



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. LOUIS DISTRICT
1222 SPRUCE STREET
ST. LOUIS, MISSOURI 63103

CEMVS-OD-F

29 February 2024

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Approved Jurisdictional Determination in accordance with the "Revised Definition of 'Waters of the United States'"; (88 FR 3004 (January 18, 2023) as amended by the "Revised Definition of 'Waters of the United States'; Conforming" (8 September 2023) ,¹ [MVS-2023-668](#)²

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

On January 18, 2023, the Environmental Protection Agency (EPA) and the Department of the Army ("the agencies") published the "Revised Definition of 'Waters of the United States,'" 88 FR 3004 (January 18, 2023) ("2023 Rule"). On September 8, 2023, the agencies published the "Revised Definition of 'Waters of the United States'; Conforming", which amended the 2023 Rule to conform to the 2023 Supreme Court decision in *Sackett v. EPA*, 598 U.S., 143 S. Ct. 1322 (2023) ("*Sackett*").

This Memorandum for Record (MFR) constitutes the basis of jurisdiction for a Corps AJD as defined in 33 CFR §331.2. For the purposes of this AJD, we have relied on Section 10 of the Rivers and Harbors Act of 1899 (RHA),⁵ the 2023 Rule as amended,

¹ While the Revised Definition of "Waters of the United States"; Conforming 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, the territorial seas, or interstate water 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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as well as other applicable guidance, relevant case law, and longstanding practice in evaluating jurisdiction.

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).

- 1) WA005 (0.095-acre), non-jurisdictional
- 2) WA007 (0.113-acre), non-jurisdictional
- 3) WA011 (0.054-acre), non-jurisdictional
- 4) WA022 (0.197-acre), non-jurisdictional
- 5) WA037 (0.273-acre), jurisdictional (Section 404)
- 6) WA039 (0.416-acre), jurisdictional (Section 404)
- 7) WA042 (0.162-acre), non-jurisdictional
- 8) WA053 (0.482-acre), non-jurisdictional
- 9) WA082 (0.071-acre), non-jurisdictional
- 10) WA128 (0.938-acre), non-jurisdictional
- 11) WB001 (0.221-acre), non-jurisdictional
- 12) WB002 (0.156-acre), non-jurisdictional
- 13) WB003 (0.131-acre), non-jurisdictional
- 14) WB005 (0.071-acre), non-jurisdictional
- 15) PA018 (0.342-acre), non-jurisdictional
- 16) PA019 (4.112-acre), non-jurisdictional
- 17) PA027 (0.237-acre), non-jurisdictional
- 18) PA032 (0.293-acre), non-jurisdictional
- 19) PA046 (0.257-acre), non-jurisdictional
- 20) PA063 (0.119-acre), non-jurisdictional
- 21) PA129 (0.606-acre), non-jurisdictional
- 22) SA001 (111 linear feet), non-jurisdictional
- 23) SA002 (147 linear feet), non-jurisdictional
- 24) SA003, (307 linear feet), non-jurisdictional
- 25) SA004, (154 linear feet), non-jurisdictional
- 26) SA005, (709 linear feet), non-jurisdictional
- 27) SA006, (1,585 linear feet), non-jurisdictional
- 28) SA007, (732 linear feet), non-jurisdictional
- 29) SA008, (511 linear feet), non-jurisdictional
- 30) SA009, (1,194 linear feet), jurisdictional (Section 404)
- 31) SA010, (563 linear feet), non-jurisdictional
- 32) SA011, (593 linear feet), non-jurisdictional
- 33) SA014, (187 linear feet), non-jurisdictional

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- 34) SA016, (157 linear feet), non-jurisdictional
- 35) SA017, (181 linear feet), non-jurisdictional
- 36) SA020, (327 linear feet), non-jurisdictional
- 37) SA021, (229 linear feet), non-jurisdictional
- 38) SA022, (543 linear feet), non-jurisdictional
- 39) SA023, (1,524 linear feet), non-jurisdictional
- 40) SA024, (702 linear feet), non-jurisdictional
- 41) SA025, (164 linear feet), non-jurisdictional
- 42) SA026, (452 linear feet), non-jurisdictional
- 43) SA027, (1,581 linear feet), non-jurisdictional
- 44) SA028, (1,589 linear feet), non-jurisdictional
- 45) SA029, (4,969 linear feet), jurisdictional (Section 404)
- 46) SA031, (1,677 linear feet), jurisdictional (Section 404)
- 47) SA032, (777 linear feet), non-jurisdictional
- 48) SA033, (689 linear feet), non-jurisdictional
- 49) SA035, (613 linear feet), non-jurisdictional
- 50) SA036, (3,334 linear feet), jurisdictional (Section 404)
- 51) SA040.1, (852 linear feet), jurisdictional (Section 404)
- 52) SA040.2, (28 linear feet), non-jurisdictional
- 53) SA041, (965 linear feet), non-jurisdictional
- 54) SA043, (191 linear feet), non-jurisdictional
- 55) SA044, (749 linear feet), jurisdictional (Section 404)
- 56) SA045.1, (1,574 linear feet), non-jurisdictional
- 57) SA045.2, (1,846 linear feet), non-jurisdictional
- 58) SA046, (166 linear feet), non-jurisdictional
- 59) SA047, (348 linear feet), non-jurisdictional
- 60) SA048, (344 linear feet), non-jurisdictional
- 61) SA049, (202 linear feet), non-jurisdictional
- 62) SA050, (419 linear feet), non-jurisdictional
- 63) SA051, (38 linear feet), non-jurisdictional
- 64) SA054, (720 linear feet), jurisdictional (Section 404)
- 65) SA055.1, (1,046 linear feet), non-jurisdictional
- 66) SA055.2, (409 linear feet), non-jurisdictional
- 67) SA056, (117 linear feet), non-jurisdictional
- 68) SA057, (157 linear feet), non-jurisdictional
- 69) SA058, (119 linear feet), non-jurisdictional
- 70) SA060, (1,072 linear feet), non-jurisdictional
- 71) SA061, (678 linear feet), non-jurisdictional
- 72) SA064, (1,132 linear feet), non-jurisdictional
- 73) SA065, (132 linear feet), non-jurisdictional
- 74) SA066, (12,117 linear feet), jurisdictional (Section 404)
- 75) SA067, (167 linear feet), non-jurisdictional

