



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3604

SAS-RD-C

February 8, 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),¹ SAS-2018-00331

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.² 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.³ For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),⁴ 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 in this state due to litigation.

¹ 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.

² 33 CFR 331.2.

³ Regulatory Guidance Letter 05-02.

⁴ 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.

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).

Name of Aquatic Resource	JD or Non-JD	Section 404/Section 10
Wetland C	JD	Section 404
Wetland D	Non-JD	N/A
Wetland E	Non-JD	N/A
Wetland G	Non-JD	N/A
Wetland H	Non-JD	N/A

Although labelled Wetland C, Wetland C and Wetland A (Wetland A is outside of the AJD project review area) function as one wetland (Wetland A/C) that abuts the Savannah and Ogeechee Canal, an RPW, which flows to the Little Ogeechee River, a TNW; therefore, Wetland C (Wetland A/C) is a jurisdictional wetland.

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. 2007 Rapanos Approved Jurisdictional Determination Form Instructional Guidebook
 - f. 20190625 Section 10 Waters List - Savannah District
3. REVIEW AREA. The review area is an approximately 26.98-acre site located at 480 John Carter Road, approximately one mile southwest of US Highway 16, in Bloomingdale, Chatham County, Georgia (Latitude: 32.0914, Longitude: -81.3487).
4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), INTERSTATE WATER, OR THE TERRITORIAL SEAS TO WHICH THE AQUATIC RESOURCE IS

CONNECTED.⁵ The Little Ogeechee River is the nearest TNW. The review area is located approximately 1.7 miles from the Little Ogeechee River. This determination was made based on a review of desktop data resources listed in Section 9 of this memorandum including review of the SAS Section 10 Waters list, and a field visit conducted on November 30, 2023.

5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS. Wetland C is a wetland that meets 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. Wetland C is part of a larger wetland system abutting the Savannah and Ogeechee Canal, an RPW, which connects to the Little Ogeechee River, a TNW.
6. SECTION 10 JURISDICTIONAL WATERS⁶: 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 10.⁷ N/A
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

⁵ This MFR should not be used to complete a new stand-alone TNW determination. A stand-alone TNW determination for a water that is not subject to Section 9 or 10 of the Rivers and Harbors Act of 1899 (RHA) is completed independently of a request for an AJD. A stand-alone TNW determination is conducted for a specific segment of river or stream or other type of waterbody, such as a lake, where upstream or downstream limits or lake borders are established.

⁶ 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.

⁷ 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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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 C (Wetland A/C)	0.07	Yes, Savannah and Ogeechee Canal	Wetland C continues north outside of the review area and is considered to be functioning as one wetland with wetland A. The wetland abuts the Savannah and Ogeechee Canal, an RPW, which flows to the Little Ogeechee River, a TNW.

Based on a review of desktop data resources described in Section 9 of this memorandum and a field visit conducted on November 30, 2023, it was determined that Wetland C meets the hydrophytic vegetation, wetland hydrology, and hydric soil criteria of the 1987 Corps of Engineers Wetland Delineation Manual and the Atlantic and Gulf Coastal Plain Regional Supplement. During the site visit, it was determined there is no culvert between Wetland C and Wetland A (Wetland A is outside of AJD project review area); however, the road (Road 1) between A and C is railroad grade and at the same elevation as these wetlands. Road 1 and its fill may have minimal depth and limited impact to the shallow

subsurface connection, and these wetlands may still have a shallow subsurface connection. The distance between Wetland A and Wetland C is less than 15 ft., and there is a high potential for hydrologic flow (overtopping) between the two wetlands across Road 1. Soil in the area of Wetland C and Wetland A consists of Mascotte sand and Ellabelle loamy sand which is friable and moderately permeable. The two areas are likely functioning as one wetland (Wetland A/C). This wetland abuts the Savannah and Ogeechee Canal, an RPW, which flows to the Little Ogeechee River, a TNW; therefore, Wetland C (Wetland A/C) is a jurisdictional wetland.

