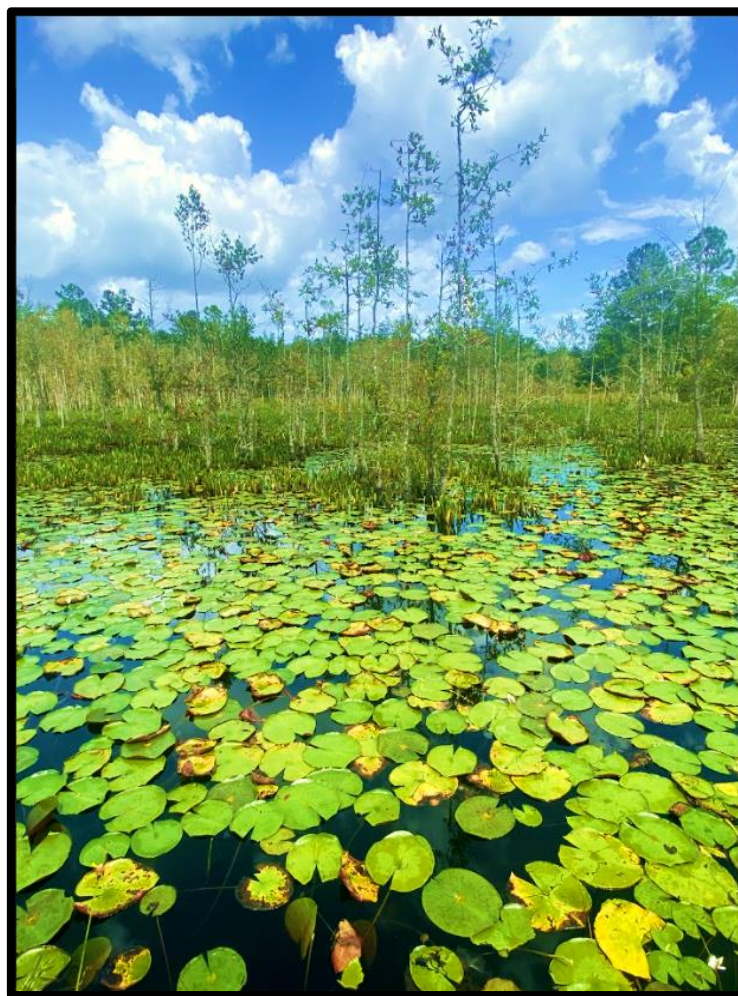


WETLAND PROGRAM PLAN FOR POARCH BAND OF CREEK INDIANS



January 2022 – December 2025



**Poarch Band of Creek Indians
Environmental Department**

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Introduction

The Poarch Band of Creek Indians (PBCI) is located in south Alabama, eight miles northwest of Atmore, AL and 50 miles northeast of Mobile, AL. The reservation is split into two watersheds, the Perdido River and Escambia River watersheds. Both rivers empty into the Gulf of Mexico, which is about 60 miles south of the tribe. Springs from the northern end of the reservation flow down into Perdido Creek and eventually into Perdido River, which forms the north-south border line for the states of Alabama and Florida. The tribe as the head of the Perdido River is recognized in the name of one of the four traditional hamlets of the community, Hedapeada. East of the tribe's central roadway, the water flows into Sizemore Creek eventually into the Escambia River. The tribe is only about 20-30 miles east of the Mobile-Tensaw River Delta, the second largest delta in the contiguous United States.

Poarch Creek reservation boundaries are relatively small. About 440 acres are in trust status with the US government for the benefit of the tribe. Of these total trust land holdings, about 300 acres are considered reservation property. PBCI additionally owns over 18,000 acres of non-contiguous parcels through Alabama and Florida, 99% of which are in Escambia County, Alabama. These lands are in fee simple status and are therefore subject to normal laws and taxation. Wetlands are a major component of the landscape. Dry upland areas are interspersed in a complex assemblage of both emergent and forested wetlands, including bottomland forests, bayhead swamps, and pitcher-plant bogs. Open water appears in the landscape through blackwater floodplains, streams, and manmade quarry ponds from gravel mining.

