

## Permit Review Criteria

1. Purpose. This document is to assist the Corps Project Managers to perform certain supplemental tasks when reviewing applications for Department of the Army Permits under Section 404 of the Clean Water Act. These tasks are: (a) Screen the incoming applications project locations against a set of maps to identify potential issues; (b) Use site specific information provided as part of the application process to determine whether the issue is relevant to the project at hand; (c) If relevant, use the suggested methodology accompanying the maps or another appropriate methodology provided by the applicant or others to assess the effect, if any; (d) Compare the project location to the predicted futures presented by the EIS. This document applies to the study area of the Environmental Impact Statement for Improving the Regulatory Process in Southwest Florida (EIS) shown by Figure 1.

2. Background. The Corps of Engineers has regulatory authority to permit the discharge of dredged or fill material into wetlands and other waters of the United States at specified disposal sites. The Corps conducts a public interest review of the probable impact of the proposed activity and its intended use. The review covers numerous public interest factors including effects upon conservation, fish and wildlife values, recreation, water quality, property interests, economics, land use, and cultural values. The guidelines pursuant to Section 404(b) of the Act require that impacts to the aquatic environment be avoided and minimized to the maximum extent practicable. Also, unavoidable impacts are to be compensated (mitigated) to the extent practicable. A permit is typically issued provided that the proposed use is not contrary to the public interest, and is in compliance with the guidelines promulgated by the EPA pursuant to Section 404(b) of the Clean Water Act. The maps do not represent permittable/non-permittable areas. The public interest factors covered by the screening maps include fish and wildlife values, wetlands, coastal activities, and water quality. The importance of any of these factors will depend on the site-specific circumstances of each individual project. A specific factor may be given substantial weight on one project while it may not be present or as important on another. For example, where a project proposes to fill nesting habitat for the wood stork, the fish and wildlife factor may be given substantial weight. On the other hand, the weight given this factor may be less where a project

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impacts an area that constitutes only potential or suitable habitat for an endangered species without evidence of use. Moreover, consistent with existing regulations, the permit reviewer will not only review any relevant public interest factors identified when compared to the maps but will also review all factors relevant to the public interest, including property rights, economics, and land use, and these other factors are given appropriate weight along with the issues identified in the review process when determining whether issuance of the permit, on balance, is not contrary to the public interest and is in compliance with the Section 404(b)(1) Guidelines.

3. Updates. These maps and suggested analysis methodologies are based on regional or statewide information rather than site-specific information due to the size of the EIS study area. This document is expected to be modified in the future based on new information. Any party with information relevant to these issues may submit that to the Corps so that revisions to this document can be made. With respect to particular parcels or sites, the Corps project manager will use site-specific information provided by the applicant to confirm whether the issue is applicable to the application under review. The project manager may depart from the suggested methodology to assess effect so long as the assessment is appropriate to the site-specific circumstances. Another methodology provided by the applicant or others may be used if appropriate. The Corps will also continue to work with the U.S. Fish and Wildlife Agency, U. S. Environmental Protection Agency and others to develop more detailed analysis tools.

4. Permit Review. The Corps' decision whether to issue or deny a Permit is based on site and project specific information. This intent of these supplemental tasks is to strengthen the analysis of the cumulative effects in the region and increase assurance that some issue is not missed in a review. They are a management tool to ensure manpower/review resources are prioritized toward that subset of permit applications for which a more elaborate cumulative assessment is warranted. A location with a larger number of confirmed issues will receive a greater rigor of review. However, the maps do not predetermine the Corps permit decision. In addition, this document does not apply to projects holding unexpired Department of the Army permits. For applications that are pending at the date of this

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document, the project manager will compare the project to the screening maps to see if the issue has already been considered and, if considered, then this document will not be referenced as the basis for initiating additional work on that issue. For example, if the Corps has already made an initial determination on the project's potential effect on a particular listed species, then a re-determination will not be performed solely because this document was issued. (This does not preclude re-determination if there is other site-specific or other new information.)

5. Cumulative Effects. The EIS document presents five maps depicting what the landscape may or may not look like in 20+/- years. The maps delineate areas of "development", "agriculture", and "preserves" based on various ideas of how the land in the study area may be or should be distributed in 20+ years. These maps represent the potential result of many individual decisions by the landowners, Counties, Corps, and others. The five maps are labeled Q, R, S, T, and U. Map R represents the County Comprehensive Plans, that is, if all individual decisions collectively matched these plans and these plans were never amended. Q provides a larger acreage of development than the comprehensive plan (R). S provides greater emphasis on listed species and their habitat. T seeks to increase the area of preserves. U proposes the largest areas of preserve. These maps were used to prepare five estimates of acres of wetland fill, area of habitat lost, change in water quality, and many other issues. These estimates and accompanying evaluations provide a range of potential cumulative effects. The Corps project manager will include in the decision document for each application a comparison of the project location with the five maps. If a project is consistent with at least one of the five maps, then the potential cumulative effect of this and future projects can be expected to fall within the range of effects described by the EIS. The EIS naturally could not predict what each applicant would propose as project-specific avoidance, minimization, or compensatory actions that would mitigate the potential cumulative effects. Therefore, mitigation actions incorporated into the project would reduce and in some cases eliminate that project's contribution to the total potential cumulative effects described by the EIS.

6. Immokalee Reservation, Seminole Tribe of Florida. The Immokalee Reservation is not assigned individual maps. The

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approximate location of the reservation is blacked out on the maps, labeled "A" on Figure 1. Therefore, there is no prepared list of issues for reviewing the cumulative effects of projects proposed within the Immokalee Reservation. The identification of natural resource issues on lands surrounding the reservation will not be considered when evaluating projects proposed by the Tribe on tribal lands. Corps Project Managers will continue to recognize the status, governmental authority, and powers of the Seminole Tribe of Florida and the rights under any tribal agreement with any agency of the U.S. Government.

7. Immokalee Area Study. On June 22, 1999, the State of Florida Administration Commission adopted Final Order No. AC-99-002, which directed Collier County to conduct a Rural and Agricultural Area Assessment. Collier County divided the Assessment into two geographic areas, the Rural Fringe Area and the Eastern Lands Area, also known as the "Immokalee Area Study." On April 29, 2002, the Rural Lands Oversight Committee voted to forward their report and recommendations to the Board of County Commissioners. A portion of the study area overlaps the EIS study area, the approximate boundary is labeled "B" in Figure 1. One product among many of that effort is a revision of the land use mapping data that was used in the original EIS. The screening maps are still based on the original land use mapping since that mapping covers the entire EIS study area. However, the Corps project manager is to refer to the more detailed land cover mapping and other site information found in that report when screening projects within the boundary of the Immokalee Area Study.

8. SLOPES. The Corps and U.S. Fish and Wildlife Service continue to develop Standard Local Operating Procedures for Endangered Species (SLOPES) for many of the species that are frequently the topic of consultations under Section 7 of the Endangered Species Act. A general introduction to these documents is found at Attachment A of this enclosure.