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”).⁸ 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 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. N/A
- 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

⁸ 51 FR 41217, November 13, 1986.

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 D	0.52	Wetland lacks a continuous surface connection to water of the US
Wetland E	0.22	Wetland lacks a continuous surface connection to water of the US
Wetland G	7.03	Wetland lacks a continuous surface connection to water of the US
Wetland H	2.44	Wetland lacks a continuous surface connection to water of the US

During the site inspection, we walked the entirety of Ted Newton Avenue as it transects the project area. One culvert was located on Ted Newton Avenue near the southeastern tip of Wetland G. This culvert, which started at the bottom of the slope of the road on the western side of the road and ended at the top of the slope of the road on the other side, was caved in on the east side of the road and determined to be failing. The culvert ended several feet from the boundary of Wetland I, and no swale or drainage pattern was observed between this culvert and Wetland I. Soil sampled between the culvert and Wetland I was non-hydric, and it was concluded that the failing culvert did not serve as a physical conveyance between Wetland G and Wetland I. Ted Newton Avenue is an improved road of more substantial construction than railroad grade (i.e., Road 1), and has been in place for over 50 years based on historic imagery. Ted Newton Avenue is at elevation 19.5-20 ft., and Wetland I is at elevation 17-17.5 ft. with Wetland G elevation at 17.5-18 ft., so the road elevation is 2-3 ft. higher than the boundaries of the wetlands. There is approximately 25-30 ft. between Wetland I and Wetland G with no signs of hydrologic flow observed between the boundaries of the two wetlands. Soil sample taken between Wetland I and the road was non-hydric, and no surface water or drainage patterns were observed along the road in Wetland G. The soil sample taken along the side of the road was not consistent with soil samples in the wetlands. No signs of inundation or saturation were observed along the Ted Newton

