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

CESAS-RDP Nov. 6, 2024

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA* 598 U.S. 651 (2023) ,[1] SAS-2024-00294

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 Georgia 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 02	Non-JD	N/A
Wetland 03	Non-JD	N/A
Wetland 04	Non-JD	N/A
Wetland 05	Non-JD	N/A
Wetland 06	Non-JD	N/A
Wetland 08	Non-JD	N/A
Wetland 09	Non-JD	N/A
Wetland 13	Non-JD	N/A
Man-Made Ditch 01	Non-JD	N/A
Man-Made Ditch 02	Non-JD	N/A
Man-Made Ditch 03	Non-JD	N/A
Man-Made Ditch 04	Non-JD	N/A
Upland Ditch 05	Non-JD	N/A
Upland Ditch 06	Non-JD	N/A
Upland Ditch 09	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. 651 (2023)

3. REVIEW AREA.
   A. Project Acreage: ~1,818 acres
   B. Center Coordinates of the Project Site:
      Latitude: 32.602995 Longitude: -82.841786
   C. Nearest City or Town: Dublin
   D. County: Laurens
   E. State: Georgia
   F. Other Associated Jurisdictional Determinations (including outcomes): N/A.
   G. Any additional, relevant site-specific information: The applicant has annotated various AJD review areas within the enclosed subject drawings, containing 8

non-adjacent wetlands and various upland dug ditches. The project site contains several mapped (slowly permeable) Grady soils (reference Figure 4: NRCS Soils Map). On-site intermittent streams contain seasonal flow, which were identified based on the absence of surface flow during field surveys but exhibiting well-defined channels with OHWM and bed-and-bank characteristics, typical to intermittent streams within this (middle-central) region of Georgia.

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

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

6. SECTION 10 JURISDICTIONAL WATERS[5]: 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.[6] 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.

[5] 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.

[6] 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.

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").[7] 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

[7] 51 FR 41217, November 13, 1986.

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 02	1.21-ac.	Wetland lacks a continuous surface connection to Waters of US
Wetland 03	3.98-ac.	Wetland lacks a continuous surface connection to Waters of US
Wetland 04	0.27-ac.	Wetland lacks a continuous surface connection to Waters of US
Wetland 05	9.41-ac.	Wetland lacks a continuous surface connection to Waters of US
Wetland 06	1.47-ac.	Wetland lacks a continuous surface connection to Waters of US
Wetland 08	1.55-ac.	Wetland lacks a continuous surface connection to Waters of US
Wetland 09	0.21-ac.	Wetland lacks a continuous surface connection to Waters of US
Wetland 13	0.61-ac.	Wetland lacks a continuous surface connection to Waters of US

Each of these on-site, non-adjacent wetlands are depressional systems with no continuous surface connections to other aquatic resources. Surrounding upland areas drain towards each of the depressional wetland features.

Wetland 02 is an emergent depressional system located within a topographic bowl surrounded by uplands within an active agricultural field utilized for row crops. This feature is mapped as Grady soils. The soil description for Grady soils notes they *are "slowly permeable soils in upland depressions but are also along drains of the Southern Coastal Plain."* Trees have been removed from the wetland, which is maintained in an emergent condition by mowing and other on-site activities. No tributaries flow into or out of this wetland. In an effort to drain Wetland 02 to maximize agricultural production, a man-made ditch was constructed and connects to the southern boundary of the Wetland. This ditch connects drainage from Wetland 02 to Wetland 03.

Approximately the upper half (northwestern) portion of Ditch 01 is located within a natural topographic valley as shown in Photos 1 – 4. The approximate eastern half of Ditch 01 is located within a flatter topographic area along the northern boundary of Wetland 03. Photo 5 is located near the western interface of the ditch and Wetland 03.

The feature connecting Wetland 02 to Wetland 03 was identified as a ditch for labeling purposes as it does convey surface flow during significant precipitation events as

evidenced by field observations including minor areas of surface scour. As exhibited in Photo 2, Ditch 01 does not exhibit any indicators of ground water contribution or evidence of sufficient flow to form an ordinary high water mark (OHWM) or bed and banks. The feature is predominately vegetated with Vasey grass (*Paspalum urvillei*), a facultative species, with minor areas of bare dirt sporadically located along its length. The site experienced heavy rainfall during the month of September. According to a weather station (KGADUBL155) located approximately 4.5 miles southwest of the site, the area received approximately 11.5 inches of precipitation in September 2024, with approximately 7 inches occurring on September 26, 2024, in association with Hurricane Helene. Despite the recent heavy rainfall, evidence of surface scour was limited, supporting that Ditch 01 is not a jurisdictional tributary.

