



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

SAS-OD-RD

May 17, 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-2021-00491²

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.³ 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.⁴ For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),⁵ 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

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 When documenting aquatic resources within the review area that are jurisdictional under the Clean Water Act (CWA), use an additional MFR and group the aquatic resources on each MFR based on the TNW, interstate water, or territorial seas that they are connected to. Be sure to provide an identifier to indicate when there are multiple MFRs associated with a single AJD request (i.e., number them 1, 2, 3, etc.).

³ 33 CFR 331.2.

⁴ Regulatory Guidance Letter 05-02.

⁵ 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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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. 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	Non-JD	N/a
Wetland B	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.

- A. Project Are Size (in acres): 62.8
- B. Center Coordinates of the Project Site (in decimal degrees)
Latitude: 32.091807 Longitude: -81.236312
- C. Nearest City or Town: Savannah
- D. County: Chatham
- E. State: Georgia
- F. Other associated Permit Actions or Jurisdictional Determinations (including outcomes)

Regulatory File No.	Type	Outcome
SAS-2020-00832	AJD	Pond A, B and C and Wetland A were determined to be non-jurisdictional (excluded waters) under the AJD. One wetland (Wetland B) was determined to be adjacent to the Savannah Ogeechee Canal making is jurisdictional.

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SAS-2009-01061	NWP/PJD	NWP was for impacts associated with the construction of the railroad located along the eastern border of the review site. Areas to the east prior to the railroad being constructed was verified as uplands with wetland impacts for the railroad construction occurring to the north of the project review area. Uplands were verified along the eastern border of the review site where the railroad was constructed. Uplands are verified between the railroad and the wetlands to the east of the rail road indicating there is no surface connection between the wetlands within the review area travel through culverts under the railroad and dissipate over uplands.
SAS-2002-04820	IP/Delineation Concurrence	The same review area as SAS-2009-01061 as also had the same determination as described above.
SAS-2021-00491 (5/25/2023)	ARDR	Wetland boundaries verified.

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: Salt Creek which is a TNW is approximately 3.82 miles south of the review 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).

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 Eastern Mountains and Piedmont Regional Supplement.

Wetlands A and B do not have continuous surface connection to a requisite water that would connect to the aforementioned TNW and are not jurisdictional.

6. SECTION 10 JURISDICTIONAL WATERS⁶: Describe aquatic resources or other features within the review area determined to be jurisdictional in accordance with

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

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 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): 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").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

"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.

⁸ 51 FR 41217, November 13, 1986.

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).

Name of excluded feature	Size (in acres)	Type of resource generally not jurisdictional
Wetland A	23.916	Wetland lacks a continuous surface connection to water of the US
Wetland B	0.43	Wetland lacks a continuous surface connection to water of the US

Wetland A is a large wetland system located throughout the review area. Wetland A continues to the south where it is located on an adjacent parcel that has been previously reviewed under an Approved Jurisdictional Determination SAS-2020-00934. Wetland A is part of the wetland system on the northern edge of the adjacent property and this wetland was determined to be non-jurisdictional. There is no evidence of a continuous surface connection on the adjacent property that would connect

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Wetland A to a requisite water. Uplands were verified to the south of the wetland between the wetland and the Savannah-Ogeechee Canal along with a large upland berm. Wetland A abuts an existing railroad that runs North to South. This railroad was previously permitted and its project area was delineated and wetlands were verified (SAS-2009-01061, 08/11/2010). Impacts associated with the railroad construction was located to the north of Wetland A. Areas adjacent to Wetland A were verified as uplands during this permit review. Additionally, this same area adjacent to Wetland A was verified uplands under a previous delineation as well under SAS-2002-04820 on August 30, 2002. Wetland A crosses through 4 separate culverts (one being crushed with no outfall). The wetland flows west to east under the railroad, but on the other side of the railroad flow remains in a depressional outfall and water pools in this feature. This feature is surrounded by uplands with no discrete feature that would constitute a continuous surface connection to a requisite water. Uplands around these depressional outfall features were verified during a site visit on 2/23/2024. Wetland A is bounded to the west by uplands and Pine Meadow Drive. Wetland A continues to the northwestern edge of the review site. Wetland A abuts the adjacent property that was permitted and wetlands were verified under Individual Permit Action SAS-2007-01659 on 10/14/2022. Wetlands were verified on the northeastern portion of the project and uplands were verified on the western portion indicating wetland A did not continue north (this may not be important given the area adjacent to the wetland is filled). No continuous surface connection has been verified or documented under current conditions that would connect Wetland A to a requisite water.

