, which would be required for permit applications to fill, relocate or otherwise physically alter regulated wetlands or other WoUS for site development.

#### **METHODS**

The preliminary assessment consisted of an online query of existing NWI, National Hydrography Dataset (NHD), U.S. Department of Agriculture Natural Resources Conservation Service (USDA-NRCS) Soil Survey, and U.S. Geological Survey (USGS) databases; a review of historical aerial imagery using Google Earth; and an initial site inspection that was completed on December 29, 2020. Areas that appeared to have wetland plant communities and evidence of potential sources of wetland hydrology at the time of the site inspections were identified as potential wetland areas, and checked against the NWI, NHD, USDA-NRCS and USGS databases. Stream channels, man-made ditches, ponds and other potential water features were similarly identified and preliminarily mapped.

Areas that were dominated by upland plant communities with no evidence of potential water sources for wetland hydrology were identified as uplands.

Areas that could not be clearly discerned as being either wetlands or uplands without completing a formal USACE wetland delineation were identified as "problem areas". Further investigation following the Corps of Engineers 2008 Arid West Delineation Manual would be necessary in order to determine whether problem areas meet the wetland delineation criteria.

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Aerial imagery dated August 17, 2018 was obtained from the Utah AGRC imagery database and used to produce aerial field maps. The locations of potential wetlands, ponds, streams, canals, ditches and other water features were marked on the aerial field maps. The identified features were digitized in the office and incorporated into a Geographic Information Systems (GIS) database using ArcGIS. The aerial imagery data and the USGS, Soil Survey, NHD, and NWI map data were obtained online and added to the GIS database.

GIS was used to produce the site location maps (Figure 1, 2a and 2b), NWI map (Figure 3), Preliminary Wetlands Assessment Map (Figure 4), Soil Survey map (Figure 5), and NHD map (Figure 6). Representative photographs showing existing site conditions at the Project Area are provided in the attached photo log. Photo point locations and view directions are shown on the Preliminary Wetlands Assessment Map (Figure 4).

#### LAND USE

The majority of the Project Area consists of undeveloped farmland and semi-arid rangeland that has been historically irrigated and managed as farm field and livestock pasture. The west portion of the Project Area has been recently filled and graded for future residential development.

The Project Area is situated on three levels of lake terraces. According to Google Earth historic imagery coupled with observations during the December 29, 2020 inspection, it appears that the high and medium lake terraces have been historically managed as flood irrigated pasture fields. The low lake terrace occurs in the central portion of the Project Area and shows no evidence of past farming practices. The low lake terrace has saline soils that are dominated by salt-tolerant saltgrass and other saline wet meadow plant species. Livestock grazing was likely the main land use on the low lake terrace.

A buried storm drain paralleling the south side of 1800 South was recently installed. The storm drain conveys water in an east/west direction along the north Project Area boundary. Flows in the storm drain appear to be split between an open road ditch that continues along the south side of 1800 South and an irrigation ditch (Ditch 1) that runs along the west Project Area boundary (Figure 4). Flowing water was observed in the buried storm drain and frozen water was observed in Ditch 1 during the December 29, 2020 site inspection.

An abandoned irrigation ditch is located along the east Project Area boundary. The abandoned irrigation ditch was dry during the site inspection and showed no indicators of an OHWM or any other evidence that would suggest recent use. Only the storm drain and those ditches with evidence of prolonged flows (Ditch 1) were mapped. The remnants of a man-made stock pond (Stock Pond) was identified and mapped along 1800 South in the northeast corner of the Project Area (Figure 4).

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#### **FINDINGS**

No perennial or intermittent stream channels are present in the Project Area. No readily discernible wetlands were identified in the Project Area.

One problem area (Problem Area 1), the remnants of one man-made stock pond (Stock Pond), and one excavated man-made irrigation ditch (Ditch 1) with evidence of ditch flows were identified and preliminarily mapped within the Project Area boundaries (Figure 4, Table 1).

Table 1. Potential Wetlands and Water Bodies Identified within the Project Area

Feature Name	Туре	Area (acres)	Length (feet)
Problem Area 1	Saline Wet Meadow	5.43	-
Stock Pond	Man-made Stock Pond	0.01	-
Ditch 1	Irrigation Ditch	-	2,048

#### **Problem Areas**

**Problem Area 1** (approximately 5.43 acres) is situated on the low lake terrace of the Project Area. It consists of mixed saline wet meadow plant community that is dominated by: saltgrass (*Distichlis spicata*). Saltgrass is a facultative and salt-tolerant plant species that can commonly occur in either wetlands or uplands. Other plants include a mix of wetland and upland species, including: seaside barley (*Hordeum marinum*), Baltic rush (*Juncus balticus*), Mexican rush (*Juncus mexicanus*), oakleaf goosefoot (*Chenopodium glaucum*), intermediate wheatgrass (*Thinopyrum intermedium*), western wheatgrass (*Pascopyrum smithii*), as well as various upland grasses and forbs. Because this problem area is situated on the lowest elevation terrace at this site, it is unknown whether the presence of the saline wet meadow plant species is due to dry saline soil conditions or due to the presence of a naturally high water table that causes prolonged soil saturation that could be indicative of a saline wet meadow wetland. Further investigation during the growing season would be needed to verify whether the problem area meets all of the USACE's Arid West wetland delineation criteria for soils, hydrology, and wetland vegetation.