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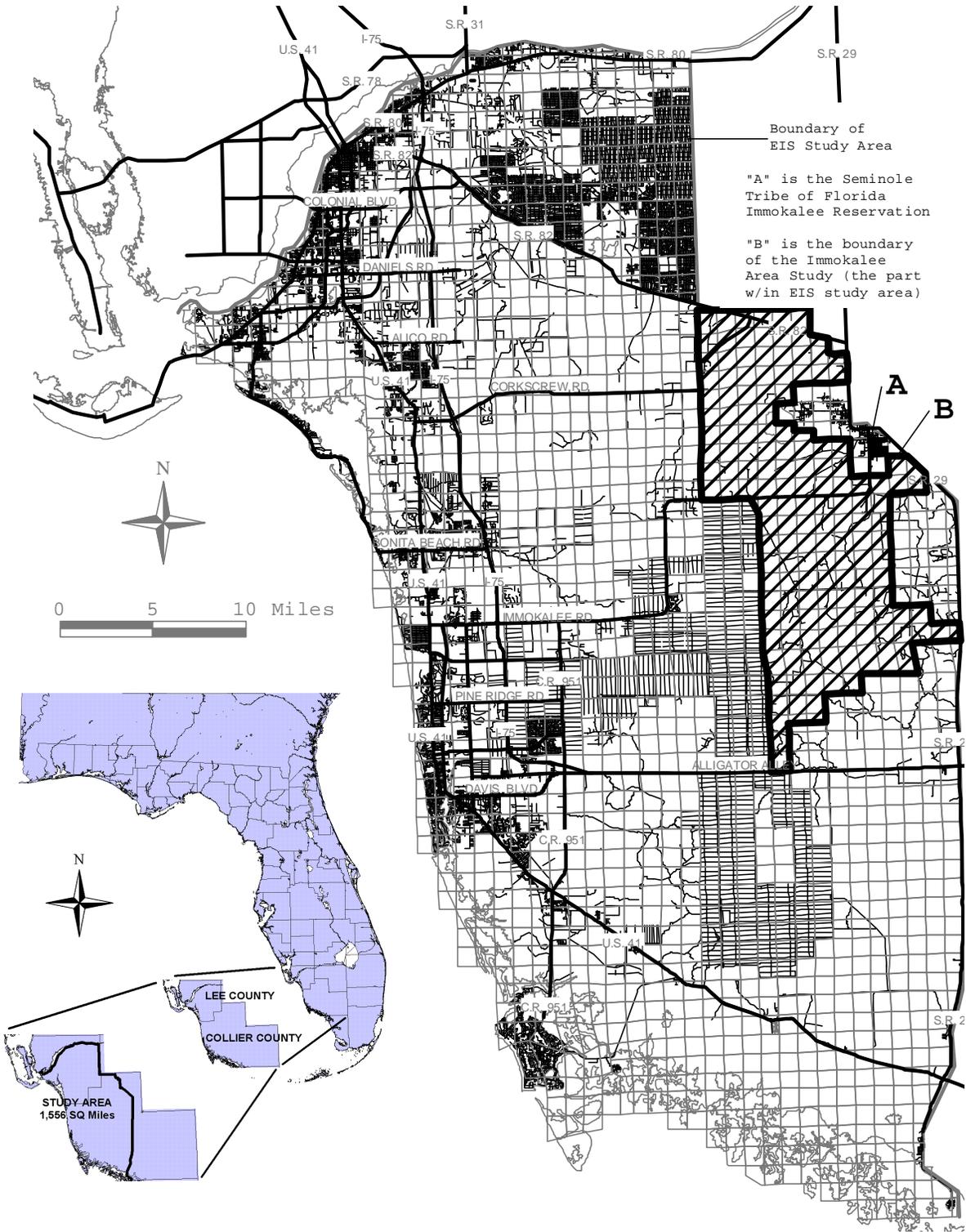


Figure 1. Base Map.

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### 9. Audubon's crested caracara.

a. The primary cause for the decline of this species has been habitat loss. This species prefers native range and unimproved pasture for foraging. All of the futures in the EIS predict a decline in existing agricultural area.

b. The project manager will use the draft local operating procedure, Attachment B of this enclosure. The first step of the procedure is to screen for the presence of nests and of suitable habitat. The "consultation area" shown on Figure 2 encompasses locations of currently known nests, plus a buffer that represents potential unknown nest locations that may be present due to dispersal from known locations. Within the EIS study area, this buffer is up to approximately 12 miles from existing known locations. The area mapped overlaps areas within the Immokalee Area Study, Lehigh Acres, and lands between the Caloosahatchee River and Lehigh Acres. Nests are typically in cabbage palms (*Sabal palmetto*) surrounded by areas of described as wet and dry prairies (with scattered saw palmetto, scrub oaks or cypress) and improved and semi-improved pastures and range lands. Due to the availability of the more current land use mapping for the Immokalee Study Area and the subdivided nature of Lehigh Acres, a map of potential habitat has not been prepared.

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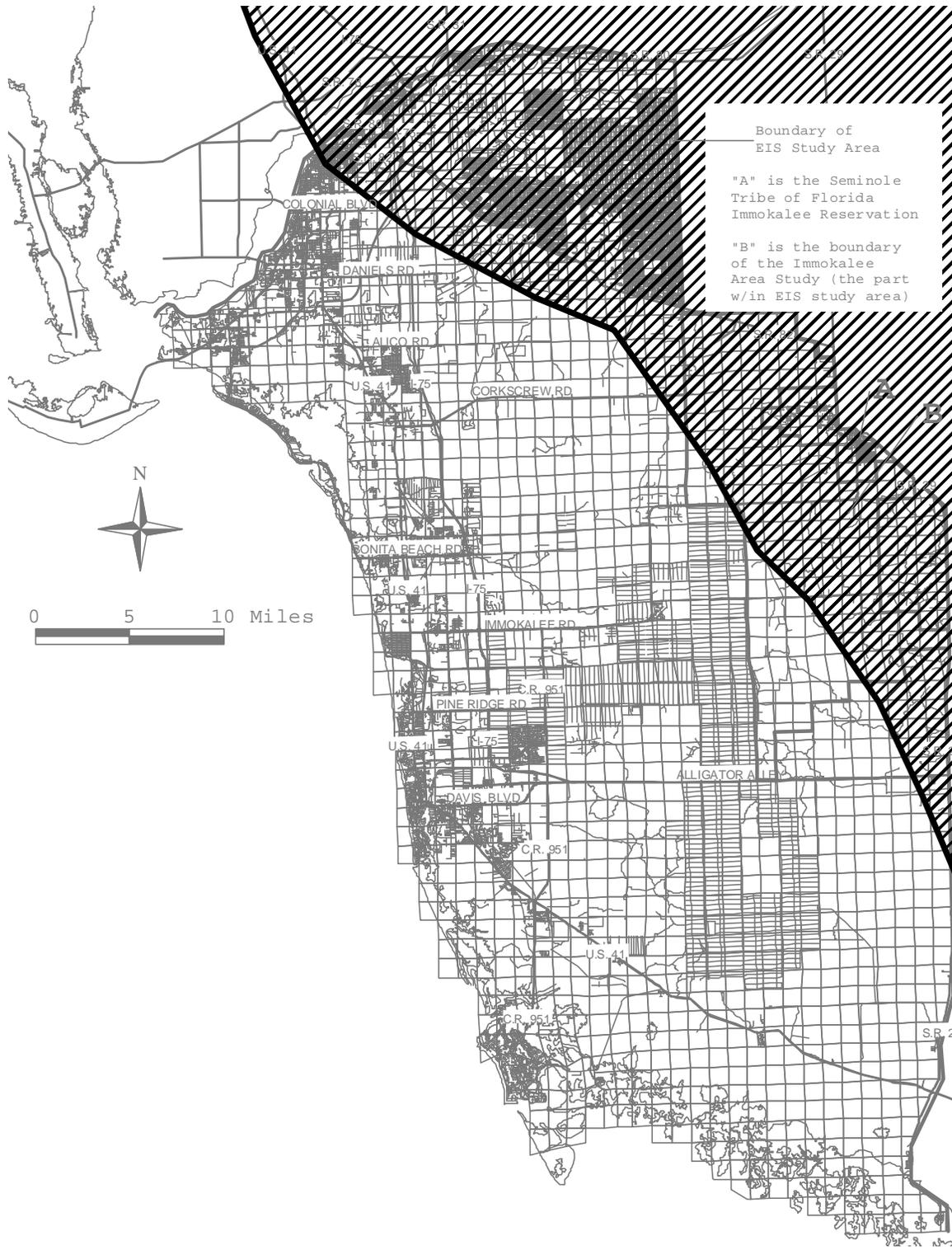


Figure 2. Audubon's crested caracara consultation area

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### 10. Bald eagle.

a. Bald eagle population was decimated in the 19th and early 20th centuries by habitat destruction, hunting, pesticide use and lead poisoning. Twenty-six active nests are recorded in the study area as of the 1996 winter census. Some of the nests will have future development occurring near them.

b. The project manager will use the draft local operating procedure, Attachment C of this enclosure. The first step of the procedure is to screen for the presence of nests and of suitable habitat. For nests, the black squares shown on Figure 3 encompass the known locations of nests as reported by the Florida Fish and Wildlife Conservation Commission's Eagle Nest Locator for the 2002 nesting season survey. This is provided for information purposes. The locator enables searches by project location. The web address is:

<http://www.wildflorida.org/eagle/eaglenests/default.asp>

Suitable habitat is described as forest canopy within 3 kilometers of open water (includes borrow pits, lakes, rivers, and large canals.) There is potential that cell, radio, television and power transmission towers will be used for nests. Due to the large quantity of forested areas, a screening map was not prepared since it would not be meaningful because data is not refined enough to attempt to identify locations with taller trees, flyways, and other characteristics that may serve to predict nest locations.