Wetland B is surrounded by uplands with the existing railroad bed to the east. There is no culvert present at this location. There were no wetlands observed or verified on the eastern side of the railroad. This upland to the east of the railroad was verified multiple under the aforementioned actions and field visit.

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): February and April, 2024
2. Date(s) of Field Review (if applicable): 2/23/2024
- b. Data sources used to support this determination (included in the administrative record).
 - ☒ Aquatic Resources delineation submitted by, or on behalf of, the requestor: A Wetland Exhibit of Parcel 1 of Bernice Bevil Hicks Property, dated 9/20/2022
 - ☒ Wetland field data sheets provided by applicant: 4/28/2021
 - ☒ Previous JDs (AJD or PJD) addressing the same (or portions of the same) review area: SAS-2002-08420 August 30, 2002; SAS-2009-01061 August

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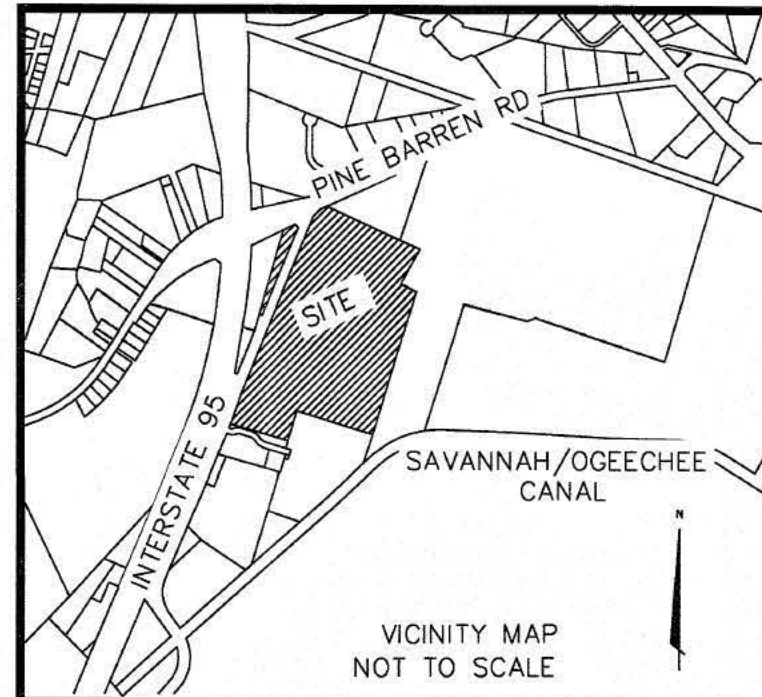
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11, 2010; SAS-2007-01659 Oct 14, 2022; a delineation concurrence of the site under SAS-2021-00491 on May 25, 2023

