



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
PANAMA CITY REGULATORY OFFICE
1002 WEST 23rd STREET, SUITE 350
PANAMA CITY, FLORIDA 32405-3648

Regulatory Division
North Permits Branch
Panama City Regulatory Office
SAJ-2005-9182-RGP-TLZ

March 8, 2007

The St. Joe Company
Attn: Mr. Bill Cunningham
120 Beckrich Road, Suite 200
Panama City Beach, FL 32407

Dear Mr. Cunningham:

Your application for a Department of the Army permit received on 26 February 2007, has been assigned number SAJ-2006-9182-RGP-TLZ. A review of the information and drawings provided shows the proposed work is for the placement of fill in approximately 10.13 acre of low quality wetlands in association with construction of the Pier Park Road Extension. The project is located north of U.S. Highway 98 and east of Frank Brown Park, Panama City Beach, in Sections 7, 8 and 17, Township 3 South, Range 16 West, Bay County, Florida.

Your project, as depicted on the, enclosed drawings, is authorized by Regional General Permit (RGP) SAJ-86. This authorization is valid until the expiration date noted for RGP SAJ-86 listed in the table at our website. Please access the U.S. Army Corps of Engineers' Regulatory web address at http://www.saj.usace.army.mil/permit/permitting/general_permits.htm to view the special and general conditions for SAJ-86, which apply specifically to this authorization. To view the referenced conditions click on the permit number and the general condition column in the row corresponding to the SAJ number noted above. You must comply with all of the special and general conditions and any project specific condition of this authorization or you may be subject to enforcement action. The following special conditions are included with this authorization:

1. Prior to commencement of authorized construction, the permittee agrees to meet the following mitigation requirements as compensation for impacts to 10.13 acres of low quality wetlands: by preserving 6.36 acres of on-site low quality wetlands, debiting 6.58 credits from the Breakfast Point Mitigation Bank and preserving 35.71 acres of low-quality wetlands located off-site but within the sub-basin.

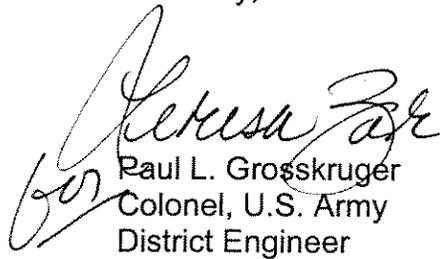
Generally, authorization of activities that have commenced or are under contract to commence in reliance of the RGP will remain in effect provided the activity is completed within 12 months of the date the RGP expires or is revoked. In the event you have not completed construction of your project within the specified time limit, a separate application or re-verification will likely be required.

This letter of authorization does not obviate the necessity to obtain any other Federal, State, or local permits, which may be required.

If you are unable to access the internet or require a hardcopy of any of the conditions, limitations, or expiration date for RGP SAJ-86, please contact Teresa Zar by telephone at 850-763-0717 ext 26.

Thank you for your cooperation with our permit program.