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- 76) SA068, (1,178 linear feet), jurisdictional (Section 404)
- 77) SA071, (519 linear feet), non-jurisdictional
- 78) SA072, (215 linear feet), non-jurisdictional
- 79) SA073, (2,952 linear feet), non-jurisdictional
- 80) SA076, (375 linear feet), non-jurisdictional
- 81) SA077, (1,096 linear feet), non-jurisdictional
- 82) SA078, (405 linear feet), non-jurisdictional
- 83) SA079, (992 linear feet), non-jurisdictional
- 84) SA083, (1,126 linear feet), non-jurisdictional
- 85) SA084, (614 linear feet), non-jurisdictional
- 86) SA085, (28 linear feet), non-jurisdictional
- 87) SA086, (33 linear feet), non-jurisdictional
- 88) SA087 (Plum Creek), (2,004 linear feet), jurisdictional (Section 404)
- 89) SA088, (171 linear feet), non-jurisdictional
- 90) SA090, (55 linear feet), non-jurisdictional
- 91) SA095, (570 linear feet), non-jurisdictional
- 92) SA096, (241 linear feet), non-jurisdictional
- 93) SA097, (125 linear feet), non-jurisdictional
- 94) SA098, (1,576 linear feet), non-jurisdictional
- 95) SA099, (303 linear feet), non-jurisdictional
- 96) SA102, (758 linear feet), non-jurisdictional
- 97) SA103, (1,1012 linear feet), non-jurisdictional
- 98) SA107, (4,731 linear feet), jurisdictional (Section 404)
- 99) SA108, (917 linear feet), non-jurisdictional
- 100) SA109.1, (984 linear feet), non-jurisdictional
- 101) SA109.2, (166 linear feet), non-jurisdictional
- 102) SA110.1, (836 linear feet), non-jurisdictional
- 103) SA110.2, (34 linear feet), non-jurisdictional
- 104) SA111.1, (1,609 linear feet), non-jurisdictional
- 105) SA111.2, (158 linear feet), non-jurisdictional
- 106) SA113, (448 linear feet), non-jurisdictional
- 107) SA114 (Plum Creek), (256 linear feet), jurisdictional (Section 404)
- 108) SA117, (578 linear feet), non-jurisdictional
- 109) SA118, (68 linear feet), non-jurisdictional
- 110) SA119, (3,532 linear feet), non-jurisdictional
- 111) SA120, (341 linear feet), non-jurisdictional
- 112) SA122, (175 linear feet), jurisdictional (Section 404)
- 113) SA123, (687 linear feet), non-jurisdictional
- 114) SA125, (1,319 linear feet), non-jurisdictional
- 115) SA126, (440 linear feet), non-jurisdictional
- 116) SA127, (1,627 linear feet), jurisdictional (Section 404)
- 117) SB004, (4,175 linear feet), jurisdictional (Section 404)

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- 118) SB006, (548 linear feet), non-jurisdictional
- 119) SB007, (779 linear feet), non-jurisdictional
- 120) SB008 (Plum Creek) (6,015 linear feet), jurisdictional (Section 404)
- 121) SB008a, (314 linear feet), non-jurisdictional
- 122) SB008b, (565 linear feet), non-jurisdictional
- 123) SB009, (869 linear feet), non-jurisdictional

*WA020, WA052, and WA118 are not included in the review under this AJD.

2. REFERENCES.

- a. “Revised Definition of ‘Waters of the United States,’” 88 FR 3004 (January 18, 2023) (“2023 Rule”)
- b. “Revised Definition of ‘Waters of the United States’; Conforming” 88 FR 61964(September 8, 2023))
- c. *Sackett v. EPA*, 598 U.S. ___, 143 S. Ct. 1322 (2023)
- d. Citing to the 27 September coordination memo, specifically to the language which reads, “Because the Supreme Court in *Sackett* adopted the Rapanos plurality standard and the 2023 rule preamble discussed the Rapanos plurality standard, the implementation guidance and tools in the 2023 rule preamble that address the regulatory text that was not amended by the conforming rule, including the preamble relevant to the Rapanos plurality standard incorporated in paragraphs (a)(3), (4), and (5) of the 2023 rule, as amended, generally remain relevant to implementing the 2023 rule, as amended.”
- e. Citing to the “Technical Support Document for the Final “Revised Definition of ‘Waters of the United States’” Rule dated December 2022.
- f. Citing to the “Memorandum to the Field on Exemptions from Regulation under Section 404(f)(1)(C) of the CWA for the Construction or Maintenance of Irrigation Ditches and for the Maintenance of Drainage Ditches” signed July 24, 2020.

- 3. REVIEW AREA. The Review Area is the approximately 1,891-acres proposed for solar development south of the Village of Tilden in Randolph County, Illinois. Approximate coordinates for the center of the Review Area are Latitude 38.1977° and Longitude -89.6909°. See attached exhibits illustrating the Review Area and associated aquatic resources.

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4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), THE TERRITORIAL SEAS, OR INTERSTATE WATER TO WHICH THE AQUATIC RESOURCE IS CONNECTED. [Kaskaskia River](#)
5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, THE TERRITORIAL SEAS, OR INTERSTATE WATER. [Plum Creek, which bisects the Review Area, is the receiving water for all surface drainage. Plum Creek eventually intersects the Kaskaskia River, a TNW.](#)
6. SECTION 10 JURISDICTIONAL WATERS⁶: 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 10.⁷ [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 2023 Rule as amended, 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 2023 Rule as amended. 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. Traditional Navigable Waters (TNWs) (a)(1)(i): [N/A](#)
 - b. The Territorial Seas (a)(1)(ii): [N/A](#)
 - c. Interstate Waters (a)(1)(iii): [N/A](#)
 - d. Impoundments (a)(2): [N/A](#)

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 "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.

e. Tributaries (a)(3):

- **SA087** (2,004 linear feet) / **SA114** (256 linear feet) / **SB008** (6,015 linear feet): Each of these features are separate reaches of Plum Creek located within the Review Area. Plum Creek is a fourth order stream (per NHD) with an 8600-acre watershed at the downstream most reach within the Review Area. The perennial flow characteristics observed throughout each reach were determined to meet the relatively permanent standard; containing base flow from groundwater connection as well as flow from precipitation events received through overland surface flow and other drainage features. At the time of the surveys, these stream segments were classified as perennial and between 2 inches and 4 inches of water was observed flowing generally to the west at a low to moderate rate.
- Sixteen unnamed tributaries within the Review Area were determined to meet the Relatively Permanent Standard as they have continuous seasonal flow because of groundwater connections and/or large enough watersheds to generate substantial overland flow during repeated precipitation events. Each of the tributaries was observed with flowing or pooled water during the site evaluations and physical characteristics that indicate sustained baseflow for extended periods of time.
 - **SA009** (1,194 linear feet) and **SA036** (3,334 linear feet) are separate reaches of a 1st order stream system that has a 257-acre watershed and has been historically manipulated within its agricultural setting. Just north of the Review Area, the headwaters of the system are impounded. Between 4 inches and 12 inches of low flow water was observed within these segments at the time of the field surveys.
 - **SA029** (4,969 linear feet) is an unnamed perennial stream with a 978-acre watershed that was observed with approximately 1 inch to 6 inches of water flowing south at a low rate during the field survey. SA029 becomes a 2nd order stream shortly after entering the Review Area from the north. The stream is channelized and heavily manipulated at its headwaters, gaining sinuosity and a riparian corridor as it flows south.

