



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

SAS-2024-01005

10 February 2025

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-2024-01005

BACKGROUND. An Approved Jurisdictional Determination (AJD) is a Corps document stating the presence or absence of waters of the United States on a parcel or a written statement and map identifying the limits of waters of the United States on a parcel. AJDs are clearly designated appealable actions and will include a basis of JD with the document.² AJDs are case-specific and are typically made in response to a request. AJDs are valid for a period of five years unless new information warrants revision of the determination before the expiration date or a District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.³ For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),⁴ the Clean Water Act (CWA) implementing regulations published by the Department of the Army in 1986 and amended in 1993 (references 2.a. and 2.b. respectively), the 2008 *Rapanos-Carabell* guidance (reference 2.c.), and other applicable guidance, relevant case law and longstanding practice, (collectively the pre-2015 regulatory regime), and the *Sackett* decision (reference 2.d.) in evaluating jurisdiction.

This Memorandum for Record (MFR) constitutes the basis of jurisdiction for a Corps AJD as defined in 33 CFR §331.2. The features addressed in this AJD were evaluated consistent with the definition of “waters of the United States” found in the pre-2015 regulatory regime and consistent with the Supreme Court’s decision in *Sackett*. This AJD did not rely on the 2023 “Revised Definition of ‘Waters of the United States,’” as amended on 8 September 2023 (Amended 2023 Rule) because, as of the date of this decision, the Amended 2023 Rule is not applicable in this state due to litigation.

¹ While the Supreme Court’s decision in *Sackett* had no effect on some categories of waters covered under the CWA, and no effect on any waters covered under RHA, all categories are included in this Memorandum for Record for efficiency.

² 33 CFR 331.2.

³ Regulatory Guidance Letter 05-02.

⁴ USACE has authority under both Section 9 and Section 10 of the Rivers and Harbors Act of 1899 but for convenience, in this MFR, jurisdiction under RHA will be referred to as Section 10.

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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
Open Water 3	Non-JD	NA
Open Water 5	Non-JD	NA
Open Water 7	Non-JD	NA
Open Water 8	Non-JD	NA
Open Water 9	Non-JD	NA
Open Water 10	Non-JD	NA
Open Water 11	Non-JD	NA
Open Water 12	Non-JD	NA
Wetland B	Non-JD	NA
Wetland D	Non-JD	NA
Wetland H	Non-JD	NA
Wetland I	Non-JD	NA
Wetland J	Non-JD	NA
Wetland K	Non-JD	NA
Wetland L	Non-JD	NA
Wetland M	Non-JD	NA
Wetland N	Non-JD	NA
Wetland O	Non-JD	NA
Wetland P	Non-JD	NA
Stream 2	Non-JD	NA

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 Area Size (in acres): 913
- B. Center Coordinates of the Project Site (in decimal degrees)

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Latitude: 34.09708591

Longitude: -84.90653656

C. Nearest City or Town: Cartersville

D. County: Bartow

E. State: Georgia

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: Coosa River which is a TNW throughout and an interstate water of Georgia and Alabama.

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)), and documented (include in AR) occurrences of boating traffic on the identified water. For interstate waters, based on a review several maps listed in Section 9 of this memorandum, the identified water is shown as an aquatic feature and crossing the interstate boundary of Georgia/South Carolina, or Georgia/North Carolina, Georgia/Tennessee, Georgia/Alabama, or Georgia/Florida.

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

The open waters and wetlands identified in Section 1.a. do not have a continuous surface connection to any tributaries that connect to a TNW, interstate water, and/or territorial sea. The nearest tributary to these features is Racoon Creek which is approximately 55.5 meters to the east of the project site and approximately 257 meters from the nearest wetland/open water feature. Racoon Creek is a tributary to the Etowah River which is a tributary to the Coosa River, a navigable water and interstate water of the United States. The Ordinary High-Water Mark (OHWM) of the open water features were indicated by the following physical characteristics: natural line impressed on the bank, shelving, absence of vegetation, scour, and bed and banks. 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 and are contiguous with the unnamed tributary.

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The stream, Stream 2, is not a relatively permanent water (RPW) and is an unnamed tributary to Wetland F. Wetland F flows off the property and its connection to the next tributary is unclear. The nearest tributary to these features is Racoon Creek which is approximately 55.5 meters to the east of the project site and approximately 1,590m from Stream 2. Racoon Creek is a tributary to the Etowah River which is a tributary to the Coosa River, a navigable water and interstate water of the United States. The Ordinary High-Water Mark (OHWM) of the open water features were indicated by the following physical characteristics: natural line impressed on the bank, shelving, absence of vegetation, scour, and bed and banks. 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 and are contiguous with the unnamed tributary.

6. SECTION 10 JURISDICTIONAL WATERS⁵: 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.

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- 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.

Name of excluded feature	Size (in acres)	Type of resource generally not jurisdictional
OW 3	1.39	Located in the northwest section of the project area, this shallow depressional water feature constructed before 1955, is used for livestock wading and watering that does not have any inlets or outlets to other water features and therefore does not meet provisions under a(3)(i) through (iii).
OW 5	0.646	Located in the southwest section of the project area, this depressional water feature constructed in 1993, is used for livestock wading and watering, and is fed by Wetland D through a small slope gradient. The feature does not have a connection to another water feature and therefore does not meet provisions under a(3)(i) through (iii)
OW 7	1.29	Located in the central section of this project area, west of Taff road, this shallow depressional water feature was originally created in 1981 as a large irrigation pond, but it was broken up into smaller livestock ponds in 1981, is used for livestock wading and watering that does not have any inlets or outlets to other water features and therefore does not meet provisions under a(3)(i) through (iii).
OW 8	3.45	Located in the north central section of this project area on the eastern boundary of Taff Road, this depressional water feature was constructed in 1993 for use of farm irrigation is now used for livestock watering and wading. This feature does not have any inlets or outlets and therefore, does not meet provisions under a(3)(i) through (iii)

⁷ 51 FR 41217, November 13, 1986.

