



DEPARTMENT OF THE ARMY
LITTLE ROCK DISTRICT, CORPS OF ENGINEERS
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LITTLE ROCK, ARKANSAS 72203-0867
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CESWL-RD

17 February 2026

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023),¹ **SWL 2025-00411** []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 For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),⁵ the Clean Water Act (CWA) implementing regulations published by the Department of the Army in 1986 and amended in 1993 (references 2.a. and 2.b. respectively), the 2008 *Rapanos-Carabell* guidance (reference 2.c.), and other applicable guidance, relevant case law and longstanding practice, (collectively the pre-2015 regulatory regime), and the *Sackett* decision (reference 2.d.) in evaluating jurisdiction.

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

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

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

³ 33 CFR 331.2.

⁴ Regulatory Guidance Letter 05-02.

⁵ USACE has authority under both Section 9 and Section 10 of the Rivers and Harbors Act of 1899 but for convenience, in this MFR, jurisdiction under RHA will be referred to as Section 10.

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. 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).
 - i. WET-1 (~0.08 acres, isolated/non-abutting an RPW), non-jurisdictional
 - ii. WET-2 (~0.02 acres, isolated/non-abutting an RPW), non-jurisdictional
 - iii. WET-3 (~0.09 acres, isolated/non-abutting an RPW), non-jurisdictional
 - iv. WET-4 (~0.02 acres, abutting an RPW), Jurisdictional, Section 404
 - v. WET-5 (~0.01 acres, isolated/non-abutting an RPW), non-jurisdictional
 - vi. WET-6 (~0.02 acres, isolated/non-abutting an RPW), non-jurisdictional
 - vii. WET-7 (~0.02 acres, isolated/non-abutting an RPW), non-jurisdictional
 - viii. EPH-1 (~370 linear feet long, non-RPW), non-Jurisdictional
 - ix. EPH-2 (~64 linear feet long, non-RPW), non-Jurisdictional
 - x. EPH-3 (~539 linear feet long, non-RPW), non-Jurisdictional
 - xi. EPH-4 (~98 linear feet long, non-RPW), non-Jurisdictional
 - xii. EPH-5 (~491 linear feet long, non-RPW), non-Jurisdictional
 - xiii. EPH-6 (~1,351 linear feet long, non-RPW), non-Jurisdictional
 - xiv. EPH-7 (~70 linear feet long, non-RPW), non-Jurisdictional
 - xv. EPH-8 (~97 linear feet long, non-RPW), non-Jurisdictional
 - xvi. EPH-8 (~97 linear feet long, non-RPW), non-Jurisdictional
 - xvii. INT-1 (~26 linear feet long, non-RPW), non-Jurisdictional
 - xviii. Dry Creek (~2,837 linear feet, RPW), Jurisdictional, Section 404

- xix. POND-1 (~0.71 acres, isolated/upland), non-Jurisdictional
- xx. POND-2 (~0.18 acres, isolated/upland), non-Jurisdictional
- xxi. POND-3 (~0.58 acres, isolated/upland), non-Jurisdictional

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, 143 S. Ct. 1322 (2023)
 - e. 1987 Corps of Engineers Wetlands Delineation Manual and the Regional Supplement to the Corps Wetland Delineation Manual: Eastern Mountains and Piedmont Region (Version 2.0) (USACE, 2012).
3. REVIEW AREA. The site is located in the SE ¼ of section 4 and the NE ¼ of section 9, T. 19 N., R. 23 W., southeast of Green Forest, in Carroll County, Arkansas. The review area is an approximately 87-acre site labeled as "Project Site" on the attached maps. The approximate geographic center of the project area is latitude 36.3272, longitude -93.4252.
4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), INTERSTATE WATER, OR THE TERRITORIAL SEAS TO WHICH THE AQUATIC RESOURCE IS CONNECTED. White River/Table Rock Lake (TNW) which is also a Section 10 Waterway.⁶
5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS. Generally, all aquatic features, within the review area, drain from the north – northwest to the southeast where they exit the review area via Dry Creek (RPW), to South Fork Dry Creek

⁶ This MFR should not be used to complete a new stand-alone TNW determination. A stand-alone TNW determination for a water that is not subject to Section 9 or 10 of the Rivers and Harbors Act of 1899 (RHA) is completed independently of a request for an AJD. A stand-alone TNW determination is conducted for a specific segment of river or stream or other type of waterbody, such as a lake, where upstream or downstream limits or lake borders are established.

(RPW), to Callens Branch (RPW), to Long Creek (RPW), to Table Rock Lake/White River (TNW).

