

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

SAS-RD-C April 29, 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-2022-00329

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), 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 iurisdiction.

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.

<sup>&</sup>lt;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>&</sup>lt;sup>2</sup> 33 CFR 331.2.

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

<sup>&</sup>lt;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).

Name of Aquatic Resource	JD or Non-JD	Section 404/Section 10
Wetland A (WA)	JD	Section 404
Wetland B (WB)	JD	Section 404
Wetland C (WC)	JD	Section 404
Wetland D (WD)	JD	Section 404
Wetland E (WE)	JD	Section 404
Wetland F (WF)	JD	Section 404
Pond A (PA)	Non-JD	N/A
Pond B (PB)	Non-JD	N/A
Pond C (PC)	JD	Section 404

#### 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. 2003 SWANCC guidance
- f. 2008 Rapanos Guidance
- 3. REVIEW AREA. The review area is an approximately 183.73-acre site located on Islands Highway, adjacent to US Interstate 95, in Midway, Liberty County, Georgia (Latitude 31.7816, Longitude -81.3744).
- 4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), INTERSTATE WATER, OR THE TERRITORIAL SEAS TO WHICH THE AQUATIC RESOURCE IS

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CONNECTED.<sup>5</sup> Jones Creek is the nearest TNW. The review area is located approximately 1.4 miles from Jones Creek. 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.

- 5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS. Wetlands A, B, C, D and E are wetlands that 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. Although labelled Wetland A, Wetland B, Wetland C, Wetland D and Wetland E, WA, WB, WC, WD, and WE function as one wetland (Wetland A/B/C/D/E). This larger wetland that includes Wetland A/B/C/D/E abuts Jones Creek, a TNW. Wetland F 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. There is a ditch/swale extending north from Wetland F towards Pond C that goes to a culvert at the road which extends to Pond C. Pond C has a culvert on the northeast side of the ponds that goes under the road and connects to Wetland D which is part of Wetland A/B/C/D/E which abuts Jones Creek.
- 6. SECTION 10 JURISDICTIONAL WATERS<sup>6</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>7</sup> 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

<sup>5</sup> 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.

<sup>&</sup>lt;sup>6</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>&</sup>lt;sup>7</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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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/B/C/D/E Wetland A Wetland B Wetland C Wetland D Wetland E	15.19 1.24 0.14 44.06 0.01	Yes, Jones Creek	Although labelled Wetland A, Wetland B, Wetland C, Wetland D and Wetland E, WA, WB, WC, WD, and WE function as one wetland (Wetland A/B/C/D/E). This larger wetland that includes Wetland A/B/C/D/E abuts Jones Creek, a TNW.
Wetland F	1.48	No.	There is a ditch/swale extending north from Wetland F towards Pond

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			C that goes to a culvert at the road which extends to Pond C. Pond C has a culvert on the northeast side of the ponds that goes under the road and connects to Wetland D which is part of Wetland A/B/C/D/E which abuts Jones Creek.
Pond C	15.96	No.	Pond C has a culvert on the northeast side of the ponds that goes under the road and connects to Wetland D which is part of Wetland A/B/C/D/E which abuts Jones Creek.

Based on review of desktop data resources described in Section 9 of this memorandum and a Corps site visit on September 28, 2022, Wetland A/B/C/D/E is determined to be jurisdictional. Although labelled Wetland A, Wetland B, Wetland C, Wetland D and Wetland E, WA, WB, WC, WD, and WE function as one wetland (Wetland A/B/C/D/E). This larger wetland that includes Wetland A/B/C/D/E abuts Jones Creek, a TNW. This determination is supported by LiDAR (which shows that based off of 1' contours, there is no significant increase in elevation between the wetlands), NWI and NRCS hydric soil mapping which shows similar hydric soils in the area of the wetlands. Wetland F 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. There is a ditch/swale extending north from Wetland F towards Pond C that goes to a culvert at the road which extends to Pond C. This ditch/swale can also be seen on LiDAR; therefore, Wetland F is determined to be jurisdictional. Pond C is an open water wetland that has a continuous flowpath to a TNW. Pond C has a culvert on the northeast side of the ponds that goes under the road and connects to Wetland D which is part of Wetland A/B/C/D/E which abuts Jones Creek. Pond C has a continuous surface connection to a TNW so Pond C is determined to be jurisdictional.

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#### 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"). 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 non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water).

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<sup>&</sup>lt;sup>8</sup> 51 FR 41217, November 13, 1986.

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Name of excluded feature	Size (in acres)	Type of resource generally not jurisdictional
Pond A	0.79	Wetland lacks a continuous surface connection to water of the US
Pond B	2.73	Wetland lacks a continuous surface connection to water of the US

Pond A is a closed depressional wetland surrounded by uplands approximately 1-2 feet higher than the average surface elevation within the pond. There were no connections observed between Pond A and any of the wetlands within the project review area which is also supported by LiDAR and NWI mapping. There is no evidence of any surface connection between Pond A and a water of the US. Pond B is a closed depressional wetland surrounded by uplands approximately 1-2 feet higher than the average surface elevation within the pond. There were no connections observed between Pond B and any of the wetlands within the project review area which is also supported by LiDAR and NWI mapping. There is no evidence of any surface connection between Pond B and a water of the US. Based on these findings through review of desktop data resources described in Section 9 of this memorandum and a Corps site visit on September 28, 2022, Pond A and Pond B are determined to be non-jurisdictional.

