



DEPARTMENT OF THE ARMY  
U.S. ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT  
100 WEST OGELTHORPE AVENUE  
SAVANNAH GEORGIA 31401

SAS-OD-RC

April 22, 2024

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023),<sup>1</sup> SAS-2021-01042

BACKGROUND. An Approved Jurisdictional Determination (AJD) is a Corps document stating the presence or absence of waters of the United States on a parcel or a written statement and map identifying the limits of waters of the United States on a parcel. AJDs are clearly designated appealable actions and will include a basis of JD with the document.<sup>2</sup> AJDs are case-specific and are typically made in response to a request. AJDs are valid for a period of five years unless new information warrants revision of the determination before the expiration date or a District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.<sup>3</sup> For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),<sup>4</sup> the Clean Water Act (CWA) implementing regulations published by the Department of the Army in 1986 and amended in 1993 (references 2.a. and 2.b. respectively), the 2008 *Rapanos-Carabell* guidance (reference 2.c.), and other applicable guidance, relevant case law and longstanding practice, (collectively the pre-2015 regulatory regime), and the *Sackett* decision (reference 2.d.) in evaluating jurisdiction.

This Memorandum for Record (MFR) constitutes the basis of jurisdiction for a Corps AJD as defined in 33 CFR §331.2. The features addressed in this AJD were evaluated consistent with the definition of “waters of the United States” found in the pre-2015 regulatory regime and consistent with the Supreme Court's decision in *Sackett*. This AJD did not rely on the 2023 “Revised Definition of ‘Waters of the United States,’” as amended on 8 September 2023 (Amended 2023 Rule) because, as of the date of this decision, the Amended 2023 Rule is not applicable Georgia due to litigation.

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<sup>1</sup> While the Supreme Court's decision in *Sackett* had no effect on some categories of waters covered under the CWA, and no effect on any waters covered under RHA, all categories are included in this Memorandum for Record for efficiency.

<sup>2</sup> 33 CFR 331.2.

<sup>3</sup> Regulatory Guidance Letter 05-02.

<sup>4</sup> USACE has authority under both Section 9 and Section 10 of the Rivers and Harbors Act of 1899 but for convenience, in this MFR, jurisdiction under RHA will be referred to as Section 10.

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1. SUMMARY OF CONCLUSIONS.

- a. Provide a list of each individual feature within the review area and the jurisdictional status of each one (i.e., identify whether each feature is/is not a water of the United States and/or a navigable water of the United States).

<b>Name of Aquatic Resource</b>	<b>JD or Non-JD</b>	<b>Section 404/Section 10</b>
Wetland A	JD	Section 404
Wetland AA	Non-JD	N/a
Wetland B	JD	Section 404
Wetland BB	Non-JD	N/a
Wetland CC	Non-JD	N/a
Wetland D	JD	Section 404
Wetland E	JD	Section 404
Wetland G	JD	Section 404
Wetland H	JD	Section 404
Wetland J	Non-JD	N/a
Wetland K	Non-JD	N/a
Wetland L	Non-JD	N/a
Wetland M	Non-JD	N/a
Wetland O	Non-JD	N/a
Wetland P	Non-JD	N/a
Wetland Q	Non-JD	N/a
Wetland R	Non-JD	N/a
Wetland S	Non-JD	N/a
Wetland T	Non-JD	N/a
Wetland U	Non-JD	N/a
Wetland V	Non-JD	N/a
Wetland W	Non-JD	N/a
Wetland X	Non-JD	N/a
Wetland Y	Non-JD	N/a
Wetland Z	Non-JD	N/a

2. REFERENCES.

- a. Final Rule for Regulatory Programs of the Corps of Engineers, 51 FR 41206 (November 13, 1986).
- b. Clean Water Act Regulatory Programs, 58 FR 45008 (August 25, 1993).
- c. U.S. EPA & U.S. Army Corps of Engineers, Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in *Rapanos v. United States & Carabell v. United States* (December 2, 2008)
- d. *Sackett v. EPA*, 598 U.S. \_\_\_, 143 S. Ct. 1322 (2023)
- e. 2008 Rapanos Guidance

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f. Joint Policy Memo: NWO-2003-60436, dated 12/18/2023

3. REVIEW AREA.

A. Project Area Size (in acres): 323.18

B. Center Coordinates of the Project Site (in decimal degrees)

Latitude: 32.015455 Longitude: -81.286523

C. Nearest City or Town: City of Savannah

D. County: Chatham

E. State: Georgia

F. Other associated Jurisdictional Determinations (including outcomes)

Regulatory File No.	Type	Outcome
SAS-2004-13640	AJD/PJD	This approval showed all wetland boundaries within the review area. This project was adjacent to the project under review and these confirmed wetland boundaries were used to follow the flow path of aquatic resources offsite.
SAS-2018-00685	ARDR	This approval showed all wetland boundaries within the review area. This project was adjacent to the project under review and these confirmed wetland boundaries were used to follow the flow path of aquatic resources offsite.

