



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT
4751 BEST ROAD, SUITE 140
COLLEGE PARK, GEORGIA 30337

SAS-2022-00863

February 27, 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), SAS-2022-00863

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.¹ 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.² For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),³ 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.

¹ 33 CFR 331.2.

² Regulatory Guidance Letter 05-02.

³ 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.

CESAS-RDP

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SAS-2023-00190

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
Stream 1	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)

3. REVIEW AREA: Review Area 1

- a. ~1.0 acres
- b. Latitude: 33.9533, Longitude: -84.0678
- c. Gwinnett County
- d. Georgia

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

- a. The nearest TNW to the subject water is the Ocmulgee River, located approximately 64 kilometers south-southeast.
- b. Determination based on: This determination was made based on a review of desktop data resources listed in Section 9 of this memorandum and 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)), and documented occurrences of boating traffic on the identified water.

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

Water from the subject feature generally flows northwestward, into an unnamed perennial tributary, through an impoundment, into three additional unnamed perennial tributaries, and into Lee Daniel Creek, located in the northwestern portion of the property. Water in Lee Daniel Creek flows south off the property and southwestward into Sweetwater Creek, southward into Yellow River, and southward into Jackson Lake and the Ocmulgee River.

6. SECTION 10 JURISDICTIONAL WATERS⁴: 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. 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 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

⁴ 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.

f. The territorial seas (a)(6): N/A

g. Adjacent wetlands (a)(7): N/A

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”).⁵ 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 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

⁵ 51 FR 41217, November 13, 1986.

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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
Stream 1	507 feet	A tributary that does not have relatively permanent, standing or continuously flowing water

Various data sources indicate that the review area contains a tributary of Lee Daniel Creek. During the first field determination, conducted on December 7, 2021, the review area was observed to contain a channel that did not have water (Stream 1). Further, an abundance of leaf litter was present in the channel.

Based on the information available, Stream 1 is assumed to only convey flows from the surrounding uplands during precipitation events. Therefore, it does not meet the description of jurisdictional tributaries, those that are relatively permanent (that typically flow year-round or have continuous flow at least seasonally), as per 33 CFR 328.3(a)(5).

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 (desktop) determination: December 2023 (CESAS-RDP)
 - b. Field determination: December 7, 2021 (Agent); January 14, 2022 (Agent); March 24, 2022 (Agent)
 - c. Data sources used to support this determination (included in the administrative record).
 - ☒ Aquatic Resources delineation submitted by, or on behalf of, the requestor: *Figure 7: USACE Existing Conditions Map*, dated September 2022, and *AJD Review Areas*, dated December 2023, as collectively prepared by [REDACTED]
 - ☐ Aquatic Resources delineation prepared by the USACE: Title and Date
 - ☐ Wetland field data sheets:
 - ☐ OHWM data sheets prepared by the USACE: Title and Date
 - ☐ Previous JDs (AJD or PJD) addressing the same (or portions of the same) review area: ORM Numbers and Dates
 - ☒ Photographs: *Photo 1: Stream 1*, prepared by [REDACTED] and dated December 2021
 - ☒ Aerial Imagery: *Figure 2: Aerial Map*, prepared by [REDACTED] and dated September 2022
 - ☒ LIDAR: 3DEP DEM and Hillshade imagery, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023

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- ☒ USDA NRCS Soil Survey: *Figure 5: NRCS Soil Map*, prepared by [REDACTED] and dated August 2022; and USA Soil Map data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023
- ☒ USFWS NWI maps: NWI data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023
- ☒ USGS topographic maps: *Figure 3: USGS Topographic Map*, prepared by [REDACTED], and dated September 2022
- ☒ USGS NHD data/maps: NHD data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023
- ☐ Section 10 resources used: Title and Dates
- ☐ NCDWR stream identification forms:
- ☒ Antecedent Precipitation Tool Analysis: December 7, 2021 (Drier than Normal Conditions) and March 24, 2022 (Wetter than Normal Conditions)
- ☒ Other sources of Information: *Figure 1: Vicinity Map*, prepared by [REDACTED] and dated August 2022; StreamStats accessed data by CESAS-RDP in December 2023; and FEMA Flood Hazard data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023

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



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January 27, 2024

MEMORANDUM FOR RECORD

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Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322
(2023), SAS-2022-00863

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¹ 33 CFR 331.2.