- **SA031** (1,677 linear feet), **SA040.1** (965 linear feet), and **SA044** (749 linear feet) are separate reaches of a 1st order stream system that has a 568-acre watershed and has been historically channelized and manipulated at its headwaters (SA040.1 and SA031), gaining sinuosity and a riparian corridor as it flows south out of the Review Area for an additional 1.25-miles before reentering as SA044. Between 2 inches and 6 inches of stagnant or low flowing water was observed within these segments at the time of the field surveys.
- **SA054** (720 linear feet) is a channelized first order stream with a 421-acre watershed that receives surface run-off from the adjacent agricultural lands and drainage from the railroad and Illinois State Route 13. Between 1 inch and 12 inches of stagnant or low flow water was observed within these segments at the time of the field surveys. SA054 intersects SA066 before flowing south into Plum Creek.
- **SA066** (12,117 linear feet) and **SA068** (1,178 linear feet) are separate reaches of an unnamed perennial stream with a 2,890-acre watershed that was observed with between 6-inches and 6-feet of water generally flowing to the southwest at moderate to high rate. SA066 and SA068 comprise much of a 2nd order stream that extends through the Review Area from north to south before entering Plum Creek 0.35-miles south off-site. The stream is heavily manipulated and lacks a riparian corridor until entering the Plum Creek floodplain.
- **SA107** (4,731 linear feet) is a channelized first order stream with an 833-acre watershed that receives surface run-off from the Village of Tilden and adjacent agricultural lands. The stream was determined to have perennial flows and was observed with approximately 1 inch to 12 inches of flowing and/or pooled during the field survey. SA107 intersects SA066 near Kelly Road before flowing south into Plum Creek.
- **SB004** (4,175 linear feet), **SA122** (175 linear feet) and **SA127** (1,627 linear feet) are three separate reaches of the same first order stream identified during the field surveys. At the time of the surveys, these stream segments were observed to be dry or had between 2 inches and 6 inches of water flowing at a low rate. SA122 is the headwater most extent of the system, followed by

SB004, and eventually SA127, a relocated and channelized reach of the system that was merged with the roadside drainage ditches. The first order stream system has a 175-acre watershed, naturally; however, due to manipulation of SA127, the watershed is likely double that due to the drainage alterations along Illinois State Route 4 and Kelly Road. SA127 eventually intersects Plum Creek south of the Review Area.

f. Adjacent Wetlands (a)(4):

- **WA037** is a forested wetland that abuts SA036, an RPW.
- **WA039** is a farmed wetland that abuts SA036, an RPW.

g. Additional Waters (a)(5): *N/A*

8. NON-JURISDICTIONAL AQUATIC RESOURCES AND FEATURES

Non-jurisdictional aquatic resources identified in this AJD have been categorized and a summation of each aquatic resource category provided in the appropriate section below.

a. Describe aquatic resources and other features within the review area identified in the 2023 Rule as amended as not “waters of the United States” even where they otherwise meet the terms of paragraphs (a)(2) through (5). Include the type of excluded aquatic resource or feature, the size of the aquatic resource or feature within the review area and describe how it was determined to meet one of the exclusions listed in 33 CFR 328.3(b).⁸

- **Excluded Ponds**
 - PA018 / PA019 / PA027 / PA032 / PA046

These five artificial ponds are excluded as a paragraph (b)(5) water as each of them was created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering or as settling basin within agricultural waterways.

- **Other Wetlands (within confines of Agricultural Ditches):**
 - WA005 / WA007 / WA011 / WA022 / WB005

⁸ 88 FR 3004 (January 18, 2023)

All five of these emergent wetlands lie within the limits of constructed agricultural ditches or waterways, that do not replace previously existing aquatic resources within their respective agricultural setting. As such, each of the wetlands are excluded as a paragraph (b)(3) water as it they lie within a constructed ditch that was excavated wholly in and draining only dry land and does not carry a relatively permanent flow of water.

- b. 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 2023 Rule as amended (e.g., tributaries that are non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water).

- **Non-RPW Streams and Agricultural Ditches:**

- SA001 / SA002 / SA003 / SA004 / SA005 / SA006 / SA007 / SA008 / SA010 / SA011 / SA014 / SA016 / SA017 / SA020 / SA021 / SA022 / SA023 / SA024 / SA025 / SA026 / SA027 / SA028 / SA032 / SA033 / SA035 / SA040.2* / SA041 / SA043* / SA045.1 / SA045.2 / SA046 / SA047 / SA048 / SA049 / SA050* / SA051 / SA055.1 / SA055.2 / SA056 / SA057 / SA058 / SA060 / SA061 / SA064 / SA065 / SA067 / SA071 / SA072 / SA073 / SA076 / SA077 / SA078 / SA079 / SA083 / SA084 / SA085 / SA086 / SA088 / SA090 / SA095 / SA096 / SA097 / SA098 / SA099 / SA102 / SA103 / SA108 / SA109.1 / SA109.2 / SA110.1 / SA110.2 / SA111.1 / SA111.2 / SA113 / SA117 / SA118 / SA119 / SA120 / SA123 / SA125 / SA126* / SB006* / SB007* / SB008a* / SB008b* / SB009
- Each of these 86 non-RPW features are first- or second-order systems that lie within the upper extents of small watersheds (generally <200-acres in size). The features flow following precipitation events, but generally cease to convey water following the termination of overland run-off. Their watershed sizes do not provide enough overland flow to maintain continuous seasonal flow without the presence of an elevated groundwater connection during the wet season for extended periods. These features may experience several separate and distinct periods of baseflow during the late winter/spring with extended dry periods in between. Based on their location within their respective local watershed and lack of physical characteristics indicating the presence of an extended groundwater connection, these features would not meet the Relatively Permanent Standard.

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*Many of the identified features exist within constructed agricultural waterways that were excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water; therefore, also meeting the (b)(3) exclusion.

- **Non-JD Wetlands and Ponds:**

- PA063 / PA129
- WA042 / WA053 / WA082 / WA128 / WB001 / WB002 / WB003

Each of these features lacks a continuous surface connection to a downslope RPW via a discrete feature. The only hydrology exiting the features is via overland surface flow and therefore they lack a continuous surface connection to a RPW.