Wetland 03 does not have a continuous surface connection to another aquatic resource. Wetland 03 is an emergent depressional system located within a topographic bowl surrounded by uplands within an active agricultural field utilized for row crops. This feature is mapped as having Grady soils. As noted above, Wetland 02 is connected to Wetland 03 *via* a man-made ditch. Extensive efforts have been made to alter surface hydrology within Wetland 03. This includes constructing a series of man-made ditches within and surrounding the wetland. The apparent intent of this effort was to increase arable land as efforts have been made to plant crops within the wetland as evidenced by the presence of undulating land (rows) within the outer portions of the wetland. The ditching has created inundated areas within the wetland that range from 0.5 to 1.0 foot in depth.

Ditch 02 bisects Wetland 03 north to south. This ditch is located along/adjacent to Wetland 03, and as a result does hold water during wetter periods of the year. Refer to Photo 6 for a representative photo of this feature. Ditch 02 extends east of Wetland 03. The only section of Ditch 02 with standing water was located along/adjacent to Wetland 03. No surface flow or standing water was observed within any other portion of Ditch 02 or any other ditch associated with Wetland 03.

Ditches 04 and 05 are also associated with Wetland 03. Like Ditch 01, Ditches 04 and 05 do not exhibit an OHWM or bed and banks. The features are predominately vegetated with Vasey grass with minor areas of bare dirt sporadically located along its length. Photos 7 and 8 provide representative photos of these features.

Wetland 03 is located in a natural depression as evidenced by available LiDAR data. In an effort to reduce hydrology within Wetland 03, it appears that Ditch 03 and a portion of Ditch 02 were constructed east of Wetland 03. Based on review of topographic data, the majority of these features located east of Wetland 03 were likely constructed in uplands. An existing 18-inch culvert crossing is located across Ditch 03. This feature is labeled as Access Road 01 on Figures 6.01A and B. However, there is no improved road

extending from this crossing in either direction. This crossing appears to be associated with general agricultural use of the property. Refer to Photos 9 through 15 for representative photos of Ditch 02 and Ditch 03 east of Wetland 03.

Based on LiDAR data, Ditches 02 and 03 slope to the east. Both of those ditches end in agricultural fields that appear to be planted on an annual basis (Photo 16). These fields are dominated by coffee weed (*Cassia obtusifolia*), a common upland agricultural weed in south Georgia. There is no constructed swale, ditch, or other continuous surface connection that proceeds eastward from the terminating points of Ditches 02 and 03; therefore, Wetland 03 does not have a continuous surface connection to Wetland 04.

Wetland 04 is an emergent depressional area within an active cotton field with no continuous surface connection to other aquatic resources. This feature is entirely contained within the review area, terminating west of Frog Level Circle with no signs of flow over or under Frog Level Circle Road. Frog Level Circle is an elevated, public dirt road that traverses north to south along the eastern border of the portion of the site where Wetland 04 is located. (Refer to Figure 6.01A). A constructed vegetated road slope and toe is located along the western side of the roadway, effectively creating a man-made berm that forms the eastern boundary of Wetland 04. The berm is approximately 1-foot in height and is located along the eastern edge of Wetland 04. This berm separates the wetland from the toe of the road slope. A dense growth of Chinese privet (*Ligustrum sinense*) is located along this area. Refer to Photos 17 through 22 for representative photographs of this area. Field investigations identified one, 12-inch corrugated metal pipe culvert under Frog Level Circle, located approximately 50 feet south of Wetland 04. The culvert inlet is buried on the western side of the road and was only noticeable on the eastern side of the road. This culvert, however, appears to transport surface runoff from Frog Level Circle and does not appear to connect to Wetland 04. As previously noted, Wetland 04 has a berm directly separating the wetland from Frog Level Circle.

Wetland 05 is a forested Grady bowl surrounded by active cotton field. This feature is non-adjacent, displaying no continuous surface connection to other aquatic resources. A small, vegetated swale/ditch is located near the southeast corner of this feature. Note that Ditch 09, has been added to Figure 6.01A and B, to demarcate the location of this feature. Considering the vegetated nature of this feature, it was not previously included on the figures but has been added for clarity. The ditch appears to have been constructed entirely in uplands. The portion of the ditch located closest to the wetland appears to slope toward the wetland. Approximately 100 feet east of the wetland, there appears to be a slope break, and the feature drains to the east. The ditch does not exhibit OHWM or bed and banks and terminates in an agricultural field. This portion of the project site is bounded to the east by a private dirt road that branches off Frog Level Circle. The road is elevated several feet above the surrounding topography and

appears to have been constructed by excavating soil from the area immediately west of and adjacent to the road. This excavation created a low area immediately beside the access road that appears to briefly hold water during heavy precipitation events.

Though Ditch 09 ends in the agricultural field, the potential for this feature to connect under the access road to offsite wetlands was investigated, however, no culverts are located under the entire length of the access road, lacking a continuous surface connection to other aquatic resources. Refer to Photos 23 through 32, illustrating the height of the access road in the vicinity of Ditch 09 and documents the absence of culverts.