² Regulatory Guidance Letter 05-02.

³ 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).

Name of Aquatic Resource	JD or Non-JD	Section 404/Section 10
Stream 15	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)

3. REVIEW AREA: Review Area 2

- a. ~0.6-acre
- b. Latitude: 33.9587, Longitude: -84.0652
- c. Gwinnett County
- d. Georgia

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

- a. The nearest TNW to the subject water is the Ocmulgee River, located approximately 64 kilometers south-southeast.
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5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS.

Water from the subject feature southwestward into an unnamed perennial tributary, continues westward through two additional unnamed perennial tributaries, and into Lee Daniel Creek, located in the northwestern portion of the property. Water in Lee Daniel Creek flows south off the property and southwestward into Sweetwater Creek, southward into Yellow River, and southward into Jackson Lake and the Ocmulgee River.

6. SECTION 10 JURISDICTIONAL WATERS⁴: 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. N/A
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⁴ 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.

f. The territorial seas (a)(6): N/A

g. Adjacent wetlands (a)(7): N/A

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”).⁵ 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
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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
Stream 15	277 feet	A tributary that does not have relatively permanent, standing or continuously flowing water

Various data sources do not indicate that the review area contains aquatic resources. During the first field determination, conducted on December 7, 2021, the review area was observed to contain a channel that did not have water (Stream 15). Further, an abundance of leaf litter was present in the channel. The feature was observed two additional times, on January 14, 2022 and March 24, 2022. No water was present in the feature and leaf litter remained abundant. Of further note, approximately 0.36-inch of rain had fallen on March 23, 2022.

Based on the information available, Stream 15 is assumed to only convey flows from the surrounding uplands during precipitation events. Therefore, it does not meet the description of jurisdictional tributaries, those that are relatively permanent (that typically flow year-round or have continuous flow at least seasonally), as per 33 CFR 328.3(a)(5).

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.
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 - b. Field determination: December 7, 2021 (Agent); January 14, 2022 (Agent); March 24, 2022 (Agent)
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 - ☐ Wetland field data sheets:
 - ☐ OHWM data sheets prepared by the USACE: Title and Date
 - ☐ Previous JDs (AJD or PJD) addressing the same (or portions of the same) review area: ORM Numbers and Dates
 - ☒ Photographs: As collectively prepared by [REDACTED]: *Photo 15: Stream 15*, dated December 2021; *Photo 1: Photograph of ephemeral feature*, dated

CESAS-RDP

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December 7, 2021; *Photo 2: Photograph of ephemeral feature*, dated January 14, 2022; and *Photo 4: Photograph of ephemeral feature*, dated March 24, 2022