Muskogee (Creek) people were called the Creeks by Europeans because of their deep dependence on waterways for agriculture, transportation, spiritual cleansing and health. To this day, a historic baptismal hole is a revered cultural site on modern tribal land. Adjacent wetlands have always provided abundant resources, including medicinal plants like willow (*Salix sp.*), elderberry (*Sambucus canadensis*), milkwort (*Polygala sp.*), angelica (*Angelica sp.*), and buttonbush (*Cephalanthus occidentalis*). Up until modern times, traditional plant uses were preserved in the Poarch Creek community out of necessity because of discrimination from local doctors. Gathering mayhaw (*Crataegus aestivalis*) fruits from swamps to make jelly is still a beloved pastime. Wetland conservation gives tribal members the chance to nurture a culturally-enriching relationship with their local landscape. Preserving wetlands alongside waterways is critical for high water quality, because these wetlands provide buffer zones to mitigate against silt runoff from ever-present logging, mining, construction, and agricultural operations. Flooding is also a huge issue on reservation land, for which strategic wetland conservation can be one of the most effective ways to store and slowly release stormwater runoff.

Previous Wetland Activities

Zoological and Natural Community Surveys on the Magnolia Branch Wildlife Reserve (2007)

In 2007, PBCI paid the Alabama Natural Heritage Program to conduct ecological community surveys on

the tribe's newly purchased Magnolia Branch Wildlife Reserve (MBWR). MBWR was purchased in 2004 and at the time of the study covered about 4,709 acres along Big Escambia Creek in Escambia County, Alabama. Detailed fish and turtle surveys were conducted, along with an assessment for red-cockaded woodpecker habitat. According to this classification scheme, MBWR included wetland communities such as Bayhead Forests, East Gulf Coastal Plain Blackwater Levee Forests, East Gulf Coastal Plain Hardwood Seepage Forests, Steephead White Cedar Woodlands, Pitcher Plant Bogs/Seepage Slopes, and Quarry Areas. These communities were mapped out and detailed common plant assemblages for each were listed. Though this survey does not cover the entirety of tribal land or even any trust land, it provides a highly useful representative sample of the mosaic of plant communities in Escambia County as a whole.

Macroinvertebrate Bioassessment Training with Environmental Staff (2019; 2016)

In April of 2019, Chris Head, the Tribe's Environmental Protection Coordinator, and the EPA's Science and Ecosystem Support Division (SESD) collaborated to assess the health of Bell Creek on tribal property through aquatic macroinvertebrate sampling. SESD is a specialized unit of the EPA, which provides training and scientific support to the Tribe's Environmental Department. The Environmental Department relies on SESD's scientists for their expertise in multiple fields. SESD has provided assistance to the Environmental Department during fish tissue sampling, macroinvertebrate sampling, water sampling, and stream assessment. There is no report yet from the 2019 SESD visit, but there is a report with data from SESD's last visit in 2016, when they also sampled for macroinvertebrates. These professionally sourced bioassessments should continue in the future as they are relevant to both a water quality and wetland monitoring program.

In July of 2019, Sehoy Thrower, the Tribe's Environmental Protection Specialist, attended the Alabama Water Watch (AWW) workshop called, "An Educator's Guide to Alabama Rivers", which included a day's training on aquatic macroinvertebrates to assess water quality. The AWW created a methodology for data collection which meets EPA QAPP standards but is also basic enough to include youth in the process to make data collection a meaningful, educational experience. The Environmental Department has since purchased materials for putting this data collection and educational curriculum into practice for tribal youth and future biomonitoring.