G. Any additional, relevant site-specific information: This project has been historically managed for timber harvest. Logging roads have been observed predated 1974 on aerial imagery thus the site has had significant manipulation over time.

4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), INTERSTATE WATER, OR THE TERRITORIAL SEAS TO WHICH THE AQUATIC RESOURCE IS CONNECTED.

A. Name of nearest downstream TNW, Territorial Sea or interstate water: The Ogeechee River is a TNW that is ~0.75 miles southwest of the project site. The Little Ogeechee is a TNW that is ~1.25 miles east of the project site.

B. Determination based on: This determination was made based on a review of desktop data resources listed in Section 9 of this memorandum, a review of the SAS Section 10 list (for a water body that is navigable-in-fact under federal law for any purpose (such as Section 10, RHA), that water body categorically qualifies as a Section 404 "traditional navigable water" subject to CWA jurisdiction under 33 CFR 328.3(a)(1)).

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5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS

The wetlands meet the hydrophytic vegetation, wetland hydrology, and hydric soil criteria of the 1987 Corps of Engineers Wetland Delineation Manual and the Atlantic Gulf Coastal Plain Regional Supplement Regional Supplement.

Wetland B continues to flow north off site where it is part of a larger wetland system and continues to flow east for 0.5 miles where it flows through a culvert under a road crossing and then continues to flow east for 1.15 miles where the wetland and its flow continues through a culvert under Little Neck Road and then continues another 0.20 miles where the wetland abuts the Little Ogeechee River.

Wetlands A, D and G are located on the western side of the project review area. These wetlands all join and are part of the same wetland system off site to the south of the project review area. The wetlands abut to a relatively permanent water (RPW), an Unnamed Tributary to the Ogeechee River (Wetland A ties into a previously delineated wetland approved under SAS-2018-00685. Additionally, the RPW-UNT was identified and reviewed under the same project and identified as a canal). This UNT continues southwest for 0.30 miles where it flows through a culvert under Fort Argyle Road and continues into a wetland system for 1.06 miles and abuts the Ogeechee River (TNW).

Wetland E and H are located on the eastern side of the project review area and flow west. These two wetlands flow offsite and join together as part of the same wetland system. The wetlands continue southwest and abut the same system referenced above for Wetlands A, D and G. Essentially all these wetlands (Wetlands A, D, E, G and H) are part of the same wetland system.

6. SECTION 10 JURISDICTIONAL WATERS<sup>5</sup>: Describe aquatic resources or other features within the review area determined to be jurisdictional in accordance with Section 10 of the Rivers and Harbors Act of 1899. Include the size of each aquatic resource or other feature within the review area and how it was determined to be jurisdictional in accordance with Section 10.<sup>6</sup>

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<sup>5</sup> 33 CFR 329.9(a) A waterbody which was navigable in its natural or improved state, or which was susceptible of reasonable improvement (as discussed in § 329.8(b) of this part) retains its character as “navigable in law” even though it is not presently used for commerce, or is presently incapable of such use because of changed conditions or the presence of obstructions.

<sup>6</sup> This MFR is not to be used to make a report of findings to support a determination that the water is a navigable water of the United States. The district must follow the procedures outlined in 33 CFR part 329.14 to make a determination that water is a navigable water of the United States subject to Section 10 of the RHA.

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7. SECTION 404 JURISDICTIONAL WATERS: Describe the aquatic resources within the review area that were found to meet the definition of waters of the United States in accordance with the pre-2015 regulatory regime and consistent with the Supreme Court’s decision in *Sackett*. List each aquatic resource separately, by name, consistent with the naming convention used in section 1, above. Include a rationale for each aquatic resource, supporting that the aquatic resource meets the relevant category of “waters of the United States” in the pre-2015 regulatory regime. The rationale should also include a written description of, or reference to a map in the administrative record that shows, the lateral limits of jurisdiction for each aquatic resource, including how that limit was determined, and incorporate relevant references used. Include the size of each aquatic resource in acres or linear feet and attach and reference related figures as needed.