#### **Water Bodies**

**Ditch 1** (Approximately 2,048 feet) is an excavated man-made irrigation ditch that runs along the eastern and southern boundaries of the Project Area before terminating in the property east of the Project Area. Ditch 1 appears to receive water diverted from the buried storm drain in the northwest corner of the Project Area. Frozen water was observed in Ditch 1 during the time of the site inspection and surface water is discernible in Ditch 1 on historic Google Earth aerial imagery, but no diversion structure on the storm drain was identified in the field during the December 29, 2020 site inspection. Wetland vegetation was observed in the bottom and along the banks of Ditch 1. Ditch 1 has indicators of an ordinary high water mark (OHWM) but the source of water and how the water in Ditch 1 is controlled or managed is unknown at this time. Further investigation is needed to determine the source of water in Ditch 1 and how the ditch is operated for irrigation.

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The **Stock Pond** (approximately 0.01 acre) is a remnant, man-made, excavated stock pond that was once used for livestock management. The bottom of the Stock Pond is about 2-3 feet lower in elevation than the native ground elevation. It appears that the excavation of the Stock Pond has intercepted the water table and wetland plants have established on the pond bottom. Frozen water was observed on the bottom of the stock pond during the time of the site inspection.

#### **Uplands**

The remaining 35.36 acres of the Project Area consists of uplands. Common plants identified within the upland areas included: greasewood (*Sarcobatus vermiculatus*), cheatgrass (*Bromus tectorum*), clasping pepperweed (*Lepidium perfoliatum*), five-horn smotherweed (*Bassia hyssopifolia*), wall barley (*Hordeum murinum*), prickly lettuce (*Lactuca serriola*), intermediate wheatgrass (*Thinopyrum intermedium*), bull thistle (*Cirsium vulgare*), and curly-cup gumweed (*Grindelia squarrosa*).

#### **National Wetlands Inventory Data**

The NWI mapping data for the Project Area were obtained online from the U.S. Fish and Wildlife Service (http://www.fws.gov/wetlands/Wetlands-Mapper.html). The NWI mapping was originally completed by photo-interpolation of 1:65,000-scale and 1:58,000-scale color infrared aerial photography that was flown in the early 1980s. The original aerial photography used for the initial NWI mapping is more than 35 years old, and conditions originally interpolated for the NWI mapping may no longer be present under current site conditions.

The NWI mapping shows two palustrine emergent persistent, seasonally flooded (PEM1C) wetlands within the Project Area (Figure 3). PEM1C wetlands are commonly associated with areas that are flood irrigated.

The PEM1C wetland in the central portion of the Project Area generally corresponds to Problem Area 1. This problem area requires further investigation to determine whether it meets the wetland delineation criteria. The area where the NWI shows a second PEM1C wetland in the southeast corner of the Project Area had no wetland plants and showed no other evidence of wetland conditions at December 29, 2020 site inspection. This NWI wetland was most likely associated with irrigation water from the abandoned ditch when it was regularly used for flood irrigation.

#### **Soil Survey Data**

The soil survey mapping data for the Project Area were obtained from the USDA-NRCS online database (<a href="http://websoilssurvey.nrcs.usda.gov">http://websoilssurvey.nrcs.usda.gov</a>) and cross-referenced with the hydric soils list for the area. Soils included on the hydric soils list typically have poor drainage characteristics and tend to have a prevalence of supporting wetland conditions if ample water sources are present.

The soil survey indicates that the Project Area is underlain by four soil units (Figure 5):

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- Ac Airport silt loam, 0 to 2 percent slopes;
- LS Leland-Saltair complex, 0 to 1 percent slopes;
- Sy Syracuse loam fine sand, moderately saline, sodic, 0 to 2 percent slopes; and
- WgA Warm Springs fine sandy loam, saline, 0 to 1 percent slopes.

All four of the soil units are identified on the hydric soils list for Weber County, Utah. The regular use and liberal application of flood irrigation water would be an ample source of hydrology to artificially establish wetland conditions on these soil units at this Project Area.

#### **National Hydrography Dataset**

NHD data used for mapping was obtained from the National Map database as part of the USGS National Geospatial Program (http://viewer.nationalmap.gov). The NHD flow paths for the general vicinity of the Project Area are shown on Figure 6. The major tributaries in the area are Walker Slough, which drains into the Weber River, which is a major tributary to the Great Salt Lake. The Taylor Canal is located approximately 200 feet south of the Project Area. This is a concrete lined ditch that conveys irrigation water diverted from the Weber River. The NHD flow paths show that the Project Area does not appear to have any potential flow path connections to Walker Slough, the Weber River, or Taylor Canal.