Tribal Youth Conservation Corps Invasive Tree Survey (2017-2018)

The Tribal Youth Conservation Corps (TYCC) of the Cultural Department of PBCI is funded by the BIA through the RESTORE Act in order to rehabilitate native plants and eradicate invasive plants, as well as to conduct any educational outreach related to such restoration efforts. One activity conducted at times when herbicide could not be effectively used was surveying invasive trees with a GPS device. The three trees selected for surveys were popcorn tree/Chinese tallowtree (*Triadica sebifera*), chinaberry (*Melia azedarach*), and mimosa (*Albizia julibrissin*). Though Chinese privet (*Ligustrum sinense*) is a highly problematic invasive tree that needs to be managed properly, it is so pervasive that selective hack and squirt herbicide treatment based upon scattered survey data would not have been feasible. Of the trees surveyed on GPS, popcorn tree, or Chinese tallow tree (*Triadica sebifera*), proved to have a high

correlation with the distribution of wetlands. This data provides not only some perspective on current wetland boundaries but also on the scope of management concerns related to invasive woody plants of the tribe's wetlands.

Wetland Cell 319 Project (1991; 2020)

The wetland cells on reservation property were created in 1991 and designed as a 3-cell system, in cooperation with the Tribe, Tennessee Valley Authority, EPA, and NRCS. The first cell is a cement lined sediment basin, the second is connected by a culvert and is naturally vegetated, and the third is also connected by culvert and naturally vegetated. The cells allow outflow into a natural wetland down gradient. The purpose of the wetlands was to reduce contaminant inputs coming from the surrounding agricultural fields from entering Perdido Creek. The Tribe currently has a 319 Supplemental grant that will assist in rehabilitating the cells. The objective of the project is to create the capacity for a higher volume of water. The first cell will have the cement liner removed to allow for infiltration, the culverts from all three cells will be enlarged, and wetland vegetation will be planted in all three after the project is finished. The project should be finished by December 2020.

NRCS Delineations (2016) vs National Wetland Inventory (1981)

Aside from the Wetland Cell 319 Project used to help protect the integrity and health of a wetland, very little prior activities on behalf of PBCI have correlated to wetland management directly. Other listed activities only indirectly offered help for wetland analysis. The most relevant two sources of data directly dealing with wetland boundaries are 1) the National Wetland Inventory, conducted on a national level in 1981, and 2) delineated wetland boundaries on GIS, performed by the NRCS to cover all PBCI property owned up until 2016. The information from NRCS only provides boundary lines of wetlands based upon infrared color correction of aerial imagery and information from Web Soil Survey (WSS). This information does not contain notes on classification. This is why, until a further detailed delineation is performed, both the National Wetland Inventory and the NRCS delineation boundaries will be employed. The National Wetland Inventory may have outdated boundaries, but it has rich information on different classifications for each location. The National Wetland Inventory can be used for location details and classification, and the NRCS delineations can be used to better narrow down the modern boundary from 2016 data. Together, these data sources will inform preliminary assessments of PBCI wetland resources.

United South and Eastern Tribes (USET) Partnership

Since July of 2019, USET helped PBCI Environmental Department implement a basic tribal wetland program, by providing educational seminars, technical assistance, key contacts in other tribal wetland programs, and bi-weekly meetings to provide consistent Department entered into a partnership with USET to participate in a wetlands pilot study funded by EPA to help tribes develop a wetland monitoring and mapping baseline strategy. In partnership with USET staff, the EPS selected five wetland reference sites for starting a small-scale pilot monitoring and mapping project. A reference site was designated for each hydric plant community identified in the in the 2007 report, *Zoological and Natural Community*

Surveys on the Magnolia Branch Wildlife Reserve. These plant communities, based on U.S. National Vegetation Classifications, comprised of a Steephead White Cedar Woodland, East Gulf Coastal Plain Hardwood Seepage Forest, Bayhead Forest, and a Pitcher-Plant Bog. American Lotus Aquatic Wetland (i.e. lilypond) was not listed in the 2007 report, but it was included in this project at the request of Tribal elders. These wetland reference sites were mapped on ArcGIS along with several other layers of data sourced from several Federal Agencies, such as the US FWS National Wetland Inventory, NRCS Soil Survey Geographic Database, and EPA EnviroAtlas Potential Wetland Areas. In June, 2021, PBCI and USET staff started contractual training sessions with renowned regional botanists Al Schotz and Gena Todia to overview vegetative assessments, wetland rapid assessment procedures, and floristic quality index assessments until September 2021. WRAP Results, FQA results, and a draft for a local plant identification booklet were created for each wetland reference site.