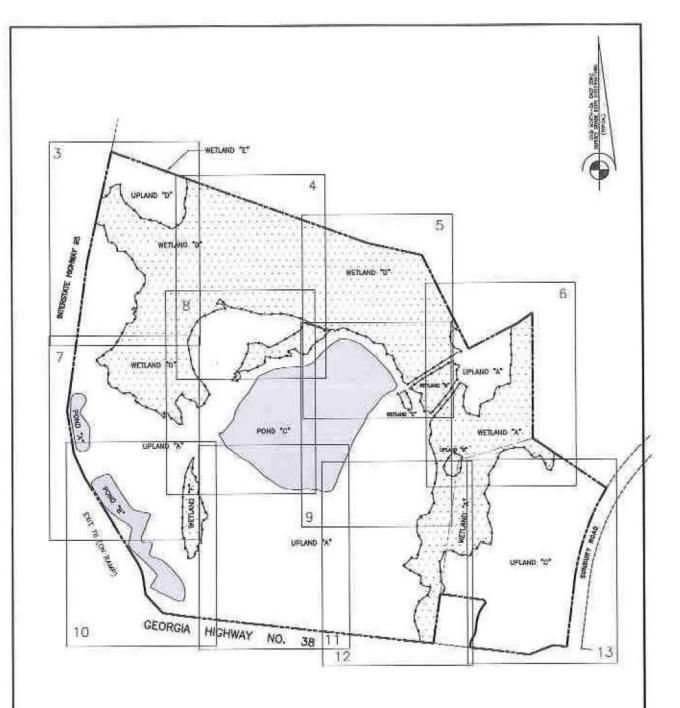
- 9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.
  - a. Office (Desk) Determination: April 2024 Corps Site Visit: September 28, 2022
  - b. Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant:
    Approved Jurisdictional Determination request and exhibit submitted by
  - c. Data sheets prepared/submitted by or on behalf of the applicant/consultant: submitted by
  - d. U.S. Geological Survey map(s): Liberty County 1'=1,000 ft.
  - e. U.S. Geological Survey Hydrologic Atlas: HUC 12 030602040501.
  - f. USDA Natural Resources Conservation Soil Survey: Liberty County, GA.

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- g. National Wetlands Inventory map(s): Liberty County, GA.
- h. Photographs: 1999, 2005 and 2023 Google Earth Aerial Imagery and 2022 Ortho Aerial Imagery.
- i. 20190625 Section 10 Waters List Savannah District
- j. NOAA Topographic LiDAR: 2018 NOAA LiDAR.

#### 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.



OVERALL BOUNDARY ACREAGE BOUNDARY TRACT = 183.73 ACRES

TOTAL ACREAGE
PONDS = 19.48 AC.
WETLANDS = 62.12 AC.
UPLANDS = 162.13 AC.
TOTAL = 163.23 AC.

WETLANDS ACREAGE

WETLAND AREA "A" = 15,10 AC.
WETLAND AREA "C" = 0.14 AC.
WETLAND AREA "C" = 0.14 AC.
WETLAND AREA "E" = 0.01 AC.
WETLAND AREA "F" = 1.48 AC.
TOTAL WETLAND = 62.12 AC.
AREA

UPLANDS ACREAGE

UPLAND AREA "A" = 77:07 AC.

UPLAND AREA "B" = 0.31 AC.

UPLAND AREA "D" = 3.89 AC.

UPLAND AREA "D" = 102.13 AC.

AREA

PONDS ACREAGE
POND AREA "A" = 0.78 AC.
POND AREA "A" = 2.73 AC.
POND AREA "C" = 15.98 AC.
TOTAL POND = 19.48 AC.
AMEA

WETLANDS MAP FOR:

### LAUREL VIEW COMMERICAL TRACT

LOCATION: 1359TH G.M.D. LIBERTY CO., GA. DRAWN, FEHRUARY 15, 2022 9Y: JAMES M. ANDERSON-GA. R.L.S. 2113 SCALE: NTS

22013WETLAND.DWG SHEET 2



"I HEREBY CERTIFY THAT THE WETLANDS AS SHOWN ON THIS SURVEY WERE LOCATED USING 99'S EQUIPMENT AT SURVEY GRADE AND SUB-LITTER ACCURACY. THE PURPOSE OF THES SURVEY IS FOR THE LOCATION OF WETLANDS ONLY AND HOT ROURDARY ESTABLISHMENT OF PROPERTY CONVEYANCE."