Wetland 06 is a depressional (Grady) wetland within an active cotton field. Evidence of additional undulating land (rows) within the wetland identifies the apparent intent to increase land for planting crops. Wetland 06 is entirely contained within the review area, with no evident continuous surface connection to other wetlands or RPWs.

Wetland 08 is a forested Grady bowl surrounded by uplands within an active cotton field with no continuous surface connection to other aquatic resources. The surrounding uplands drain toward Wetland 08. The potential for a drainage connection between this feature and adjacent wetlands to the south and west was investigated. A review of aerial imagery indicates the potential presence of surface drainage features near the southern most point of the wetland. however, subsequent field observations of the area south of Wetland 08 (by Consultant) on November 01, 2024, confirmed that no drainage swale, ditch, or other continuous surface conveyance exists. The potential drainage feature to the west of the wetland is actually a barbed-wire fence (refer to Photos 33 through 36). The fence follows natural terrain including crossing over a hill that is well elevated above Wetland 08. This feature is entirely contained within the review area.

Wetland 09 is located within a topographic depression surrounded by uplands that are being utilized for agricultural production. This wetland is not mapped as Grady soils; however, the wetland resembles the other various natural Grady depressions throughout the site. The wetland contains no outlet, with no continuous surface connection to other wetlands or RPWs.

Wetland 13 is a depressional wetland, located near the head of a natural, gently sloping valley. Surface water from this wetland would only exit during periods of high water and overland sheet flow. No evident continuous surface connection to other wetlands or RPWs is present at Wetland 13.

Ditches (overall summary, describing continuous surface connections):

The upper half (northwestern) portion of Ditch 01 (1,635 LF) is approximately located within a natural topographic valley, as shown in Photos 1 – 4. The approximate eastern half of Ditch 01 is located within a flatter topographic area along the northern boundary of Wetland 03. Photo 5 is located near the western interface of the ditch and Wetland 03. The feature connecting Wetland 02 to Wetland 03 was identified as a ditch for labeling purposes as it does convey surface flow during significant precipitation events as evidenced by field observations including minor areas of surface scour. As exhibited in Photo 2, Ditch 01 does not exhibit any indicators of ground water contribution or evidence of sufficient flow to form an ordinary high-water mark (OHWM) or bed and banks. The feature is predominately vegetated with Vasey grass (*Paspalum urvillei*), a facultative species, with minor areas of bare dirt sporadically located along its length. This site experienced heavy rainfall during the month of September. According to a weather station (KGADUBL155) located approximately 4.5 miles southwest of the site, the area received approximately 11.5 inches of precipitation in September 2024, with approximately 7 inches occurring on September 26, 2024, in association with Hurricane Helene. Despite the recent heavy rainfall, evidence of surface scour was limited, supporting that Ditch 01 is not a jurisdictional tributary.

Extensive efforts have been made to alter surface hydrology within Wetland 03. This includes constructing this series of man-made ditches within and surrounding the wetland. The apparent intent of this effort was to increase arable land as efforts have been made to plant crops within the wetland as evidenced by the presence of undulating land (rows) within the outer portions of the wetland. The ditching has created inundated areas within the wetland that range from 0.5 to 1.0 foot in depth.

Man-Made Ditch 02 (523 LF) bisects Wetland 03 north-to-south. This ditch is located along/adjacent to Wetland 03, and as a result does hold water during wetter periods of the year. Photo 6 is a representative photo of this feature. Ditch 02 extends east of Wetland 03. The only section of Ditch 02 with standing water was located along/adjacent to Wetland 03. No surface flow or standing water was observed within any other portion of Ditch 02 or any other ditch associated with Wetland 03.

Based on LiDAR data, Man-Made Ditches 02 and 03 (598 LF) slope to the east. Both of those ditches end in agricultural fields that appear to be planted on an annual basis (Photo 16). These fields are dominated by coffee weed (*Cassia obtusifolia*), a common

upland agricultural weed in south Georgia. There is no constructed swale, ditch, or other continuous surface connection that proceeds eastward from the terminating points of Ditches 02 and 03 (in addition, wetland 03 does not have a continuous surface connection to Wetland 04).

Man-Made Ditches 04 and 05 (205 LF and 160 LF, respectively) are also associated with Wetland 03. Like Ditch 01, Ditches 04 and 05 do not exhibit an OHWM or bed and banks. The features are predominately vegetated with Vasey grass with minor areas of bare dirt sporadically located along its length. Photos 7 and 8 provide representative photos of these features.

Man-Made Ditches 01, 02, 03, 04, and 05, are bounded by Frog Level Circle to the east and lack any continuous surface connection to other aquatic resources (Photos 21-22 depict an elevated Frog Level Circle. The Consultant further describes the absence of any culverts at/near this location).