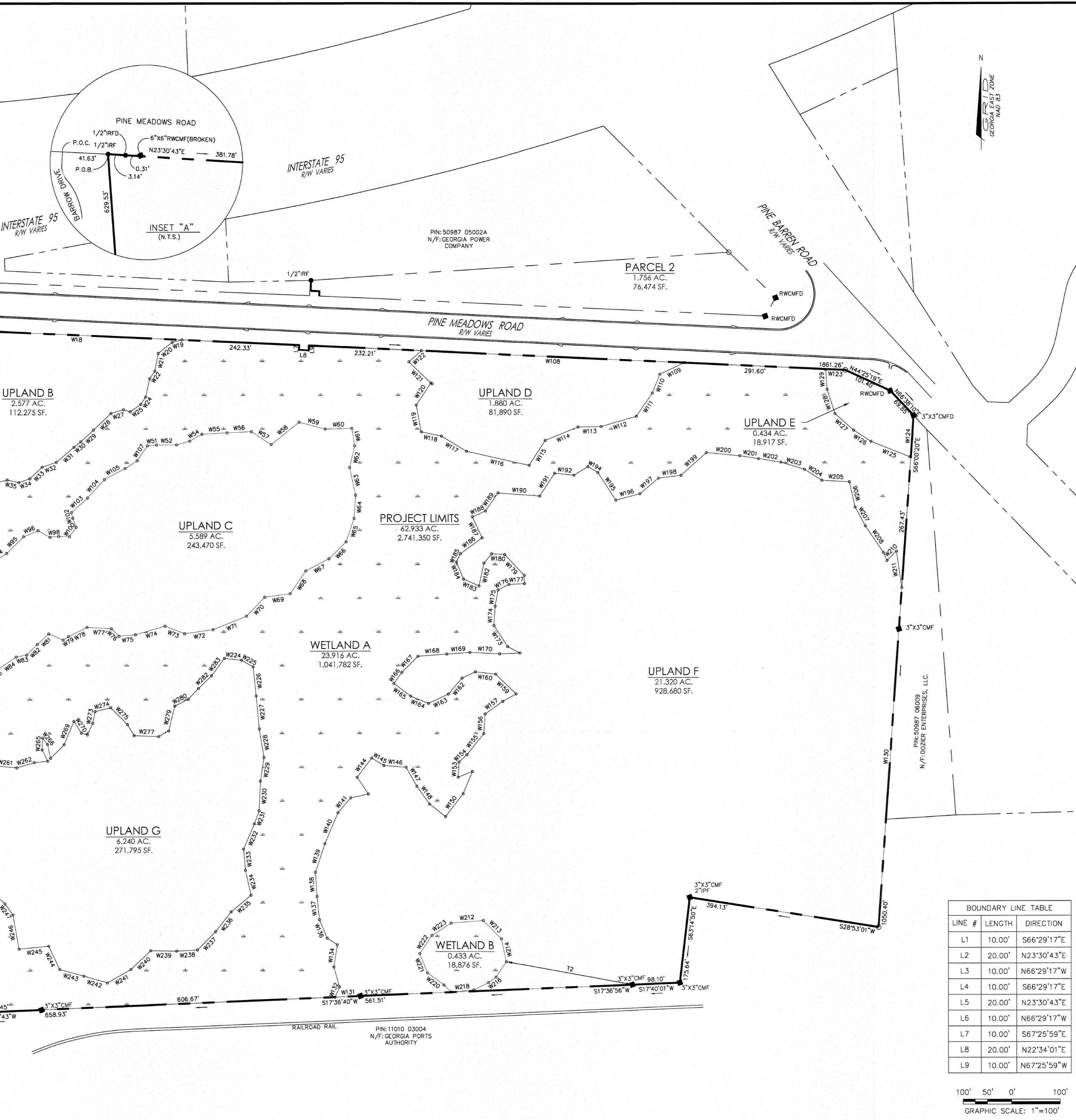
- ☒ Photographs: site visit photos on 2/23/24
- ☒ Aerial Imagery: provided by applicant, 2018 NAIP Ortho Aerial dated 6/9/2021
- ☐ LIDAR: NOAA Lidar Elevation was used to make: Southern Edge of Property with Hillshade and Lidar; Lidar from NOAA;
- ☒ USDA NRCS Soil Survey: provided by applicant; NRCS Soil Map dated 6/9/2021
- ☒ USFWS NWI maps: provided by applicant; NWI Map dated 6/9/2021
- ☒ USGS topographic maps: provided by applicant; USGS Topographic Map dated 6/9/2021
- ☒ USGS NHD data/maps: NHD-TNW Map used in ARCPRO
- ☒ Section 10 resources used: SAS Section 10

10. OTHER SUPPORTING INFORMATION.

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.