6. SECTION 10 JURISDICTIONAL WATERS⁷: 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 10.⁸ N/A
7. SECTION 404 JURISDICTIONAL WATERS: Describe the aquatic resources within the review area that were found to meet the definition of waters of the United States in accordance with the pre-2015 regulatory regime and consistent with the Supreme Court's decision in *Sackett*. List each aquatic resource separately, by name, consistent with the naming convention used in section 1, above. Include a rationale for each aquatic resource, supporting that the aquatic resource meets the relevant category of "waters of the United States" in the pre-2015 regulatory regime. The rationale should also include a written description of, or reference to a map in the administrative record that shows, the lateral limits of jurisdiction for each aquatic resource, including how that limit was determined, and incorporate relevant references used. Include the size of each aquatic resource in acres or linear feet and attach and reference related figures as needed.
 - a. TNWs (a)(1): N/A
 - b. Interstate Waters (a)(2): N/A
 - c. Other Waters (a)(3): N/A
 - d. Impoundments (a)(4): N/A
 - e. Tributaries (a)(5):
 - i. Dry Creek ~2,837 linear feet, RPW 2nd order RPW. Dry Creek, a mapped and named perennial stream, flowing through the project area from north to southeast. This RPW is supported by hydrologic contributions from several ephemeral channels and groundwater contribution, as well as

⁷ 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.

⁸ 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.

upland drainage and localized runoff conveyed through swales and topographic rises. This feature exhibited characteristics consistent with an RPW, including a well-defined and continuous bed and bank, observable ordinary high water marks (OHWM), evidence of sediment transport, and sustained flow during the dry season. This feature has been mapped on USGS topographic maps dating from 1972 (USGS topoView). Historic aerial imagery also supports evidence of relatively permanent flow.

f. The territorial seas (a)(6): N/A

g. Adjacent wetlands (a)(7):

- i. WET-4 is an approximately 0.02-acre palustrine emergent wetland located in the western portions of the site. WET-4 abuts Dry Creek (RPW) along its southern boundary. As such WET-4 does have a continuous surface connection to a RPW and provides relatively permanent flow to a downstream TNW.

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”).⁹ 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.

- i. Pond-1 is an approximately 0.71-acre pond located in the northwest corner of the review area. Upon review the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report) this pond was constructed between 1970 and 1984 (per historical aerals.com). No discernible channel was apparent in the 1970 aerial photo and per the delineation report the pond is supported by sheet flow from the surrounding landscape as well as a non-RPW stormwater drainage from the north during rain events. The delineation report states that overflow from POND-1 discharges into EPH-2 (non-RPW). Pond-1 was constructed/dug in an upland.
- ii. Pond-2 is an approximately 0.18-acre pond located on the eastern side of the project area. Upon review the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report) this pond was constructed between 1970 and 1984 (per historical aerals.com). No discernible channel was apparent in the 1970 aerial

⁹ 51 FR 41217, November 13, 1986.

photo and per the delineation report the pond is on top of a rise and is hydrologically isolated.

- iii. Pond-3 is an approximately 0.58-acre pond located on the western side of the project area. Upon review the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report) this pond was constructed prior to 1970, the earliest historical areal available on historical aerials.com. No discernible channel was apparent in the 1970 aerial photo and per the delineation report no inlet channel was noted and overflow from POND-3 discharges into EPH-7 (non-RPW). Pond-1 was constructed/dug in an upland.

- b. Describe aquatic resources and features within the review area identified as “generally not jurisdictional” in the *Rapanos* guidance. Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA based on the criteria listed in the guidance. N/A

- c. Describe aquatic resources and features identified within the review area as waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA. Include the size of the waste treatment system within the review area and describe how it was determined to be a waste treatment system. N/A

- d. Describe aquatic resources and features within the review area determined to be prior converted cropland in accordance with the 1993 regulations (reference 2.b.). Include the size of the aquatic resource or feature within the review area and describe how it was determined to be prior converted cropland. N/A

- e. Describe aquatic resources (i.e. lakes and ponds) within the review area, which do not have a nexus to interstate or foreign commerce, and prior to the January 2001 Supreme Court decision in “*SWANCC*,” would have been jurisdictional based solely on the “Migratory Bird Rule.” Include the size of the aquatic resource or feature, and how it was determined to be an “isolated water” in accordance with *SWANCC*. N/A

- f. Describe aquatic resources and features within the review area that were determined to be non-jurisdictional because they do not meet one or more categories of waters of the United States under the pre-2015 regulatory regime consistent with the Supreme Court’s decision in *Sackett* (e.g., tributaries that are non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water).