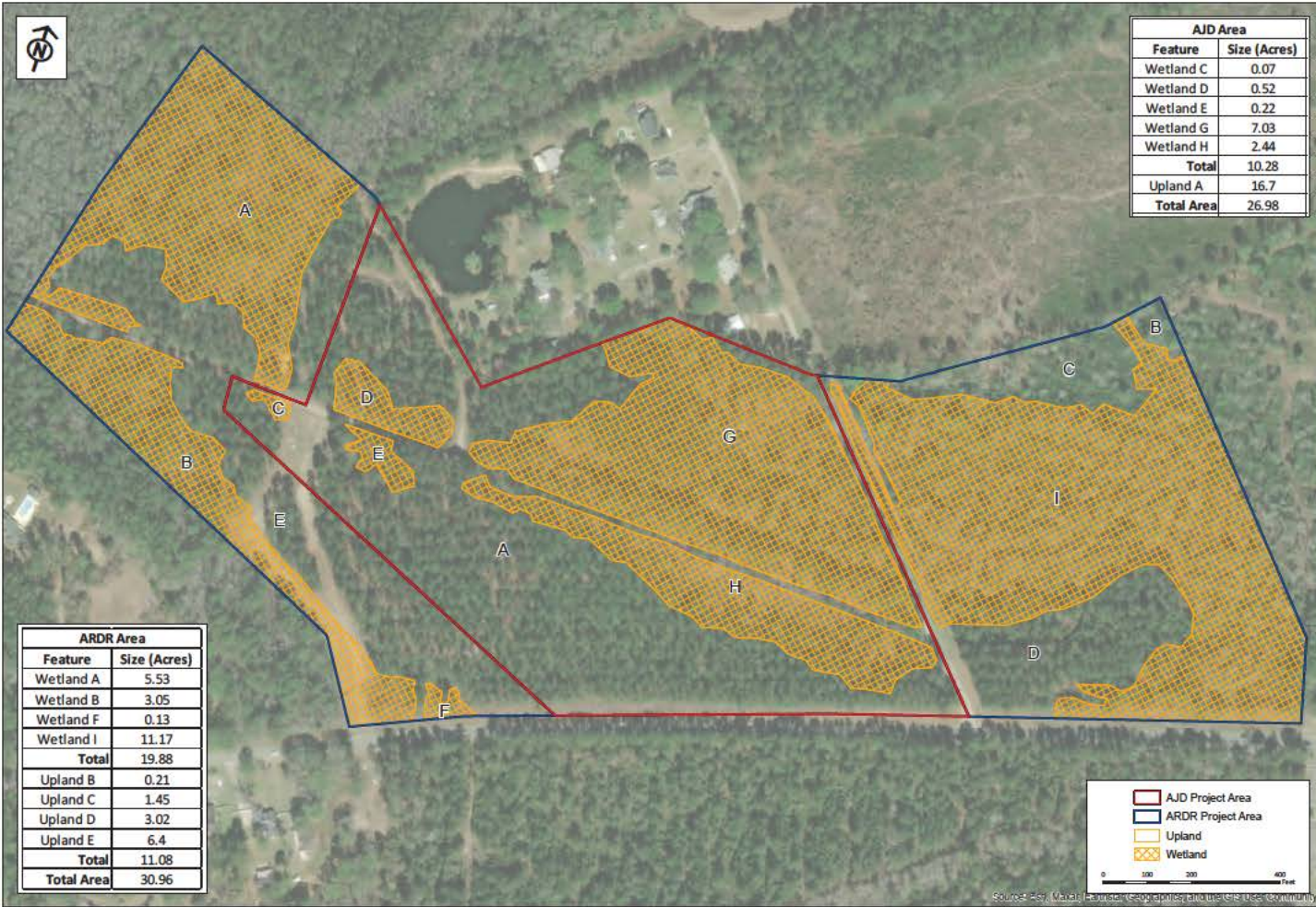
Avenue during examination of historical imagery, and NWI shows Wetland I mapped as wetland, but Wetland G and Wetland H are not. Observations on site support Wetland G and Wetland I as being two separate wetlands, and without substantiation of subsurface flow between G and I observed onsite or during desktop review, we would not consider Wetland G and Wetland I as one wetland; therefore, Wetland G was determined to be non-jurisdictional. The unnamed road (Road 1) runs between Wetland G and Wetland H. A culvert was located connecting under Road 1 acting as a physical conveyance between Wetland G and Wetland H. Wetland G and Wetland H may be functioning as one wetland: however, since Wetland G was determined to be non-jurisdictional, Wetland H would also be non-jurisdictional. No other culverts were found along Road 1 as it continues through the project review area between the western edge of Wetland G and the western edge of the project boundary past Wetland C. The northernmost boundary of Wetland G was observed (from the edge of the project boundary) where it ends just outside the boundary as supported by LiDAR. We found no physical connection or culvert between Wetland G and Wetland D, and no physical connection or culvert was observed between Wetland D and Wetland E. The perimeters of Wetland D and E were observed and confirmed as accurate with no physical connection to Wetlands G, H, or A. The boundary of Wetland C was confirmed as accurate, and there is no connection to Wetland B. Based on site inspection and review of desktop data resources listed in Section 9 of this memorandum, Wetlands D, E, G, and H were determined to be non-jurisdictional and lacking a continuous surface connection to a water of the US.

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. Office (Desk) Determination: December 15, 2023
Field Visit: November 30, 2023
 - b. Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant: Approved Jurisdictional Determination request and exhibit submitted by [REDACTED].
 - c. Data sheets prepared/submitted by or on behalf of the applicant/consultant: submitted by [REDACTED].
 - d. U.S. Geological Survey map(s): Chatham County 1'=2,000 ft.
 - e. U.S. Geological Survey Hydrologic Atlas: HUC 12 - 030602040201.