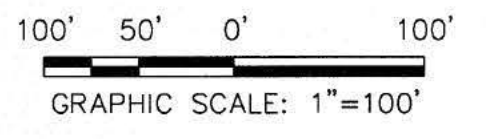


- NOTES:
1. PROPERTY ADDRESS: PINE BARREN ROAD.
 2. PARCEL IDENTIFICATION NUMBER: 50987 06008.
 3. THIS PROPERTY IS CURRENTLY ZONED R-A.
 4. AS OF THE DATE OF THIS SURVEY, BASED ON MY OBSERVATION THIS PROPERTY IS LOCATED IN ZONE X, NOT A SPECIAL FLOOD HAZARD AREA AS DETERMINED BY FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) FLOOD INSURANCE RATE MAP NUMBERS 1305100126H & 1305100128G, EFFECTIVE DATE: 8/16/2018. FEMA MAPS ARE SUBJECT TO REVISIONS AND AMENDMENTS AND SHOULD BE REVIEWED PRIOR TO CONSTRUCTION.
 5. THE HORIZONTAL DATUM OF THIS SURVEY IS BASED ON GRID NORTH, GEORGIA STATE PLANE, EAST ZONE, NAD 83.
 6. AQUATIC RESOURCES SHOWN ON THE SURVEY MAY BE UNDER THE JURISDICTION OF THE USAGE AND/OR STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES. LOT OWNERS AND THE DEVELOPER ARE SUBJECT TO THESE PROTECTED AREAS WITHOUT PROPER PERMIT APPLICATION & APPROVAL.
 7. WETLANDS Delineated by Resource-Land Consultants.
 8. ALL LINE AND CURVE TABLE TAGS ARE IN CONSECUTIVE AND SEQUENTIAL ORDER, NOT ALL TAGS SHOWN FOR CLARITY.
 9. THIS PLAT COMPILED FROM PLATS DRAWN BY OTHERS, AND IS NOT THE PRODUCT OF A COMPLETE BOUNDARY SURVEY PERFORMED BY COLEMAN COMPANY, INC.



- LEGEND
- IRF IRON ROD FOUND
 - IPF IRON PIPE FOUND
 - IPS 1" IRON PIPE SET
 - CMF CONCRETE MONUMENT FOUND
 - RWCMF RIGHT-OF-WAY CMF

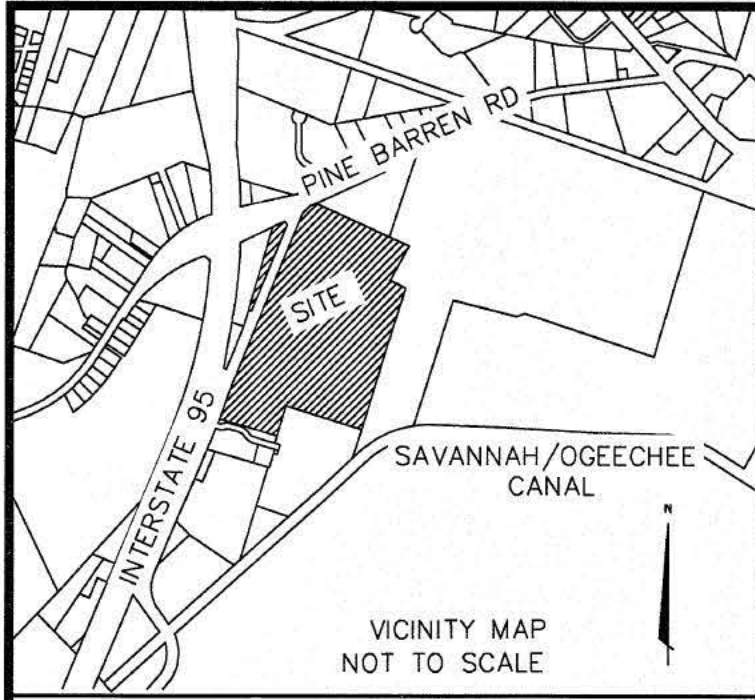
BOUNDARY LINE TABLE		
LINE #	LENGTH	DIRECTION
L1	10.00'	S66°29'17"E
L2	20.00'	N23°30'43"E
L3	10.00'	N66°29'17"W
L4	10.00'	S66°29'17"E
L5	20.00'	N23°30'43"E
L6	10.00'	N66°29'17"W
L7	10.00'	S67°25'59"E
L8	20.00'	N22°34'01"E
L9	10.00'	N67°25'59"W