m M. anderson

2/15/22

	WETLAND	AREA "A"			WETLAND	AREA "B"			ETLAND AREA	A REAL PROPERTY OF THE PROPERT	
SINTS	NORTHING	EASTING	DESCRIPTION	FOINTS	MORTHING	LASTING	DESCRIPTION	POMTE	NORTHING	EASTING 901659.358	DESCRIPTION
47	647508.356	2018/2/13		412	548836,953	803937,019	HO.	283	849893.102 849849.231	901853.149	653 653
46	868531,357	304468,958		413	648598,014	903865,412	HD ND	285	669971,144	901591,349	ES4 10 PL
13	64/178.449	903829,493	KI4	616	549000 253	963888.685	12	288	650134.826	901626,773	GA TO PL
4	849/27,582 849144,792	984357.498	K13	637	049018-21B	904012.587	Þ	267	650145,347	901652.402	62
Ď.	649052.267	804360.776	K12	616	648981-271	803987,953	14	288 289	650201.774	801882,811 901888,352	G3 G4
ti.	646978.293	104350.751	811	519	64R927,173	903984,572	15 to 16	293	650220.706	901727.452	55
7 8	648899.553	004355,120	K10	521	648713,469	903782.818	=2	201	650725.154	901753,237	58
	648867.709 646785.459	904256.210 904238,454	KS KS	623	648784,784	903746.059	<b>80</b>	192	650172.723	901754.787	67
gI.	£48761,498	904152,254	K7	624	648829,400	903705.246	π7	293	650133.335	901780,280	58 56
10.	E48678.688	904139.604	K6	525	848833,272	993799 327	nd.	205	600003,282	901090.851	99
2	648701.910	804055,586	KO	626 627	648857.193	903715,177	e5	290	619984.676	901990,108	D10
3	848748.511 848828.040	904032.915	K4 K3	528	648562,602		63	297	64BR62.84B	902033.031	011
4	648879.112	804058.464	82	529	648975,422	983885,714	a2	298	649930.103	902096,534	613
6	640866.325	904028.278	KI TE TO BO	530	648929,243	903762.424	and to rea	300	549971,139 550044,845	902159.500 902191.058	014
1	640652,600	903816,671	A12 30 KD	RILL	849040.782	903957.559	\$1 YO HO.	301	850094,555	000177.142	015
9	648580.314	903810,085	A13					302	650166.769	902194.451	GTH
0	648520.459	903804.428	ATS		SHEETS AND	AREA "C"		303	550239.127	902139,513	G17
il.	548453.870	603830.412	ATE				SSSSSSILHOW	420	650133,488	901588,924	
2:	848401,656	603848,744	MIX	PONIS	HORTHING	EASTING	DESCRIPTION	422	549831 042	803400,736	
1	545342.809	903057.937	A18	831	646654,726	003647.014	27 to 21	425	650266.062	902190.639	
2	549259,200 548174,807	903852,587	A10:	832	848791.087	903079,594	62	425	048750-237	G03784.048	
4	848111,800	903836.990	A21	E34	546720.829	903682,394	62	430	849330.815	903971.137	M. Se
5	648033.412	903800,904	A22	538	84823R.873	903642.753	64	503 504	648777.31¢ 648842.915	902155.503	61 to 61
5	548022.892	903759.787	A23	636	648816.019	903614.225	ch.	505	646810.946	90217A.055	113
!	647990.000 647916.007	903724.507	A24 A25	637	648924.885	903504.785	es	504	648784,573	902252, 385	0.4
5	847849.2G4	903723.541	A26					507	648744.<22	902262.871	145
à	047/03/924	903731.598	A27					508	648835.004	902303.909	h6 h7
1	847736.739	\$03723,049	A20		1900	General Services		510	648878 145	902321.913	hib
2	843746.472	503668,113	A2B		WETLAND	AREA "D"		557	648008.092	902200-094	hi
4	547651,741 547678,237	903629.135	OEA FEA	POHTS	NOTCHING	EASTING	DESCRIPTION	512	649968,157	902246,984	h sia
5	647646.299	003701.114	AJI	230	640721.319	902151.226	ST E1 10 H1	513	648036-876	980901,857	631
8.	647626.173	903751,471	A33	231	646671,824	902153.822	E2	514 515	849093.805 649182.401	302212.926 302195.505	h12 h13
7	647584,490	903743,076	A34		848835,284	902160.545	13	516	649268 170	902231-476	1/15
5	047502.209	903761,750	A30	3.22	648645.056	902128.935	£4 £5:	512	649308,978	902253,384	b16
9	847549.997 847499.548	E03815,638 E03792.940	A36 A37	234	648882.072	900075.700	EG	518	849,347,357	902292 904	P12
	647461.596	B85740.800	A38	238	648713.528	902051,618	L	519	649396,778 649391,230	802341.061 802391.399	h18:
2	047412.993	8037(3.716	A38	237	546710.221	902027.302	E8	523	549404,000	902438.886	1,20