Upland Ditches 06 and 07 (760 LF and 790 LF) previously identified as Upland Ditches 03 and 04 within the southern AJD review area) are upland-dug features, draining agricultural lands into upper portions of Wetland 14.

Man-Made Ditch 09 (280 LF) is a vegetated swale/ditch. This ditch contains a slope break approximately 100 feet east of Wetland 05, which appears to drain towards the wetland. The ditch does not exhibit OHWM or bed-and-bank features, terminates in an agricultural field (bounded to the east by Frog Level Circle), and lacks any continuous surface connection to other aquatic resources (Photos 23-32 depict an elevated access road. The Consultant further describes the absence of any culverts at/near this location).

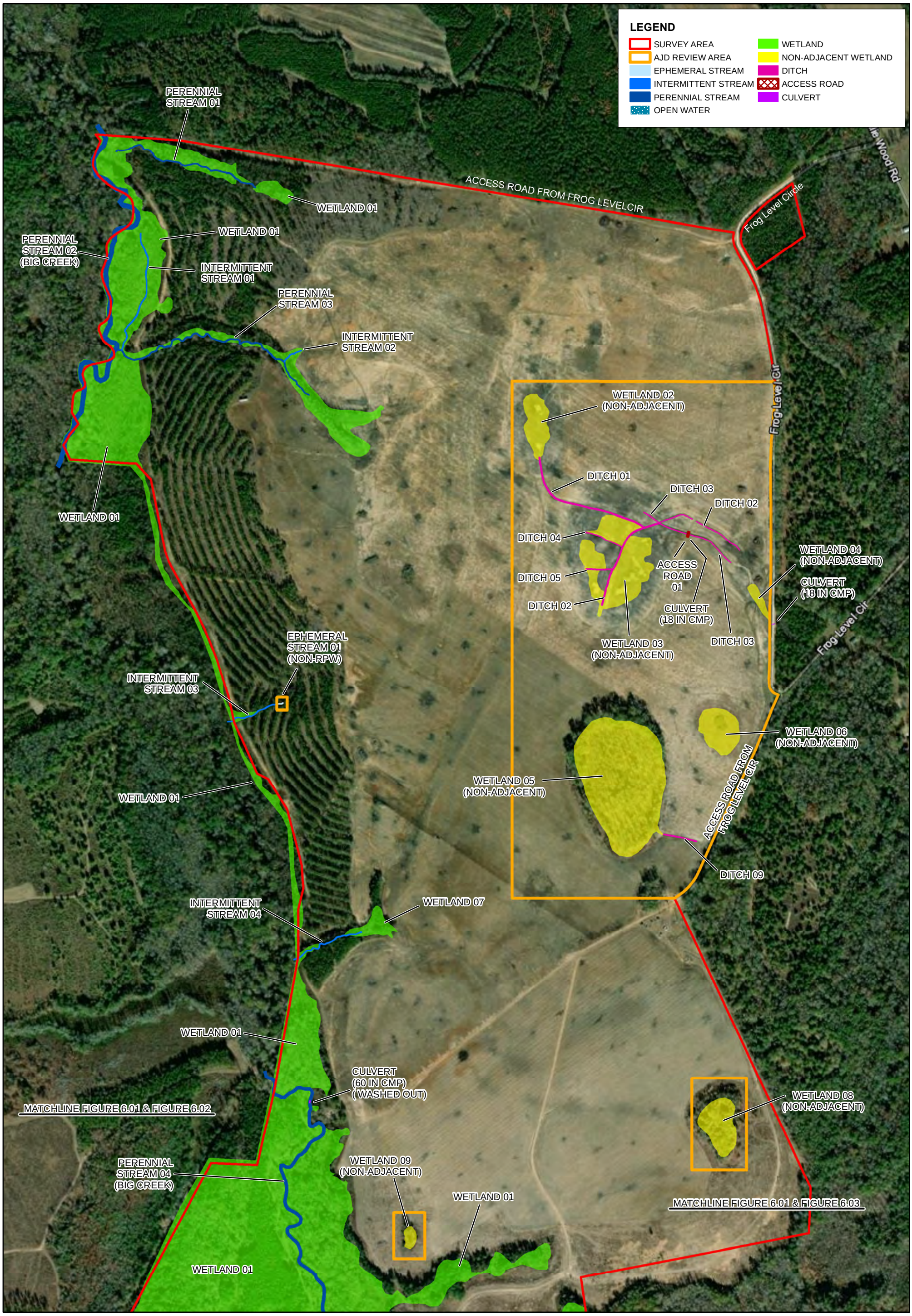
9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.

   a. 1. Date of Office (desktop review): N/A.
      2. Date(s) of Field Review (if applicable): October 16-19, 2023, and November 1, 2024, by Consultant.
   b. Data sources used to support this determination (included in the administrative record).
      ☒ Aquatic Resources delineation submitted by, or on behalf of, the requestor: Figures 6.00-6.04: Environmental Survey Findings, dated February 2024.
      ☐ Aquatic Resources delineation prepared by the Corps: N/A.
      ☐ Wetland field data sheets prepared by the Corps: N/A.
      ☐ OHWM data sheets prepared by the Corps: N/A.