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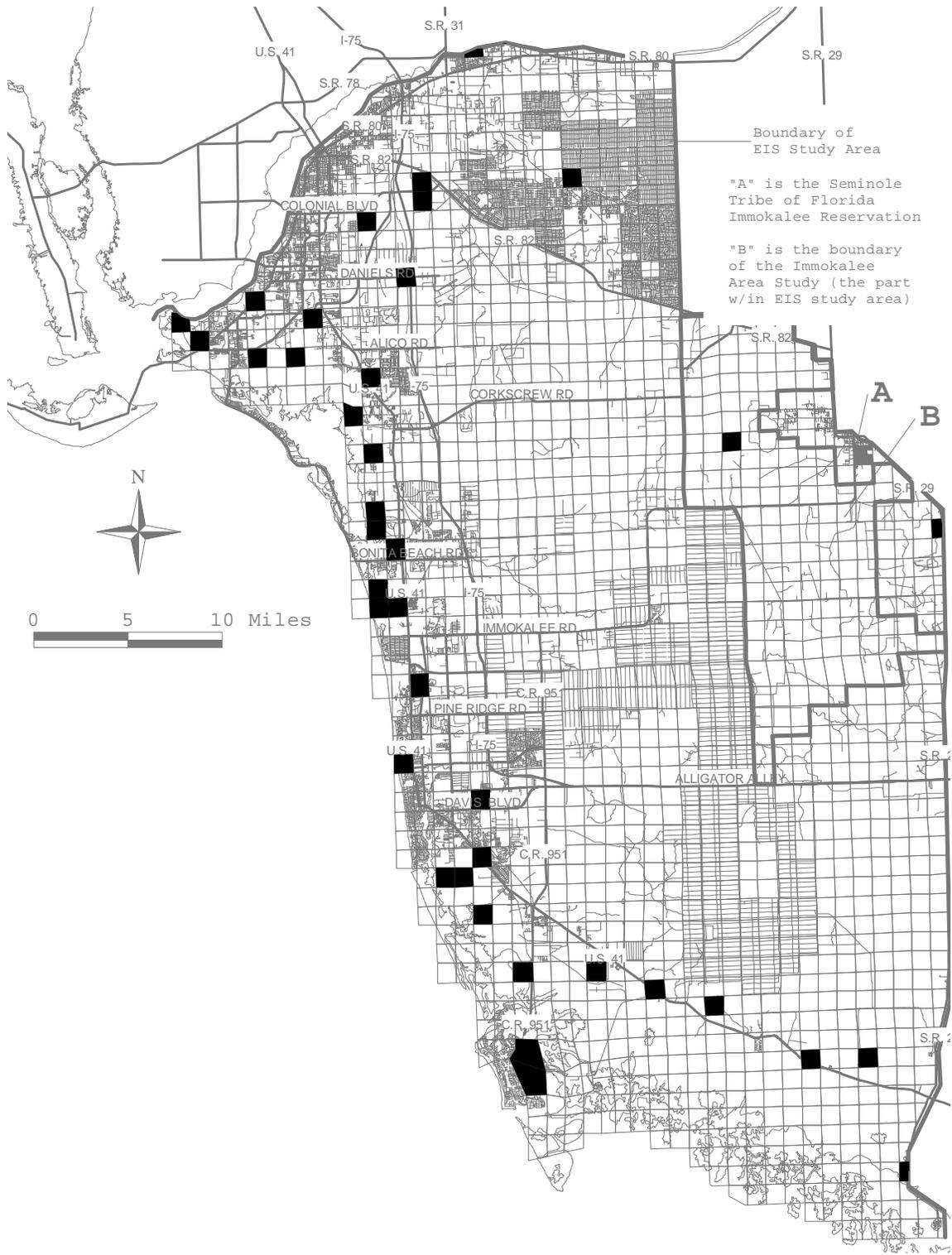


Figure 3. Bale eagle nest locations

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### 11. Flowways

a. The study area has many man-made changes to the historic flow patterns, including drainage canals, roads that block historic sheet-flow, and berms. Many ideas have been developed in the past to retrofit structures or to restore areas. Wider flowways or preservation of wetlands in flowways are evaluated to be beneficial generally because these actions may reduce the potential for changes in flood depth, maintained historic flow patterns, and reduced reliance on structural water management solutions.

b. Project managers will evaluate alternatives that maintain, enhance, create, preserve or restore wetlands within the footprint of the slough of sufficient width for wet season flows. If a site has a canal, consider restoration of the original slough by partial blocking of the canal or other actions. Potential locations of flowways are shown on Figure 4. Within the study area, lands typically once drained to sloughs that eventually reached streams on the coast. Many sloughs have now been intercepted/converted to canals. Figure 4 is based on the assumption that potential locations of remaining natural flowways can be identified by the land-use mapping that was performed by the South Florida Water Management District. First, land uses identified as sloughs (560), inland sloughs (616), cypress (621), bottomland (615), and streams (510) were separated from the entire map. Then, where the individual polygons were either very small or not adjacent to others were eliminated. The remaining map was compared to the maps prepared by the ADG where flowway locations were annotated. Further refinement of the map was not performed since the areas mapped were sufficient to indicate potential flows and refinement of the actual boundary/centerline would need site-specific information that would be generated during the permit review.