A WETLAND EXHIBIT OF
PARCEL 1 OF THE BERNICE BEVILL HICKS PROPERTY
8TH G.M. DISTRICT, CITY OF POOLER
CHATHAM COUNTY, GEORGIA
PREPARED FOR: COLDWELL BANKER COMMERCIAL PLATINUM PARTNERS

WETLAND
EXHIBIT

SHEET:



NOTES:

1. PROPERTY ADDRESS: PINE BARREN ROAD.
2. PARCEL IDENTIFICATION NUMBER: 50987 0600B.
3. THIS PROPERTY IS CURRENTLY ZONED R-A.
4. AS OF THE DATE OF THIS SURVEY, BASED ON MY OBSERVATION THIS PROPERTY IS LOCATED IN ZONE X, NOT A SPECIAL FLOOD HAZARD AREA AS DETERMINED BY FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) FLOOD INSURANCE RATE MAP NUMBERS 13051C0126H & 13051C0126G, EFFECTIVE DATE: 8/16/2018. FEMA MAPS ARE SUBJECT TO REVISIONS AND AMENDMENTS AND SHOULD BE REVIEWED PRIOR TO CONSTRUCTION.
5. THE HORIZONTAL DATUM OF THIS SURVEY IS BASED ON GRID NORTH, GEORGIA STATE PLANE, EAST ZONE, NAD 83.
6. AQUATIC RESOURCES SHOWN ON THE SURVEY MAY BE UNDER THE JURISDICTION OF THE USAGE AND/OR STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES. LOT OWNERS AND THE DEVELOPER ARE SUBJECT TO THESE PROTECTED AREAS WITHOUT PROPER PERMIT APPLICATION.
7. WETLANDS DELINEATED BY RESOURCE-LAND CONSULTANTS.
8. ALL LINE AND CURVE TABLE TAGS ARE IN CONSECUTIVE AND SEQUENTIAL ORDER, NOT ALL TAGS SHOWN FOR CLARITY.
9. THIS PLAT COMPILED FROM PLATS DRAWN BY OTHERS, AND IS NOT THE PRODUCT OF A COMPLETE BOUNDARY SURVEY PERFORMED BY COLEMAN COMPANY, INC. NO FIELD SURVEY DONE THIS DATE.