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OW 9	1.01	Located in the central south-east section of the project area, this depressional water feature was constructed in 1993 but was modified between 1993 and 2007 to be smaller and connected to OW 10 through Wetland I both of which were not noticed in the 1993 historic aerial. This feature has no water feature as an inlet and, therefore, does not meet provisions under a(3)(i) through (iii).
OW 10	1.17	Located in the central southeast section of the project area south of OW 9, this depressional water feature was constructed sometime between the years 1993-2007. This water feature has an inlet from Wetland I and is connected to OW 9. This feature does not have an outlet that connects this OW feature to any other resource and, therefore, does not meet provisions under a(3)(i) through (iii)
OW 11	0.568	Located in the central south-east section of this project area, east of OW 10, this depressional water feature was construction sometime between the years of 1993-2007. This water feature is used for livestock watering and wading and does not have any inlet or outlet features. Therefore, does not meet provisions under a(3)(i) through (iii)
OW 12	0.819	Located in the central south-east section of this project area east of OW 11, this depressional water feature was constructed sometime between the years of 1993-2007. This water feature is used for livestock watering and wading and does not have any inlet or outlet features. Therefore, does not meet provisions under a(3)(i) through (iii)

- 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

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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.

Name of excluded feature	Size (in acres)	Type of resource generally not jurisdictional
OW 15	0.878	Located in the northwest section of the project area, this depressional water feature was originally created and flooded before 1955. This feature was modified in some period between 1955 and 1971 and is no longer a large open water feature. The feature remaining depressional water feature has a wetland feature O as its inlet and wetland feature P as its outlet. The inlet and outlet wetlands lose their characteristics prior to connecting to a tributary of a TNW. Therefore, this open water feature does not meet provisions under a(3)(i) through (iii)

- 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 B	0.0996	This feature, located in the western portion of the project area, has weak wetland characteristics and no vegetation larger than grasses. This feature is formed from the culvert exiting a farm-road crossing, but no feature is identified on the other side of the culvert. This wetland lacks a continuous surface connection to water of the US.
Wetland D	1.00	This feature, located in the southwest portion of the project area, has weak characteristics and only grasses as vegetation. This feature drains into OW 5 and has no connection to any tributaries of a TNW, therefore, Wetland D lacks a continuous surface connection to water of the US.
Wetland H	0.317	This feature, located in the eastern portion of the project area, has weak characteristics and is constant trampled by livestock which now only has some grasses scatter along raw earth. This feature has no inlets or outlets and, therefore, Wetland H lacks a continuous surface connection to water of the US.
Wetland I	0.0411	This feature located in the central southeastern portion of the project area connects OW 9 to OW 10. Neither OW 9 nor OW 10 have a connection to another aquatic resources. Therefore, Wetland I lacks a continuous surface connection to water of the US.
Wetland J	1.66	This feature, located east of Wetland I and is in the central southeastern portion of the project area, has weak wetland features and is constantly trampled by livestock. This feature has no inlets or outlets to connect it to another aquatic

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		resource, and, therefore, Wetland J lacks a continuous surface connection to water of the US.
Wetland K	0.859	This feature, located east of OW 11 and is in the central southeastern portion of the project area, has weak wetland features and is constantly trampled by livestock. This feature has no inlets or outlets to connect it to another aquatic resource, and, therefore, Wetland K lacks a continuous surface connection to water of the US.
Wetland L	0.0124	This feature, located southeast of OW 11 and is in the central southeastern portion of the project area, has weak wetland features and is constantly trampled by livestock. This feature has no inlets or outlets to connect it to another aquatic resource, and, therefore, Wetland L lacks a continuous surface connection to water of the US.
Wetland M	0.0162	This feature, located southeast of OW 11 and is in the central southeastern portion of the project area, has weak wetland features and is constantly trampled by livestock. This feature has no inlets or outlets to connect it to another aquatic resource, and, therefore, Wetland L lacks a continuous surface connection to water of the US.
Wetland N	0.356	This feature, located southeast of OW 11 and is in the central southeastern portion of the project area, has weak wetland features and is constantly trampled by livestock. This feature has no inlets or outlets to connect it to another aquatic resource, and, therefore, Wetland L lacks a continuous surface connection to water of the US.
Wetland O	0.417	This feature, located in the northeastern section of the project area, is a deep-set wetland that has no signs of an OHWM, thus preventing it from being categorized as a stream. This feature has weak features with some grasses scattered around the feature. This feature is flows into OW 15 to the northeast which then flows into Wetland P. Wetland O lacks a continuous surface connection to water of the US.
Wetland P	0.0578	This feature, located in the northeastern section of the project area, is a deep-set wetland that has no signs of an OHWM, thus preventing it from being categorized as a stream. This feature has weak features with little to no vegetation. This feature drains in the swale-like feature and during high flows would continue north before leaving the project area. The swale-like feature has a concave topography right at the boundary line. Using aerials, it looks that the ephemeral stream is abruptly due to a farm road. Upon site visit on January 30, 2025, performed by the Corps, and review of the aerials of offsite road crossings, Wetland P lacks a continuous surface connection to water of the US.
Stream 2	0.009	This feature located in the north central portion of the project area is a first order, non-relatively permanent water that does not connect in the same order to a stream of a greater flow magnitude. Therefore, this feature is to be considered a non-relatively permanent water and is not under jurisdiction of the US.