A ditch that diverts water from Walker Slough occurs on the north side of 1800 South. The ditch is labeled on Figure 4 as the "Walker Slough Diversion Ditch". There are no drainage connections between the Project Area and the Walker Slough Diversion Ditch. The 1800 South road prism functions as a barrier between the Project Area and Walker Slough. There are no road culverts located along this length of 1800 South that would connect the Project Area to the Walker Slough Diversion Ditch. There are no drainage connections between Ditch 1 and the Walker Slough Diversion Ditch. There are also no drainage connections between Ditch 1 and Taylor Canal. Ditch 1 terminates in the property located east of the Project Area (Figure 4). Both Taylor Canal and the Walker Slough Diversion Ditch have no downgradient connections to the Weber River or the Great Salt Lake.

#### JURISDICTIONAL ASSESSMENT

Features within the Project Area that would meet the USACE's delineation criteria for wetlands or other types of water bodies could be potentially regulated as WoUS if they are determined to have: (1) connections to a stream or river channel that is tributary to the Great Salt Lake, (2) connections to wetlands that are adjacent to a tributary that connects to the Great Salt Lake, or (3) connections to wetlands that are adjacent to the Great Salt Lake.

Under the current 2020 NWPR definitions, most man-made irrigation ditches constructed in uplands are not classified as tributary streams. Tributaries are defined as perennial or intermittent stream channels that normally convey surface flows during a typical year. A manmade ditch can be regulated as a WoUS if (1) the ditch relocates flows from a tributary stream, (2) it is constructed in a tributary, or (3) it is constructed in a wetland adjacent to a tributary. The

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ditch must also have perennial or intermittent flows during a typical year, and have surface water connections to a traditional navigable water. In other words, man-made ditches constructed in uplands that do not meet the conditions above are potentially non-jurisdictional waters under the 2020 NWPR. Also, under the new 2020 NWPR definitions, wetlands artificially created by irrigation water are non-jurisdictional if they would revert to uplands if the application of irrigation water is ceased.

There are no tributaries in the Project Area. The closest tributary is Walker Slough on the north side of 1800 South. Walker Slough connects to the Weber River, which is a major tributary to the Great Salt Lake. An irrigation diversion ditch off Walker Slough runs along the north side of 1800 South but does not have any connections to the Project Area.

Under the current 2020 NWPR definitions, the irrigation ditch (Ditch 1) would not be classified as a jurisdictional water if it is demonstrated that it is a man-made ditch that was constructed in uplands for the purpose of conveying irrigation water, it does not convey flows from relocated tributary channel, and the wetlands associated with this ditch has been artificially created by ditch water.

The remnant man-made stock pond (Stock Pond) would not likely be classified as a jurisdictional water because it appears to have been excavated in uplands, the wetland plants were artificially established by excavation that intercepted the water table, and the excavated stock pond has no tributary connections to Walker Slough, the Weber River or any other tributary to the Great Salt Lake.

Problem Area 1 could be classified as a wetland if it would meet the wetland delineation criteria during the spring growing season. It is unknown whether the saltgrass and other saline wet meadow plant species growing in Problem Area 1 are present due to soil salinity or prolonged soil saturation. However, if Problem Area 1 would meet the USACE delineation criteria for a wetland, it could be considered an isolated, non-jurisdictional wetland because it appears to have no tributary connections to Walker Slough, the Weber River, or the Great Salt Lake.

A formal delineation for the Project Area would have to be completed in order to get a formal jurisdictional determination from USACE that:

- 1. Verifies the presence and geographical boundaries of wetlands, ponds, ditches and other aquatic resource features that are within the Project Area boundaries.
- 2. Verifies whether any of the ditches in the Project Area meet the tributary stream definition.
- 3. Verifies the jurisdictional vs. non-jurisdictional status of each delineated aquatic resource feature.

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#### **SUMMARY**

The purpose of this preliminary wetlands assessment is to identify the presence of potential wetlands and other water bodies that could potentially be regulated as WoUS by the USACE under Section 404 of the federal Clean Water Act.

The majority of the Project Area consists of undeveloped farmland and semi-arid rangeland that has been historically irrigated and managed as farm field and livestock pasture. There are no perennial or intermittent stream channels in the Project Area, and there are no readily discernible wetlands in the Project Area.

One problem area (Problem Area 1), the remnants of one man-made stock pond (Stock Pond), and one excavated man-made irrigation ditch (Ditch 1) with evidence of ditch flows were identified within the Project Area boundaries (Figure 4, Table 1).

Further investigation would have to be done to determine if Problem Area 1 would meet the USACE delineation criteria during the spring growing season. Further investigation would also be need to document whether Problem Area 1, Ditch 1, and the Stock Pond have downgradient tributary connections to Walker Slough, the Weber River or the Great Salt Lake.