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- f. USDA Natural Resources Conservation Soil Survey: Chatham County, GA.
 - g. National Wetlands Inventory map(s): Chatham County, GA.
 - h. Photographs: 2022 Ortho Aerial and 2023 Google Earth Aerial Imagery.
 - i. FEMA/FIRM maps: Panel ID: 13051C0105G.
 - j. NOAA Topographic LiDAR: 2018 NOAA LiDAR.
 - k. Antecedent Precipitation Tool Analysis: [REDACTED] agent site visit on July 13, 2023, and Corps site visit on November 30, 2023.
10. OTHER SUPPORTING INFORMATION. Wetland delineation boundaries in project review area supported by previous Aquatic Resource Delineation Review (ARDR) previously verified for the site by letter dated June 27, 2018 (SAS-2018-00331).
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 additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.



ARDR Area	
Feature	Size (Acres)
Wetland A	5.53
Wetland B	3.05
Wetland F	0.13
Wetland I	11.17
Total	19.88
Upland B	0.21
Upland C	1.45
Upland D	3.02
Upland E	6.4
Total	11.08
Total Area	30.96

AJD Area	
Feature	Size (Acres)
Wetland C	0.07
Wetland D	0.52
Wetland E	0.22
Wetland G	7.03
Wetland H	2.44
Total	10.28
Upland A	16.7
Total Area	26.98



Wetland Exhibit
Prepared For: [Redacted]

Newton Tract
Chatham County, Georgia

Figure No.	07-14.2.7
Prepared By	[Redacted]
Sketch Date	12/11/2023
Map Scale	1 Inch = 200 feet

Label	Latitude	Longitude
0	32.092331	-81.349549
1	32.092330	-81.349548
2	32.092297	-81.349501
3	32.092206	-81.349440
4	32.092183	-81.349281
5	32.092247	-81.349134
6	32.092223	-81.349104
7	32.092163	-81.349185
8	32.091973	-81.349277
9	32.091997	-81.349352
10	32.091974	-81.349470
11	32.091815	-81.349584
12	32.091752	-81.349752
13	32.091646	-81.349955
14	32.091569	-81.349962
15	32.091544	-81.350122
16	32.091497	-81.350223
17	32.091438	-81.350232
18	32.091399	-81.350162
19	32.091379	-81.350059
20	32.091409	-81.349932
21	32.091364	-81.349854
22	32.091331	-81.349193
23	32.091299	-81.348431
24	32.091299	-81.348288
25	32.091275	-81.347994
26	32.091264	-81.347694
27	32.091262	-81.347411
28	32.091238	-81.347100
29	32.091229	-81.346738
30	32.091248	-81.346699
31	32.091377	-81.346835
32	32.091490	-81.346935
33	32.091702	-81.347174
34	32.091882	-81.347349
35	32.092139	-81.347627
36	32.092290	-81.347797
37	32.092404	-81.347956
38	32.092479	-81.348188
39	32.092480	-81.348389
40	32.092462	-81.348546
41	32.092508	-81.348644
42	32.092499	-81.348695
43	32.092571	-81.348789
44	32.092541	-81.348854

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49	32.092463	-81.347692
50	32.092430	-81.347613
51	32.092250	-81.347438
52	32.092196	-81.347417
53	32.092091	-81.347279
54	32.091951	-81.347125
55	32.091915	-81.347125
56	32.091912	-81.347172
57	32.091991	-81.347247
58	32.092059	-81.347317
59	32.092186	-81.347459
60	32.092276	-81.347559
61	32.092304	-81.347563
62	32.092359	-81.347647
63	32.092434	-81.347714
64	32.092478	-81.347764
65	32.092514	-81.347797
66	32.092521	-81.347864
67	32.092467	-81.347848
68	32.092431	-81.347785
69	32.092374	-81.347735
70	32.092212	-81.347585
71	32.091966	-81.347331
72	32.091628	-81.346964
73	32.091505	-81.346818
74	32.091393	-81.346718
75	32.091274	-81.346572
76	32.091313	-81.346525
77	32.091411	-81.346125
78	32.091507	-81.345948
79	32.091570	-81.345875
80	32.091616	-81.345753
81	32.091744	-81.345571
82	32.091911	-81.345444
83	32.092028	-81.345295
84	32.092056	-81.345190
85	32.092006	-81.345077
86	32.091897	-81.344914
87	32.091832	-81.344839
88	32.091707	-81.344806
89	32.091607	-81.344853