- a. TNWs (a)(1): N/a
- b. Interstate Waters (a)(2): N/a
- c. Other Waters (a)(3): N/a
- d. Impoundments (a)(4): N/a
- e. Tributaries (a)(5): N/a
- f. The territorial seas (a)(6): N/a

g. Adjacent wetlands (a)(7):

Name of Aquatic Resource	Size (in acres)	Contiguous with or abutting? If so, list water	Describe continuous surface connection
Wetland A Wetland G	27.01 4.03	Yes, abutting to Ogeechee River	Wetland G is located to the southwest of Wetland A. Wetland G continues off site to the south where it connects to Wetland A and these two wetlands are part of the same wetland system.  Wetland A flows to the south of the project area and continues offsite where it abuts to a relatively permanent water (RPW), an Unnamed Tributary to the Ogeechee River (Wetland A is part of a previously delineated wetland approved under SAS-2018-00685. Additionally, the RPW-UNT was identified and reviewed under the same project and identified as a canal). This UNT continues southwest for 0.30 miles where its flows through a culvert under Fort Argyle Road and continues into a wetland system for 1.06 miles and abuts the Ogeechee River (TNW).

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Wetland B	14.6	Yes, abutting to Little Ogeechee River	Wetland B continues to flow north off site where it connects to a larger wetland system and continues to flow east for 0.5 miles where it flows through a culvert under a road crossing and then continues to flow east for 1.15 miles where the wetland and its flow continues through a culvert under Little Neck Road and then continues another 0.20 miles where the wetland abuts the Little Ogeechee River.
Wetland D	14.3	Yes, abutting to the Ogeechee River	<p>Wetland D has an existing at grade logging road built through the wetland. There are two locations where the road goes through the wetland. The road width between the two wetland crosses ranges from 7' to 13'. Based on the information provided in the wetland delineation report and the best available desktop information, the wetland to the north and south of the access road is palustrine forested wetlands with similar vegetation. USDA-NRCS Web Soil Survey soils maps indicate similar hydric soils throughout the area in question. Additionally, surface water is seen downslope of the road and coming out from underneath the southern edge of the road indicating flow from the upslope portion of the wetland. Topography and elevation maps do not show any elevation change between the two wetlands along the access road. This information indicates that these wetlands are functioning as one wetland system.</p> <p>Wetland D flows to the south of the project area and continues offsite where it abuts to a relatively permanent water (RPW), an Unnamed Tributary to the Ogeechee River (Wetland A is part of a previously delineated wetland approved under SAS-2018-00685. Additionally, the RPW-UNT was identified and reviewed under the same project and identified as a canal). This UNT continues southwest for 0.30 miles where its flows through a culvert under Fort Argyle Road and continues into a wetland system for 1.06 miles and abuts the Ogeechee River (TNW).</p> <p>Wetland A and D are part of the same wetland system south of the project area.</p>
Wetland E	29.08	Yes, abutting to the Ogeechee River	Wetlands E has an existing at grade logging road through the wetland. There are two locations where the road goes through the wetland. The road width between the two wetland crosses ranges from 7' to 13'. Based on the information provided in the wetland delineation report, the wetland to the north and south of the access road is palustrine forested wetlands with similar vegetation. USDA-NRCS Web Soil Survey soils maps indicate similar hydric soils throughout the area in question. Inundation can be seen in some aerial photography (surface water can be seen in aerial imagery in 1999, 2003 and 2020). Topography and elevation maps do not show any elevation change between the two wetlands along the access road. Due

			<p>to the road not resulting in fill placement or upgrade and changing elevations, the road crossings at these two locations indicate that these wetlands are functioning as one wetland.</p> <p>Wetland E continues southwest offsite and abuts an UNT to the Ogeechee River (an RPW). This UNT continues southwest for 0.30 miles where it flows through a culvert under Fort Argyle Road and continues into a wetland system for ~1.06 miles where it abuts the Ogeechee River (TNW).</p>
Wetland H	3.15	Yes, abutting to the Ogeechee River	<p>Wetland H is located east of wetland E. Wetland H flows south off the property and continues flowing south where it eventually connects to Wetland E above. Wetland H and Wetland E are functioning as one wetland system. Wetland H was previously delineated and approved under project number SAS-2004-13640 on 12/1/2016 (under this project Wetland H was referred to as Wetland A). Wetland H follows the same flow path to the Ogeechee River as outlined above for Wetland E's flow path to the Ogeechee River.</p>