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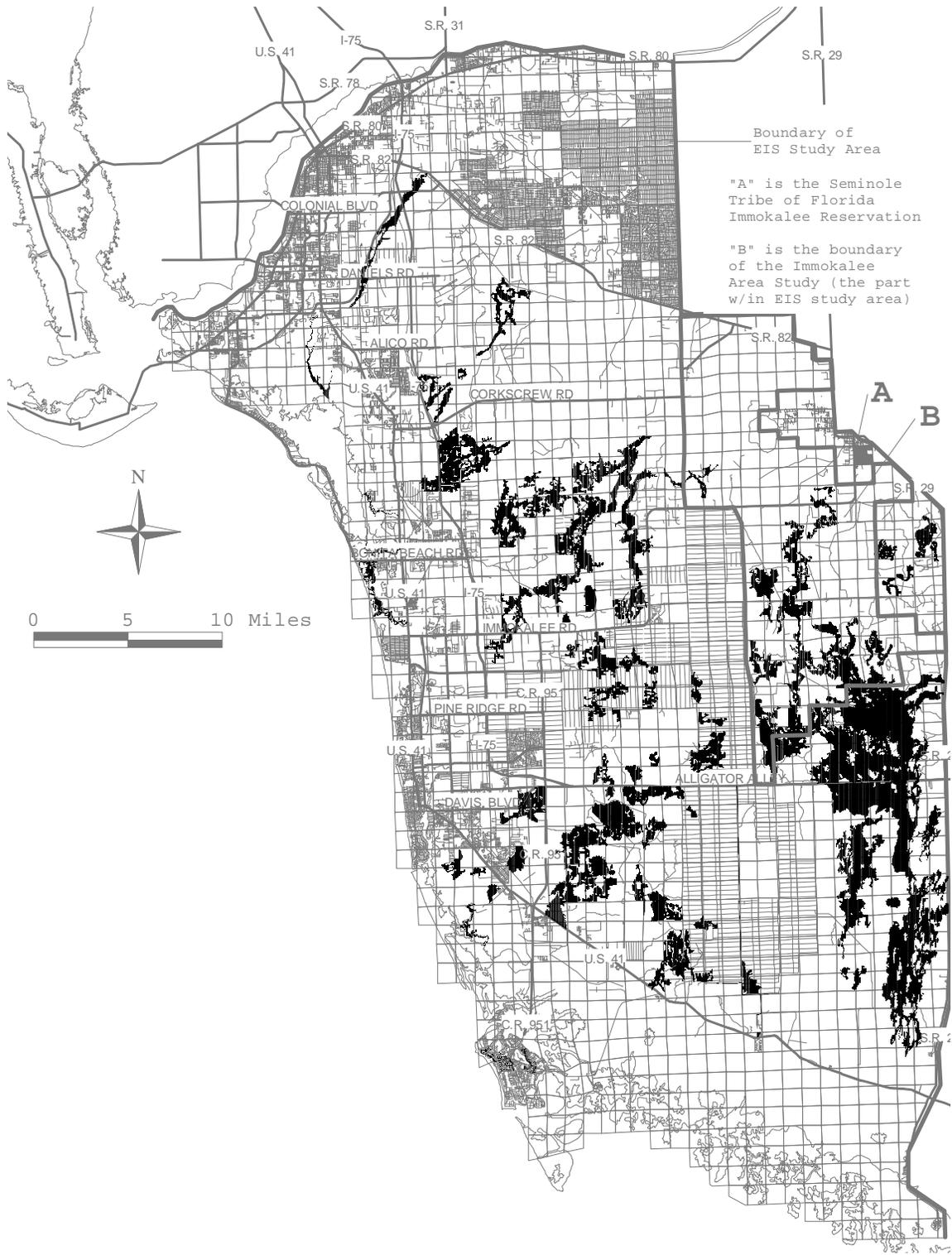


Figure 4. Flowways

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### 12. Habitat Fragmentation

a. The area still has a wide variety and large populations of wildlife. Suburban development has been expanding inland from the urban centers of Fort Myers, Bonita Springs, and Naples to meet with the build-out of Lehigh Acres and Golden Gate Estates. Large expanses of the historically characteristic pinelands are becoming more fragmented. Many species forage over large areas and require a mixture of vegetative communities for their life histories. Connections between the large islands of existing preserves are evaluated to be beneficial generally because they are considered to potentially retain a sustainable fabric of habitat.

b. Project managers will evaluate alternatives that maintain, enhance, create, preserve or restore native cover for the species expected to utilize the connection. Figure 5 shows areas of habitat connections. Within the study area, remaining natural habitat connections tend to follow the wetter lands. Figure 5 is based on the assumption that potential locations of remaining habitat connections can be identified as natural vegetated areas adjacent to those that were mapped as flowways. Therefore, areas were selected as those identified by the South Florida Water Management District land use mapping as either upland (400) or wetland (600) and adjacent to flowways shown in figure 4. Then, any adjacent natural areas less than 1,000 feet in width were eliminated. There has been a lot of discussion on appropriate wildlife corridor widths and for some species 2,000 feet would not be wide enough if there was high disturbance on either side. On the other hand, for some species, widths considerably less than 1,000 feet would be appropriate. The 1,000 foot is essentially a mid-range that also resulted in a map that showed the connections highlighted by the EIS. Further refinement of the map was not performed since the assessment of connection/fragmentation depends on the site-specific circumstances, including the nature of the project (disturbance level, etc.) and the extent of exotics or other such factors that would influence the wildlife use of the connection.

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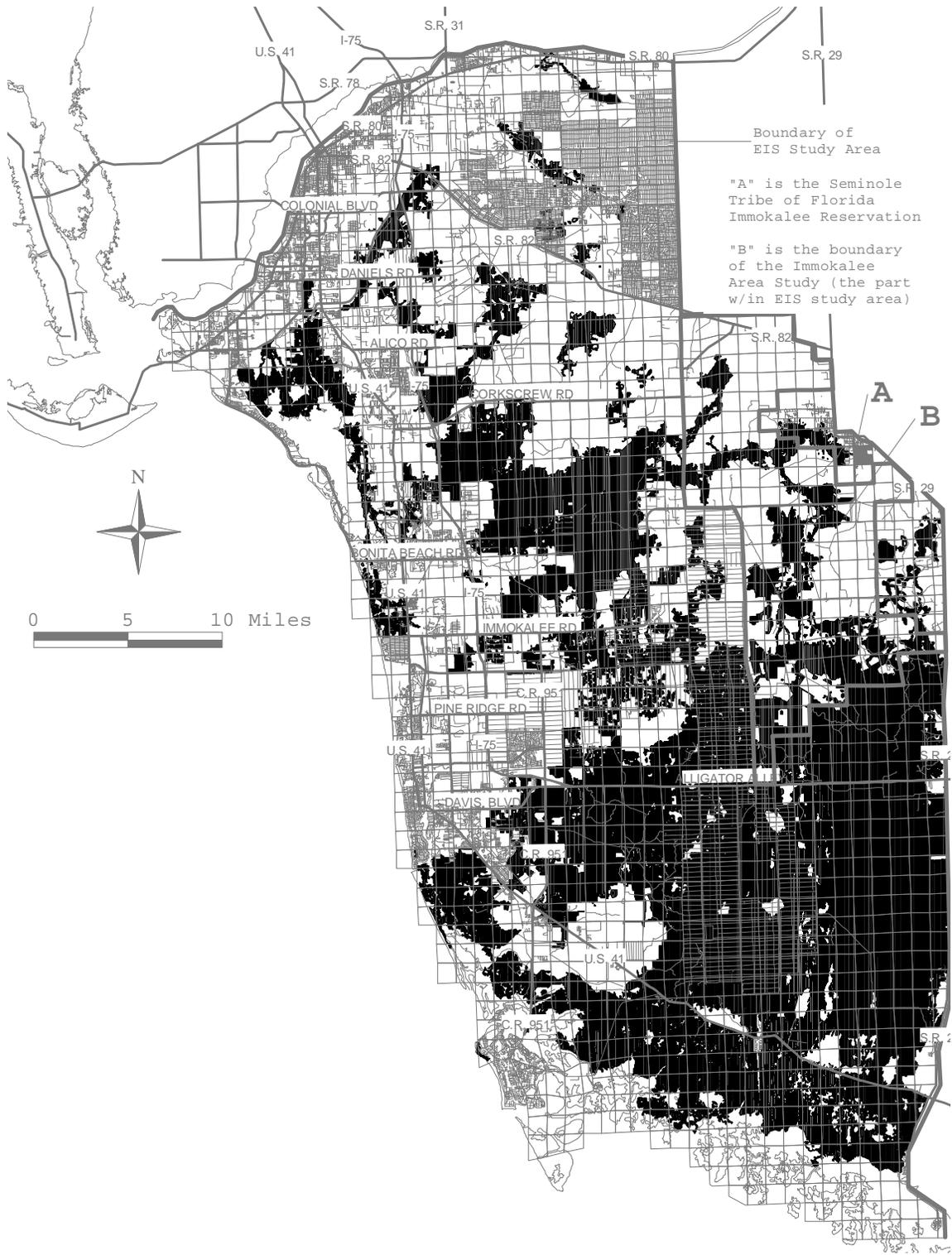


Figure 5. Fragmentation

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### 13. Marshes.

a. Description. Wetlands are foraging areas for a wide variety of wading birds, including the federally listed Wood Stork and Snail kite, and are depended upon by other species. Because of their small size and shallow depth, these have been the ones most affected by drainage, direct fill, or changes in surrounding landscape. Preserving natural plant types around these wetlands is evaluated to be beneficial generally because that would maintain sheetflow connections between individual marshes, provide clean water runoff to hydrate the marshes, and provide cover for species. A large percentage of these marshes are expected to be surrounded in the future by development.