☐ Previous JDs (AJD or PJD) addressing the same (or portions of the same) review area: N/A.
☒ Photographs: Twelve (12) general photographs of aquatic resources.
☒ Aerial Imagery: Figure 1.00: Project Location Map, dated February 2024; and Figure 5: Aerial Map, dated February 2024.
☒ LIDAR: Figures 6.00B-6.04B: Environmental Survey Findings-LIDAR, dated May 2024.
☒ USDA NRCS Soil Survey: Figure 4.00: NRCS Soils Map, dated February 2024.
☒ USFWS NWI maps: Figure 3.00: NWI Map, dated Feb. 2024.
☒ USGS topographic maps: Figure 2.00: Topographic Map, dated February 2024.
☐ USGS NHD data/maps: N/A.
☐ Section 10 resources used: N/A.
☐ NCDWR stream identification forms: N/A.
☒ Antecedent Precipitation Tool Analysis: Batch analysis of dates within APT, based on dates of Consultant's field review (between October 16-19, 2024).
☒ Other sources of Information: StreamStats north-south imagery, prepared by USACE and depicting the approximate project review area boundaries; and Figure 7.00: 100-year Flood Zone Map, dated May 2023.

10. OTHER SUPPORTING INFORMATION: Results of the APT provides a "wetter than normal" response per the dates of the Consultant's field review (precipitation occurring within the wetter range over a preceding 30-year period). Based on all available data and supporting information from the Consultant, the Consultant's description of natural (wetland) features not presenting any excess flow throughout the site (during wetter than normal conditions), and not exhibiting continuous surface connections to other adjacent wetlands or streams, the Corps has determined that these various wetlands would not be regulated by the CWA.

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.



Ecological Solutions Inc.

LAURENS COUNTY SOLAR SITE
LAURENS COUNTY, GEORGIA

ENVIRONMENTAL SURVEY FINDINGS

FEBRUARY 2024
20236-968

0 1,000 2,000 Feet

N W E S

FIGURE 6.01A

LEGEND

- SURVEY AREA
- AJD REVIEW AREA
- EPHEMERAL STREAM
- INTERMITTENT STREAM
- PERENNIAL STREAM
- OPEN WATER
- WETLAND
- NON-ADJACENT WETLAND
- DITCH
- ACCESS ROAD
- CULVERT

PERENNIAL STREAM 01
WETLAND 01
ACCESS ROAD FROM FROG LEVEL CIR
Frog Level Cir
Wood Rd
WETLAND 01
PERENNIAL STREAM 02 (BIG CREEK)
INTERMITTENT STREAM 01
PERENNIAL STREAM 03
INTERMITTENT STREAM 02
WETLAND 02 (NON-ADJACENT)
Frog Level Cir
DITCH 01
DITCH 03
DITCH 02
DITCH 04
DITCH 03
WETLAND 04 (NON-ADJACENT)
ACCESS ROAD 01
DITCH 05
CULVERT (12 IN CMP)
DITCH 02
CULVERT (18 IN CMP)
WETLAND 03 (NON-ADJACENT)
Frog Level Cir
WETLAND 01
EPHEMERAL STREAM 01 (NON-RPW)
INTERMITTENT STREAM 03
WETLAND 06 (NON-ADJACENT)
WETLAND 05 (NON-ADJACENT)
ACCESS ROAD FROM FROG LEVEL CIR
DITCH 09
INTERMITTENT STREAM 04
WETLAND 07
WETLAND 01
CULVERT (60 IN CMP) (WASHED OUT)
WETLAND 08 (NON-ADJACENT)
MATCHLINE FIGURE 6.01 & FIGURE 6.02
PERENNIAL STREAM 04 (BIG CREEK)
WETLAND 09 (NON-ADJACENT)
WETLAND 01
MATCHLINE FIGURE 6.01 & FIGURE 6.03
WETLAND 01

Ecological Solutions Inc.