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W121	62.52'	S63°34'38"W
W122	34.27'	N21°18'26"W
W123	40.82'	N22°34'01"E
W124	85.81'	S66°00'20"E
W125	87.85'	S41°30'29"W
W126	42.45'	S52°42'41"W
W127	51.32'	S61°40'05"W
W128	52.13'	N88°07'46"W
W129	41.43'	N74°15'27"W
W130	697.17'	S66°00'20"E
W131	52.26'	S17°38'27"W
W132	22.79'	N46°37'41"W
W133	42.35'	N86°03'24"W
W134	46.04'	N60°57'34"W
W135	24.79'	S52°33'34"W
W136	41.34'	S87°07'07"W
W137	47.84'	N75°54'52"W
W138	49.86'	N73°38'45"W
W139	61.51'	N51°25'18"W
W140	68.88'	N46°48'33"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W141	39.72'	N28°50'41"W
W142	37.27'	N7°50'35"E
W143	41.69'	S75°49'51"W
W144	49.85'	N32°26'59"W
W145	29.26'	N51°32'52"E
W146	45.99'	N24°28'55"E
W147	44.98'	N80°23'25"E
W148	44.93'	N74°16'56"E
W149	41.91'	N57°40'28"E
W150	59.11'	N32°21'13"W
W151	49.65'	N47°16'32"W
W152	31.65'	S2°06'14"E
W153	31.41'	N66°42'31"W
W154	22.04'	N22°43'04"W
W155	55.43'	N30°42'07"W
W156	40.42'	N66°13'31"W
W157	44.90'	N15°18'41"W
W158	31.27'	N8°39'45"W
W159	58.20'	S63°37'00"W
W160	42.18'	S26°37'57"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W161	30.40'	S5°02'25"E
W162	42.96'	S29°12'58"E
W163	45.34'	S4°53'06"E
W164	39.53'	S41°46'46"W
W165	43.40'	S56°49'20"W
W166	27.92'	N33°54'54"W
W167	47.15'	N24°58'02"W
W168	59.89'	N15°26'45"E
W169	47.50'	N16°07'38"E
W170	61.46'	N22°36'09"E
W171	42.19'	N17°25'06"E
W172	28.68'	S47°14'21"W
W173	51.98'	S76°55'59"W
W174	40.03'	N66°22'57"W
W175	33.58'	N59°28'05"W
W176	24.72'	N7°11'29"W
W177	32.48'	N17°21'47"E
W178	16.69'	N70°59'19"W
W179	58.67'	S66°17'42"W
W180	27.08'	S22°41'44"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W1	47.17'	S53°01'43"E
W2	65.38'	S78°51'42"E
W3	41.86'	S89°01'47"E
W4	59.45'	S74°59'48"E
W5	59.75'	S82°04'24"E
W6	43.80'	N72°56'05"E
W7	28.01'	N74°20'26"E
W8	23.72'	S74°53'11"E
W9	42.60'	S62°47'02"E
W10	38.90'	S55°44'05"E
W11	35.43'	S54°54'08"E
W12	36.16'	S17°17'05"E
W13	24.33'	S52°17'58"E
W14	35.61'	S74°36'09"E
W15	12.81'	S3°40'06"E
W16	551.87'	N74°08'02"W
W17	36.69'	N23°30'43"E
W18	433.76'	S22°34'01"W
W19	20.84'	S6°03'32"W
W20	36.36'	S18°03'31"E

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W21	36.39'	S59°00'54"E
W22	18.65'	S35°24'20"E
W23	38.27'	S57°31'34"E
W24	18.19'	S36°31'09"E
W25	26.63'	S15°00'25"E
W26	14.60'	S37°42'16"W
W27	27.18'	S3°22'45"W
W28	49.38'	S23°34'21"E
W29	35.76'	S21°53'46"E
W30	17.84'	S18°41'47"E
W31	47.90'	S20°20'21"E
W32	31.25'	S1°47'15"W
W33	34.91'	S23°12'56"E
W34	23.74'	S1°07'25"W
W35	24.76'	S32°12'55"W
W36	23.41'	S6°36'44"W
W37	41.67'	S45°10'38"W
W38	42.05'	S5°22'31"W
W39	36.07'	S25°21'05"W
W40	46.30'	S26°24'18"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W41	35.04'	S58°34'23"W
W42	47.72'	N76°19'33"W
W43	38.31'	N36°58'39"E
W44	42.69'	N72°24'20"W
W45	25.32'	N46°10'05"W
W46	51.56'	N56°22'03"W
W47	45.25'	N24°56'19"W
W48	47.78'	N37°31'22"W
W49	25.98'	N26°36'26"W
W50	31.77'	N50°17'04"W
W51	18.43'	N14°54'50"E
W52	41.38'	N19°48'28"E
W53	28.25'	N4°16'44"E
W54	29.01'	N9°11'54"W
W55	51.87'	N16°52'32"E
W56	50.35'	N17°18'56"E
W57	48.53'	N53°08'40"E
W58	73.81'	N18°10'18"W
W59	55.62'	N34°33'05"E
W60	54.89'	N18°37'50"E