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

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- a. 1. Date of Office (desktop review): 1/7/2023 CESAS - RDP
2. Date(s) of Field Review (if applicable): 10/21/2024 & 10/22/2024 – Consultant, 1/30/2025 – CESAS-RDP & 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:
Figure 7a: Existing Conditions Map – Project Bunkhouse November 2024
 - Aquatic Resources delineation prepared by the USACE:
 - Wetland field data sheets prepared by the Corps:
 - OHWM data sheets prepared by the USACE:
 - Previous JDs (AJD or PJD) addressing the same (or portions of the same) review area:
 - Photographs: Consultant, Site Photographs, October 21 & 22, 2024, CESAS-RDP 1/30/2025
 - Aerial Imagery: Figure 2: Aerial Map Project Bunkhouse November 2024
 - LIDAR: Figure 6: USGS Digital Elevation Model Map – Project Bunkhouse 2024
 - USDA NRCS Soil Survey: Figure 5: NRCS Soils Map – Project Bunkhouse November 2024
 - USFWS NWI maps: SAS-2024-01005 NWI MAP – CESAS-RDP
 - USGS topographic maps: Figure 3: USGS Topographic Map – Project Bunkhouse November 2024
 - USGS NHD data/maps:
 - Section 10 resources used:
 - NCDWR stream identification forms
 - Antecedent Precipitation Tool Analysis: List Date(s) 10/21/2024 Conditions Normal, but in a Moderate Drought and 10/22/2024 Conditions Drier than Normal and in a Drought.
 - Other sources of Information:

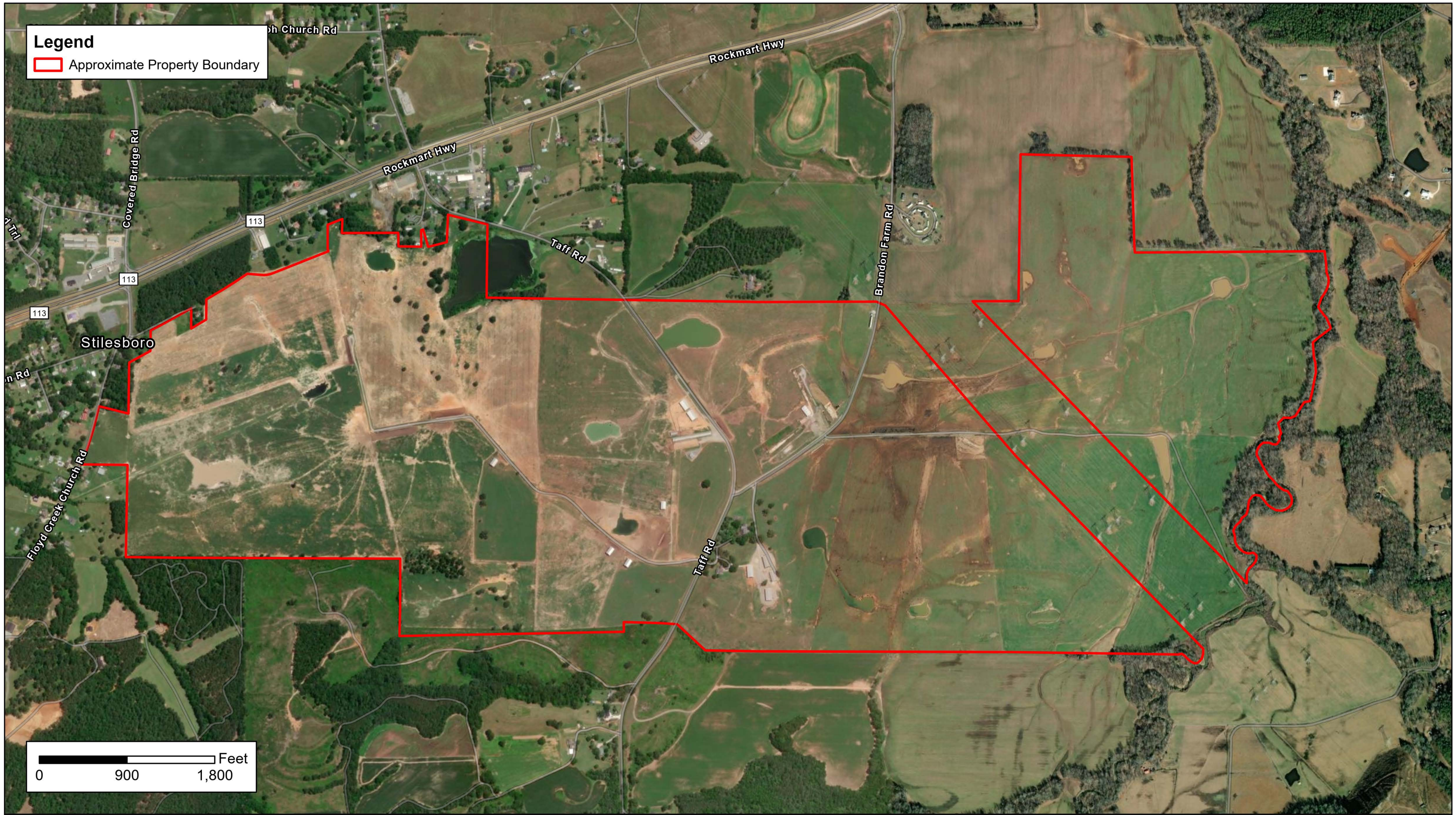
10. OTHER SUPPORTING INFORMATION. The project review area has been historically a farmland (1955 last recorded information). Informal consultation was held with USDA and there is no online history of any prior converted wetlands within the project review area.

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

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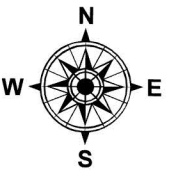
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additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.