3.3	847348.820	103701,10E	WIO	238	648691,707	902053,448 902051,934	E10	522	6494TB.452	902447,145	h21
5	647293.324 647253.38U	803/14.325 803/33.204	A41	239 240	648685.343	902034,120	E)1	523	649427,1222	802444.862	h22
6	647197.699	803741.154	A43 TO PL	241	648727.058	801983.623	E12	525	849456.512	902359.051	623
77	647551,817	903906.189	A04	242	E4875E.338	901900, TOB	E17	576	649470.930	902462.923	h25
F.	847502,488	503878.118	A55	243	848793.759	901845.199	EI4	527	649464.232	902512.935	1128
9	647630,395 647713,288	903890,464	AST AST	244	648815.046	901858.364	£15 F16	528	649395 72B	909573.287	1127
11	847750.5h2	903991.313	Abe	298	648841.270	901764.284	E17	52#	649379,610	902670.229	5.28
2	647793,443	903906.560	A59	247	646878,426	801722.759	EID	530	649364.888 649360.175	902072-976	H20
3	547795.135	903954,757	ABD	244	648884.353	901607,160	E19	532	649367.405	992790.913	11.53
4	547768.200	904003.356	AGI AGZ	245 252	648954.373	901860.908	E20 E21	533	649367.587	902844.524	h32
16	847784,777 947758,956	904079,228	A53	253	649005,745	201667.739	622	534	649353.003	902692.020	1.33
7	547799,338	904092-030	A64	254	649032.092	901639.388	E23	535	649326.737 649286.252	902977,707	1:34 1:33
ii.	547798,803	904117.050	AGS	255	049027.308	901619,179	£24	537	649270.873	902090.585	1636
9	847853,752	904148,079	A66	256	649088,875	901584.978	£25	538	649263,890	993103.884	1-37
6	647B2B.004	904212.634 904222.842	AST.	257 258	649092.118	901826.231	£26 £27	539	549292,296	903015,518	7/20
12	847938,733	904220.743	A09	255	049138.883	901694,788	£28	540	649305,862	202271.942	N39
3	648015.834	004189.498	A70	200	54B177,401	001724,B19	E23	542	549260.957 549227.143	902957.222 902908,452	540 541
4	548080.505	909209.908	A71	281	849744.721	901764.297	EHO	543	649189,133	102834.580	7/42
5	648170374 848231.853	904171.458	A72 A73	262	649300.737 549310.951	901794:820	E31 E32	544	540168,672	902501.477	453
7	648220.088	304201.540	A74	204	649352.386	991855,317	E33	545	E49140,38/	902743.403	444
8	548353,155	B04243-211	A75	266	649371,572	991635,310	E34	515	549173,029 849172,429	902885.148	145 145
9	640437,713	904227,891	A7G	266	649306.387	901852,807	F35	547	649150,705	902003.172	n47
0	84845E101	904307,723	A27	267	649+00,05A	901827-145	E36	540	649129,610	802684,746	nen-
11	E484EB.E35	904266.541	A70 A70	26h	649338.021	901635.610	E37 E38	550	049071.251	902579,030	640
92	048451.806	904485 354	OBA	270	649432.554	801881.662	E30	551	849017.118	502554,685	M50
94	848402,160	884504.922	AB1	221	649474.452	001846.838	E40	553	648971,589	502518.040 502508.328	152
05	B48415.920	804550.960	ART	277	649406.546	90 (85) 557	F41	555	848958.055	902527,158	1:53
05	64B35T.847 64B324.388	804592,914	AB3 AB4	274	649519.518	801883.002 901916.658	E42 E43	555	648923.RBR	902496.498	No.4
05	646320,001	964613.655	ABS	275	649828.417	901912.587	E44	556	648922,199	902527,918	1155
23	84835   502	904635,887	ARE	276	649668,625	901955,399	£45	557	648981,777	902552,738 902542,550	1158 1157
10	048398.850	904838,542	ART TO PL	277	649738.722	601n29.393	E46	559	648995 169	902577.450	h58
14	048733.998	903886,349	RD	175	649760.687	901785,255	E47	550	048997.019	802591-410	heffin
15	648872.739	903958,803	RD RD	280	549781.704 549817.549	901733,109	E48	561	n48991.392	B02815.207	NEG
18	647100.456	803742,487	100	281	649843.82/	801703,014	FB0	562	640006.083	802644.575	h63
205	849293.89B	904399.768		282	649845.252	901673.17A	ES1	563 564	649034.600 649084.041	902711.596	663
28	649383,095	904499,990						255	649086 BHS	902790 508	164
121	649274.558	904361.654						588	849583.817	902858.204	h65
32	048437,936	903991,75E						fin7	649080.438 649081.188	902880.847	167
4.7								569			
133	647504,093	Charles High						509	649101.841	902889-00E	hEB