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92	32.091447	-81.345065
93	32.091290	-81.345096
94	32.091237	-81.345172
95	32.091252	-81.345269
96	32.091224	-81.345374
97	32.091194	-81.345499
98	32.091167	-81.345446
99	32.091159	-81.345337
100	32.091166	-81.345255
101	32.091121	-81.345261
102	32.091100	-81.345362
103	32.091108	-81.345497
104	32.091078	-81.345592
105	32.091006	-81.345599
106	32.090955	-81.345566
107	32.089891	-81.349592
108	32.089951	-81.349751
109	32.089994	-81.349776
110	32.090018	-81.349815
111	32.089995	-81.349846
112	32.089923	-81.349832
113	32.089899	-81.349855
114	32.089907	-81.349886
115	32.089973	-81.349896
116	32.089974	-81.349927
117	32.089998	-81.349991
118	32.089986	-81.350025
119	32.089931	-81.349978
120	32.089898	-81.349995
121	32.089769	-81.349957
122	32.089739	-81.350041
123	32.089817	-81.350041
124	32.089879	-81.350060
125	32.089929	-81.350101
126	32.089984	-81.350106
127	32.089978	-81.350238
128	32.089957	-81.350292
129	32.089955	-81.350392
130	32.090010	-81.350448
131	32.090085	-81.350571
132	32.090136	-81.350688
133	32.090223	-81.350855
134	32.090279	-81.350956

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137	32.090525	-81.351436
138	32.090641	-81.351611
139	32.090705	-81.351628
140	32.090744	-81.351756
141	32.090804	-81.351795
142	32.090824	-81.351882
143	32.090898	-81.351948
144	32.090993	-81.351928
145	32.091047	-81.352042
146	32.091045	-81.352210
147	32.091103	-81.352308
148	32.091190	-81.352414
149	32.091295	-81.352463
150	32.091376	-81.352482
151	32.091395	-81.352459
152	32.091402	-81.352406
153	32.091431	-81.352417
154	32.091444	-81.352529
155	32.091457	-81.352745
156	32.091451	-81.352969
157	32.091399	-81.353017
158	32.091390	-81.353157
159	32.091376	-81.353219
160	32.091389	-81.353261
161	32.091382	-81.353312
162	32.091425	-81.353359
163	32.091483	-81.353485
164	32.091491	-81.353651
165	32.091554	-81.353631
166	32.091551	-81.353610
167	32.091535	-81.353411
168	32.091526	-81.353167
169	32.091513	-81.352876
170	32.091546	-81.352873
171	32.091577	-81.352791
172	32.091582	-81.352828
173	32.091649	-81.352937
174	32.091650	-81.353435
175	32.091581	-81.353484
176	32.091584	-81.353548
177	32.091634	-81.353508
178	32.091691	-81.353542
179	32.091762	-81.353507

Label	Latitude	Longitude
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181	32.091945	-81.353357
182	32.091990	-81.353233
183	32.092054	-81.353188
184	32.092051	-81.353090
185	32.091991	-81.353060
186	32.092057	-81.352944
187	32.092078	-81.352784
188	32.091972	-81.352740
189	32.091884	-81.352747
190	32.091799	-81.352548
191	32.091827	-81.352475
192	32.091908	-81.352337
193	32.091848	-81.352301
194	32.091885	-81.352206
195	32.091849	-81.352111
196	32.091760	-81.352069
197	32.091719	-81.351966
198	32.091642	-81.351902
199	32.091564	-81.351889
200	32.091463	-81.351879
201	32.091457	-81.351657
202	32.091505	-81.351640
203	32.091603	-81.351645
204	32.091751	-81.351730
205	32.091897	-81.351729
206	32.091990	-81.351748
207	32.092183	-81.351785
208	32.092322	-81.351759
209	32.092424	-81.351733
210	32.092519	-81.351707
211	32.092555	-81.351709
212	32.092583	-81.351653
213	32.092626	-81.351641
214	32.092648	-81.351683
215	32.092824	-81.351571
216	32.091604	-81.351305
217	32.091440	-81.351264
218	32.091420	-81.350871
219	32.091406	-81.350459
220	32.091406	-81.350455
221	32.091511	-81.350391
222	32.091601	-81.350412
223	32.091659	-81.350537
224	32.091619	-81.350648