## 8. NON-JURISDICTIONAL AQUATIC RESOURCES AND FEATURES

- a. Describe aquatic resources and other features within the review area identified as “generally non-jurisdictional” in the preamble to the 1986 regulations (referred to as “preamble waters”).<sup>7</sup> Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA as a preamble water. N/a
- b. Describe aquatic resources and features within the review area identified as “generally not jurisdictional” in the *Rapanos* guidance. Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA based on the criteria listed in the guidance. N/a
- c. Describe aquatic resources and features identified within the review area as waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA. Include the size of the waste treatment system within the review area and describe how it was determined to be a waste treatment system. N/a
- d. Describe aquatic resources and features within the review area determined to be prior converted cropland in accordance with the 1993 regulations (reference

<sup>7</sup> 51 FR 41217, November 13, 1986.

- 2.b.). Include the size of the aquatic resource or feature within the review area and describe how it was determined to be prior converted cropland.
- e. Describe aquatic resources (i.e., lakes and ponds) within the review area, which do not have a nexus to interstate or foreign commerce, and prior to the January 2001 Supreme Court decision in “*SWANCC*,” would have been jurisdictional based solely on the “Migratory Bird Rule.” Include the size of the aquatic resource or feature, and how it was determined to be an “isolated water” in accordance with *SWANCC*. N/a
- f. Describe aquatic resources and features within the review area that were determined to be non-jurisdictional because they do not meet one or more categories of waters of the United States under the pre-2015 regulatory regime consistent with the Supreme Court’s decision in *Sackett* (e.g., tributaries that are non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water).

Name of excluded feature	Size (in acres)	Type of resource generally not jurisdictional
Wetland AA	0.12	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland BB	0.10	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland CC	0.05	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland J	1.42	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland K	1.11	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland L	0.91	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.



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Wetland M	0.77	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland O	0.56	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland P	0.50	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland Q	0.44	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland R	0.37	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland S	0.36	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland T	0.30	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland U	0.26	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland V	0.23	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland W	0.21	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland X	0.20	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.

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Wetland Y	0.18	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.
Wetland Z	0.14	Wetland is a depressional wetland surrounded by uplands. Review of lidar and contour elevations indicates that uplands around the wetland are higher in elevation. There is no discrete feature that would constitute a continuous surface connection to a jurisdictional water.

9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.

- a. 1. Date of Office (desktop review): March/April 2024
2. Date(s) of Field Review (if applicable): Applicant site visit 3/20/2024
- b. Data sources used to support this determination (included in the administrative record).
  - Aquatic Resources delineation submitted by, or on behalf of, the requestor: Delineation Report Submitted with AJD submittal on January 12, 2024
  - Wetland field data sheets prepared by the Corps: Provided by applicant dated 11/16/2021
  - Photographs: Applicant Site Visit photos from 3/20/2024
  - Aerial Imagery: aerial provided from applicant 2015 Ortho Aerial, dated 11/29/2021, Google Earth Aerial 1993,
  - LIDAR: maps generated from ARCPRO and data from NOAA. Lidar and Lidar Hillshade
  - USDA NRCS Soil Survey: provided by applicant; NRCS Soil Map Hill Durrence Tract dated 11/29/2021
  - USFWS NWI maps: National Wetlands Inventory dated 11/29/2021
  - USGS topographic maps: USGS Topographic Map dated 11/29/2021
  - USGS NHD data/maps: NHD
  - Section 10 resources used: SAS Section 10 List
  - Antecedent Precipitation Tool Analysis: 3/24/2024
  - Other sources of Information: Wetland B Flowpath Map, Wetlands A, D, G and H Flowpath Map