Legend
 [Red Line] Approximate Property Boundary

0 900 1,800 Feet

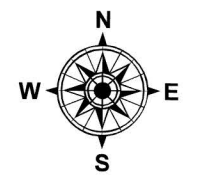
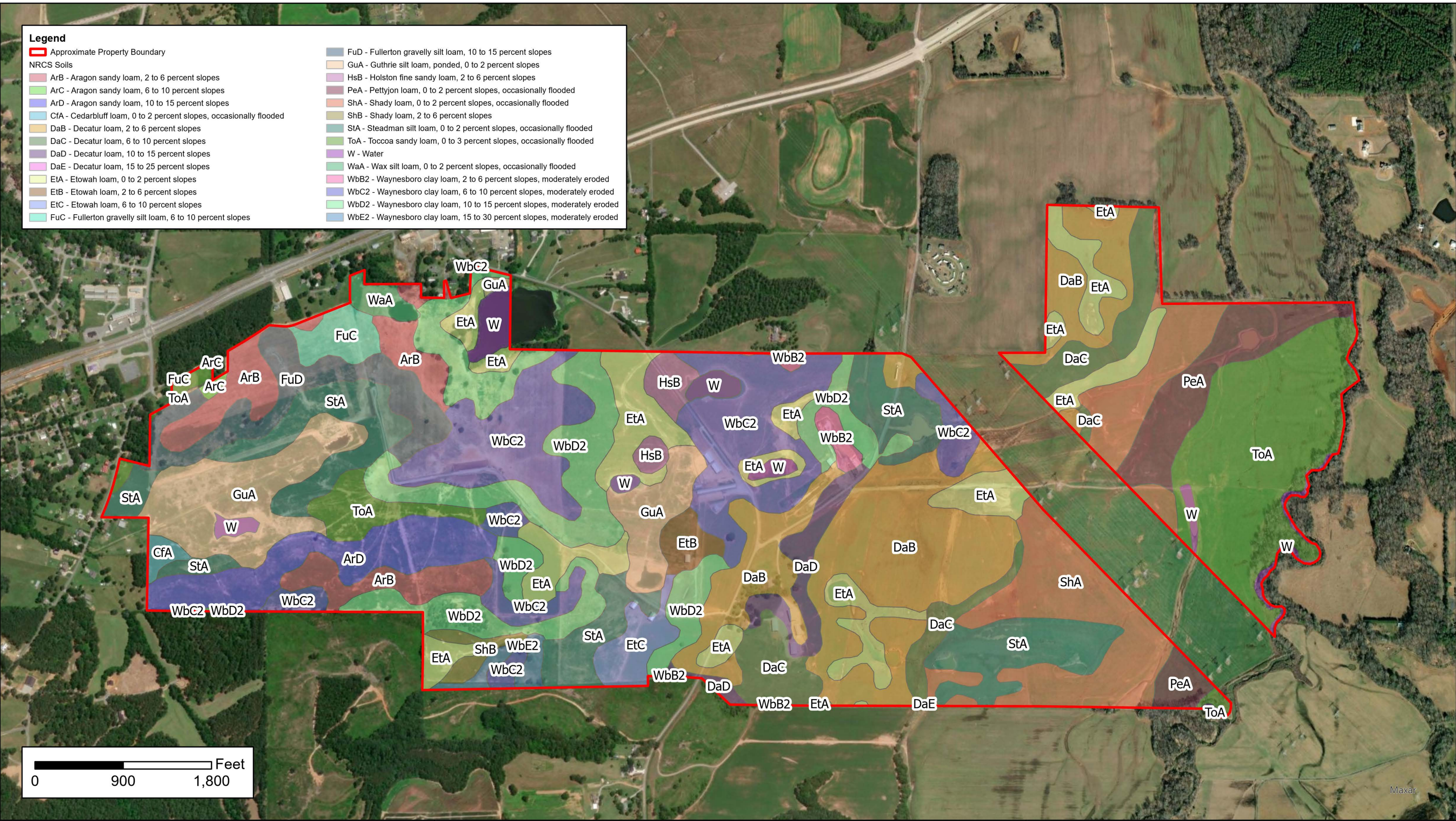


Legend


Approximate Property Boundary

NRCS Soils


ArB - Aragon sandy loam, 2 to 6 percent slopes	FuD - Fullerton gravelly silt loam, 10 to 15 percent slopes
ArC - Aragon sandy loam, 6 to 10 percent slopes	GuA - Guthrie silt loam, ponded, 0 to 2 percent slopes
ArD - Aragon sandy loam, 10 to 15 percent slopes	HsB - Holston fine sandy loam, 2 to 6 percent slopes
CFA - Cedarbluff loam, 0 to 2 percent slopes, occasionally flooded	PeA - Pettyjon loam, 0 to 2 percent slopes, occasionally flooded
DaB - Decatur loam, 2 to 6 percent slopes	ShA - Shady loam, 0 to 2 percent slopes, occasionally flooded
DaC - Decatur loam, 6 to 10 percent slopes	ShB - Shady loam, 2 to 6 percent slopes
DaD - Decatur loam, 10 to 15 percent slopes	StA - Steadman silt loam, 0 to 2 percent slopes, occasionally flooded
DaE - Decatur loam, 15 to 25 percent slopes	ToA - Toccoa sandy loam, 0 to 3 percent slopes, occasionally flooded
EtA - Etowah loam, 0 to 2 percent slopes	W - Water
EtB - Etowah loam, 2 to 6 percent slopes	WaA - Wax silt loam, 0 to 2 percent slopes, occasionally flooded
EtC - Etowah loam, 6 to 10 percent slopes	WbB2 - Waynesboro clay loam, 2 to 6 percent slopes, moderately eroded
FuC - Fullerton gravelly silt loam, 6 to 10 percent slopes	WbC2 - Waynesboro clay loam, 6 to 10 percent slopes, moderately eroded
	WbD2 - Waynesboro clay loam, 10 to 15 percent slopes, moderately eroded
	WbE2 - Waynesboro clay loam, 15 to 30 percent slopes, moderately eroded