b. The project manager will use the draft local operating procedure, Attachment D of this enclosure. The first step of the procedure is to screen for the presence of nests and of suitable habitat. For nests, almost the entire EIS study area falls within the Core Foraging Area (CFA) of one or more rookeries, figure 6. For information purposes, this figure also shows some of the major nesting areas within the EIS study area, though additional sites may have been recorded and may be found in any year. The CFA is a distance of 18.6 miles (30 km) from these sites. For habitat, figure 6 show areas mapped by the National Wetland Inventory (NWI) as Palustrine Emergent within the CFA. This shows how proportionally small is the area of shallow herbaceous marshes that provide the typical forage locations for this species. However, the Supplemental habitat management guidelines for the wood storks in the South Florida Ecological Services consultation area (U.S. Fish and Wildlife, South Florida Ecological Services Office, Vero Beach, FL. 2002) states "good feeding conditions usually occur where the water is relatively calm and uncluttered by dense thickets of aquatic vegetation and successful foraging sites are those where the water is between 2 and 15 inches deep." In addition to freshwater marshes, it adds shallow and seasonally flooded roadside or agricultural ditches, narrow tidal creeks or shallow tidal pools, managed impoundments, and depressions in cypress heads, swamps and sloughs. "During wet season wood storks generally feed in the shallow water of the short-hydroperiod wetlands and in coastal habitats during low tide. During the dry season, foraging shifts to longer hydroperiod interior wetlands as these progressively dry down." Nest initiation begins roughly at the start of the dry season concurrent with

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the concentration of fish from the dry-down. A recent Biological Opinion inventoried all "shallow wetlands with water depths of 2 to 15 inches" as suitable habitat (not just freshwater herbaceous.) While describing historic habitat loss, the Biological Opinion also listed "...habitat types known to be important foraging habitat..." cypress domes and strands, wet prairies, scrub cypress, freshwater marshes and sloughs, and sawgrass marshes. Of particular significance is any change to the hydroperiod (and thereby a change in the time of year forage fish would be concentrated).

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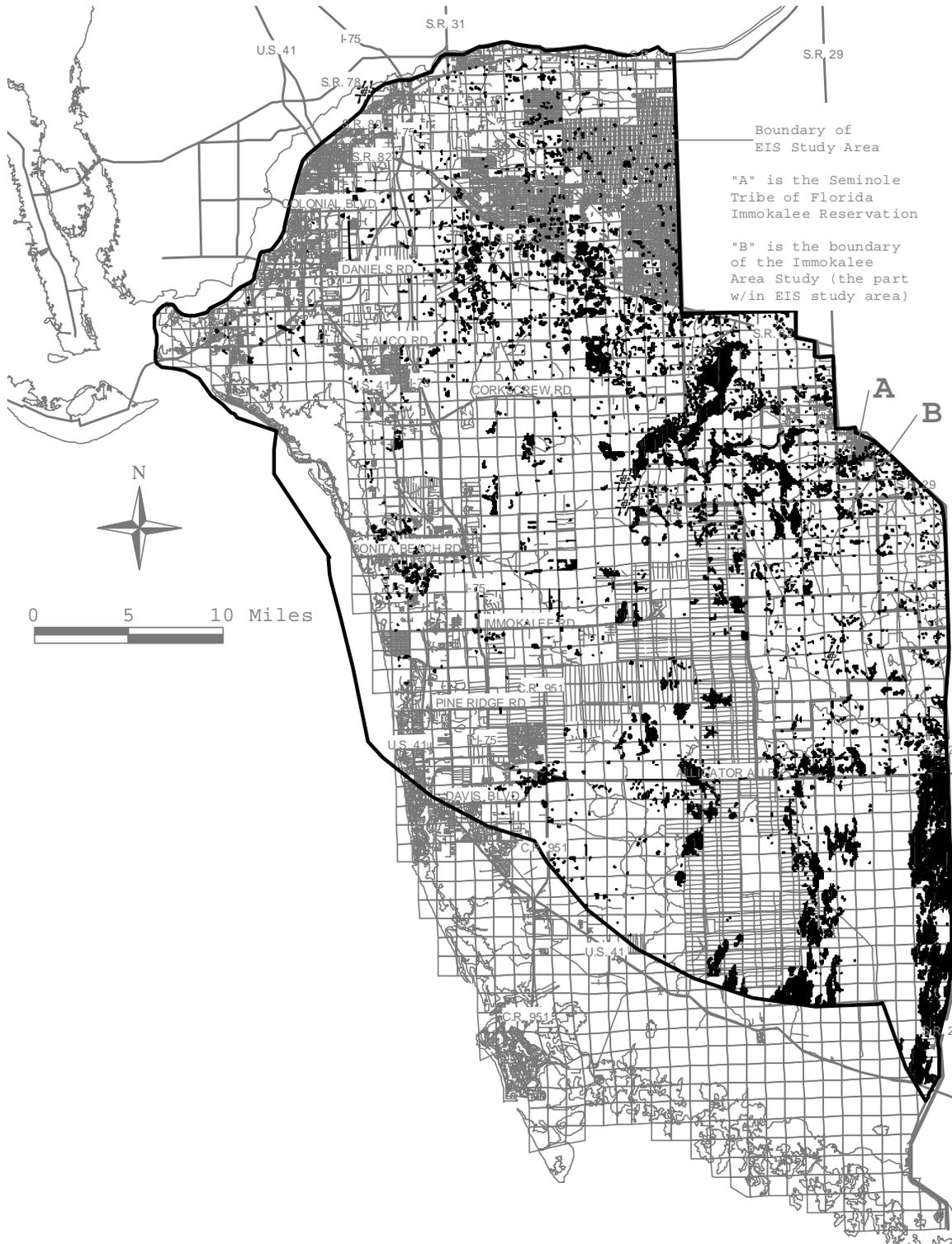


Figure 6. Wood stork Core Foraging Area

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### 14. Florida Panther.

a. This wide-ranging species primarily uses large areas of a mixture of upland and wetlands. Correlation of telemetry data from radio-collared panthers and plant cover plus other observations suggest preference for forested areas, including hardwood swamp, mixed hardwood swamp, cypress swamp, hardwood hammock, and pinelands. Panther will cross other lands that have low human presence to travel to other patches of forested cover. Also, prey are found at the edges of forested and range, prairie, and agricultural areas. One key need for the recovery of this species is to preserve and manage lands within as well as adjacent to existing preserves to provide a contiguous mix of natural vegetation types.

b. The project manager will use the interim local operating procedure, Attachment E of this enclosure. The first step of the procedure is to screen whether the project falls within the "Consultation Area" defined as those portions of nine counties where Florida panthers may be present. The entire map is found in Attachment D. The second step is to review all the effects of the proposed project on the panther. This review includes, among other things, the evaluation of the telemetry locations of radio-collared panthers and road-kills to determine if the project site itself or adjacent areas that are affected by the project are being used by the species. With or without telemetry, the review will consider whether the project site includes substantial patches of forested cover that are connected range, prairie, agricultural and other forested areas to areas of known panther home ranges, such as the Florida Panther NWR. Areas of residential or commercial development and major highways are generally considered to be avoided by panther due to human disturbance or lack of prey. Recent Biological Opinions on projects within the EIS study area have identified the "take" (as defined by the Endangered Species Act) to include natural vegetated lands (forested and unforested) and agriculture (pasture). The lands were those directly filled/built upon by the project as well as those affected by the project (for example, by isolating lands by building intervening residential development.) The acres affected are compared to the total area that is known to be occupied by the Florida panther (2.2 million acres, described by the report The Florida panther and Private Lands, Maehr, D.S., Conservation Biology Vol 4 No 2 June 1990.) Note that the species may be

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present outside of known areas (but not necessarily everywhere in the 4.96 million acre "Consultation Area.") On the "Consultation Area" map and in at least one recent Biological Opinion, references have been made to the Ecological Units defined by the Florida Panther Habitat Preservation Plan (HPP). For each Ecological Unit, the HPP also mapped lands adjacent to public preserves that "...considered essential to maintaining the Florida panther population..." and designated some as "Priority 1" and the remainder as "Priority 2". In situations where the loss of panther habitat has been determined to be unavoidable and the area of loss has been minimized to the maximum extent practicable, then the HPP mapping should be considered when evaluating locations when lands are being selected for preservation and restoration as compensation. For purposes of screening within the EIS study area, the various data sources mentioned above are overlaid in figure 7. The telemetry data is that available at the time of the preparation of the EIS document and does not include additional points recorded since that date.