10. OTHER SUPPORTING INFORMATION. N/A

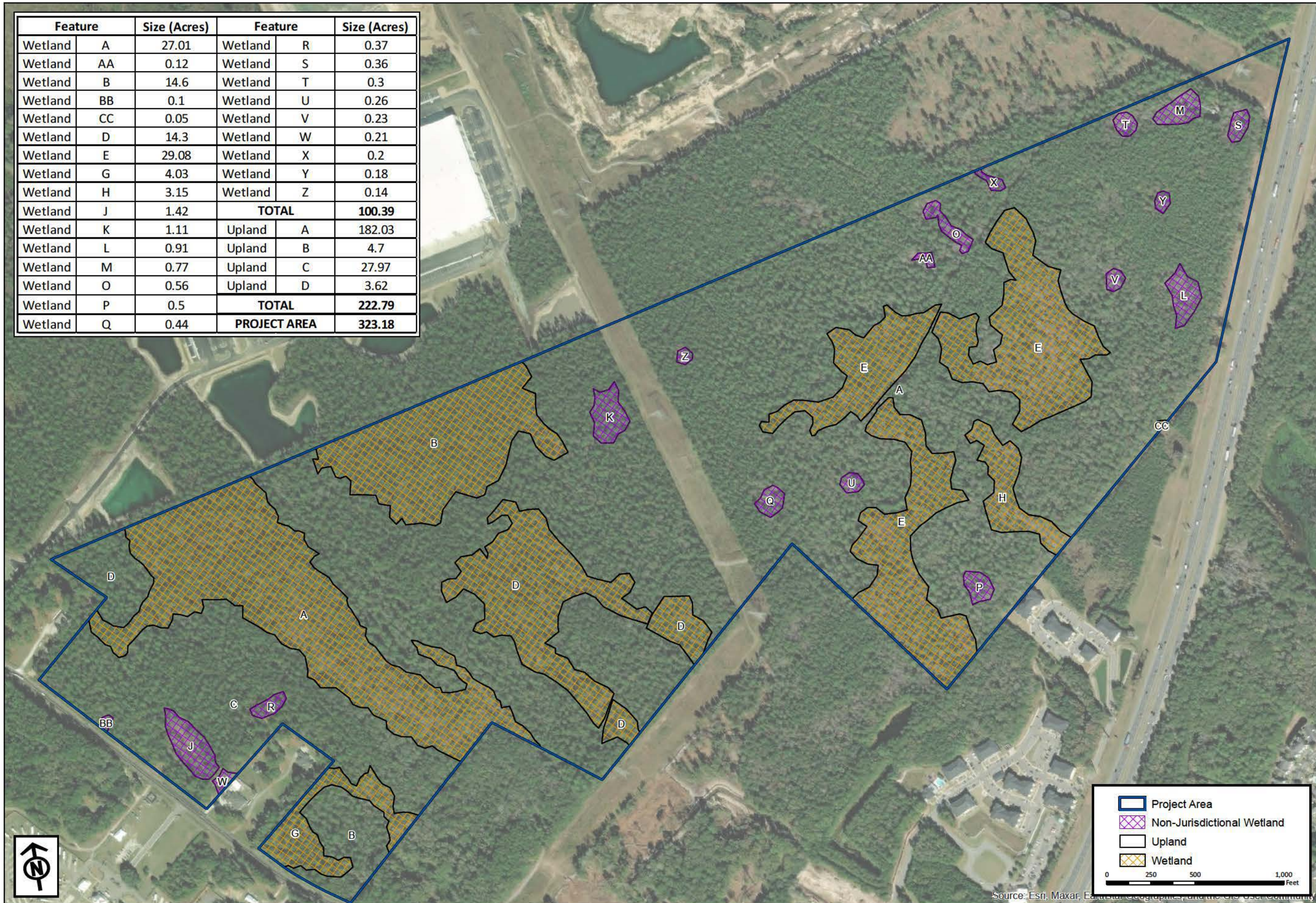
11. NOTE: The structure and format of this MFR were developed in coordination with the EPA and Department of the Army. The MFR's structure and format may be subject to future modification or may be rescinded as needed to implement

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additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.

Feature	Size (Acres)	Feature	Size (Acres)		
Wetland	A	27.01	Wetland	R	0.37
Wetland	AA	0.12	Wetland	S	0.36
Wetland	B	14.6	Wetland	T	0.3
Wetland	BB	0.1	Wetland	U	0.26
Wetland	CC	0.05	Wetland	V	0.23
Wetland	D	14.3	Wetland	W	0.21
Wetland	E	29.08	Wetland	X	0.2
Wetland	G	4.03	Wetland	Y	0.18
Wetland	H	3.15	Wetland	Z	0.14
Wetland	J	1.42	<b>TOTAL</b>	<b>100.39</b>	
Wetland	K	1.11	Upland	A	182.03
Wetland	L	0.91	Upland	B	4.7
Wetland	M	0.77	Upland	C	27.97
Wetland	O	0.56	Upland	D	3.62
Wetland	P	0.5	<b>TOTAL</b>	<b>222.79</b>	
Wetland	Q	0.44	<b>PROJECT AREA</b>	<b>323.18</b>	



  Project Area  
  Non-Jurisdictional Wetland  
  Upland  
  Wetland

0 250 500 1,000 Feet

**GPS Wetland Exhibit**

Chatham County, Georgia

RLC Project No.: 19-280.3  
 Figure No.: 8  
 Prepared By: BS  
 Sketch Date: 1/31/2024  
 Map Scale: 1 inch = 500 ft