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W181	24.55'	S30°02'27"E
W182	47.43'	S57°45'50"E
W183	34.96'	S43°37'43"W
W184	37.78'	S87°07'29"W
W185	18.20'	N44°12'57"W
W186	55.65'	N15°53'32"W
W187	47.81'	S84°46'47"W
W188	29.62'	N3°44'03"W
W189	45.18'	N34°54'39"W
W190	86.34'	N24°20'36"E
W191	56.07'	N36°41'20"W
W192	39.94'	N25°54'32"E
W193	33.90'	N11°27'45"W
W194	23.67'	N50°20'20"E
W195	67.69'	N76°48'58"E
W196	51.52'	N5°27'31"E
W197	49.85'	N20°00'46"W
W198	47.01'	N13°07'13"E
W199	70.12'	N21°46'32"W
W200	69.25'	N25°17'50"E

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W201	39.25'	N28°56'19"E
W202	46.66'	N28°54'13"E
W203	50.85'	N36°46'34"E
W204	42.59'	N52°17'07"E
W205	56.81'	N23°03'32"E
W206	52.95'	S82°43'39"E
W207	44.18'	N81°16'49"E
W208	65.70'	N75°34'50"E
W209	18.25'	N85°44'43"E
W210	27.16'	N25°04'13"W
W211	74.88'	S78°33'50"E
W212	66.68'	N15°09'12"E
W213	52.77'	N65°01'34"E
W214	47.75'	S82°00'23"E
W215	37.99'	S36°27'34"E
W216	19.10'	S16°03'37"E
W217	34.08'	S6°10'00"E
W218	46.63'	S14°20'02"W
W219	20.77'	S64°23'33"W
W220	42.37'	S56°05'35"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W221	42.44'	S88°14'50"W
W222	44.60'	N35°51'38"W
W223	46.83'	N12°26'33"W
W224	35.26'	N26°22'21"E
W225	27.79'	N49°49'11"E
W226	59.87'	S76°03'40"E
W227	67.62'	S75°24'07"E
W228	59.12'	S79°06'46"E
W229	49.22'	S61°25'35"E
W230	60.88'	S67°25'42"E
W231	28.05'	S49°34'31"E
W232	56.52'	S46°33'09"E
W233	43.34'	S75°10'07"E
W234	52.42'	S82°47'37"E
W235	53.53'	S19°29'19"E
W236	51.37'	S31°41'57"E
W237	52.96'	S24°51'14"E
W238	42.87'	S16°57'23"W
W239	53.47'	S20°40'57"W
W240	55.89'	S23°14'21"E