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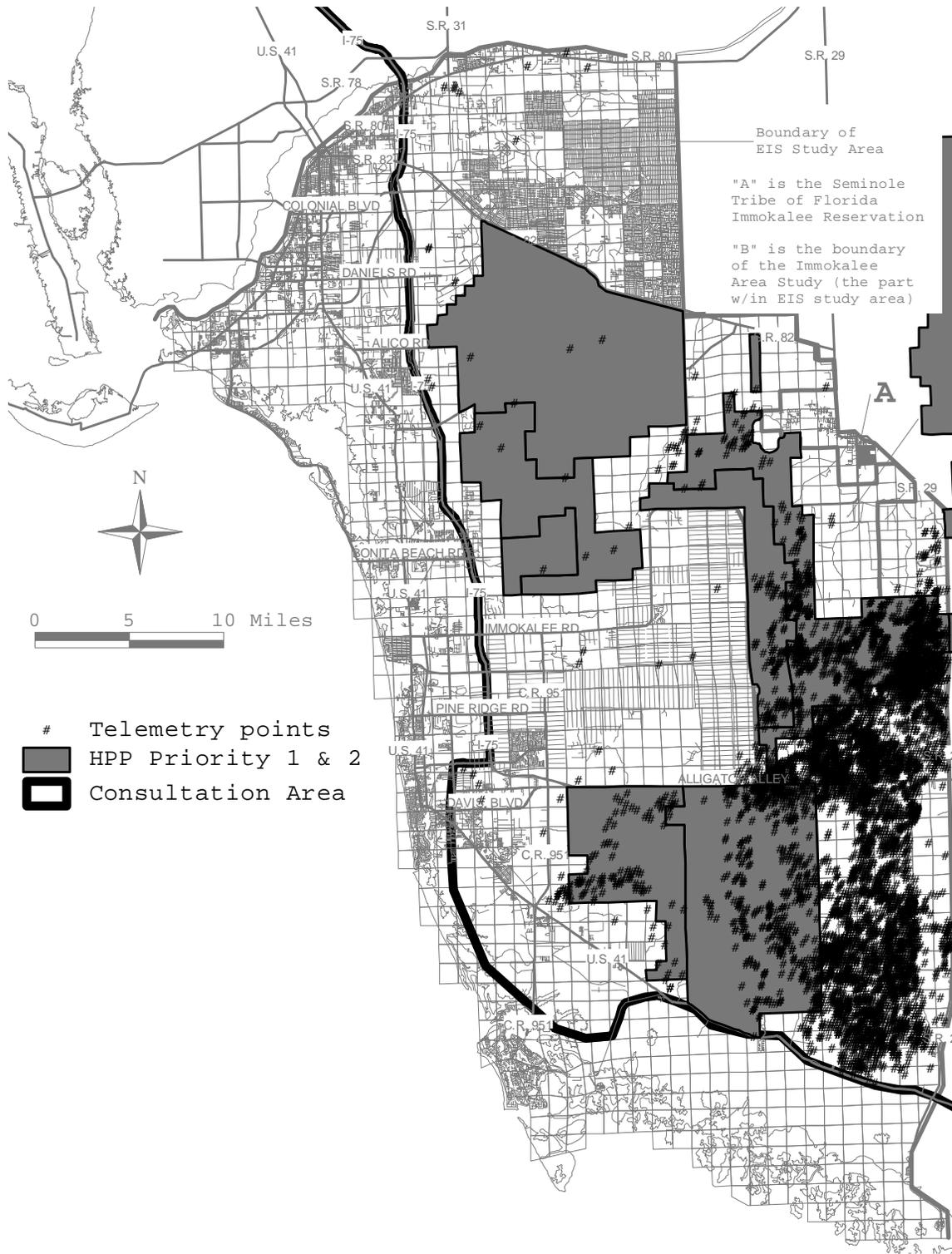


Figure 7. Florida panther maps.

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### 15. Shorebirds.

a. Shorebirds in general, and the federally listed Piping plover in particular, use beaches within the study area. While direct impacts to these beaches are unlikely, indirect effects may occur as a result of human disturbance (pets, noise, nuisance animals) and fill activities associated with increased coastal development.

b. A screening map has not been prepared since the presence of beaches will be obvious from the site-specific information in the application. The project manager will ask the applicant of the practicability to avoid disturbance along undeveloped beaches. For the Piping plover, in addition to the species information found in the EIS, the project manager will also screen the project location against the location of designated critical habitat, described at attachment F of this enclosure.

### 16. Red-cockaded woodpecker.

a. At the time of the preparation of the EIS, there were 40 known groups of this species in the study area. Not all habitat has been surveyed so others may exist. Pinelands with mature pine trees, open midstory and regular burns are preferred colony and foraging habitat areas but this species will also forage in other pine forested areas. The U.S. Fish and Wildlife Service considers the average foraging territory in southern Florida to be approximately 500 acres or 1/2 mile radius around the center of a nesting cluster. Dispersal into other suitable habitat has been described to vary from approximately 2 miles (frequent) to 7 miles (infrequent).

b. The project manager will use the draft local operating procedure, Attachment G of this enclosure. The first step of the procedure is to screen for the occurrences of this species and of suitable habitat. Suitable habitat is described as any forested community that includes pines in the canopy. It does not include any forested areas smaller than 10 acres and separated from larger continuous stands by a tree-less habitat greater than 300 feet in width, although south Florida populations have been observed crossing areas much larger (300 to 500 feet). Figure 8 encompass known locations of clusters along with additional areas within which suitable habitat may be

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found that is within dispersal distance. A more refined map has not been prepared due to the desire to not disclose the locations of known colonies and a map of potential habitat would not be meaningful because of the immense amount of forested cover that has some pine in within the EIS study area.