- i. WET-1 is an approximately 0.08-acre palustrine emergent wetland located in the northwestern portion of the project area. This wetland's hydrology supported by localized sheet flow and diffuse flow from stormwater drainage. WET-1's low topographic position promotes periodic saturation and surface water accumulation, supporting hydrologic indicators and sustaining wetland conditions. Flow leaving this wetland becomes channelized to the south via EPH-1 (non-RPW). WET-1 does not abut a RPW, as such it is not jurisdictional because it does 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).
- ii. WET-2 is an approximately 0.02-acre palustrine emergent wetland located in the northern portion of the project area. This wetland's hydrology supported by diffuse sheet flow and out-of-bank flooding from POND-1, which briefly channelizes via EPH-2 (non-RPW) before dispersing into the wetland. No direct outlet channel into Dry Creek was observed. WET-2 does not abut a RPW, as such it is not jurisdictional because it does 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).
- iii. WET-3 is an approximately 0.09-acre palustrine emergent wetland located in the northern portion of the project area. This wetland's hydrology supported by localized sheet flow and concentrated stormwater drainage inflows. Flow from this wetland is conveyed into POND-1 via EPH-8 (non-RPW). WET-3 does not abut a RPW, as such it is not jurisdictional because it does 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).
- iv. WET-5 is an approximately 0.01-acre palustrine emergent wetland located in the eastern portion of the project area. This wetland's hydrology supported by groundwater seepage and out-of-bank flooding of Pond-2. WET-5 does not abut a RPW, as such it is not jurisdictional because it does 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).

- v. WET-6 is an approximately 0.02-acre palustrine emergent wetland located in the southern portion of the project area. WET-6 is in a topographical depression and is geographically isolated. This wetland's hydrology supported by localized sheet flow due to its concave nature. WET-6 does not abut a RPW, as such it is not jurisdictional because it does 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).
- vi. WET-7 is an approximately 0.02-acre palustrine forested wetland located in the southern portion of the project area. This wetland's hydrology supported by a seep and localized sheet flow. Outflow from this feature enters INT-1 (non-RPW), which transitions into ephemeral flow via EPH-5 (non-RPW). WET-7 does not abut a RPW, as such it is not jurisdictional because it does 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).
- vii. EPH-1 is an approximately 370 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).
- viii. EPH-2 is an approximately 64 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).

- ix. EPH-3 is an approximately 539 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).
- x. EPH-4 is an approximately 98 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).
- xi. EPH-5 is an approximately 491 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).
- xii. EPH-6 is an approximately 1,351 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).
- xiii. EPH-7 is an approximately 70 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic

Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).

- xiv. EPH-8 is an approximately 97 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).
 - xv. INT-1 is an approximately 26 linear-foot-long non-RPW. Upon review of the available data (historical aerial photography, USGS Topographic Maps, LiDAR, and the delineation report), this feature does not display Relative Permanent Flow, as such it is not jurisdictional because it does 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).
9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.
- a. Office review by Corps personnel was conducted on December 11, 2025
 - b. Crafton Tull Delineation Report dated, September 24, 2025
 - c. USGS Stream Stats accessed, December 11, 2025
 - d. USGS topoView Green Forest, AR 1:24K accessed, December 11, 2025
 - e. Google Earth Pro. (1994-2021 Imagery) accessed, December 11, 2025
 - f. USDA Natural Resources Conservation Service Web Soil Survey Carroll County accessed, December 11, 2025