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W61	36.00'	S78°56'59"E
W62	45.95'	S56°48'25"E
W63	57.80'	S82°19'17"E
W64	48.23'	S66°11'45"E
W65	50.54'	S51°05'27"E
W66	49.31'	S24°05'54"E
W67	53.63'	S6°51'46"E
W68	56.70'	S35°33'02"E
W69	53.01'	S12°17'26"W
W70	53.91'	S26°03'25"E
W71	74.57'	S1°51'14"E
W72	59.44'	S11°58'50"W
W73	42.75'	S41°38'13"W
W74	63.72'	S3°40'16"W
W75	34.01'	S14°48'56"W
W76	22.03'	S64°05'45"W
W77	50.44'	S23°31'05"W
W78	42.49'	S6°42'43"E
W79	13.41'	S13°30'01"E
W80	32.68'	S43°35'34"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W81	32.14'	S22°02'32"E
W82	31.05'	S25°26'59"E
W83	21.98'	S8°58'10"W
W84	43.93'	S13°55'53"E
W85	19.40'	S3°48'13"E
W86	31.03'	S9°00'30"W
W87	54.11'	S21°10'00"W
W88	25.63'	N72°44'44"W
W89	43.84'	N54°41'23"W
W90	69.14'	N51°15'49"W
W91	46.13'	N38°43'44"W
W92	25.56'	N77°22'53"W
W93	50.57'	N22°24'31"W
W94	33.13'	N11°15'35"W
W95	49.05'	N24°19'11"W
W96	32.28'	N2°38'27"W
W97	28.34'	N48°30'35"E
W98	18.06'	N15°23'00"E
W99	22.15'	N21°16'48"E
W100	23.45'	N34°09'49"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W101	20.03'	S89°58'28"W
W102	11.82'	N84°04'37"W
W103	44.79'	N21°54'20"W
W104	51.54'	N27°28'51"W
W105	48.41'	N7°58'45"W
W106	29.36'	N12°38'37"W
W107	37.38'	N35°17'45"W
W108	543.61'	N22°34'01"E
W109	56.06'	S4°39'26"E
W110	41.33'	S47°59'48"E
W111	57.88'	S35°05'41"E
W112	75.85'	S3°47'48"W
W113	47.59'	S18°49'55"W
W114	73.07'	S1°51'02"E
W115	61.11'	S37°07'03"E
W116	132.37'	S32°36'50"W
W117	60.37'	S50°54'18"W
W118	42.55'	S31°52'51"W
W119	55.44'	N80°20'08"W
W120	54.28'	N36°26'26"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W241	55.79'	S9°22'38"E
W242	50.47'	S36°07'16"W
W243	51.49'	S35°04'34"W
W244	53.02'	S84°35'14"W
W245	61.80'	S14°18'47"W
W246	71.03'	N80°10'58"W
W247	27.91'	S74°05'59"W
W248	37.67'	S62°01'32"W
W249	43.99'	S61°54'41"W
W250	44.40'	S64°42'20"W
W251	23.43'	S66°34'06"W
W252	9.57'	N54°08'33"W
W253	29.30'	N87°00'07"W
W254	41.56'	N81°31'55"W
W255	19.21'	N52°44'04"W
W256	20.99'	N84°12'17"W
W257	26.11'	N85°57'19"W
W258	44.08'	N37°03'20"W
W259	20.06'	N9°04'48"W
W260	63.41'	N27°38'16"E

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W261	49.54'	N25°03'17"E
W262	37.51'	N3°24'50"E
W263	28.67'	N13°38'56"E
W264	26.07'	S81°52'53"W
W265	24.17'	N66°38'10"W
W266	16.89'	N71°30'34"E
W267	29.25'	S81°48'36"E
W268	39.82'	N24°40'00"W
W269	51.68'	N47°08'25"W
W270	28.52'	N77°18'44"E
W271	13.04'	N35°34'48"E
W272	26.17'	N45°22'30"W
W273	24.39'	N58°28'26"W
W274	33.11'	N6°44'55"E
W275	48.76'	N64°37'55"E
W276	26.30'	N79°03'47"E
W277	50.72'	N22°23'37"E
W278	23.64'	N9°49'36"W
W279	52.29'	N55°58'55"W
W280	30.93'	N6°35'45"W

WETLAND LINE TABLE		
LINE #	LENGTH	DIRECTION
W281	30.61'	N26°22'27"W
W282	37.05'	N23°30'06"W
W283	44.87'	N33°27'13"W

TIE LINE TABLE		
LINE #	LENGTH	DIRECTION</