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. Wetland and Waters Survey Report dated February 13, 2023
- b. USGS TopoView Topographic Maps, 1:24,000 Scale, Tilden, IL Quad
- c. USGS NHDPlus, Accessed December 27, 2023
- d. USGS Stream Stats
- e. Hydrologic Modeling System (HEC-HMS)
- f. Antecedent Precipitation Tool
- g. USDA-NRCS Soil Survey for Randolph County, Illinois & Web Soil Survey
- h. USGS Illinois Geologic Maps
- i. USFWS National Wetland Inventory, Color Infrared, 1980's, 1:58,000 Scale
- j. Illinois Height Modernization (ILHMP) LiDAR Data
- k. Google Earth Pro Aerial Imagery, Various Aerial Images

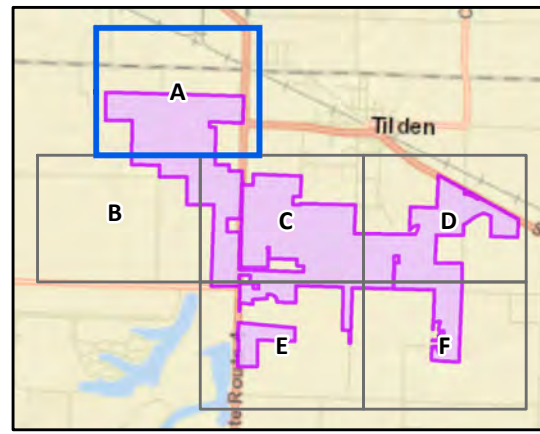
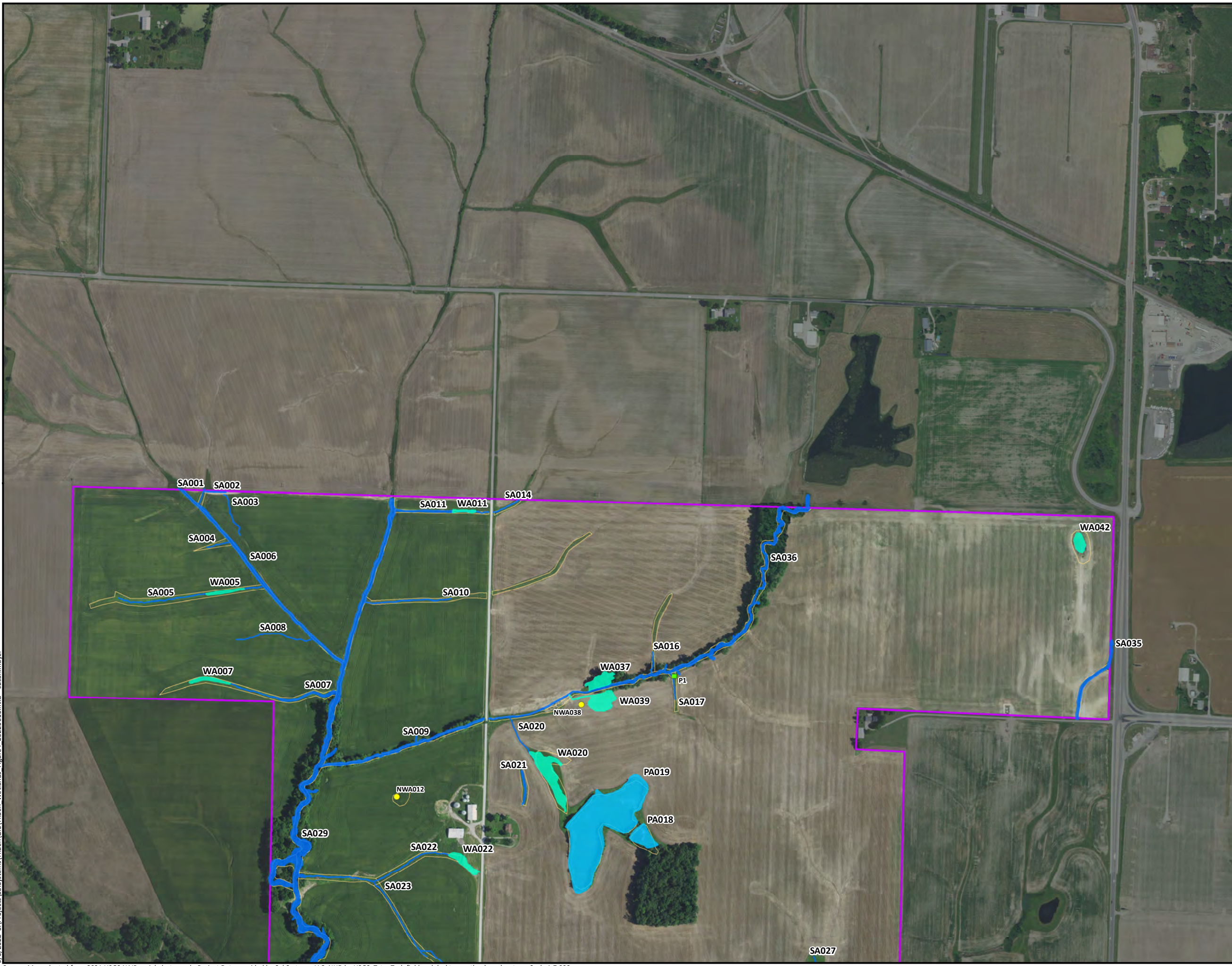
10. OTHER SUPPORTING INFORMATION.

Per the 24 July 2020 Ditch Memo, the term “ditch” is defined as a constructed or excavated channel used to convey water. Section III.e further defines “drainage ditch”, which includes agricultural ditches, as a ditch where increasing the drainage of a particular land area or infrastructure is at least part of the designed purpose. Per 33 CFR 328.3(b): The following are not “waters of the United States” even where they otherwise meet the terms of paragraphs (a)(2) through (5) of this section: (b)(3) ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water.

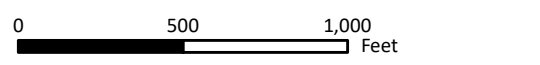
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11. NOTE: The structure and format of this MFR were developed in coordination with the EPA and Department of the Army. The MFR's structure and format may be subject to future modification or may be rescinded as needed to implement additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.