Label	Latitude	Longitude
225	32.091550	-81.350855
226	32.091646	-81.350928
227	32.091768	-81.351185
228	32.091763	-81.351290
229	32.091654	-81.351340
230	32.091370	-81.351910
231	32.091337	-81.351845
232	32.091371	-81.351769
233	32.091267	-81.351649
234	32.091299	-81.351561
235	32.091396	-81.351578
236	32.091407	-81.351867
237	32.091312	-81.351005
238	32.091248	-81.351104
239	32.091225	-81.351088
240	32.091240	-81.350990
241	32.091207	-81.350959
242	32.091140	-81.350984
243	32.091130	-81.350903
244	32.091197	-81.350851
245	32.091058	-81.350673
246	32.091134	-81.350538
247	32.091222	-81.350579
248	32.091298	-81.350776
249	32.091363	-81.350782
250	32.091373	-81.351151
251	32.091367	-81.351143
252	32.091273	-81.350008
253	32.091331	-81.350065
254	32.091331	-81.350066
255	32.091251	-81.350199
256	32.091210	-81.350202
257	32.091183	-81.350099
258	32.091187	-81.349953
259	32.091160	-81.349793
260	32.091198	-81.349748
261	32.091185	-81.349664
262	32.091149	-81.349639
263	32.091155	-81.349390
264	32.091126	-81.349323
265	32.091149	-81.349205
266	32.091064	-81.349001
267	32.091077	-81.348894
268	32.090966	-81.348635
269	32.090898	-81.348498

Label	Latitude	Longitude
270	32.090881	-81.348327
271	32.090835	-81.348224
272	32.090867	-81.348083
273	32.090838	-81.347969
274	32.090870	-81.347831
275	32.090886	-81.347685
276	32.090837	-81.347568
277	32.090834	-81.347439
278	32.090791	-81.347361
279	32.090811	-81.347162
280	32.090751	-81.347061
281	32.090774	-81.346952
282	32.090794	-81.346775
283	32.090882	-81.346768
284	32.090980	-81.346678
285	32.091024	-81.346543
286	32.091074	-81.346523
287	32.091141	-81.346587
288	32.091154	-81.346710
289	32.091181	-81.347136
290	32.091208	-81.347682
291	32.091219	-81.347875
292	32.091228	-81.348215
293	32.091239	-81.348430
294	32.091269	-81.348668
295	32.091268	-81.348912
296	32.091290	-81.349245
297	32.091293	-81.349363
298	32.091302	-81.349660
299	32.091255	-81.349829
300	32.092607	-81.349130
301	32.093329	-81.345445
302	32.093329	-81.345494
303	32.093290	-81.345528
304	32.093290	-81.345578
305	32.093351	-81.345603
306	32.093338	-81.345776
307	32.093472	-81.345958
308	32.092644	-81.347460
309	32.093403	-81.346038
310	32.093299	-81.345852
311	32.093216	-81.345747
312	32.093163	-81.345794
313	32.093055	-81.345723
314	32.093093	-81.345589

Label	Latitude	Longitude
315	32.092890	-81.345683
316	32.092906	-81.345927
317	32.092824	-81.345978
318	32.092860	-81.346074
319	32.092807	-81.346192
320	32.092791	-81.346407
321	32.092766	-81.346483
322	32.092781	-81.346567
323	32.092710	-81.346677
324	32.092698	-81.346933
325	32.092624	-81.347123
326	32.092575	-81.347262
327	32.092597	-81.347468