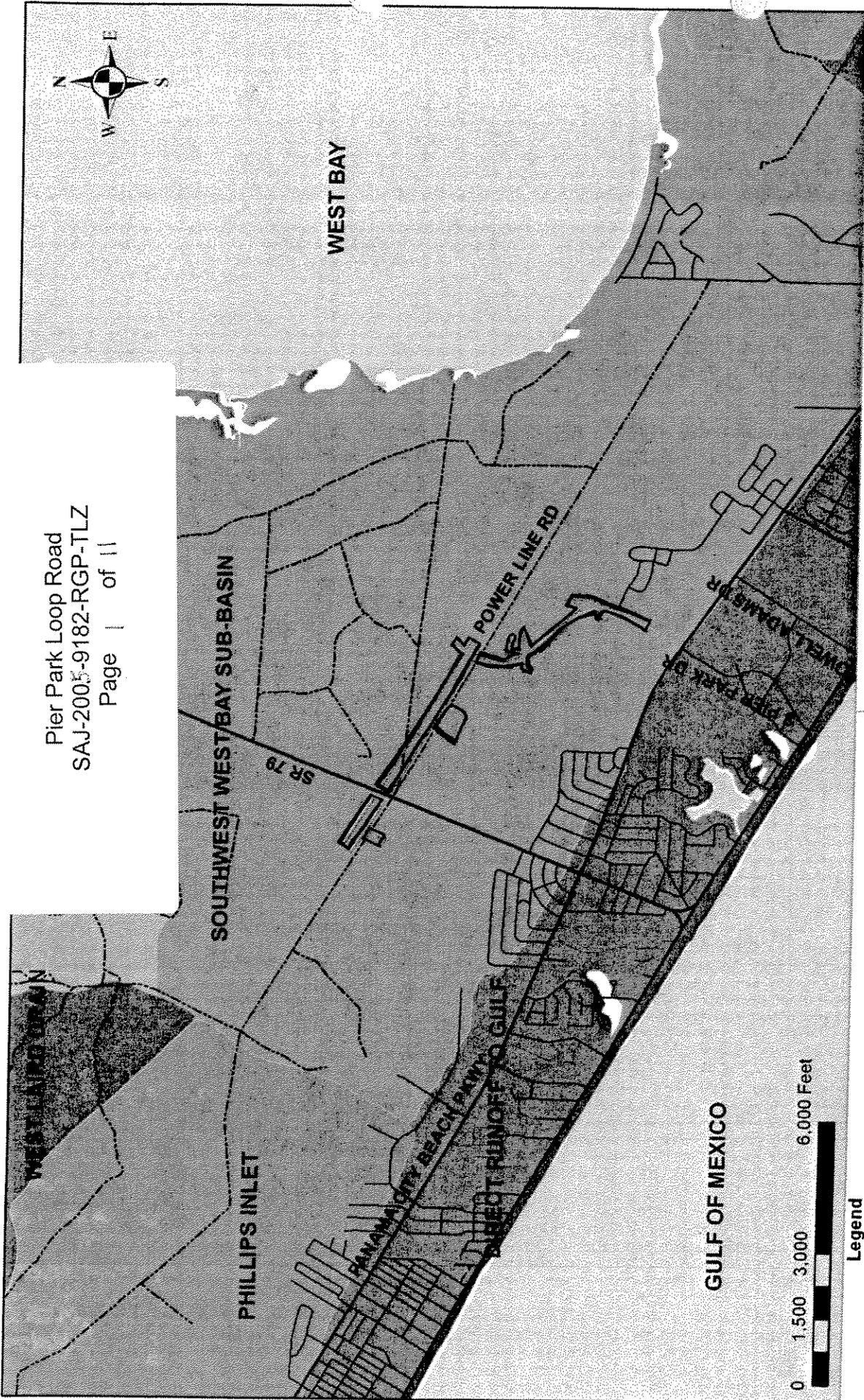
Sincerely,



Paul L. Grosskruger
Colonel, U.S. Army
District Engineer

Enclosures

Copies Furnished:
ERC, Inc.
FWS, Panama City
CESAJ-RD-PE

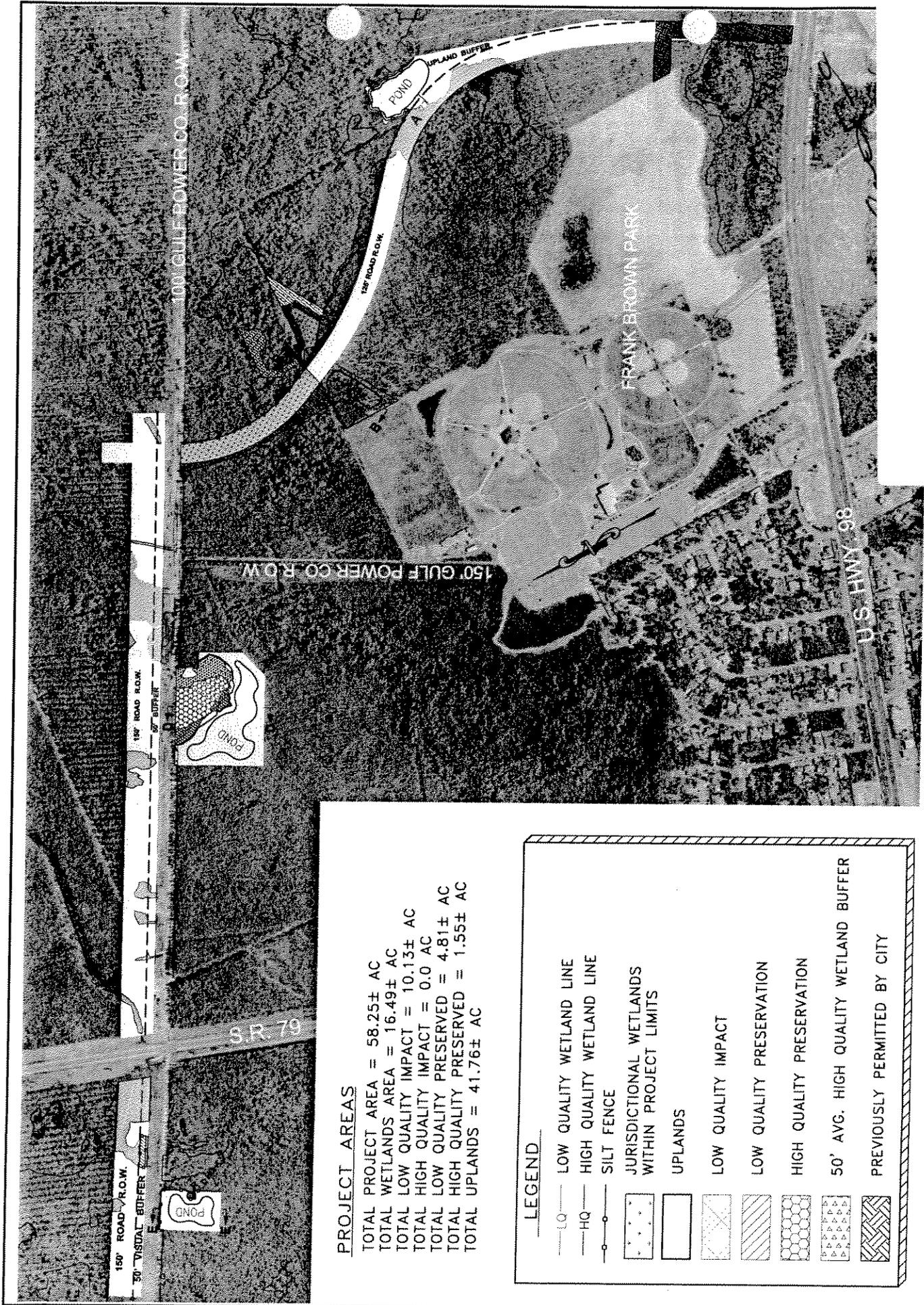


Legend

- Site Boundary
- BOTHERTON BAYOU
- DIRECT RUNOFF TO GULF
- HWY 98 SUB-BASIN
- PHILLIPS INLET
- SOUTH CREEK SUB-BASIN
- WEST CREEK SUB-BASIN
- WEST LAIRD DRAIN

**Pier Park Loop Road
 Sub-Basin Map**

erc Ecological Resource
 Consultants, Inc.



PROJECT AREAS

TOTAL PROJECT AREA = 58.25± AC
 TOTAL WETLANDS AREA = 16.49± AC
 TOTAL LOW QUALITY IMPACT = 10.13± AC
 TOTAL HIGH QUALITY IMPACT = 0.0 AC
 TOTAL LOW QUALITY PRESERVED = 4.81± AC
 TOTAL HIGH QUALITY PRESERVED = 1.55± AC
 TOTAL UPLANDS = 41.76± AC

LEGEND

- LO — LOW QUALITY WETLAND LINE
- HQ — HIGH QUALITY WETLAND LINE
- S — SILT FENCE
- J — JURISDICTIONAL WETLANDS WITHIN PROJECT LIMITS
- U — UPLANDS
- LQ — LOW QUALITY IMPACT
- LP — LOW QUALITY PRESERVATION
- HQ — HIGH QUALITY PRESERVATION
- 50' — 50' AVG. HIGH QUALITY WETLAND BUFFER
- P — PREVIOUSLY PERMITTED BY CITY