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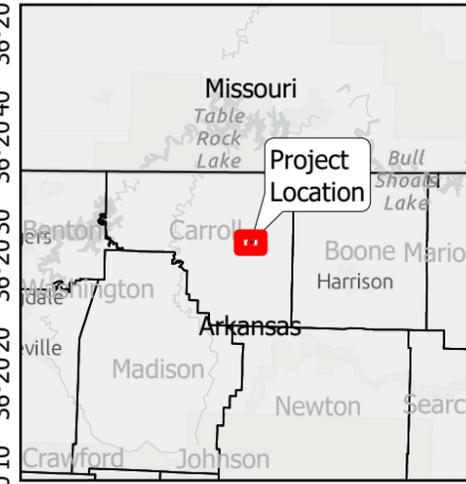
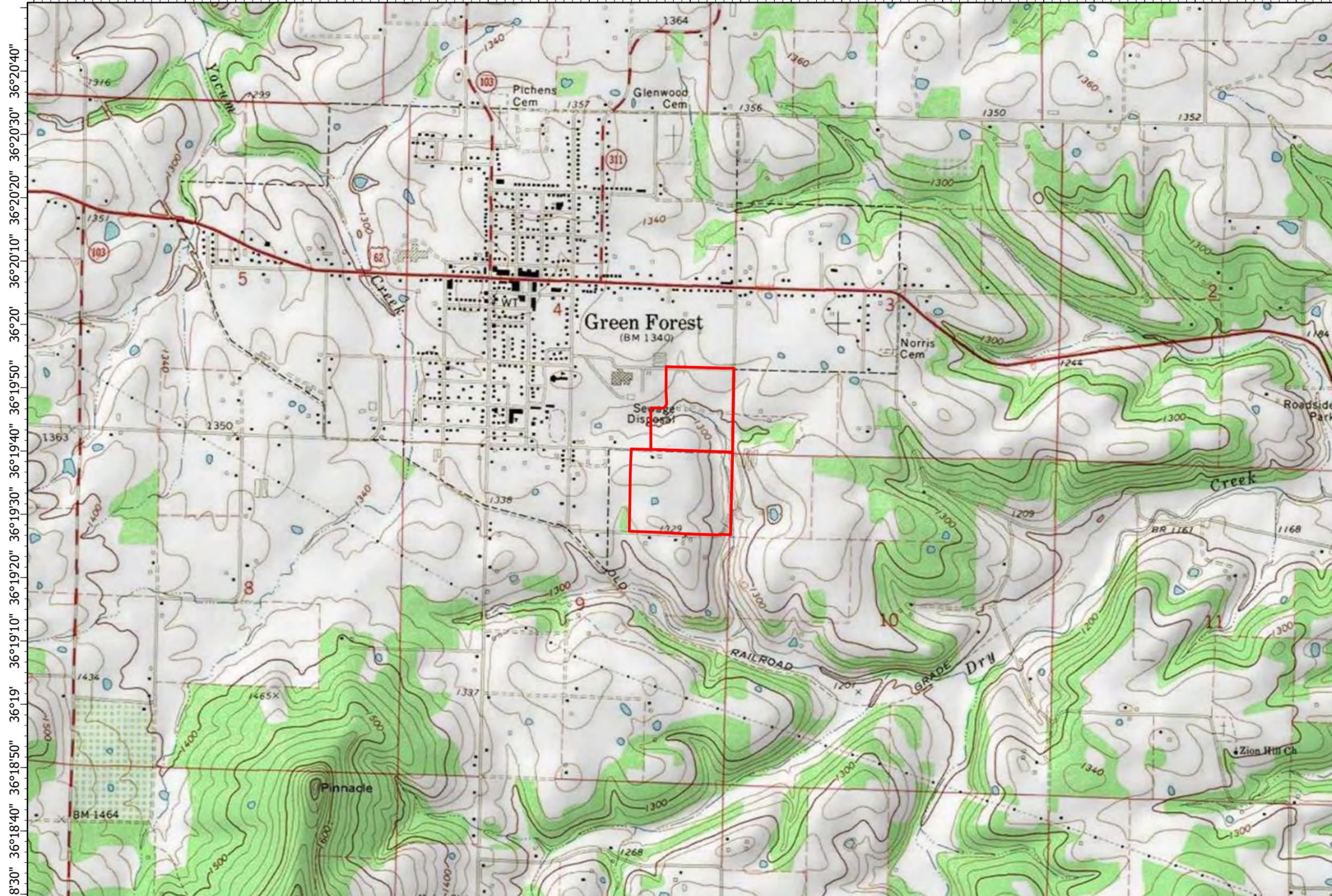
g. NHD data accessed on National Regulatory Viewer accessed, December 11, 2025

h. Historic Aerials via <https://www.historicaerials.com/viewer> accessed, December 11, 2025

10. OTHER SUPPORTING INFORMATION. N/A

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

-93°27'40" -93°27'20" -93°27'-93°26'50" -93°26'30" -93°26'10"-93°26'-93°25'50" -93°25'30" -93°25'10"-93°25'-93°24'50" -93°24'30" -93°24'10"-93°24'-93°23'50" -93°23'30"



Spatial ReferenceName: WGS 1984 Web Mercator Auxiliary Sphere

36°20'40" 36°20'30" 36°20'20" 36°20'10" 36°20' 36°19'50" 36°19'40" 36°19'30" 36°19'20" 36°19'10" 36°19' 36°18'50" 36°18'40" 36°18'30"