LAURENS COUNTY SOLAR SITE
LAURENS COUNTY, GEORGIA

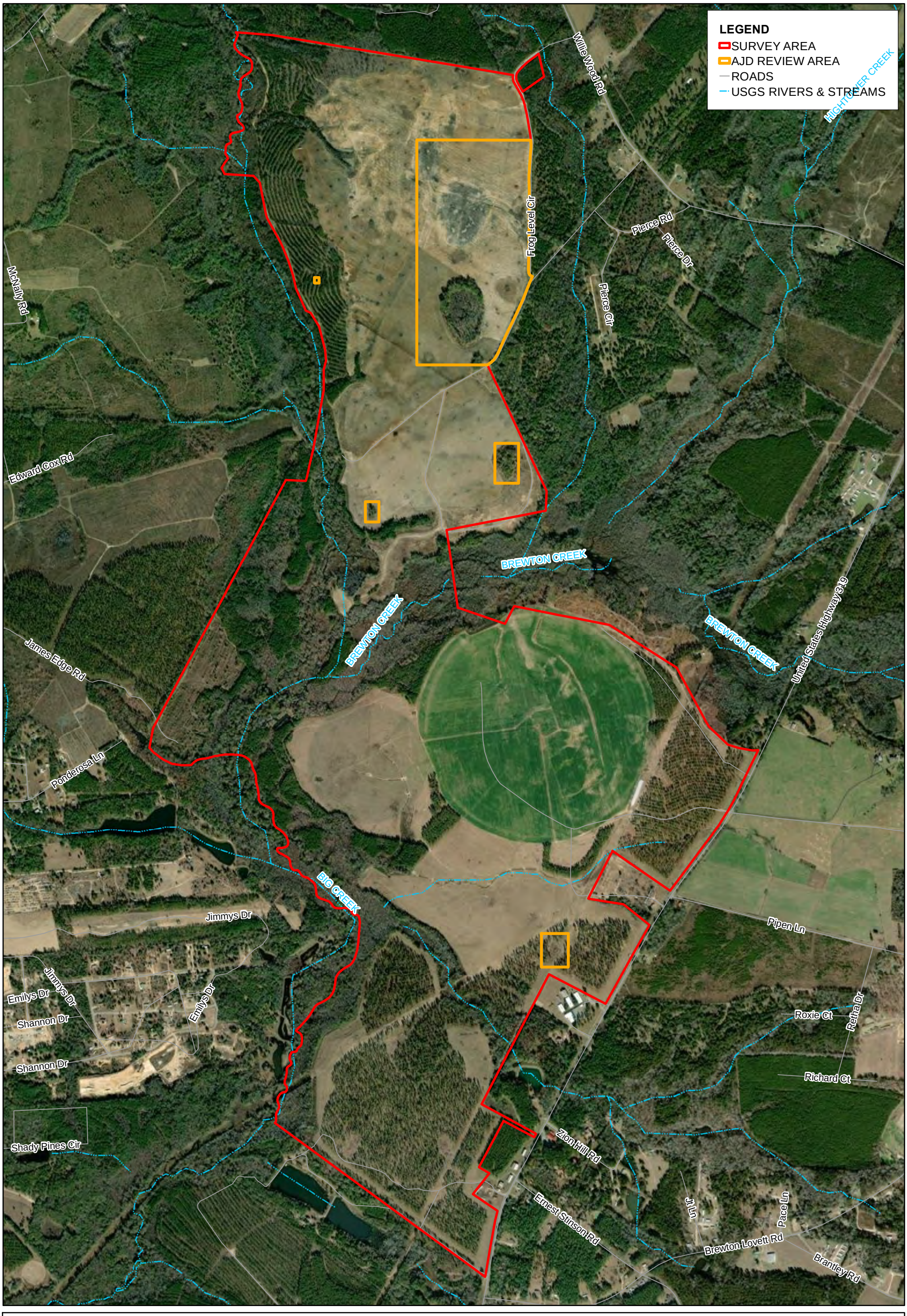
ENVIRONMENTAL SURVEY FINDINGS - LIDAR

MAY 2024
20236-968

N
W E
S

0 1,000 2,000 Feet

FIGURE 6.01B



Ecological Solutions Inc.

LAURENS COUNTY SOLAR SITE
LAURENS COUNTY, GEORGIA

AERIAL MAP

FEBRUARY 2024
20236-968

N
W E
S

0 0.5 1 Miles

FIGURE 5

STREAMS (NON-RPWs)		
ID	Length (Linear Feet)	AREA (Acres)
Ephemeral Stream 01	37	0.0026
Total	**37**	**0.0026**

601

602

603

LEGEND

- SURVEY AREA
- AJD REVIEW AREA
- EPHEMERAL STREAM
- INTERMITTENT STREAM
- PERENNIAL STREAM
- OPEN WATER
- WETLAND
- NON-ADJACENT WETLAND
- DITCH IN WETLAND
- DITCH IN UPLAND
- ACCESS ROAD
- CULVERT

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0 0.5 1 Miles

LAURENS COUNTY SOLAR SITE
LAURENS COUNTY, GEORGIA

ENVIRONMENTAL SURVEY FINDINGS (INDEX)

N W E S

FEBRUARY 2024
20236-968

FIGURE 6.00

LEGEND

- SURVEY AREA
- AJD REVIEW AREA
- EPHEMERAL STREAM
- INTERMITTENT STREAM
- PERENNIAL STREAM
- OPEN WATER
- WETLAND
- NON-ADJACENT WETLAND
- DITCH IN UPLAND
- DITCH IN WETLAND
- ACCESS ROAD
- CULVERT