Overall Goals and Time Frame

The PBCI Environmental Department will develop an effective wetland monitoring and assessment program and use that data to make sound policy decisions in regards to protecting and remediating wetland resources. Wetland conservation efforts will protect priceless resources for future generations, and wetland restoration efforts will bring habitat back to providing recreational or ecological services that were historically valued by the community. The timeframe for this Wetland Program Plan will be for four years, beginning in January 2022 and ending in December 2025.

This Wetlands Program Plan will follow the guidelines provided by the U.S. Environmental Protection Agency (EPA) Core Elements Framework (https://www.epa.gov/sites/default/files/2015-10/documents/2009_03_10_wetlands_initiative_cef_full.pdf). Four outputs are outlined in this Wetland Program Plan, and each output's project tasks correlate to at least one of the four core elements: 1) Monitoring and Assessment; 2) Regulation; 3) Voluntary Restoration and Protection; and 4) Water Quality Standards for Wetlands.

Output #1: Development of the PBCI wetland monitoring and assessment strategy to more effectively address at risk or vulnerable wetland ecosystems, resources, and priority species. This is intended to be completed as part of a WPDG workplan from January 2022 until December 2023.

Project Task (a): Ensuring scientific validity of monitoring and laboratory activities (e.g. QMP, QAPP, review of candidate indicators) (*Core Element #1, Objective #2*)

Project Task (b): Defining wetlands monitoring objectives, strategies, and benefits for long-term decision-making. (*Core Element #1, Objective #1*)

Project Task (c): Developing monitoring design that best serves monitoring objectives, strategy, and long-term vision. (*Core Element #1, Objective #1*)

Project Task (d): Monitoring wetland resources as specified in strategy. (*Core Element #1,*

Objective #2)

Project Task (e): Analyzing monitoring data to evaluate wetlands extent and condition/function or to inform long-term decision-making. *(Core Element #1, Objective #3)*

Output #2: Development of a report and mapped inventory of the ambient condition of wetland resources including traditionally important species, sites, etc. This is intended to be completed as part of a WPDG workplan from January 2022 until December 2023.

Project Task (a): Create primary baseline maps of wetland boundaries and their resources according to publically available data from various agencies and local input from the community. *(Core Element #1, Objectives #1-3)*

Project Task (b): Utilize contracted experts to complete a detailed, updated inventory and assessment of Tribal wetland boundaries and resources over the course of one year. *(Core Element #1, Objectives #1-3)*

Output #3: Tribal training and educational outreach materials for tribal wetland staff, tribal community, and other relevant partners and groups that may benefit from dissemination of knowledge and practices learned through a PBCI wetland program. This is intended to be completed as part of a WPDG workplan from January 2022 until December 2023, but it is considered an ongoing output after 2023 as well.

Project Task (a): Building trust and comprehensive understanding about wetland program development with community and leaders. *(Core Element #2, Objective #3)*

Project Task (b): Comprehensively reporting findings and meaningfully disseminating learned knowledge to relevant groups/people. *(Core Element #2, Objective #3)*

Project Task (c): Continuously seeking training to improve skills and knowledge of PBCI Wetland Program Staff. *(As relevant to all Core Elements)*

Output #4: Incorporate Wetland Program data into Tribal decision-making for regulatory or voluntary restoration activities for an overall watershed-based approach to Section 106/Wetland Program convergence. This output is intended to be addressed more directly after December 2023.

Project Task (a): Track Wetland Program development for long-term use of data in Tribal decision-making on behalf of community and leaders. *(Core Element #1, Objective #3; Core Element #4, Objective #2)*

Project Task (b): Provide clear and comprehensive jurisdictional coverage of aquatic resources and incorporate the watershed approach into the regulatory decision-making process. *(Core Element #1, Objective #3; Core Element #2, Objective #1)*

Project Task (c): Clearly define restoration and protection goals throughout tribal territory and consider watershed planning, wildlife habitat, and other objectives when selecting restoration/protection sites. *(Core Element #3, Objectives #1-5)*

Output #1: Development of the PBCI wetland monitoring and assessment strategy to more effectively address at risk or vulnerable wetland ecosystems, resources, and priority species.