This preliminary wetlands assessment is for planning purposes only. The assessment was not done at a level of detail necessary for a formal USACE wetland delineation and jurisdictional determination. A formal delineation for the Project Area would have to be completed in order to get a formal jurisdictional determination from USACE that verifies the presence and locations of jurisdictional vs. non-jurisdictional aquatic resource features within the Project Area boundaries.

Please feel free to call me if you have any questions about the findings of our preliminary wetlands assessment.

Sincerely,

Frontier Corporation USA

Vennis C. Wenger\_

Dennis C. Wenger

Senior Wetlands Ecologist/Principal

Attachments:

Figure 1. Site Vicinity Map – 1:100,000 scale topo basemap

Figure 2a. Project Area Location Map – 1:24,000 scale topo basemap

Figure 2b. Project Area Location Map – 1:24,000 scale aerial basemap

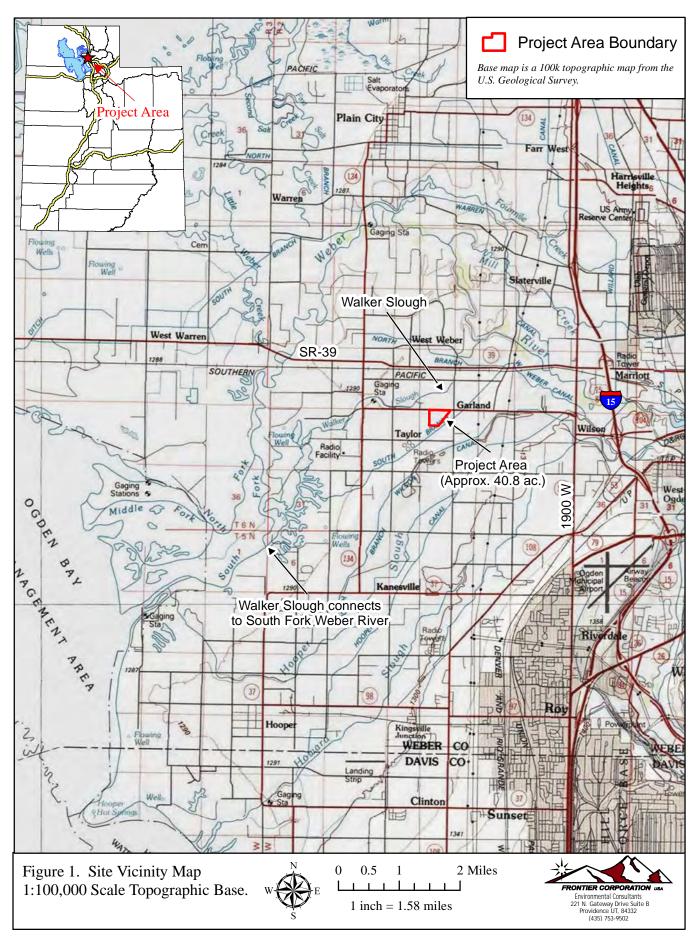
Figure 3. National Wetlands Inventory Map

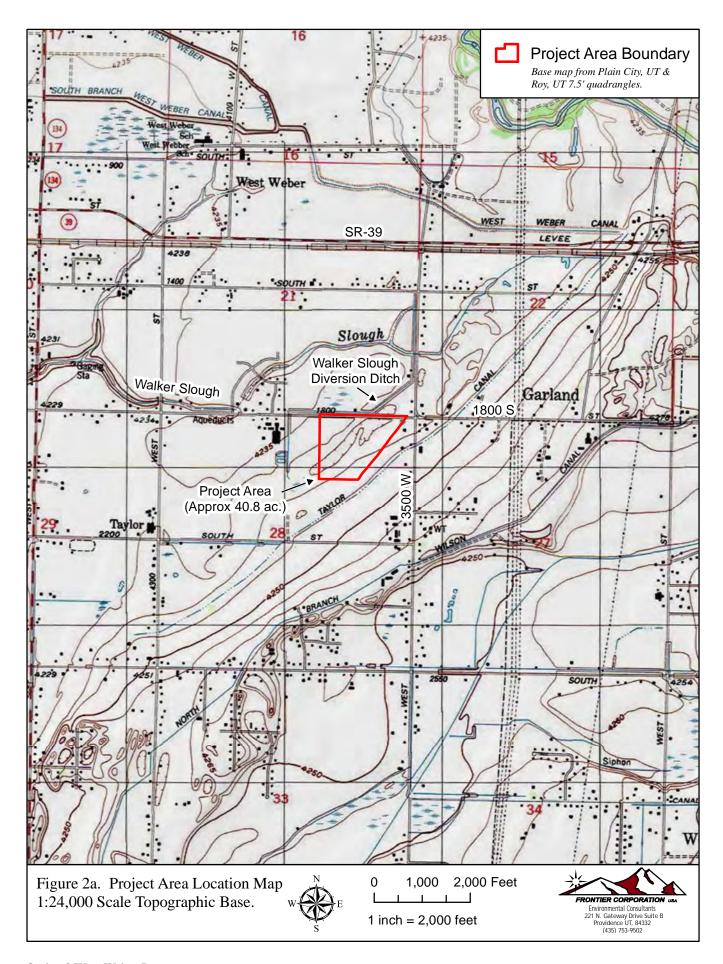
Figure 4. Preliminary Wetlands Assessment Map