T RESERVICIONE DANS THE WELLANDS AS SHOWN ON THE SUPPLY WERE DOCATED HERSE APE TOURSMENT AT EMPLOY GAVE AND SIGN MEDIES ACCUSANCE, THE PRINCAPOR OF THIS SUPPLY IT THE HIS LOCATION OF ATTACHOR OULY AND HOS BOUNDARY ESTABLISHMENT OF PROPERTY EMPLOYMENT.

WETLANDS MAP FOR:

## LAUREL VIEW COMMERICAL TRACT

LOCATION: 1359TH G.M.D. LIBERTY CO., GA. DRAWN; FEBRUARY 15, 2022
BY: JAMES M. ANDERSON—GA. R.L.S. 2113
JN22013.CRD & 22013WEILAHD.DWG SHEET 14

Jun M. adam 2115/22

JAMES M. ANDERSON & ASSOCIATES, INC. REGISTERED LAND SURVEYORS P.O. BOX BOA 104 OAK STREET STATESBORD, GA. JOHNO PHONE: (912) 764-2002

	-11-11V22-	C PARTED A DE POUL			e Gallac	5.2			la vivia		
WE	ETLAND ARE	A "D" (CONT.)			POND	.y.			POND	*C*	THE WORLD
PONTS	NORTHING	EASTING	DESCRIPTION	POORTS	KORTHEKS	EASTING	DESCRIPTION	PORTS	NORTHING	EXSTING	DESCRIPTION
	649131.837	901914.332	NO.	166	E48937.286	801418.002	PORD	658	n460038,564	802851.563	potul
572	949096.322	902855-231	121	101	648626,280	M01424.610	PONE	6.79	648030,036	902775,416	pond
	848095.247	802997.854	1072	102	648840,532	501436,522	POND	640	EAS952,590	9020/1/143	pond
	849157.543	903034.661	107.5	103	648845.332	901464.92/	POND	541	548546,902	802:605,314	pinnid
	640160.010	803093,437	n74	101	E48943.925	801485,895	POND	642	646773.770	902545,820	butce
57E	649205.560	803106.245	h75	105	648826.050	901510.831	FOND	843	648719.729	002516.512	pond
57)	649247.875	903143,459	1/7E	106	648801.967	901519.738	POND	644	648663 1902	992501.691	pand
76	649255.066	903104.397	N/F	107	618774.611	901507.677	POND	645	646804.192	902453,256	patri
179	049270,447	903125.774	h78	100	848736,291	901463.070	POND	846	B48577.634	002428,080	pond
	049252.845	903140.203	1.79	109	648700.065	901479,598	POND	647	649579,122	902406.500	pend
581	649760.808	003175.317	NBG.	110	549683.602	901496.900	9080	618	648558.615 648568.821	802413.325 802453.065	posts
587	649247.996	903177.537	PRI	337	E48550.616	901574.140	POND	659	648417,040	902548 103	pend
	549270.091	903235.579	hR2	112	645628,021	901537,71H 901543,327		650	648384 162	902804,536	pond
501	649226,364	903339,190	LRI	113	848605.649 848572.554		PUND	661	648334.712	902859-632	monal
585 586	649301,545 649171,278	903410.027	684 685	114	648539.862	901536.581	POND	652	848291,659	902703.11B	pond
587	519159.616	903502.316	h65	116	848507.739	901540.424	POND	663	648267,120	902740-656	pond
568	849118.675	903525.573	1186	117	848485 013	101537.405	FOND	654	648228,803	902/97.680	pond
569	849005 225	003522.717	ner	158	846459.095	901523,559	POND	655	658203.689	902845.540	perul
590	640083.563	903567,398	n68	115	040459.047	#01507.324	F080	556	648198.818	902924.962	pond
591	549032.429	803580,685	189	120	848457.204	90149G.H95	PONS	687	848203,604	902952.133	pond
SBL	548980.750	a03603,508	1:00	121	848463.201	901471,092	FOND	668	G4B194.675	902070.382	pond
59.5	848961,336	903631.240	91	122	648475.133	901457,641	POND	669	848184,105	903111-117	piond
594	648940.577	175.VX9f06	h82	123	648483.705	HD1450,414	POND	670	846184,675	903141.725	pond
595	540909.533	803636.088	H23	124	648480.810	901440.250	POND	671	648197,642	903102.045	pond
566	#48884 239	903684,725	1/24	814	646603,600	201414.415	POND	672	648254.578	903188.468	pozid
597	849115-105	804015,400	II the to re					6/3	046317.586	803211.839	pand
508	840129,138	B04001.344	(2		POND	- mar		674	848398.271 648453.302	803248-029	pond
593	549132.403	903979.523	13			The second second	365 B. 1879	675 676	668517,003	903272.551	pond
600	649177.607	903949,606	34	PONTS	MORPHING	EASTING	DESCRIPTION	577	E40570.009	803333.732	nand
601	849236.433	003949.972	10	125	848233.056	001552,280	POND	678	648836.568	903380,445	pond
EDI	E49208.948	B03987.108 B03982.879	ガロ	125	648248.839	901550,105	POND	679	648697.002	903398 227	nond
003	E49255.538	Bryanc DLA	- 14	127	648261 843	901559,080	POND	680	648741.645	863441.097	penn
				122	548284,247	901599,887	POND	891	848814.049	903498.560	point
				129	648300,551	901625.85%	POND	682	648890.508	903556,879	pond
	WETT AND	AREA "E"		130	548307.034	901050,843	POND	683	648852 886	503572,213	pond
-	. JOHN TENSTONE		mineral control control	121	545305.094	P01667-235	POND	684	610864 895	803598,345	pend
SIMIC	HORTHING	EASTING	DESCRIPTION	132	848297.782	901878.005	POND	685	£48973.518	903548,978	ponel
NOR.	650302.833	902061.078	G20	133	848245.440	991710,425	POND	888	849859,332	903495,711	pond
423	650325,418	902025,526		134	B48184.950	901749.506	POND	687	\$40072.790	503457.460	pand
424	450305.573	402090,727		135	548118.295	901794-509	POND	68#	649121.610	903399,527	pond
				136	548098.114	001809.873	POND	669	649563,986	903349.210	pord
		PACK PRESIDENCE AND		137	648072.734 648065.205	901832,810	POND	890	849192.467	503277.786	pond
	WETLAND	AREA "F"		138	548065.285 648058.143	901839,541	PONO	891	640158.784	503220.552	poor
diam'r.	200	The state of the s	DESCRIPTION	140	548051.284	001006.200	PONE	692	549159,812	903157.930	pond
ONTS	MORTHING	EASTING	Chicago III	140	648048.510	351929.513	POND	693	649106,466	903097.236	pond
194	647820.123	802175,774	F)	142	648043.188	931942.661	PONO	694	649041,111		sond