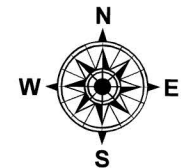
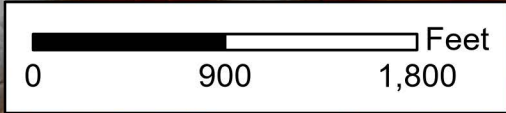
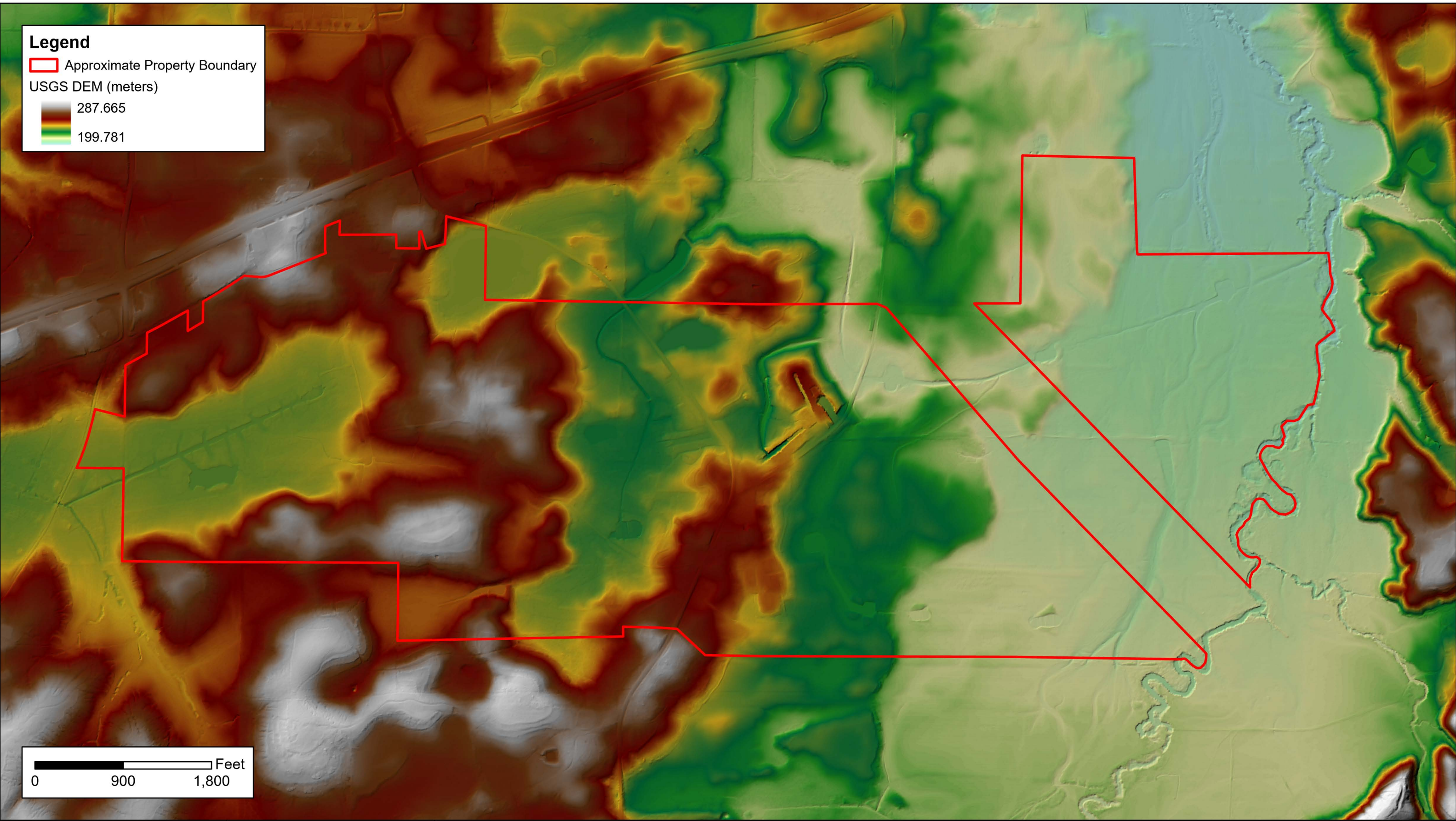
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 Approximate Property Boundary