PERENNIAL STREAM 01
WETLAND 01
WETLAND 01
PERENNIAL STREAM 02 (BIG CREEK)
INTERMITTENT STREAM 01
PERENNIAL STREAM 03
INTERMITTENT STREAM 02
WETLAND 01
WETLAND 02 (NON-ADJACENT)
DITCHES IN UPLAND
ACCESS ROAD 01
DITCHES IN WETLAND
CULVERT (18 IN CMP)
WETLAND 04 (NON-ADJACENT)
WETLAND 03 (NON-ADJACENT)
EPHEMERAL STREAM 01 (NON-RPW)
INTERMITTENT STREAM 03
WETLAND 06 (NON-ADJACENT)
WETLAND 05 (NON-ADJACENT)
WETLAND 01
INTERMITTENT STREAM 04
WETLAND 07
WETLAND 01
CULVERT (60 IN CMP) (WASHED OUT)
WETLAND 08 (NON-ADJACENT)
MATCHLINE FIGURE 6.01 & FIGURE 6.02
PERENNIAL STREAM 04 (BIG CREEK)
WETLAND 09 (NON-ADJACENT)
WETLAND 01
MATCHLINE FIGURE 6.01 & FIGURE 6.03
WETLAND 01

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LAURENS COUNTY, GEORGIA

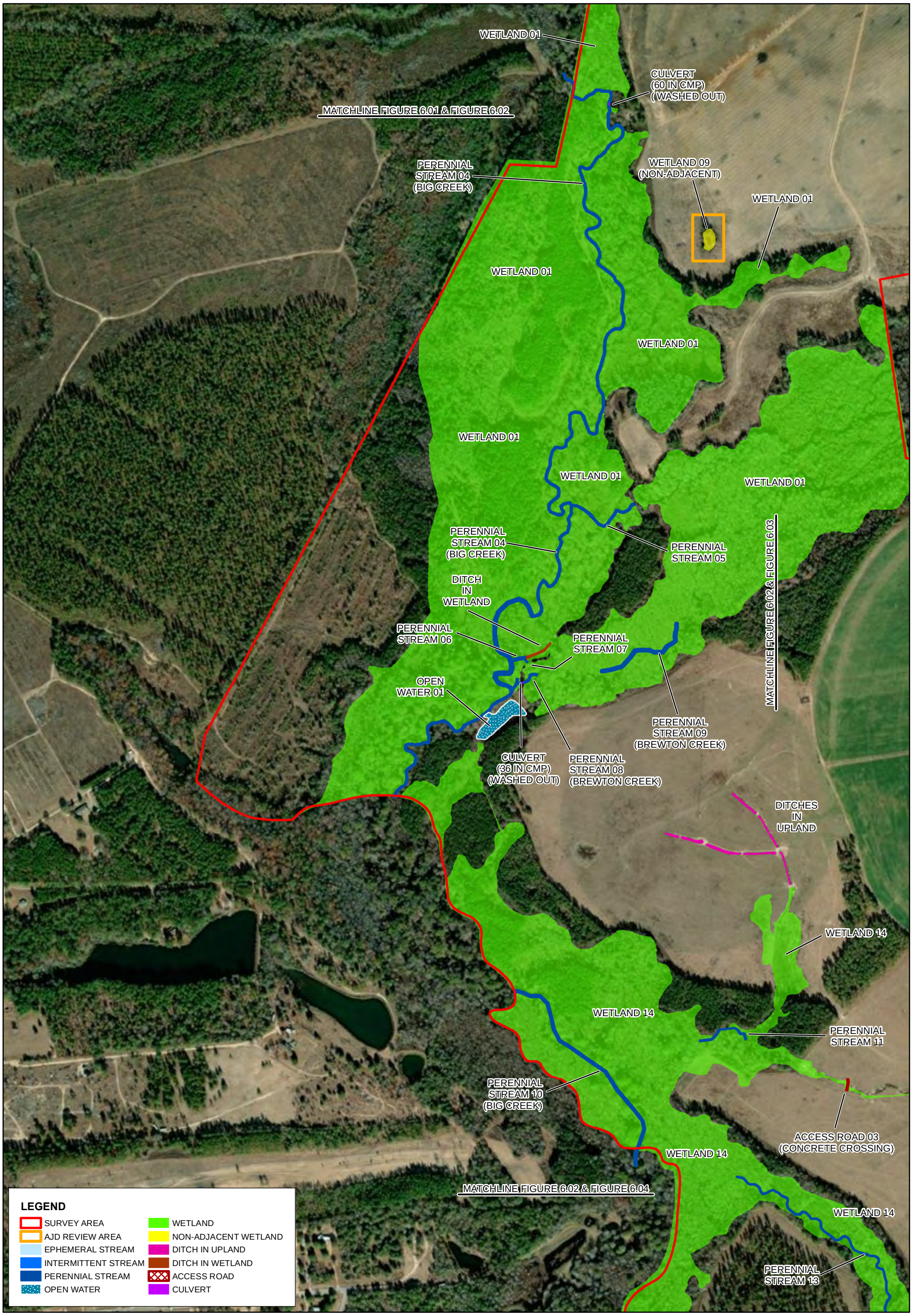
ENVIRONMENTAL SURVEY FINDINGS

FEBRUARY 2024
20236-968

N
W E
S

0 1,000 2,000 Feet

FIGURE 6.01



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N
W E
S

0 1,000 2,000 Feet

FIGURE 6.02

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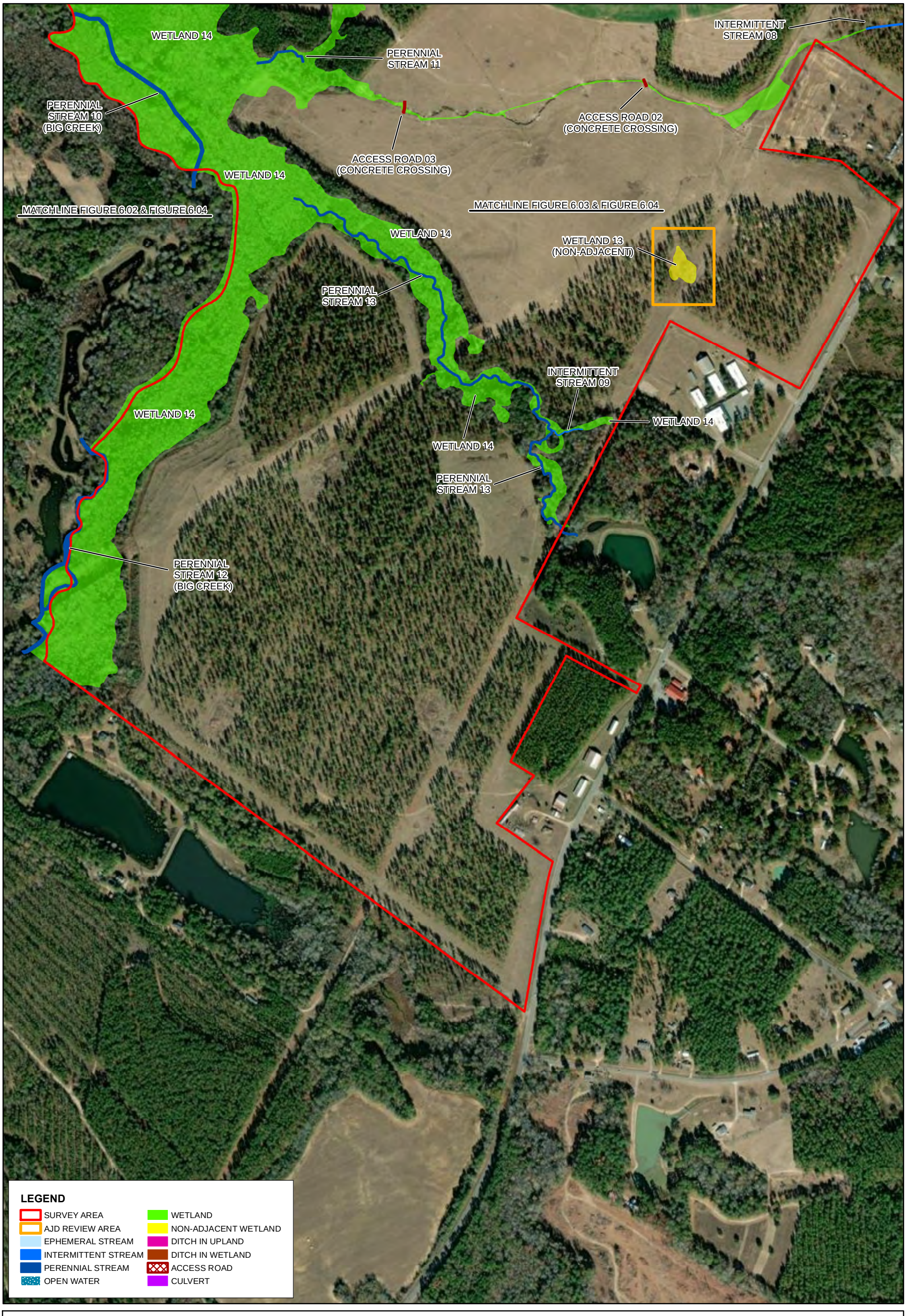
N
W E
S

0 1,000 2,000 Feet

FIGURE 6.03



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0 1,000 2,000 Feet

N W E S

FIGURE 6.04