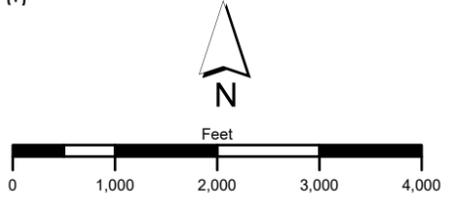
**PEAKS RENEWABLE-
GREEN FOREST**
131 CO ROAD 960
GREEN FOREST, AR
WOTUS ASSESSMENT
CT Prj #: 25803000

Section-Title-Range
S4-T19N-R23W & S9-T19N-
R23W

Figure 1 USGS Topographic Map

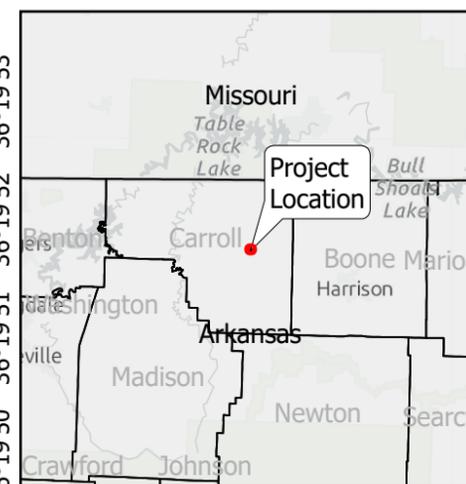
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LEGEND
Project Site



Spatial ReferenceName: WGS 1984 Web Mercator Auxiliary Sphere

Service Layer Credits: World Imagery: State of Missouri, Maxar, Microsoft
State Boundary: BLM Admin State
Light Gray Reference: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community
World Hillsshade: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community
GSA, Geoland, FEMA, Intermap, and the GIS user community
Environment Base: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community



LEGEND

- Sample Point
- Streams & Drainages
 - ~ Ephemeral
 - ~ Intermittent
- Wetlands & Ponds
 - Wetland
 - Pond
- Project Site



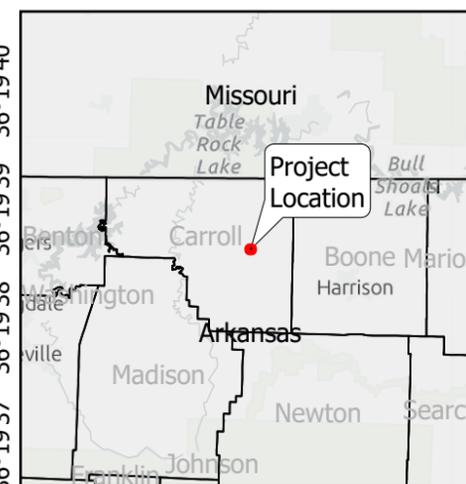
**PEAKS RENEWABLE-
GREEN FOREST**
131 CO ROAD 960
GREEN FOREST, AR
WOTUS ASSESSMENT

CT Prj #: 25803000

Figure 6a
Wetlands & Waters Delineation - North - Sec. 4

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-93°25'44" -93°25'42" -93°25'40" -93°25'38" -93°25'36" -93°25'34" -93°25'32" -93°25'30" -93°25'28" -93°25'26" -93°25'24" -93°25'22" -93°25'20"



Spatial ReferenceName: WGS 1984 Web Mercator Auxiliary Sphere

Service User Credits: World Imagery: State of Missouri, Maxar, Microsoft
 State Boundary: ELLM Admin State
 Light Gray Reference: Sources: Esri, TomTom, Garmin, FHO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community
 Light Gray Base: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community
 World Hillsshade: Sources: Esri, Metax, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatasynthese, Rijkswaterstaat,
 GSA, Geoland, FEMA, Intermap, and the GIS user community
 Environment Base: Sources: Esri, TomTom, Garmin, FHO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

LEGEND

- Sample Point
- Streams & Drainages
 - ~ Ephemeral
 - ~ Intermittent
- Wetlands & Ponds
 - Wetland
 - Pond
- Project Site

Crafton Tull
 901 N. 47th Street, Suite 400, Rogers, AR 72756
 479.636.4838 | 479.631.6224 f

**PEAKS RENEWABLE-
 GREEN FOREST**
 131 CO ROAD 960
 GREEN FOREST, AR
WOTUS ASSESSMENT
 CT Prj #: 25803000

Figure 6b
Wetlands & Waters Delineation - South - Sec. 9

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