- Survey Area
 - Desktop Potential
 - Wetlands and Waters
 - Non-Wetland Sample Point
 - Non-Wetland Photopoint
- Delineated Wetlands and Waters**
- Surveyed Stream
 - Surveyed Wetland
 - Surveyed Pond

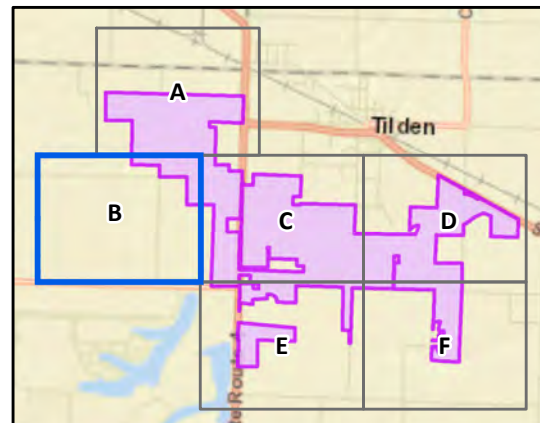
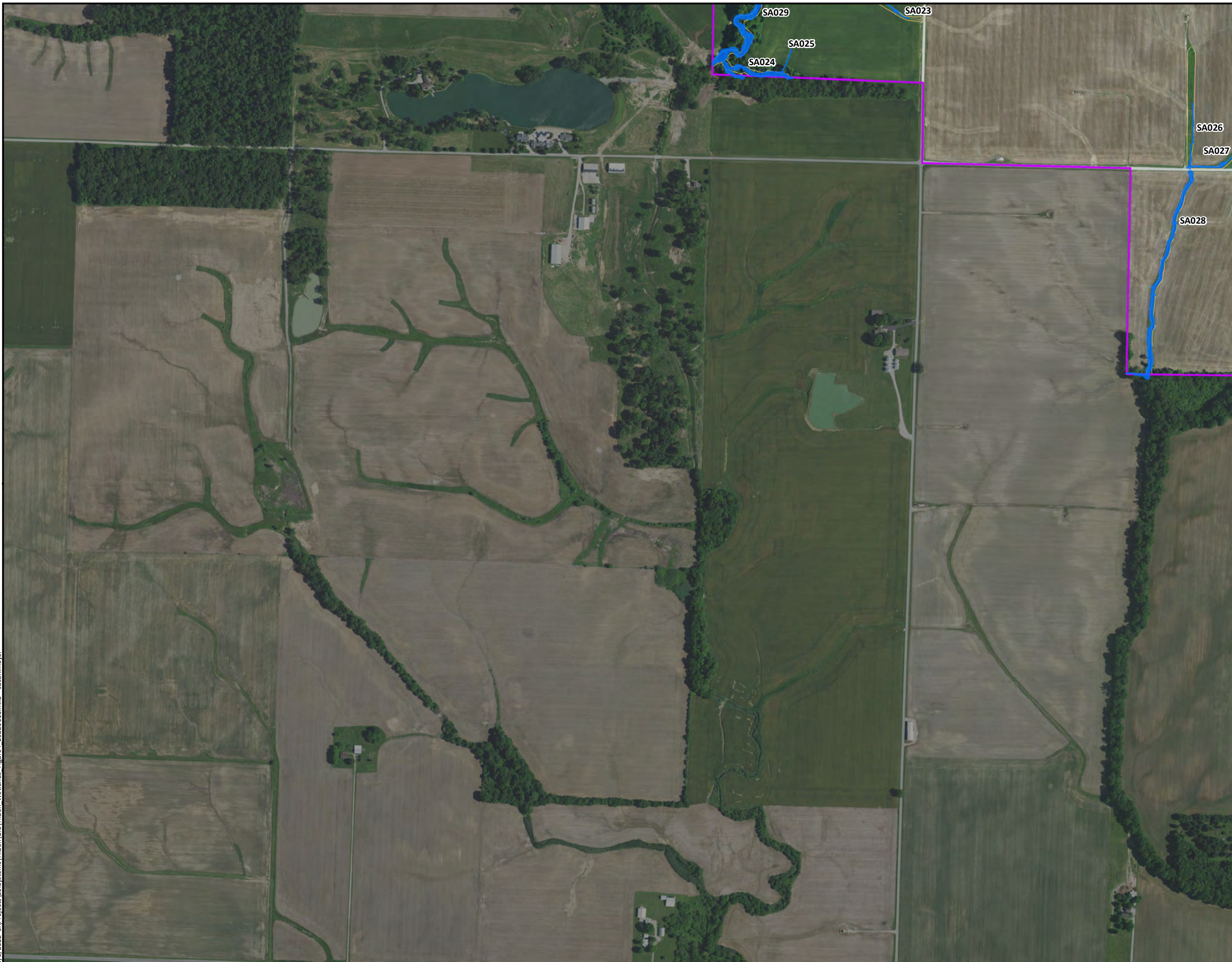


**Figure 4A: Wetlands and Waters
Survey Results
Tilden Solar
Randolph County, Illinois**

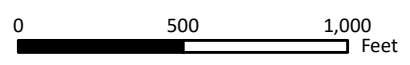


9/16/2022 5:\Projects\SoilSystems\Tilden\GIS\Wetlands_Figure4_20220616.mxd susan.mayer

Source: Map adapted from 2021 USGS NAIP aerial photograph; Project Data provided by Sol Systems, LLC; NHD by USGS; Tetra Tech field and desktop wetlands and waters. Scale 1:7,000.



- Survey Area
- Desktop Potential
- Wetlands and Waters
- Delineated Wetlands and Waters**
- Surveyed Stream