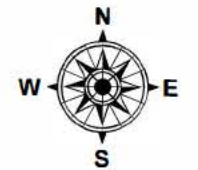
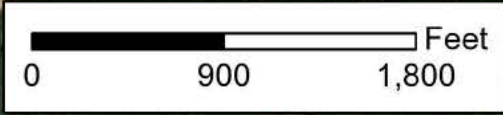
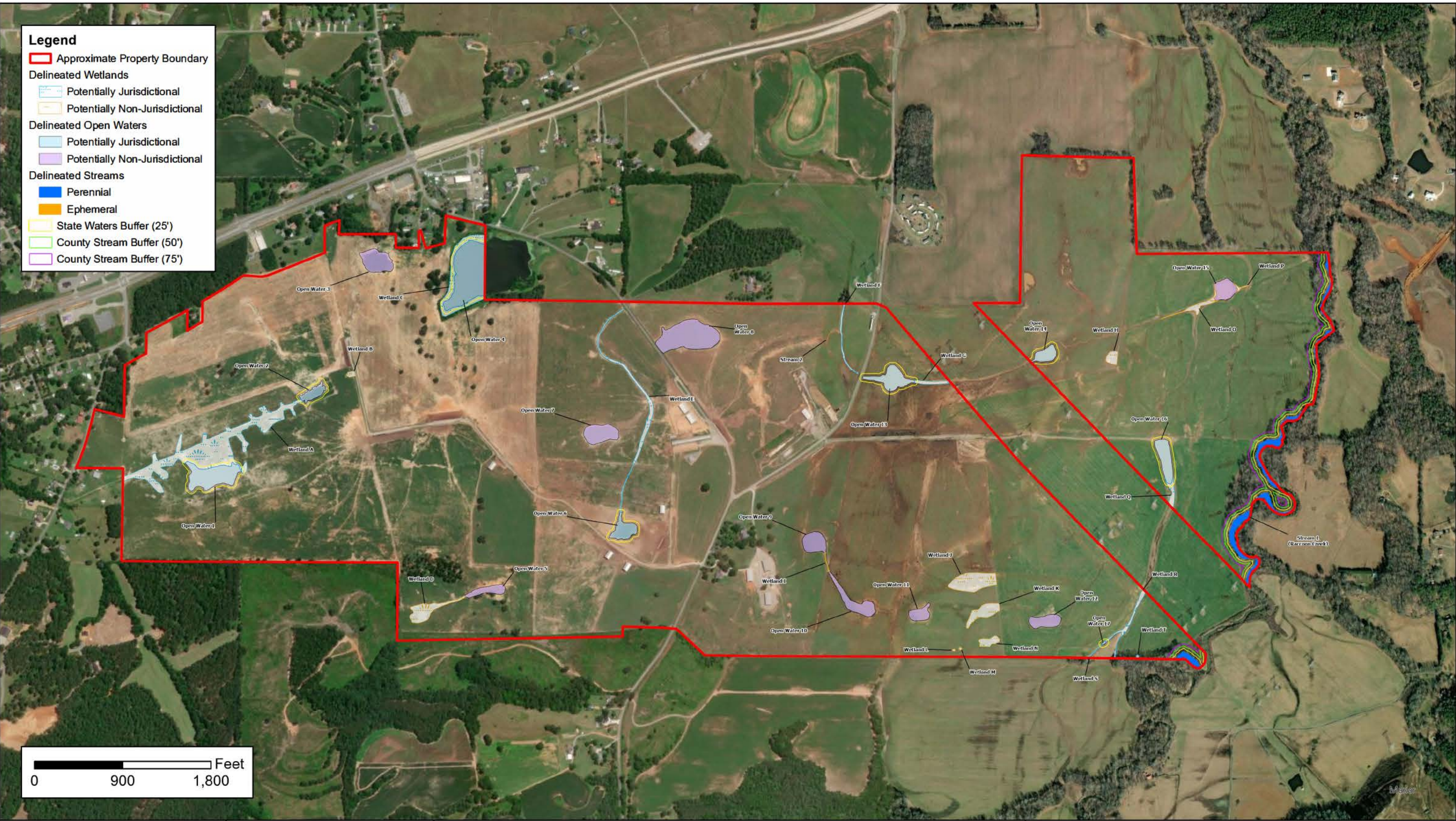
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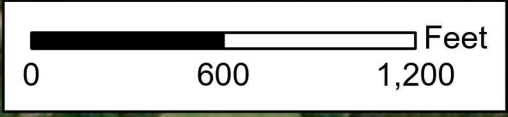
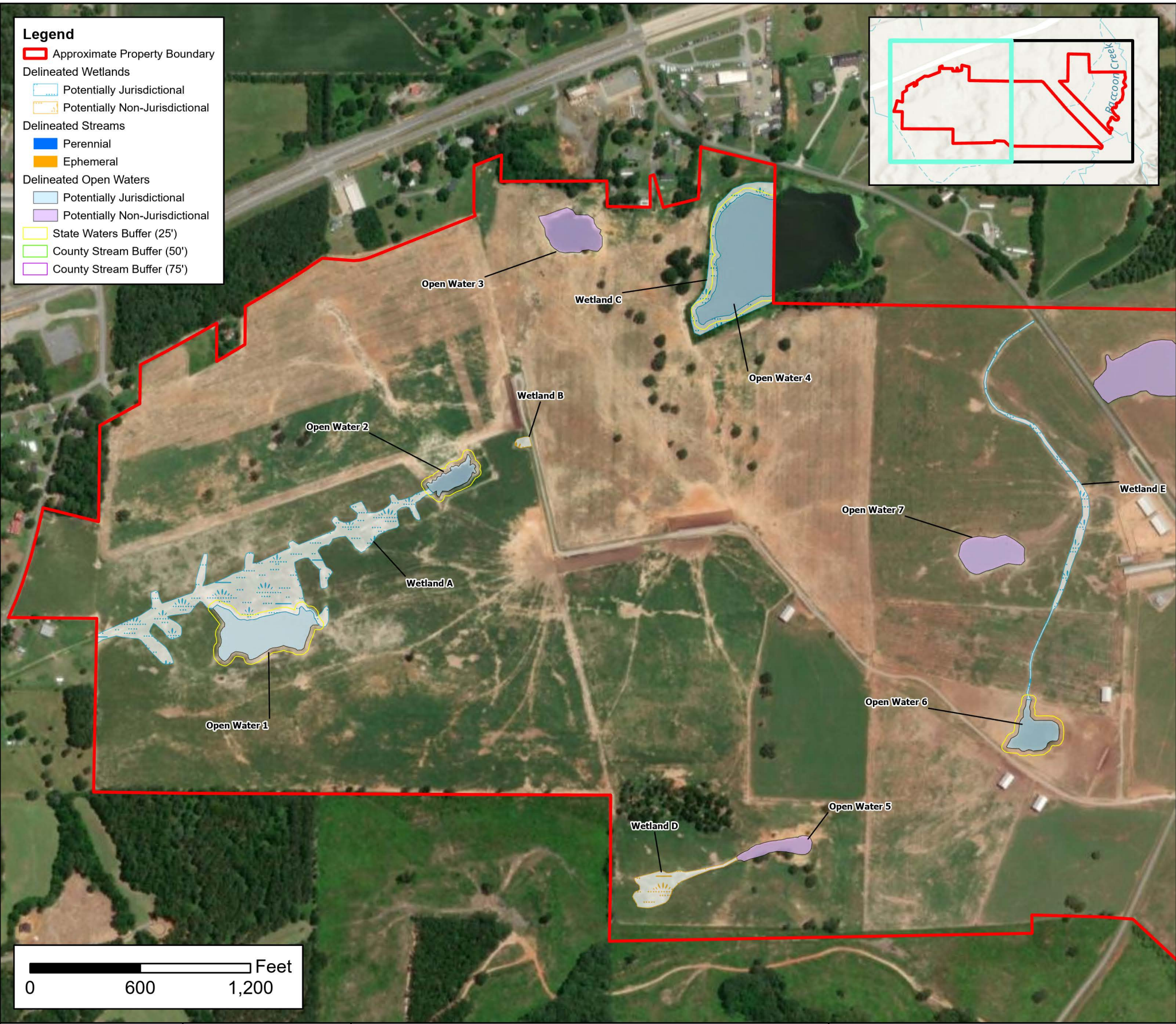
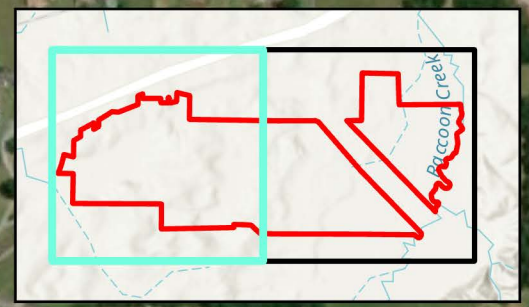
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- Legend**
- Approximate Property Boundary
 - Delineated Wetlands**
 - Potentially Jurisdictional
 - Potentially Non-Jurisdictional
 - Delineated Open Waters**
 - Potentially Jurisdictional
 - Potentially Non-Jurisdictional
 - Delineated Streams**
 - Perennial
 - Ephemeral
 - State Waters Buffer (25')
 - County Stream Buffer (50')
 - County Stream Buffer (75')