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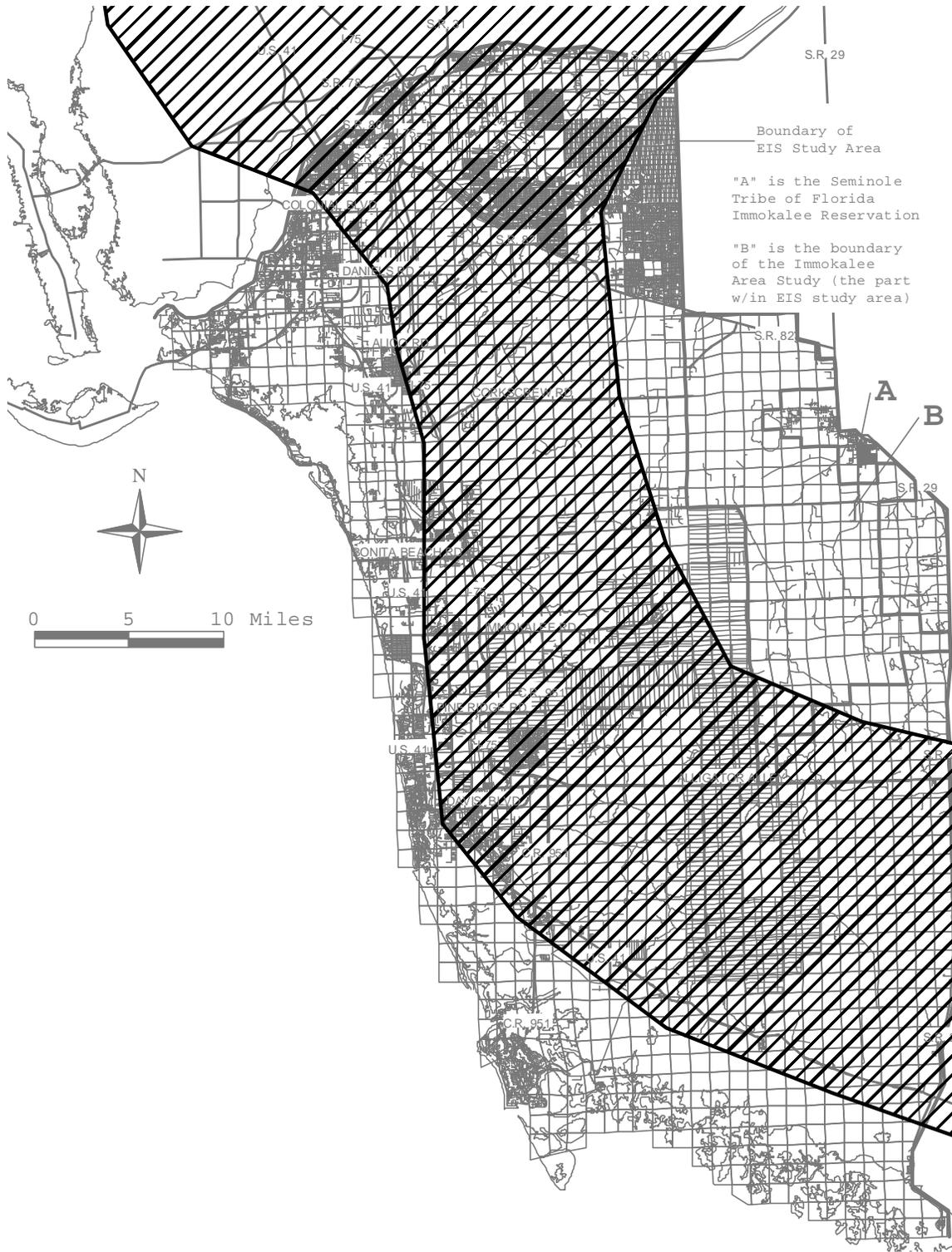


Figure 8. Red-cockaded woodpecker consultation area

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### 17. Florida scrub jay.

a. This species has very narrow habitat requirements, being endemic to Florida' relic dune ecosystems and scrub. Scrub habitats are considered to be among the most threatened natural systems. There were 26 known families of scrub-jays in the study area at the time the EIS was prepared. Not all habitat has been surveyed, so others may exist, although there is only a limited amount of remaining scrub habitat. Mean territory size is about 25 acres although the size may vary depending on group size and suitability of habitat.

b. The project manager will use the draft local operating procedure, Attachment H of this enclosure. The first step of the procedure is to screen for the presence of occupied territories and of suitable habitat. Suitable habitat is the scrub communities (xeric oak scrub, scrubby pine flatwoods, scrubby coastal strand and sand pine scrub) and also areas that include improved, unimproved and woodland pastures; citrus groves; rangeland; pine flatwoods; longleaf pine xeric oak; sand pine; sand pine plantations; forest regeneration areas; sand (other than beaches); disturbed rural lands in transition; disturbed burned areas; and areas with the presence of scrub oaks, no matter how sparsely distributed. A screening map of potential habitat locations has not been prepared because the available vegetation cover mapping available is based on interpretation of aerial photography, from which is difficult to reliably differentiate small patches (average territory size is 25 acres) of scrub habitat from other cover types. For information purposes, figure 9 shows metapopulations within the EIS study area derived from an analysis the U.S. Fish and Wildlife performed as part of its memorandum "Guidance for assessing mitigation needs for the Florida scrub jay" and for the Multi-Species Recovery Plan. These are locations that have several scrub jay families. The shaded areas represent a buffer around those locations. There have been other families found within the study area outside these mapped areas.

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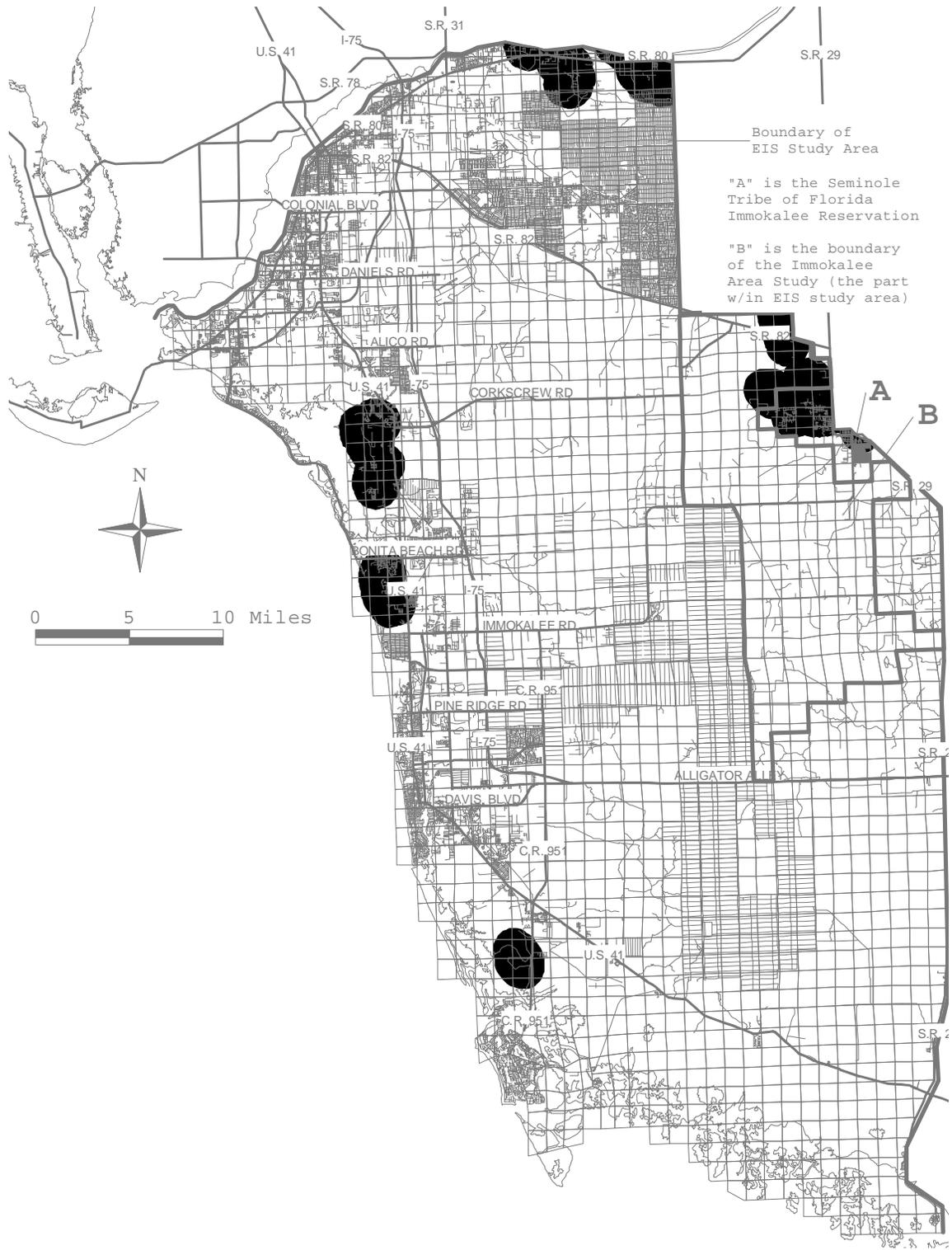


Figure 9. Florida scrub jay meta-populations.