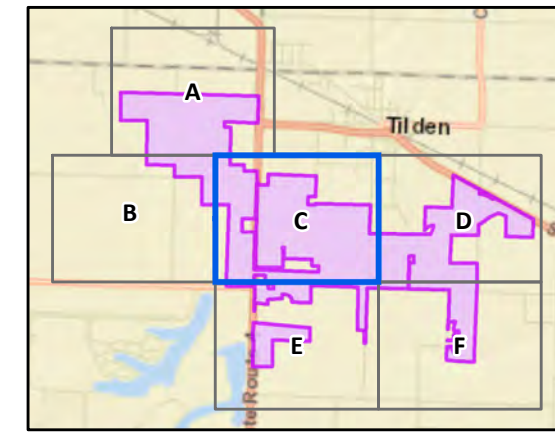
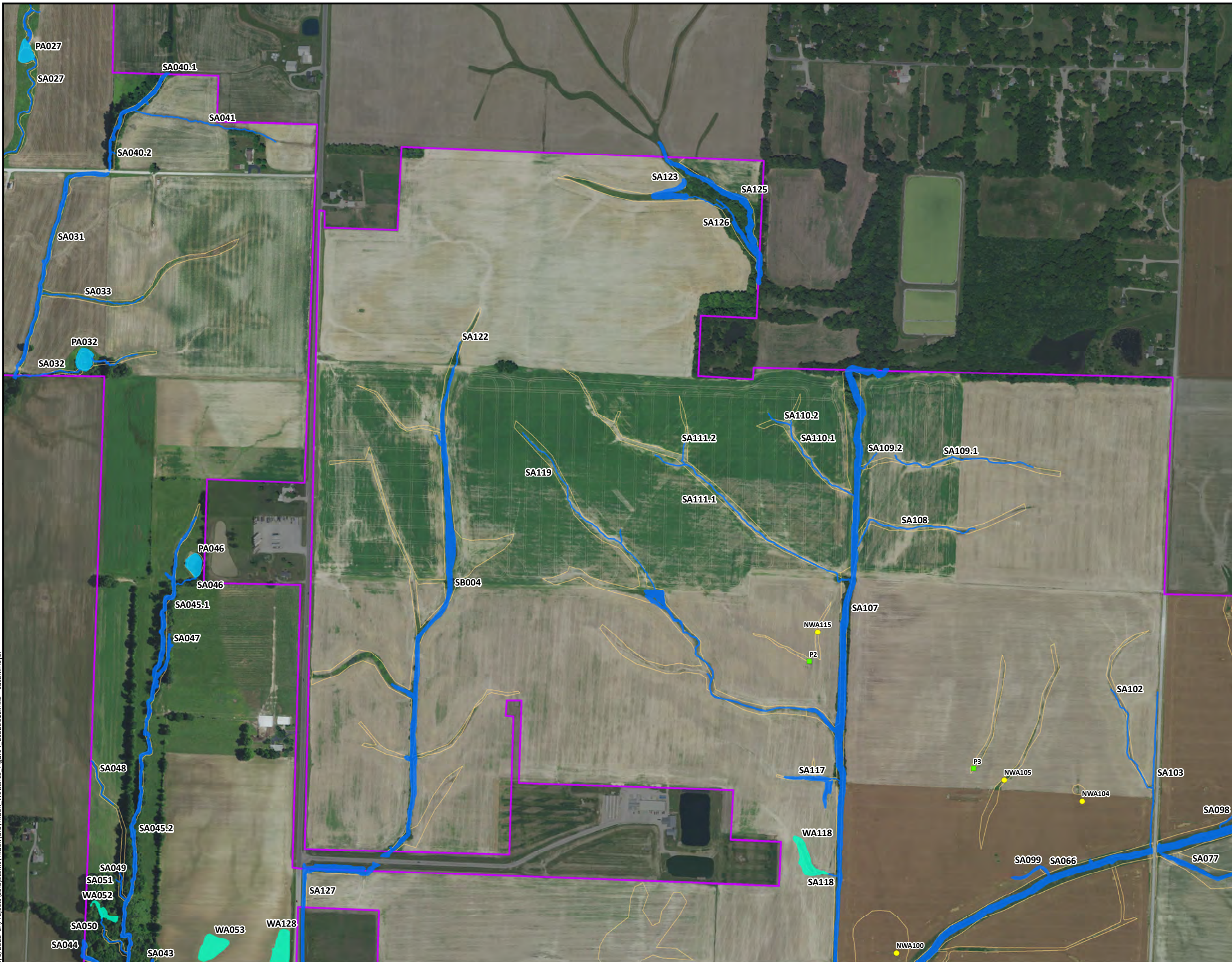


**Figure 4B: Wetlands and Waters
Survey Results
Tilden Solar
Randolph County, Illinois**



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Source: Map adapted from 2021 USGS NAIP aerial photograph; Project Data provided by Sol Systems, LLC; NHD by USGS; Tetra Tech field and desktop wetlands and waters. Scale 1:7,000.



- Survey Area
 - Desktop Potential
 - Wetlands and Waters
 - Non-Wetland Sample Point
 - Non-Wetland Photopoint
- Delineated Wetlands and Waters**
- Surveyed Stream
 - Surveyed Wetland
 - Surveyed Pond

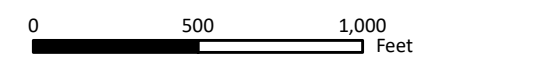
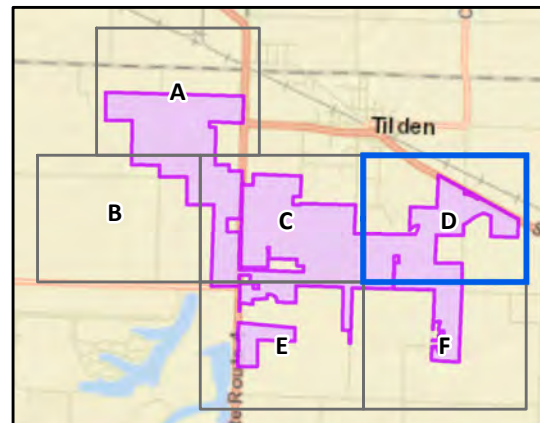
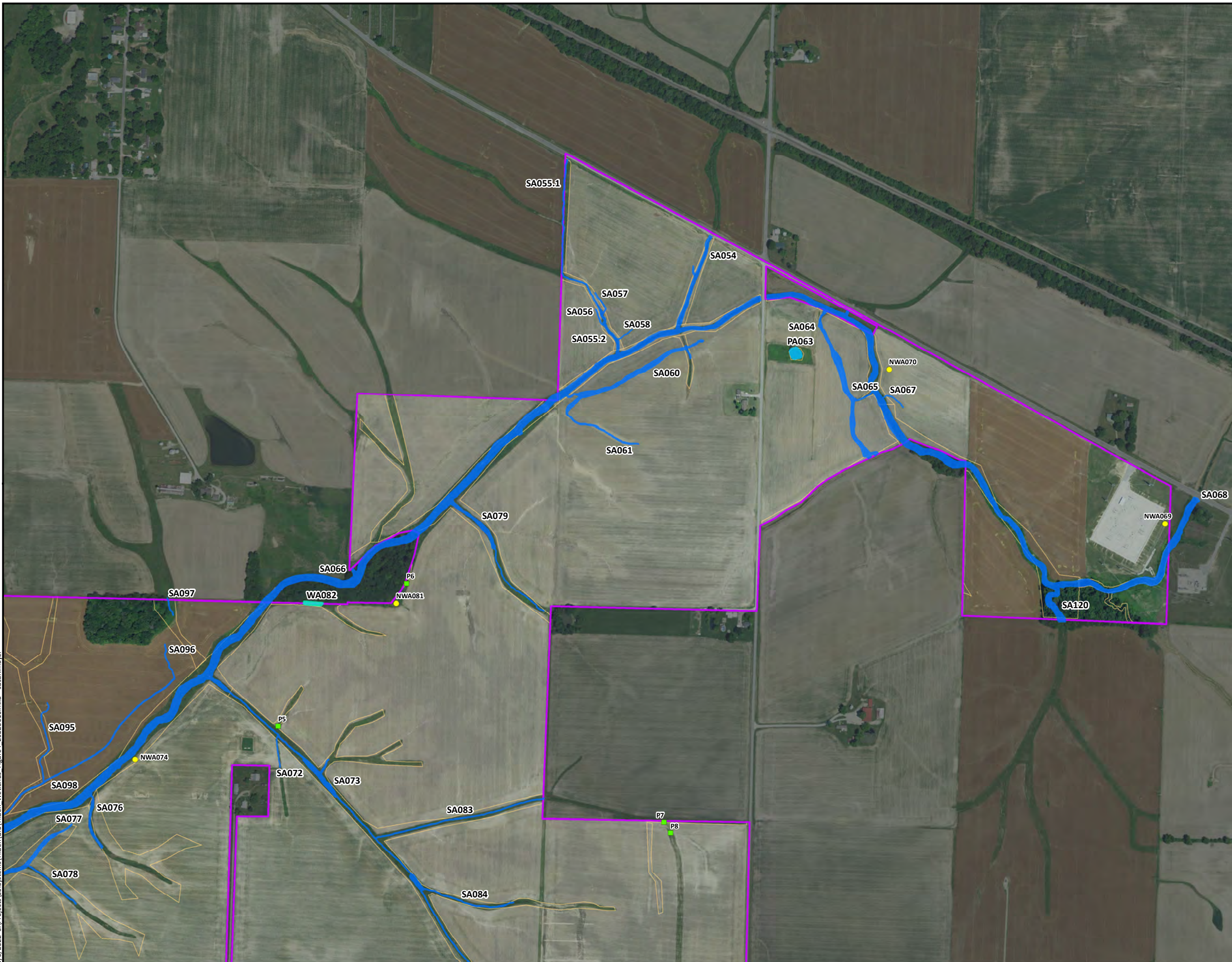