- Legend**
- Approximate Property Boundary
 - Delineated Wetlands**
 - Potentially Jurisdictional
 - Potentially Non-Jurisdictional
 - Delineated Streams**
 - Perennial
 - Ephemeral
 - Delineated Open Waters**
 - Potentially Jurisdictional
 - Potentially Non-Jurisdictional
 - State Waters Buffer (25')
 - County Stream Buffer (50')
 - County Stream Buffer (75')

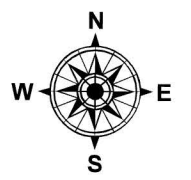


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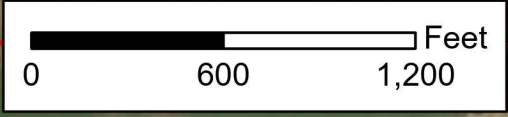
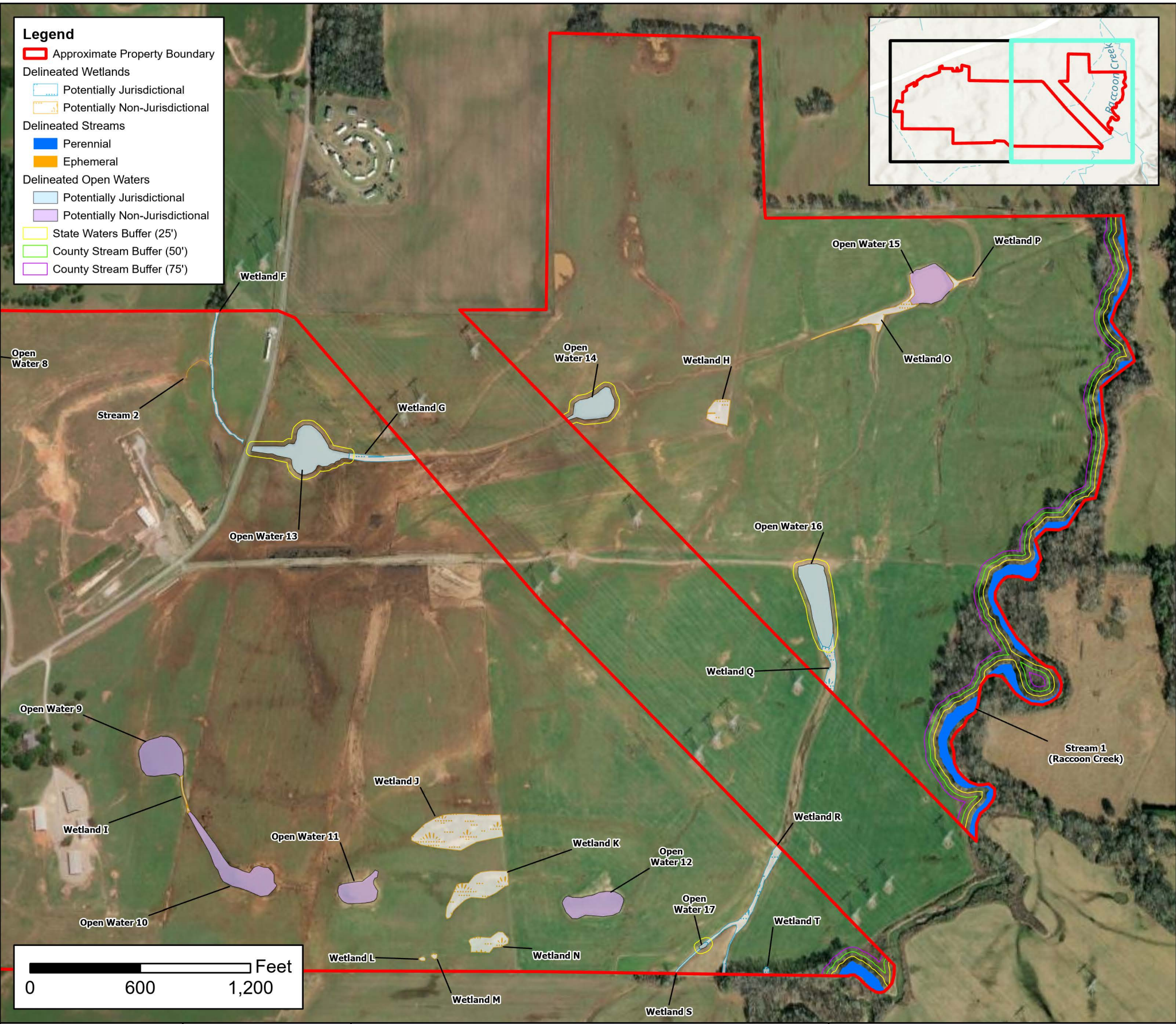
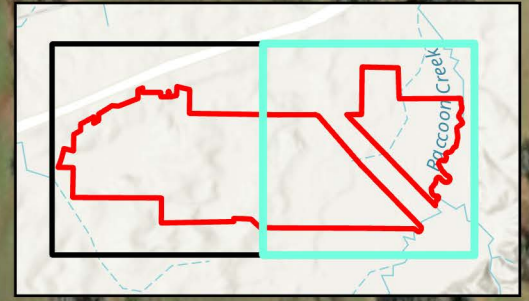
**Figure 7b:
Existing
Conditions Map**