155	647791,739	802192.870	12	143	648029.033	901941.95B	PONO	695	545016,957	902563.886	bood
106	847753,440	902184,517	FB	144	647976,191	901919,687	POND	696	549011.318	902000.110	gend
197	557747 798	802207.444	74	145	647808,394	301837.572	PONI				
198	947762,257	505535131	FD:	146	G47872.988	901883.131	POHO		DOM:	ITA DOC	
159	647799.983	002249.491	F6	147	\$47652,008	001892.283	POND		BOUN	The state of the s	
200	547803.213	B02268 184	77	148	847858.568	901015,064	POND	POINTS	HORTHING	EASTING	DESCRIPTION
201	867834 204	90225H.377	FB	149	847858.422	901945,237	NOND:	14	847308.514	002677,300	1
202	647855.540	902274.902	#9: #10	150	647853.089	901954,429	POND	15	647370,013	/002152 117))	2 178
203	547851,218 547877 MD	802200.004	F11	151	047837,518	901954,054	PONG				1. Con read
201	547877.310 847804.937	902280.591 502288.258	F12	152	647800.842	001044,451	POHO	16	547395.128	942025 ash	1100 800
205	547946,007	502296,328	113	153	647770,711	901935.751	POND	17	647513.641	901910.876	
207	547979.695	B02285.743	F14	154	647770,855	901936,602	POND	16	847825.67E	L401895.180	
200	510002.851	902302.258	FIS	155	847782,774	901954.719	POND	19	047880.185	901884,090	
209	848011,110	202322.360	£16	158	647751,527	901091.244	POND	10	847718.501	201861.940	
548	648030.985	902325.537	117	157	647737.506	902022.795	EGHD	31	846039.395	901001.432	
251	648050.417	902308.788	T18	158	647694.526	802073,857	POHD	22	040284.190	901507.676	
212	648092.898	902295.878	F19	159	847880,879	0005R7,653	POND	23	#46452.087	201434.110	
213	848147.806	902281 279	F20	150	547536.335	002123.001	POND	24	648720.000	501203.125	
214	848175,200	902265-203	121	165	547512.424	902142.620	POND	25		801403.881	
215	E48215:473	902267.423	F22	152	647590,140	902156,877	POND		648868.001		
238	848252,431	202271.233	F23	163	647564,670	902187.550	PCND	26	E489E2.41E	901425.069	
217	548253.041	902252.885	124	164	647526,470	902174.255	POND	27	#49714,780	901528,498	
218	648268.812	902241.733	125	155	647496,846	9021/1/858	POND	-35	H47152.185	904718.A3B	
215	649266.073	902246.985	F26	165	647466.623	902153.671	POND	20	047163.158	904629,526	
220	nan302.107	902232.529	F27	168	647486.827	902137.949	POND	37	E47102.242	904469.984	
221	646372,936	992220,093	128	159	647476.175	902107.722	TYCHO	38	547131.221	901215-276	
222	648349.118	802227.321	F29	170	647499.851	902060.162	POND	39	547141,471	SC(4146.041	
223	848378,276	992227.504	F30	171	647527.780	900012.001	POND	40	647150.220	904071,953	
224	848407,830	907231.611	F31	172	647557,146	901950.092	POND	41	847188.191	904076.167	
	648308.444	902216,614	1-52	172	647563.555	901844,586	POND	42	647245.748	904108.045	
	648308.041	902179,140	133	129	547572,414	601047.540	POND	43	£47311.512	904118.349	
226	148163.687	902188.571	F34 F37	175	B47814.653	901973.067	POND	42	54/447.942	904151,409	
226 227		902171,498	F38 10 F1	176	547628.650	901988.351	DOND	46		904162,931	
226 227 226	647919,618	AH4-17 (-12H)	144 14.11	177	647042.497	901984.994	POND		847465.846		
226 227 226				1.7#	647887.780	001071-050	POHO	47	647508 356	903875.713	
226 227 226	647919,618			179	647696.875	901038.757	PONO	40	648531.357	804130.858	
226 227 226	647919,618				547738.798	901095.672	LOND	50	648189,424	904969.726	
226 227 226	647919,618			180		901649.028	POND	51	647576,085	904770.18N	
126 227 226	647919,618			181	047703.690		POND	54	597170.649	803828,493	
226 227 226	647919,618			182	647800.787		100004753			003742,487	
226 227 226	647919,618			181 182 183	647800.787 647817.905	991817.931	POSE	710	847188,458		
226 227 226	647919,618			181 182 183 184	647800.787 647817.905 647832.650	991817.931 991804.990	POND	419	847188,458 850444,725	961693.653	
226 227 226	647919,618	EORGI		181 182 183 184 185	647800.787 647817.905 647832.650 647848.230	991817.931 991804.998 991797.587	POND	419	650444.725		
226 227 226	647919.618 647868.330			181 182 183 184 185 186	647800.787 647817.905 647832.650 647848.230 647940.911	901817.931 901804.998 901797.587 901819.878	POND POND POND	419 420	650444.725 640973.016	981693.653 981696.824	
226 227 226	647919.618 647868.330			181 182 183 184 185 186 187	647800.787 647817.905 647832.650 657848.230 647940.911 647956.231	901817.931 901804.990 901797.587 901819.878 901818.370	POND POND POND POND	419 420 421	650444,725 640973,016 650133,468	961693.653 901596.824 901623.253	
226 227 226	647919.618 647868.330	EORGIA GISTERED		181 182 183 184 185 186 187	647800.787 647817.905 647832.650 657848.230 647940.911 647966.231 647966.231	901817.931 901804.990 901797.587 901816.378 901816.370 901810.142	POND POND POND POND POND	419 420 421 422	650444.795 649973.016 650133,468 649831.042	961693.653 901596.824 901623.253 963408.718	
226 227 226	647919.618 647868.330	EGISTER C		181 182 183 184 185 186 187 188	647800.787 647817.905 647832.650 647940.911 647940.911 647965.946 647965.352	901817.931 901804.990 901797.587 901819.878 901818.370 901810.142 901783.145	POND POND POND POND POND POND	419 420 421 422 423	650444 795 640973.016 650133.468 649831.042 050325,418	901596.824 901596.824 901623.255 963408.718 902925.528	