Figure 4C: Wetlands and Waters Survey Results
Tilden Solar
Randolph County, Illinois

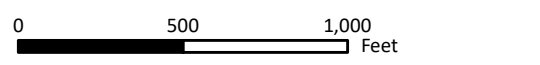


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Source: Map adapted from 2021 USGS NAIP aerial photograph; Project Data provided by Sol Systems, LLC; NHD by USGS; Tetra Tech field and desktop wetlands and waters. Scale 1:7,000.



- Survey Area
 - Desktop Potential
 - Wetlands and Waters
 - Non-Wetland Sample Point
 - Non-Wetland Photopoint
- Delineated Wetlands and Waters**
- Surveyed Stream
 - Surveyed Wetland
 - Surveyed Pond

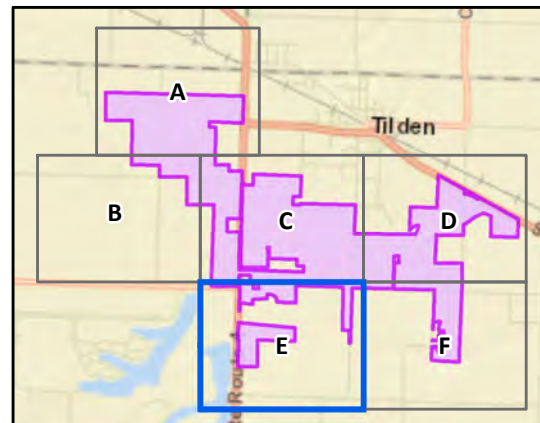
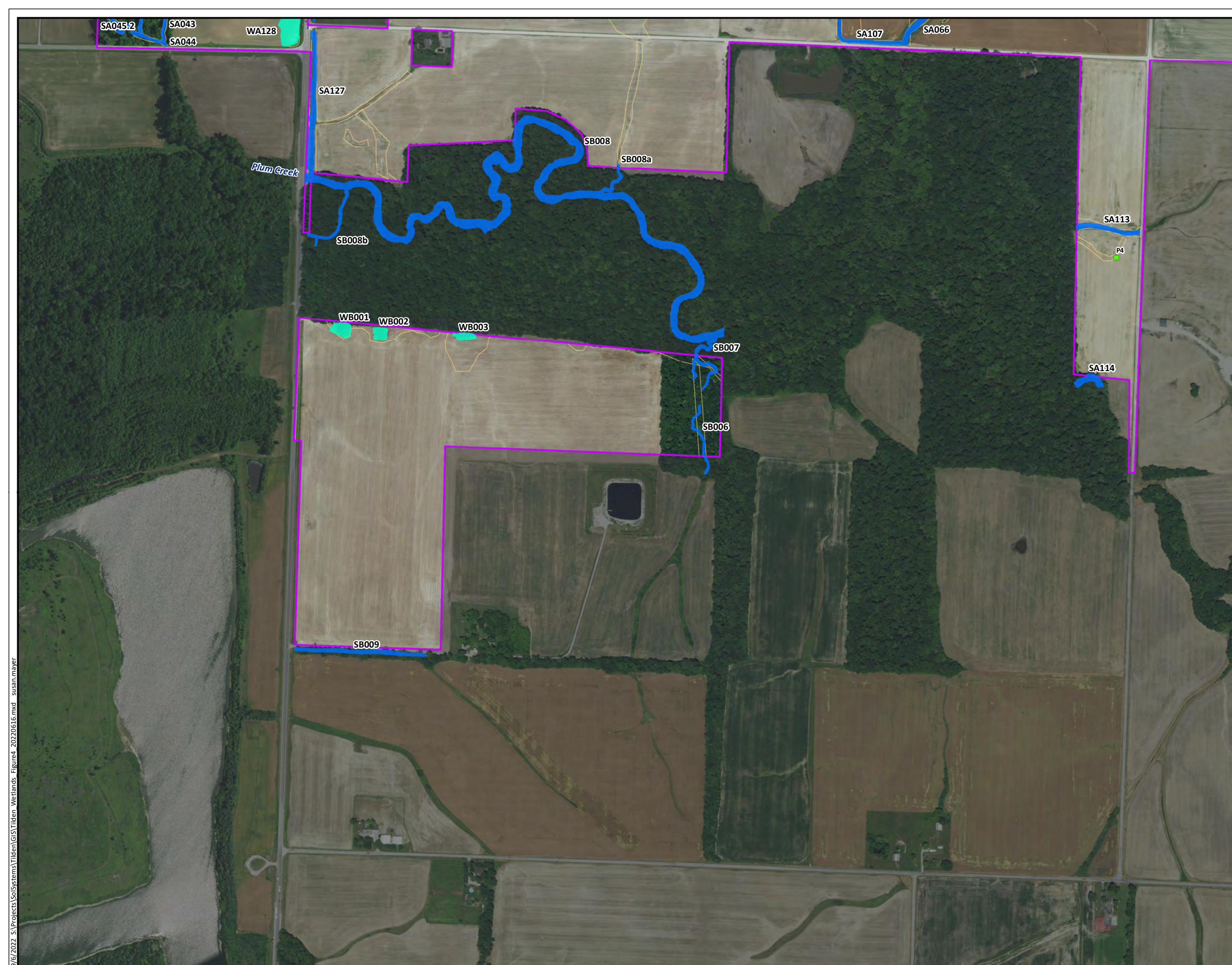


**Figure 4D: Wetlands and Waters
Survey Results
Tilden Solar
Randolph County, Illinois**

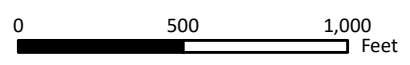


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Source: Map adapted from 2021 USGS NAIP aerial photograph; Project Data provided by Sol Systems, LLC; NHD by USGS; Tetra Tech field and desktop wetlands and waters. Scale 1:7,000.