Project Task (a): Ensuring scientific validity of monitoring and laboratory activities (e.g. QMP, QAPP, review of candidate indicators)								
Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>
Consultation with EPA on integrating Wetland Program and Section 106 program Quality Assurance documents	X							
Wetland Program Advisory Board meetings will help finalize details of Quality Assurance documents	X	X						
Submission and EPA-approval of completed Wetland Program Quality Assurance documentation		X						
Annual Quality Assurance updates/revisions				X		X		X
Project Task (b): Defining wetlands monitoring objectives, strategies, and benefits for long-term decision-making.								
Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>

[illegible]

Activity:								
	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>
<p>During and after EPA approval of PBCI Wetland Program QAPP/QMP, make purchases and arrangements to launch the monitoring and assessment program.</p> <ul style="list-style-type: none"> ○ Purchase equipment needed ○ Set up contractual partnerships (i.e. for lab testing) ○ Seek out training and certifications needed for staff to properly comply with the PBCI Wetland Program QAPP/QMP. ○ Perform any internal cross-training needed between supporting staff (i.e. EPS teaching Wetland Rapid Assessment Method) 		X						
Monitor wetland resources, as well as tracking and analyzing wetland data, as specified in established strategy.		X	X	X	X	X	X	X
Project Task (e): Analyzing monitoring data to evaluate wetlands extent and condition/function or to inform long-term decision-making.								
Activity:								
	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>

<p>EPS will submit Biannual Reports and Data Uploads to EPA.</p> <p>*Wetland Activities will be fully integrated into the Section 106 Program Reports no later than January 2024</p>			X	X	X*	X*	X*	X*
<p>EPS will submit final report to EPA which will be a detailed assessment of one year of wetland monitoring and a completed wetland inventory using WPDG funding.</p>					X			

Output #2: Development of a report and mapped inventory of the ambient condition of wetland boundaries and resources.

Project Task (a): Create primary baseline maps of wetland boundaries and their resources according to publically available data from various agencies and local input from the community.								
Activity:	Jan – Jun 2022	July – Dec 2022	Jan – Jun 2023	July – Dec 2023	Jan – Jun 2024	July – Dec 2024	Jan – Jun 2025	July – Dec 2025
Completion of baseline maps with publically available wetland data, existing Tribal data, and community input.	X	X						
Project Task (b): Utilize contracted experts to complete a detailed, updated inventory and assessment of Tribal wetland boundaries and resources over the course of one year.								
Activity:	Jan – Jun 2022	July – Dec 2022	Jan – Jun 2023	July – Dec 2023	Jan – Jun 2024	July – Dec 2024	Jan – Jun 2025	July – Dec 2025
Wetland Program Advisory Board meetings will help finalize details of methodology and objectives of a contractual project to complete a detailed inventory of wetland boundaries and resources of interest to PBCI (i.e., workplan outputs, scientifically defensible procedures for the wetland inventory project, etc.).	X	X						
PBCI staff will hire contractual employees to complete wetland inventory project.		X						

EPS will oversee and assist contractually hired employees as they update wetland boundaries, assess resources in the field, and create current maps for the updated inventory and accompanying report.		X	X	X				
A six-month progress report on the inventory project will be completed by contractors and submitted to the PBCI Environmental Department.			X					
Contractor(s) will submit a final report on the completed inventory project to the PBCI Environmental Department.				X				

Output #3: Tribal training and educational outreach materials for tribal wetland staff, tribal community, and other relevant partners and groups that may benefit from dissemination of knowledge and practices learned through a PBCI wetland program.