Point	Y	X	Point	Y	X	Point	Y	X	Point	Y	X	Point	Y	X	Point	Y	X	Point	Y	X	Point	Y	X	Point	Y	X	Point	Y	X
0	32.0261193	-81.2735702	90	32.0156987	-81.2823317	180	32.0133167	-81.2808456	270	32.0165498	-81.2888036	360	32.0182036	-81.2787623	450	32.0168876	-81.2759603	540	32.0182412	-81.2810504	630	32.0142214	-81.2872941	720	32.0109797	-81.2822678	810	32.0124900	-81.2919508
1	32.0199288	-81.2739706	91	32.0156932	-81.2821853	181	32.0133248	-81.2809698	271	32.0166809	-81.2888601	361	32.0182024	-81.2787919	451	32.0171346	-81.2759809	541	32.0182404	-81.2808445	631	32.0142178	-81.2874666	721	32.0108546	-81.2822461	811	32.0123847	-81.2918461
2	32.0156841	-81.2759019	92	32.0156487	-81.2819343	182	32.0133194	-81.2806338	272	32.0166811	-81.2888492	362	32.0182036	-81.2787919	452	32.0172084	-81.2761511	542	32.0182677	-81.2807891	632	32.0142205	-81.2876885	722	32.0107624	-81.2822449	812	32.0123236	-81.2917008
3	32.0150949	-81.278691	93	32.0154746	-81.2817437	183	32.0133056	-81.2804962	273	32.0166532	-81.2883856	363	32.0182749	-81.2790416	453	32.017466	-81.276243	543	32.0180356	-81.2807975	633	32.0142776	-81.287678	723	32.0108872	-81.2822678	813	32.0123892	-81.2918535
4	32.0151105	-81.2770005	94	32.0153106	-81.2816636	184	32.0133014	-81.2804336	274	32.0166203	-81.2882418	364	32.0182722	-81.2792248	454	32.0173197	-81.2807914	544	32.0180721	-81.2806675	634	32.0142461	-81.2879438	724	32.0108139	-81.2823077	814	32.0124137	-81.2914483
5	32.0151208	-81.2771384	95	32.0151660	-81.2817072	185	32.0129504	-81.2803722	275	32.0161387	-81.2881042	365	32.0181937	-81.2793845	455	32.0174857	-81.280664	545	32.0183717	-81.2760045	635	32.0146629	-81.2880854	725	32.0106646	-81.2916493	815	32.0120841	-81.2913246
6	32.0150507	-81.2771981	96	32.0149942	-81.2817238	186	32.0128708	-81.2804192	276	32.0162247	-81.2881314	366	32.0184542	-81.2793689	456	32.0174915	-81.2807646	546	32.0182759	-81.2763805	636	32.0148889	-81.2882695	726	32.0108935	-81.2946303	816	32.0120992	-81.2911918
7	32.0148634	-81.2771547	97	32.0147894	-81.2817844	187	32.0128233	-81.2805798	277	32.0163667	-81.2878905	367	32.0183123	-81.2796749	457	32.0174012	-81.2808997	547	32.0184068	-81.2762291	637	32.0150981	-81.2894109	727	32.0120434	-81.2931348	817	32.0120118	-81.2911009
8	32.0135719	-81.2790463	98	32.0146252	-81.2819197	188	32.0128647	-81.2807021	278	32.0165371	-81.2879634	368	32.0181983	-81.279578	458	32.0174129	-81.2811208	548	32.0185762	-81.2762154	638	32.0152744	-81.2894303	728	32.0120418	-81.2931203	818	32.0121936	-81.2908599
9	32.0135729	-81.2790634	99	32.0144326	-81.2819218	189	32.0128806	-81.2808039	279	32.0166207	-81.2880914	369	32.0181805	-81.2793805	459	32.0174019	-81.2812926	549	32.0186196	-81.2763189	639	32.0154408	-81.2885374	729	32.0120186	-81.2930217	819	32.0118185	-81.290842
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12	32.0139725	-81.2795449	102	32.0145475	-81.2824709	192	32.0130491	-81.2910387	282	32.0170429	-81.2882626	372	32.0176787	-81.2793366	462	32.017619	-81.2816314	552	32.0156307	-81.2893434	642	32.0156045	-81.2898242	732	32.0118242	-81.292803	822	32.0121358	-81.290048
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