225 226 227 220 220 220 221	647919.618 647868.330	EGISTER C	£4	181 182 183 184 185 186 187 188 189	647800.787 647817.905 647832.650 647848.230 647940.911 647965.846 647965.846 647965.352	901817.931 901804.990 901797.587 901819.878 901818.370 901810.142 901783.145 901733.876	POND POND POND POND POND POND POND	419 420 421 422 423 424	650444.725 640973.016 650133.468 649831.042 650325.438 650305.573	961693.653 961596.824 961623.253 963408.716 962925.526 962096.727	
226 227 226	647919.618 647868.330			183 183 184 185 186 187 188 189 180	647800.787 647817.905 647832.650 647848.230 647940.911 647965.936 647965.936 648031.811 848043.302	901817.931 901804.999 901797.909 901816.370 901816.370 901816.374 901783.145 901690.228	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425	650444.725 649973.016 650133.468 649831.042 650325.418 650305,573 850266.083	951693.653 901596.924 901623.255 963400.718 902095.526 902086.727 902196.535	
226 227 226	647919.618 647868.330	EGISTER C		181 182 183 184 185 186 187 188 199 191 183	647800.787 647817.900 647812.550 647848.230 647940.911 647940.911 647965.352 648031.811 648043.302 648043.4161	901817.931 901804.999 901797.999 901810.879 901810.370 901810.142 901783.145 901733.876 901690.223 901662.738	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425 425	650444.725 640973.016 620133.468 649831.042 650325.438 450305.673 650266.683 640750.237	961693.653 901596.924 901923.253 963400,718 902925.526 902986.727 902/98.535 903/64.646	
226 227 226	647919.618 647868.330	EGISTER C		183 183 184 185 186 187 188 189 180	647800.787 647817.905 647832.650 647848.230 647940.911 647965.936 647965.936 648031.811 848043.302	901817.931 901804.999 901797.909 901816.370 901816.370 901816.374 901783.145 901690.228	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425	650444.725 649973.016 650133.468 649831.042 650325.418 650305,573 850266.083	951693.653 901596.924 901623.255 963400.718 902095.526 902086.727 902196.535	
226 227 226	647919.618 647868.330	NO. 2113		181 182 183 184 185 186 187 188 199 191 183	647800.787 647817.900 647812.550 647848.230 647940.911 647940.911 647965.352 648031.811 648043.302 648043.4161	901817.931 901804.999 901797.999 901810.879 901810.370 901810.142 901783.145 901733.876 901690.223 901662.738	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425 425	650444.725 640973.016 620133.468 649831.042 650325.438 450305.673 650266.683 640750.237	961693.653 901596.924 901923.253 963400,718 902925.526 902986.727 902/98.535 903/64.646	
226 227 226	647919.618 647868.330	NO. 2113		181 182 183 184 185 186 187 188 199 191 183	647800.787 647817.900 647812.550 647848.230 647940.911 647940.911 647965.352 648031.811 648043.302 648043.4161	901817.931 901804.999 901797.999 901810.879 901810.370 901810.142 901783.145 901733.876 901690.223 901662.738	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425 425 427	850444.725 649973.016 850133.468 649851.042 850325.418 850305.673 850266.083 649750.237 649127.387	961693.653 901596.924 901923.253 963400.718 902096.727 902190.535 903764.646 904071.579	
226 227 226	647919.618 647868.330	NO. 2113		181 182 183 184 185 186 187 188 199 191 183	647800.787 647817.900 647812.550 647848.230 647940.911 647940.911 647965.352 648031.811 648043.302 648043.4161	901817.931 901804.999 901797.999 901810.879 901810.370 901810.142 901783.145 901733.876 901690.223 901662.738	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425 425 427 428	850444 795 640973.016 850133.488 649831.042 050325.448 650305.573 850208.083 649750.237 649127.387 648293.698	961993.653 901596.824 901923.253 963490.718 902096.727 902096.727 902190.533 903764.040 904071.578 904399.788	
226 227 226	647919.618 647868.330	NO. 2113		181 182 183 184 185 186 187 188 199 191 183	647800.787 647817.900 647812.550 647848.230 647940.911 647940.911 647965.352 648031.811 648043.302 648043.4161	901817.931 901804.999 901797.999 901810.879 901810.370 901810.142 901783.145 901733.876 901690.223 901662.738	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425 425 427 428 479	850444 725 640973.016 850133.488 649831.042 650325,418 850305,573 850268.083 640750.237 649127.387 048293.698 842345.985	961693.653 901596.823 901596.923 903400.718 903925.508 902080.727 902190.535 903/64.640 904071.578 903498.768	
226 227 226 226 228	#47619.418 #47668.330	NO. 2113		181 182 183 184 185 186 187 188 189 180 181 182	647800.787 647817.900 647812.550 647848.230 647940.911 647940.911 647965.352 648031.811 648043.302 648043.4161	901817.931 901804.999 901797.999 901810.879 901810.370 901810.142 901783.145 901733.876 901690.223 901662.738	POND POND POND POND POND POND POND POND	419 420 421 422 423 424 425 425 425 427 428 429 430	850444.795 549973.018 850133.48 859851.042 050325,418 850308.973 850298.083 649750.237 649127.387 048293.088 849350.813	961993.653 901596.821 901923.253 963400.718 902995.528 902090.727 902190.535 903764.040 904071.578 90499.788 90499.788	