- Survey Area
 - Desktop Potential
 - Wetlands and Waters
 - Non-Wetland Photopoint
- Delineated Wetlands and Waters**
- Surveyed Stream
 - Surveyed Wetland

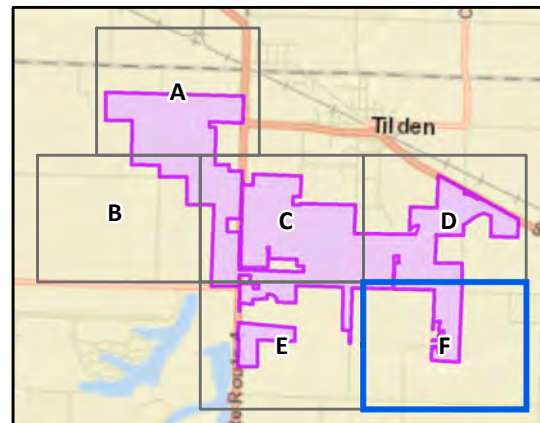
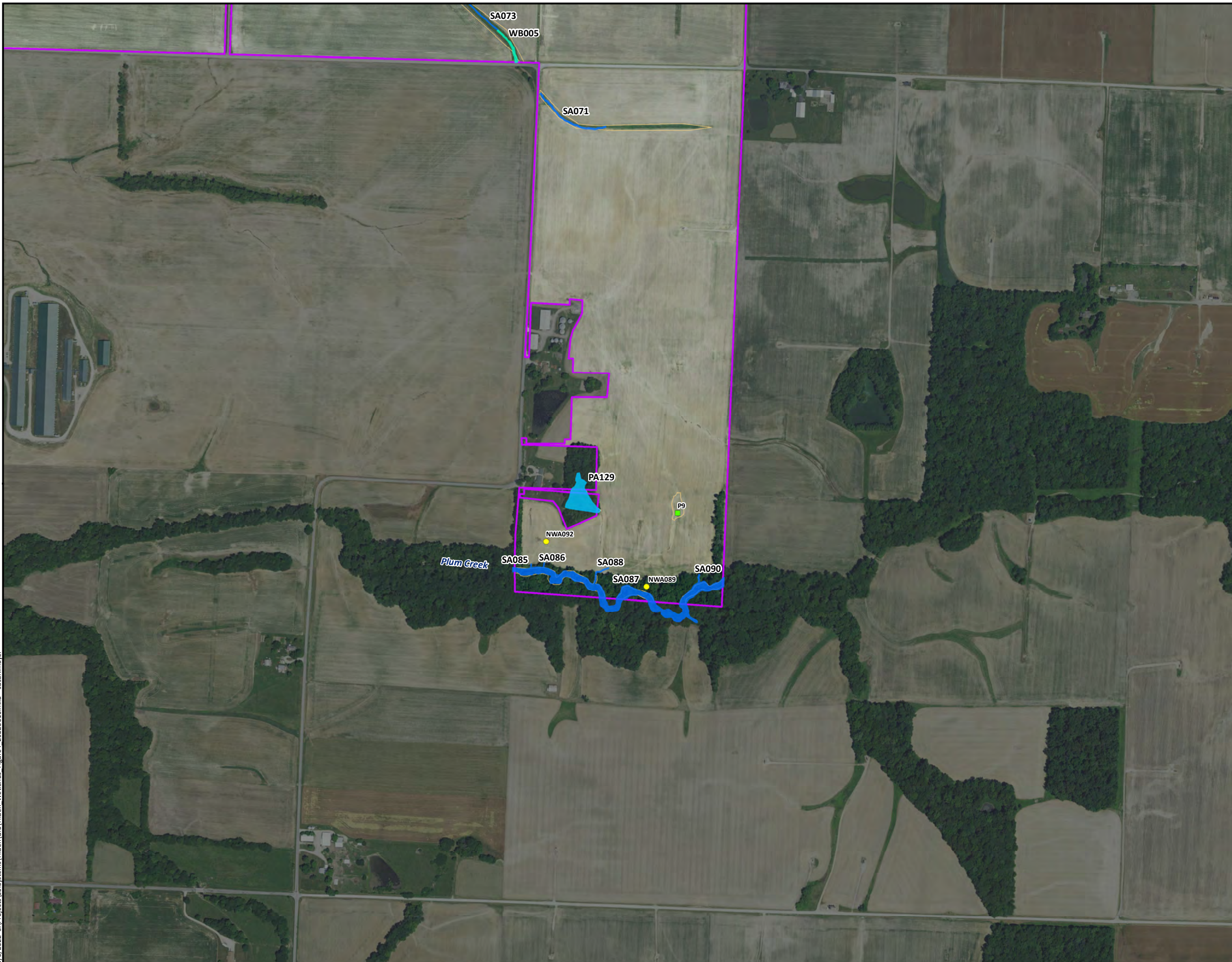


**Figure 4E: Wetlands and Waters
Survey Results
Tilden Solar
Randolph County, Illinois**

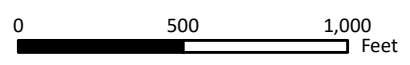


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Source: Map adapted from 2021 USGS NAIP aerial photograph; Project Data provided by Sol Systems, LLC; NHD by USGS; Tetra Tech field and desktop wetlands and waters. Scale 1:7,000.



- Survey Area
 - Desktop Potential
 - Wetlands and Waters
 - Non-Wetland Sample Point
 - Non-Wetland Photopoint
- Delineated Wetlands and Waters**
- Surveyed Stream
 - Surveyed Wetland
 - Surveyed Pond



**Figure 4F: Wetlands and Waters
Survey Results
Tilden Solar
Randolph County, Illinois**



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Source: Map adapted from 2021 USGS NAIP aerial photograph; Project Data provided by Sol Systems, LLC; NHD by USGS; Tetra Tech field and desktop wetlands and waters. Scale 1:7,000.