**Project Bunkhouse
Bartow County, Georgia
November 2024**

1 inch = 600 feet



- Legend**
- Approximate Property Boundary
 - Delineated Wetlands**
 - Potentially Jurisdictional
 - Potentially Non-Jurisdictional
 - Delineated Streams**
 - Perennial
 - Ephemeral
 - Delineated Open Waters**
 - Potentially Jurisdictional
 - Potentially Non-Jurisdictional
 - State Waters Buffer (25')
 - County Stream Buffer (50')
 - County Stream Buffer (75')

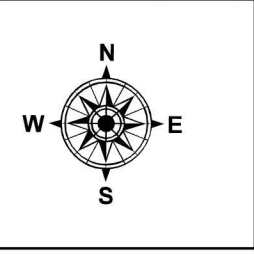


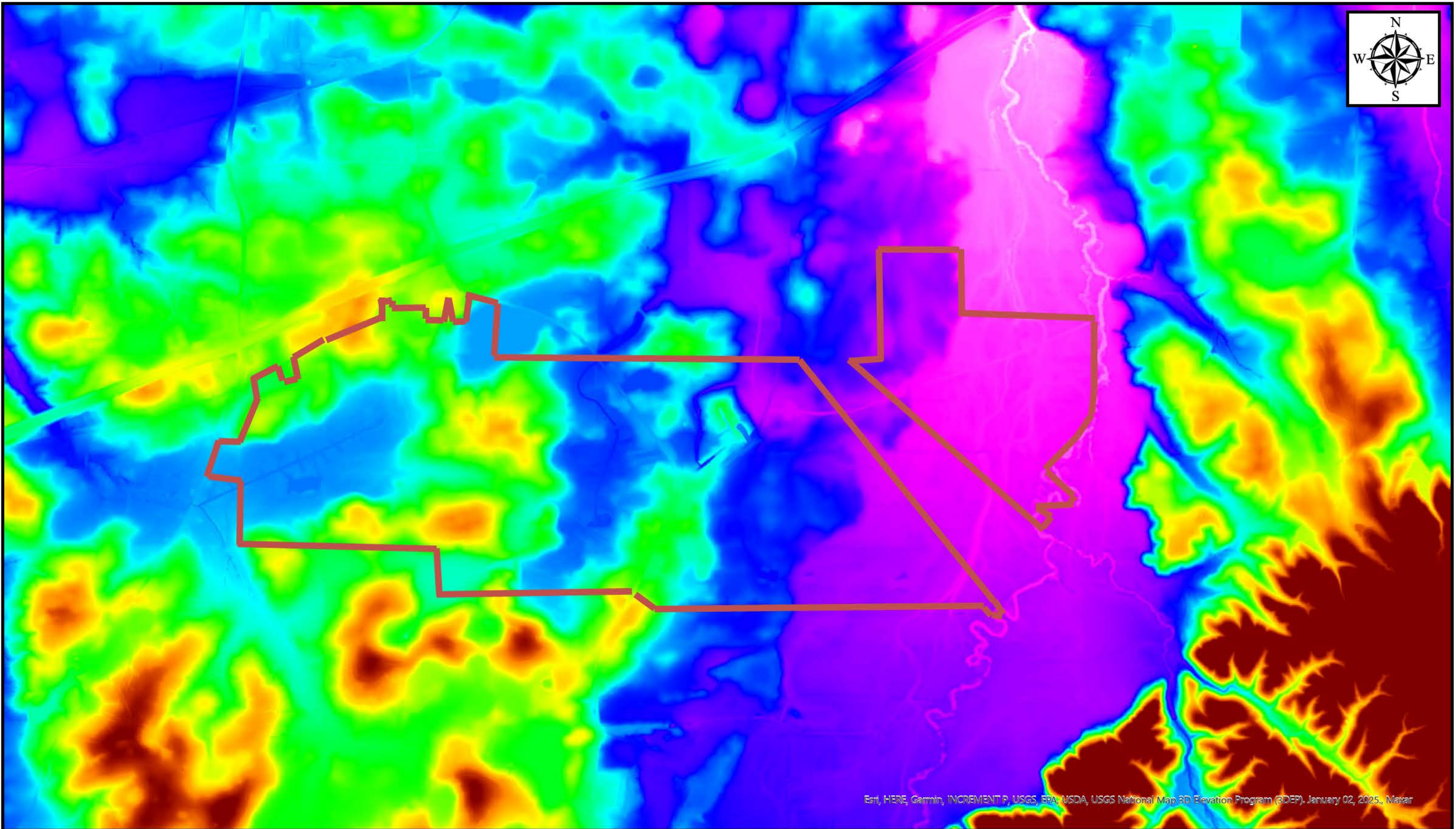
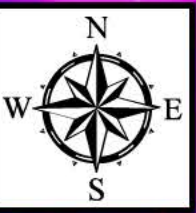
Kimley»Horn

**Figure 7c:
Existing
Conditions Map**

**Project Bunkhouse
Bartow County, Georgia
November 2024**

1 inch = 600 feet



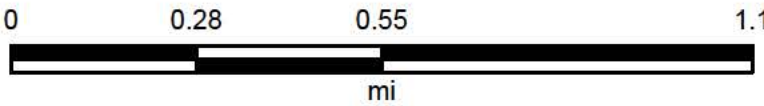


Esri, HERE, Garmin, INCREMENT P, USGS, EPA, USDA, USGS National Map 3D Elevation Program (3DEP), January 02, 2025., Maxar



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SAS-2024-01005



Map Center: 84.903705°W 34.098685°N

Map Created by: CESAS-RDP

Date: 1/8/2025

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere
Projection: Mercator Auxiliary Sphere