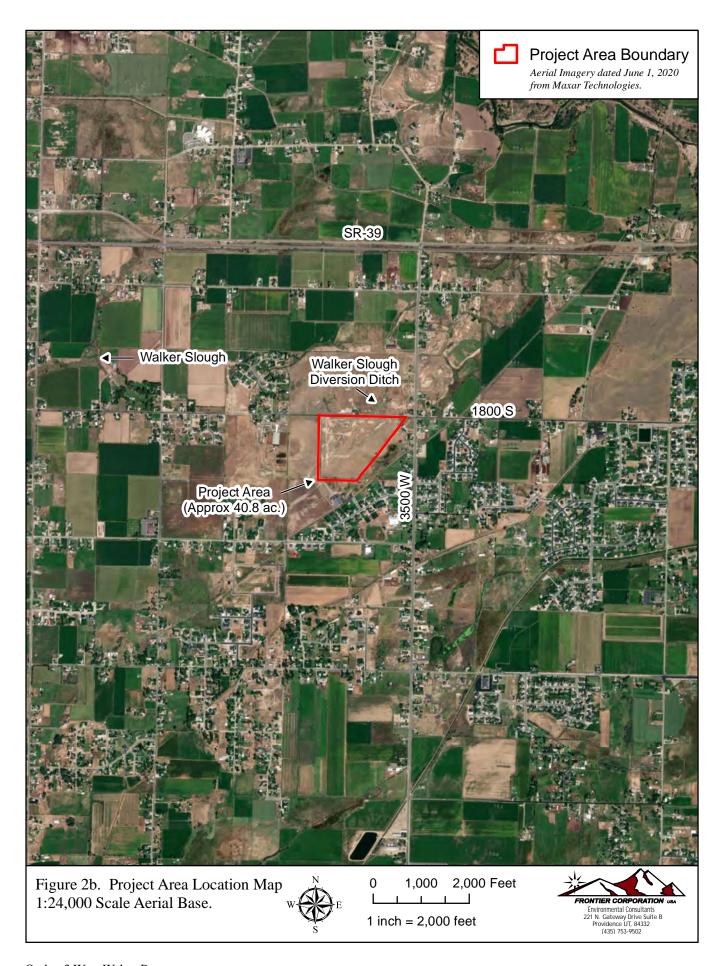
Figure 5. USDA-NRCS Soil Survey Map

Figure 6. National Hydrography Dataset Map

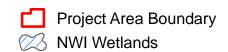
Photolog depicting current site conditions – 11 pages total







# NWI Data PEM1C - Palustrine Emergent Persistent, Seasonally Flooded R4SBCx - Riverine Intermittent Streambed, Seasonally Flooded, Excavated R5UBFx - Riverine Unkown Perennial, Unconsolidated Bottom, Semipermanently Flooded, Excavated



NWI data acquired from the USFWS NWI Mapper https://www.fws.gov/wetlands/data/Mapper



Figure 3. National Wetlands Inventory Map.