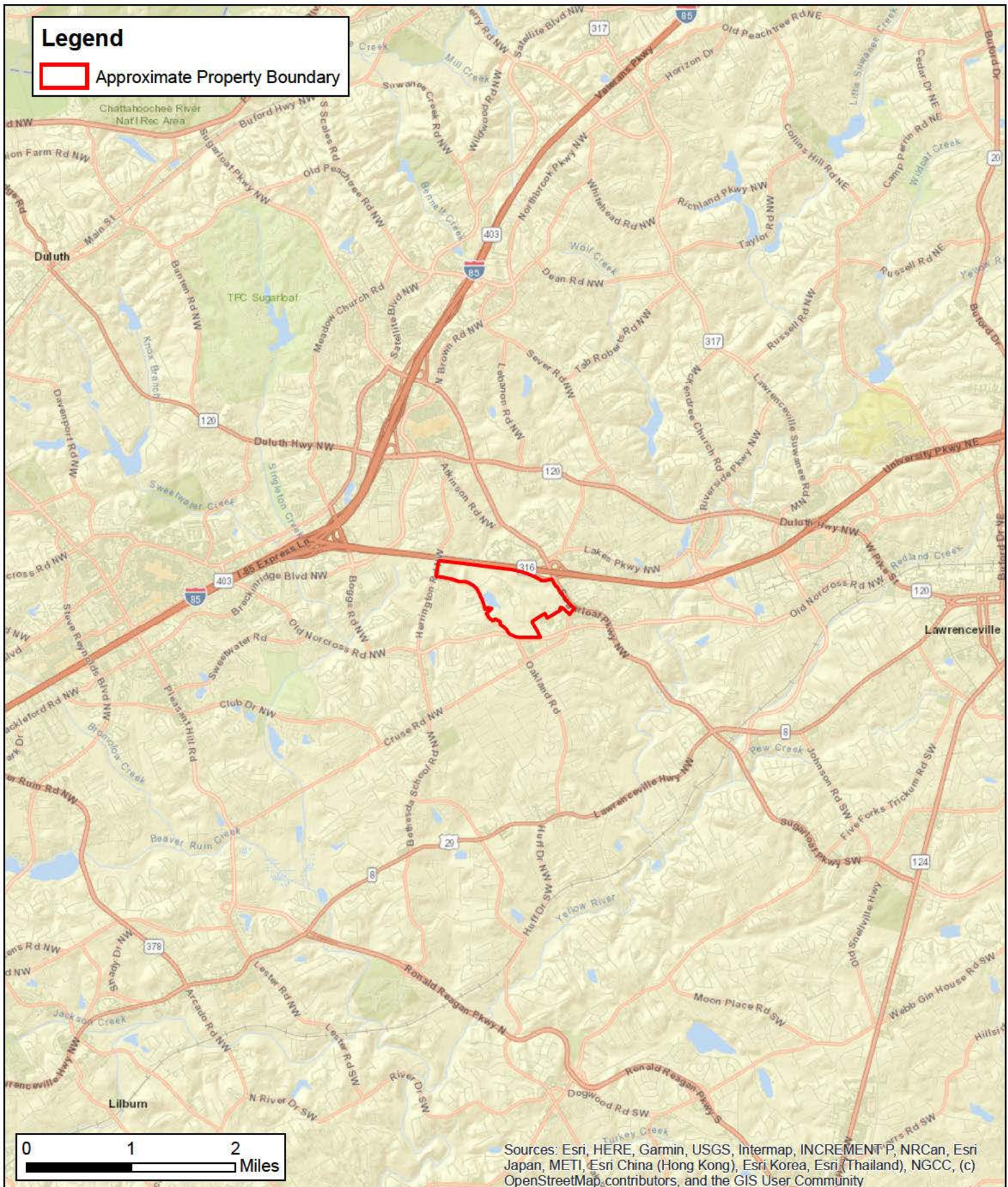
- ☒ Aerial Imagery: *Figure 2: Aerial Map*, prepared by [REDACTED], and dated September 2022
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- ☒ USDA NRCS Soil Survey: *Figure 5: NRCS Soil Map*, prepared by [REDACTED], and dated August 2022; and USA Soil Map data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023
- ☒ USFWS NWI maps: NWI data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023
- ☒ USGS topographic maps: *Figure 3: USGS Topographic Map*, prepared by [REDACTED], and dated September 2022
- ☒ USGS NHD data/maps: NHD data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023
- ☐ Section 10 resources used: Title and Dates
- ☐ NCDWR stream identification forms:
- ☒ Antecedent Precipitation Tool Analysis: December 7, 2021 (Drier than Normal Conditions) and March 24, 2022 (Wetter than Normal Conditions)
- ☒ Other sources of Information: *Figure 1: Vicinity Map*, prepared by [REDACTED], and dated August 2022; StreamStats accessed data by CESAS-RDP in December 2023; and FEMA Flood Hazard data, accessed from the National Regulatory Viewer by CESAS-RDP in December 2023

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

Legend

 Approximate Property Boundary



Kimley»Horn

Figure 1:
Vicinity Map

Sugarloaf Industrial
Gwinnett County, Georgia
August 2022

1 in = 1 miles