Project Task (a): Building trust and comprehensive understanding about wetland program development with community and leaders.								
Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>
Including but not limited to: <ul style="list-style-type: none"> ○ Newsletter articles and social media posts about program development ○ Communication with cultural figures in community on cultural resources to be protected; possible internal Tribal advisory board 	X	X	X	X	X	X	X	X
Project Task (b): Comprehensively reporting findings and meaningfully disseminating learned knowledge to relevant groups/people.								
Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>
Work with EPA to reinstate contractual partnership to continue an ongoing project for creating Plant Identification Booklets for the community for each type of wetland plant community. (Possibly add more community types to project: East Gulf Coastal Plain Blackwater Levee Forest, Longleaf Pine Sandhill, and/or Common Plants of Disturbed Areas)	X							
Monthly check-ins with contractor for Plant Identification Booklets, updating final drafts with pictures at different life cycle stages,	X	X	X					

adding species, key diagnostic information, etc.								
Final printing, distribution, and outreach of Plant Identification Booklets.				X				
Potential TFRST data system integration for community access of Wetland Program data		X	X	X	X	X	X	X
Willingness to presenting information and attend at: <ul style="list-style-type: none"> • Southeast Water Pollution Biologist Association (SWPBA) meetings • Association of State Wetland Managers(ASWM) meetings • Regional Wetlands/Section 401 Workshops • USET Wetland Program Meetings/Webinars 	X	X	X	X	X	X	X	X

Project Task (c): Continuously seeking training to improve skills and knowledge of PBCI Wetland Program Staff.

Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>
Including but not limited to webinars, online courses, certificates, and workshops.	X	X	X	X	X	X	X	X

Output #4: Incorporate Wetland Program data into Tribal decision-making for regulatory or voluntary restoration activities for an overall watershed-based approach to Section 106/Wetland Program convergence.

Project Task (a): Track Wetland Program development for long-term use of data in Tribal decision-making on behalf of community and leaders.								
Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>
Wetland Program Advisory Board meetings will help finalize details of: <ul style="list-style-type: none"> Objectives, strategies, and long-term benefits of Wetland Program (i.e., making Tribal management and prioritization of sites and resources as efficient as possible, etc.) A long-term schedule to evaluate monitoring program. 	X	X						
Ensure the assessment method is providing the necessary information and make changes as needed. Document in annual QAPP revision.				X		X		X
After a year or more of Wetland Monitoring and Assessment, hold internal Tribal discussions to discuss greater incorporation of the long-term benefits of the Wetland Program: <ul style="list-style-type: none"> Water Quality Standard Development in regards to Wetland Program Other wetlands program elements (e.g., restoration, regulation, water quality standards) Programs that will ultimately use monitoring data (e.g., track trends, 401 certification, restoration, permitting). 					X	X	X	X
Project Task (b): Provide clear and comprehensive jurisdictional coverage of aquatic resources and incorporate the watershed approach into the regulatory decision-making process.								
Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>

Delineate wetlands in a manner that is at least equivalent with the federal program.							X	X
Adopt definition of waters of the state or tribe at least as inclusive as CWA (S/T permit program does not need to be as comprehensive as CWA)					X	X		
Extend state/tribal jurisdiction to aquatic resources that are not "waters of the US" (e.g., isolated wetlands)							X	X
Base all water related regulatory programs within state/tribe on the same definition of waters of the State							X	X
Establish methods for determining cumulative impacts to aquatic resources within a watershed					X	X		
Evaluate cumulative impacts to aquatic resources within a watershed					X	X		
Use watershed plans to set priority areas for mitigation					X	X	X	X
Identify how wetland data can be used to implement watershed planning.					X	X	X	X
Project Task (c): Clearly define restoration and protection goals throughout tribal territory and consider watershed planning, wildlife habitat, and other objectives when selecting restoration/protection sites.								
Activity:	<i>Jan – Jun 2022</i>	<i>July – Dec 2022</i>	<i>Jan – Jun 2023</i>	<i>July – Dec 2023</i>	<i>Jan – Jun 2024</i>	<i>July – Dec 2024</i>	<i>Jan – Jun 2025</i>	<i>July – Dec 2025</i>
Gather information on wetland location, class, and condition/functions.	X	X	X	X	X	X	X	X

Identify rare, vulnerable, or important wetlands and prioritize for restoration/protection.		x	X	X	X	X	X	X
Apply tools (GIS, color-infrared photography, mapping, modeling, field inspection of soil, vegetation, and hydrologic conditions) to identify and prioritize restorable wetlands.		x	X	X	X	X	X	X