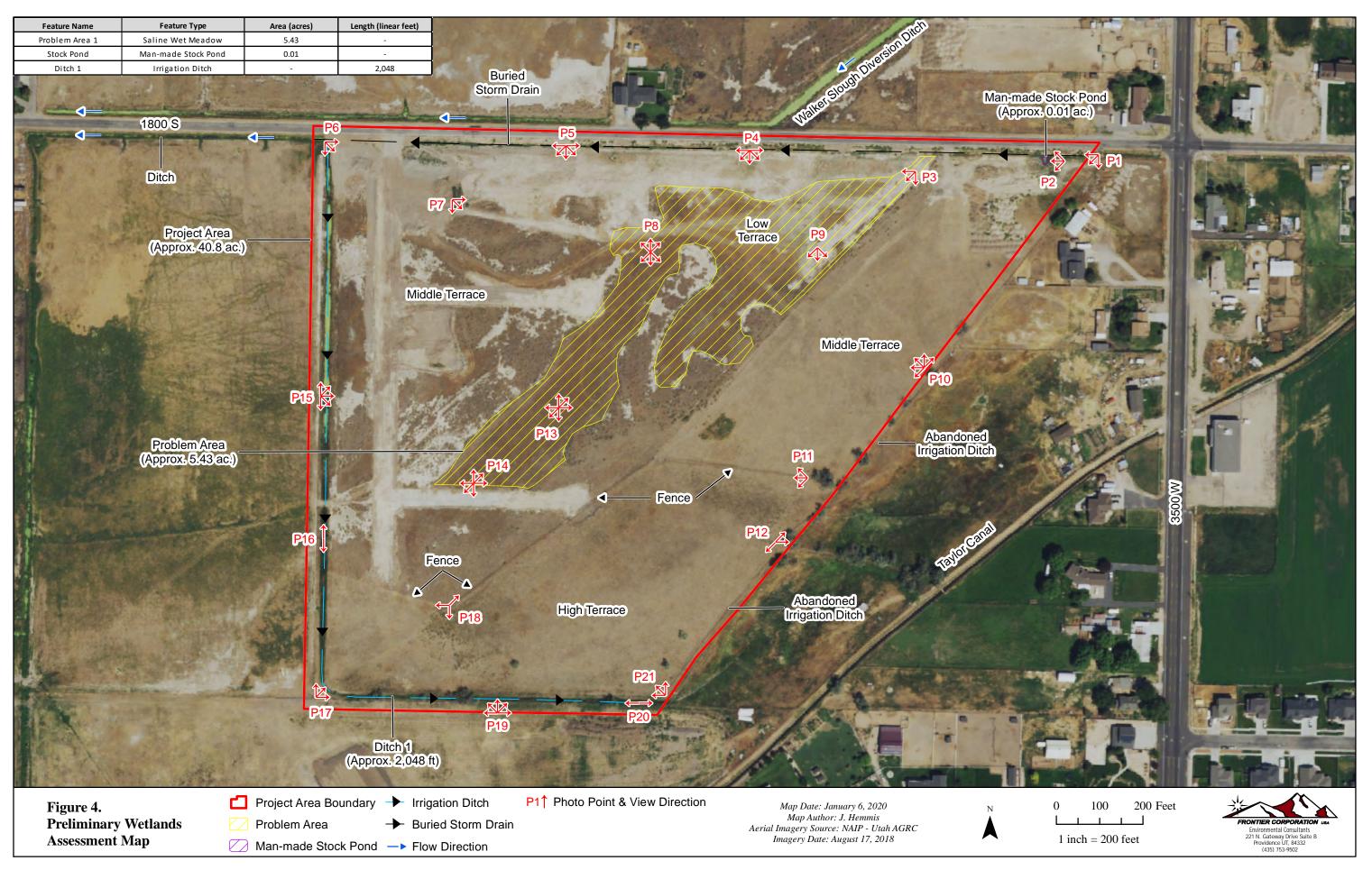
0 250 500 1,000 Feet 1 inch = 500 feet



Date Prepared: January 6, 2021 Map Preparer: J. Hemmis Aerial Image Source: NAIP - Utah AGRC Aerial Image Date: August 17, 2018



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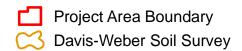
#### **Soil Units**

Ac - Airport silt loam, 0-2% slopes\*

LS - Leland-Saltair complex, 0-1% slopes\*

Sy - Syracuse loam fine sand, moderately saline, sodic, 0-2% slopes\* WgA - Warm Springs fine sandy loam, saline, 0-1% slopes\*

\*Included on the Hydric Soils List



Soil units acquired from the NRCS web soil survey at: http://websoilsurvey.nrcs.usda.gov/



Figure 5. USDA - Natural Resources Conservation Service Soil Survey Map.

0 200 400 800 Feet

1 inch = 400 feet



Date Prepared: January 6, 2020 Map Preparer: J. Hemmis Aerial Image Source: NAIP - Utah AGRC Aerial Image Date: August 17, 2018