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### 18. Water Quality.

a. The EIS included two analyses of the watersheds within the study area. The first analysis used actual sampling data collected from the past 30 years to develop a trend analysis based on the calculation of an Index of Water Quality (IWQ) for each of the three decades. This reported an overall degradation of water quality in all of the ten basins for which sufficient data was available. The second analysis used land cover maps and runoff rates to estimate an IWQ for both the current landscape and two potential futures (20 years.) This analysis reported potential degradation in all of the basins. A further comparison of the results from the two futures indicates that a reduction in acres of development or the implementation of more effective BMPs could reduce the degree of water quality degradation.

b. The Corps and EPA have a concern that in some cases increased loading as a result of placement of fill authorized by Section 404 permits could contribute to degradation of receiving waters. 40 CFR 230.10(c) states "...no discharge of dredged or fill material shall be permitted which will cause or contribute to significant degradation of waters of the United States." This is one of four restrictions found in the guidelines issued under Section 404(b)(1) of the Clean Water Act. This concern is based on: (1) the pollutant removal limitations of Stormwater Management Systems (SMS) authorized by State permits; and (2) the potential deleterious impacts that direct and cumulative pollutant discharges will have on sensitive aquatic resources in this region.

c. To date, EPA has notified the Corps of this concern through individual letters in response to the Corps public notices of permit applications. This is in accordance with the procedural requirement in the regulations for evaluating permit applications. Specifically, 33 CFR 320.4(d) states the Corps' policy to be that the State certification of compliance under the provisions of Section 401 will be considered conclusive with respect to water quality unless the Regional Administrator, EPA, advises of other water quality aspects of be taken into consideration. The Corps, EPA, FDEP, and the State's Water Management Districts are coordinating efforts to address water quality impacts associated with Sections 404 and 401 permitting.

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d. In the interim, for projects identified by the EPA, the Project Manager will request of the applicant an analysis of the water quality loadings for the pre-project and post-project condition. A project where the post-quantity is equal to the pre-quantity would be considered less likely to cause or contribute to significant degradation of water quality. The EPA will identify the water quality constituent on which to perform the analysis. There is no restriction on the level of detail for the analysis. Among others, both the areal and the concentration methods have been used, these described in "Stormwater Loading Rate Parameters for Central and South Florida" Dr. Harvey H. Harper, Environmental Research & Design, Inc., Orlando FL, 1994. That publication also provides tables of various water quality parameters needed for the analysis, the tables based on field work in Central and Southern Florida. The same author also has provided information on stormwater management system pollution removal efficiencies in the 1995 report "Pollution Removal Efficiencies for Typical Stormwater Systems for Florida." The author has prepared for the Water Enhancement and Restoration Coalition, Inc. (WERC), an analysis methodology that has been tailored to the EIS study area, "Evaluation of Alternative Stormwater Regulations for Southwest Florida, Draft Final Report", March 2003. At the presentation of this report on April 30, 2003, to representatives of WERC, EPA, SFWMD, DEP and the Corps, there was general acceptance of the method with suggestions for minor revisions of the document.

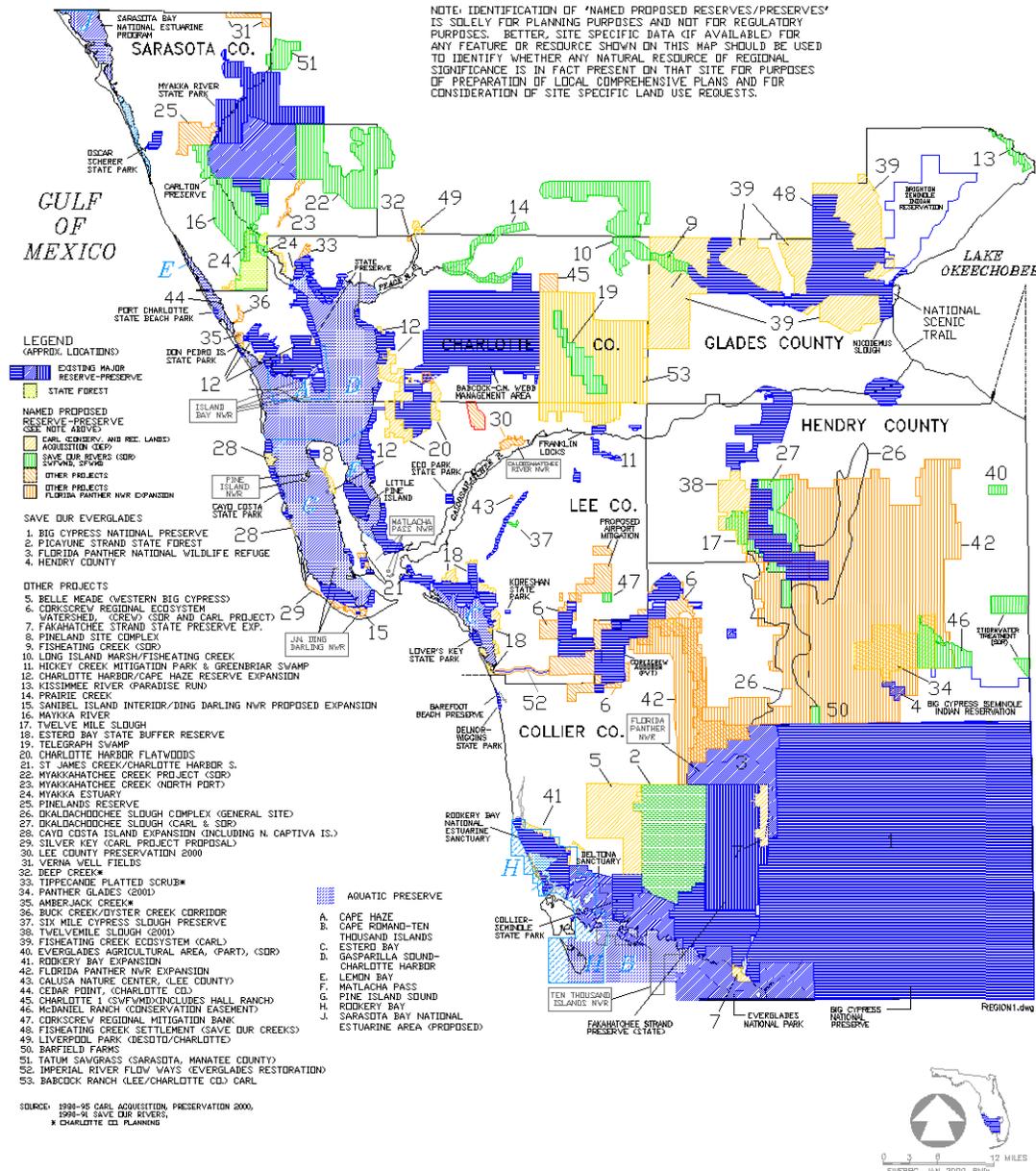
### 19. Regionally Significant Natural Resources.

a. The Southwest Florida Regional Planning Council (SWFRPC) periodically updates its map, figure 10, showing lands currently owned by government agencies or non-government organizations that are managed for natural resource values. The lands were typically acquired and managed for multiple other purposes, including recreation, protection of unique wildlife, water supply protection, or hunting. The map also shows some proposed expansions or additions to these lands. These often reflect some valued natural resource function, for example, a wildlife corridor. However, the designation/labeling of the land by itself does not give weight either for or against in the decision whether to issue a permit.

b. For projects in the vicinity of an existing preserve, the Project Manager will assess whether the project affects the

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natural resources within the preserve. The SWFRPC map is used based on the assumption that it provides a regional perspective, reflects community input, and will be periodically updated. Its use here is solely to ensure Corps staff does not inadvertently overlook the relationship between an application and some locally-valued natural resource.



SOUTHWEST FLORIDA REGION  
 REGIONALLY SIGNIFICANT NATURAL RESOURCES  
 Figure 10.