WEIGH ACCURACY, THE PURPOSE OF THIS PURPEY IS TON THE COCKNOWN OF MITTARIES CHULY AND NOT SOUMMAN ESTABLISHMENT OR PROPERTY CONVEYANCE."

m. M. admon 2/15/22

- 1. WETLAND DELINEATION PLACEDED BY SLIDH LIMINENMENTAL CONSULTANTS, NO. DATE: DECEMBER 2, 2021.

  BOUNDARY INFORMATION WAS COMPLED FROM FILLD MEASUREMENTS WAS BY MF 199AC GRS.

  LOUTHWANT AT SURVEY GRAFF, AND SUB-WITTER ACCURACY LOCATION FREID GUSTAVID ENTRENCE OF PROPERTY LINES AND FROM A PLAI, RECORDED ON P.B. P. 17. PC. LIN OF LIBERTY COUNTY CLERK OF SUPCINIOR COUNTY AND A CAD FLE OF A WETLAND EXHIBIT BY THOMAS A BUTTON, PREPARED 6/9/09 LINE THE FORMA GROUP.

  A PORTION OF THIS PROMEOTY MAY BY CONSIDERED WETLANDS UNIDER THE JURISDICTION OF THE CORPS OF ENGINEERS GRIEGES MAY BE SUBJECT TO MEASURE WIT AM FOR DISTLIBUTIONS OF THESE WETLAND AND SUBJECT OF THESE WETLAND AND SUBJECT SHOWN MILL STATE PLANE GOORGINATES WAS BY, U.S. FEET.

WETLANDS MAP FOR:

## LAUREL VIEW COMMERICAL TRACT

LOCATION: 1359TH G.M.D. LIBERTY CO., GA. DRAWN: FEBRUARY 15, 2022 BY: JAMES M. ANDERSON-GA. R.L.S. 2113 JN22013.0RD & 22013WETLAND.DWG SHEET 15

JAMES M. ANDERSON & ASSOCIATES, INC. REGISTERED LAND SURVEYORS. P.D. BOX 894 104 OAK STREET STATESBORG, GA. 10459 PHONE: (912) 784-2002