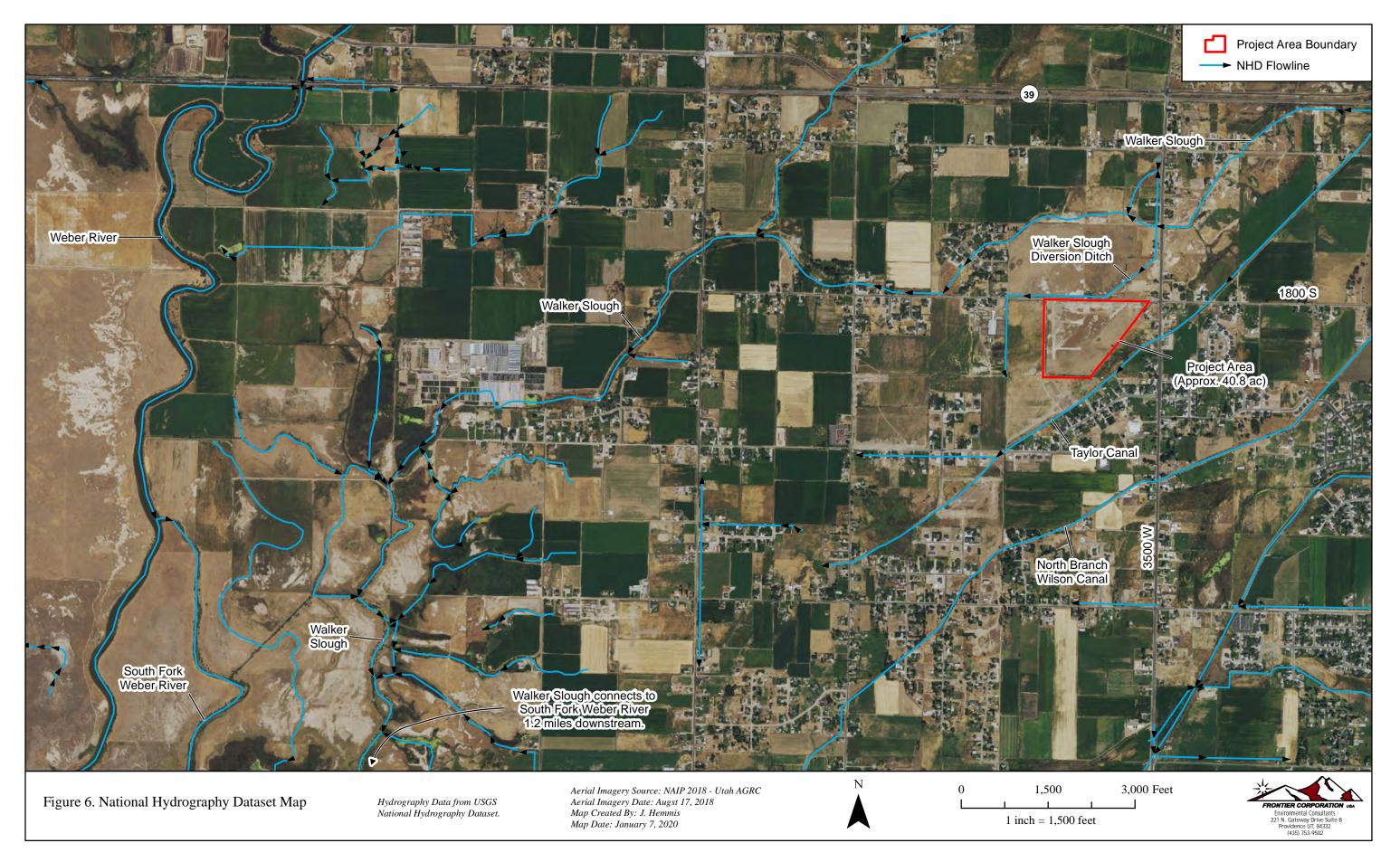




Photo 1. Southwest view of upland area taken from northeast corner of Project Area. A buried storm drain conveys water in an east/west direction along the north Project Area boundary paralleling 1800 South.



Photo 2. West view of remnants of an excavated stock pond located near the northeast corner of the Project Area. Wetland plants have established on the bottom of the excavated pond. Water was observed in stock pond during December 29, 2020 site inspection. Buried storm drain also pictured.



Photo 3. Southwest view of the northern extent of Problem Area 1. Problem Area 1 contains saline wet meadow plant species that are found in both seasonal wetlands and uplands with saline soils.



Photo 4a. Southeast view of upland area and Problem Area 1 taken from north Project Area boundary. No road culverts were observed along the entier length of the 1800 South property boundary.



Photo 4b. Southwest view of upland area and Problem Area 1 taken from north Project Area boundary.



Photo 5a. Southeast view of upland area taken from northern boundary of the Project Area.



Photo 5b. Southwest view of upland area taken from northern boundary of the Project Area.



Photo 6. Southeast view of Ditch 1 where it enters the Project Area in the northwest corner of the property. It appears that Ditch 1 receives water from the buried storm drain.



Photo 7. Southeast view of upland area recently filled and graded.



Photo 8a. South view of Problem Area 1 located in the central portion of the Project Area. Problem Area 1 is on a low terrace that is distinctly lower in elevation than the bordering uplands on the middle and high terraces.

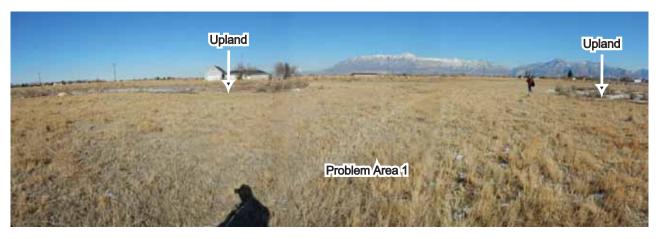


Photo 8b. North view of Problem Area 1 located in the central portion of the Project Area. Problem Area 1 contains a saline wet meadow plant community that is dominated by saltgrass.

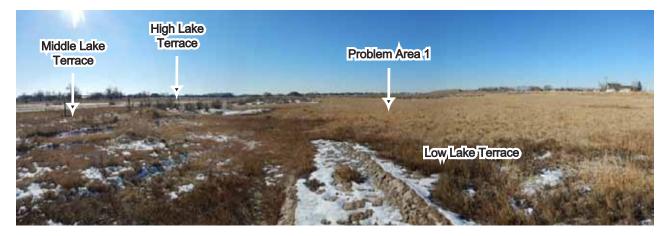


Photo 9. South view of Problem Area 1 located in the central portion of the Project Area. Problem Area 1 is situated on a low lake terrace. Uplands are on the distinctly higher middle and high lake terraces.



Photo 10a. Southwest view of upland area taken from western boundary of the Project Area. This upland area is located on the middle lake terrace.



Photo 10b. North view of upland area taken from western boundary of the Project Area. This upland area is located the middle lake terrace.



Photo 11. West view of upland area taken from the western boundary of the Project Area. The Project Area has three levels of lake terraces.



Photo 12a. Northeast view of abandoned irrigation ditch. No OHWM indicators present.



Photo 12b. Southwest view of abandoned irrigation ditch. No OHWM indicators present.



Photo 12b. East view of where abandoned irrigation ditch enters Project Area and splits. Ditch dominated by upland plant species.



Photo 13a. Southwest view of Problem Area 1 located in the central portion of the Project Area. Problem Area 1 contains a saline wet meadow plant community dominated by saltgrass, but also containing a mix of both upland and wetland plants commonly found on saline soils.



Photo 13b. Northeast view of Problem Area 1 located in the central portion of the Project Area. Problem Area 1 is distincly lower in elevation than the surrounding upland areas.

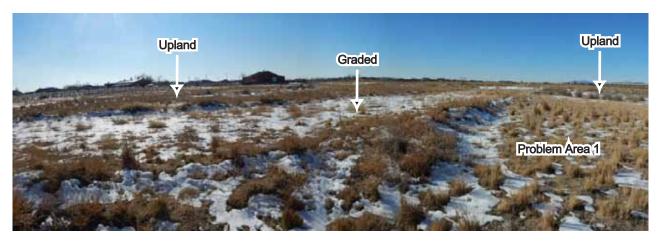


Photo 14a. Southwest view of upland, graded area, and Problem Area 1 located in the central portion of the Project Area. Problem Area 1 is on distinctly lower ground.

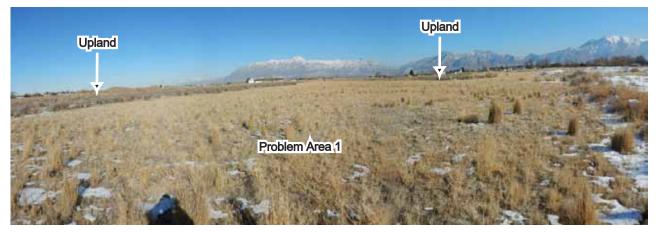


Photo 14b. Northeast view of Problem Area 1 located in the central portion of the Project Area. Problem Area 1 contains saline wet meadow plant community.



Photo 15a. Northeast view of Ditch 1 and upland area taken from the west Project Area boundary. Wetland plants were observed in Ditch 1 during the December 29, 2020 site inspection.



Photo 15b. Southeast view of Ditch 1 and upland area taken from the west Project Area boundary. Ditch 1 contains wetland plant species including broadleaf cattail, Baltic rush, and rabbits-foot grass.



Photo 16a. North view of Ditch 1. Ditch 1 is an excavated man-made irrigation ditch.



Photo 16b. South view of Ditch 1. OHWM indicators are present in Ditch 1 indicative of flowing water during the irrigation season.



Photo 17. Northeast view of excavated, man-made irrigation Ditch 1 in the southwest corner of the Project Area. It appears Ditch 1 flows in a north/south direction along the west Project Area boundary before turning eastward along the south Project Area boundary. The ditch has been excavated several feet lower than the native ground elevation.



Photo 18a. West view of upland area and fenceline. in the southern portion of the Project Area on the high lake terrace. No ditches present.



Photo 18b. Northeast view of upland area and fenceline. No ditches present.



Photo 18c. South view of upland area and fenceline. No ditches present.



Photo 19a. Northwest view of upland area and Ditch 1 taken from south Project Area boundary. Ditch 1 is a man-made excavated irrigation ditch.



Photo 19b. Northeast view of upland area and Ditch 1 taken from south Project Area boundary. Ditch 1 had water present during the December 29, 2020 site inspection.



Photo 20a. West view of Ditch 1 taken near southeast corner of Project Area.



Photo 20b. East view of Ditch 1 where it leaves the Project Area.



Photo 21. Northeast view of Ditch 1 and abandoned irrigation ditch taken from southeast corner of the Project Area. The abandoned irrigation ditch had no OHWM indicators present and was dominated by upland plant communities during the December 29, 2020 site inspection.