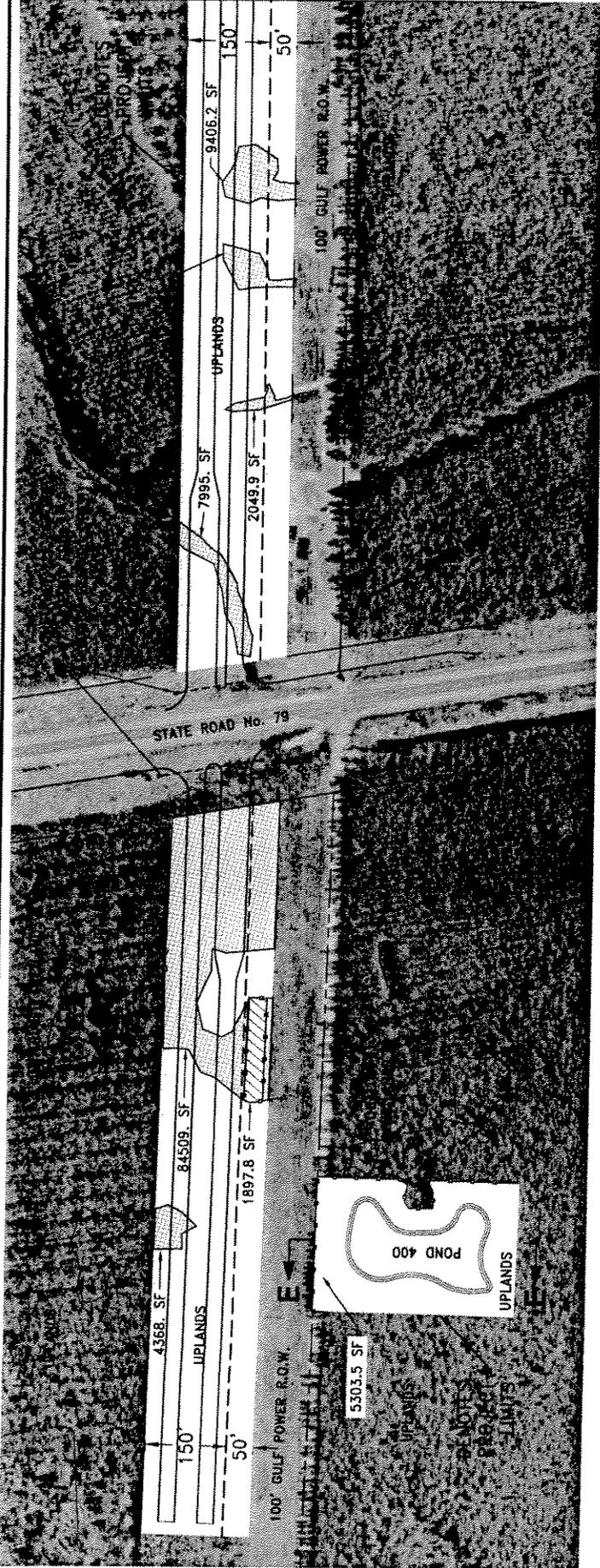


DATE	REVISED BY	CHECKED BY	DATE	NAME	DATE
			11/04	EMG	DESIGNED BY
			11/04	EMG	DRAWN BY
			11/04	CB	CHECKED BY
			11/04	CB	APPROVED BY
FILE: 98-008-001 N. DWG. 0122.DWG					



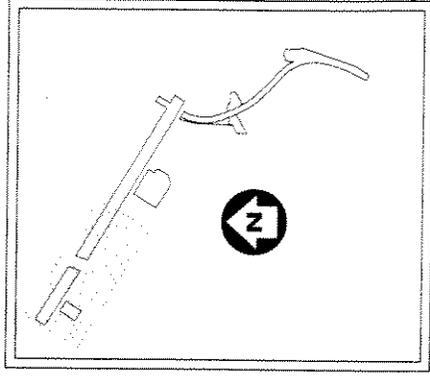
WARNING
 IF THIS MAP DOES NOT MEASURE 1/2" = 100' THE DOCUMENT IS NOT TO SCALE

MATCH LINE - SHEET 3



LEGEND

- LOW QUALITY WETLAND LINE
- HIGH QUALITY WETLAND LINE
- SILT FENCE
- JURISDICTIONAL WETLANDS WITHIN PROJECT LIMITS
- UPLANDS
- LOW QUALITY IMPACT
- LOW QUALITY PRESERVATION
- HIGH QUALITY PRESERVATION
- 50' AVG. HIGH QUALITY WETLAND BUFFER
- PREVIOUSLY PERMITTED BY CITY



PROJECT SITE MAP

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Pier Park Loop Road
SAJ-2005-9182-RGP-TLZ
Page 3 of 11

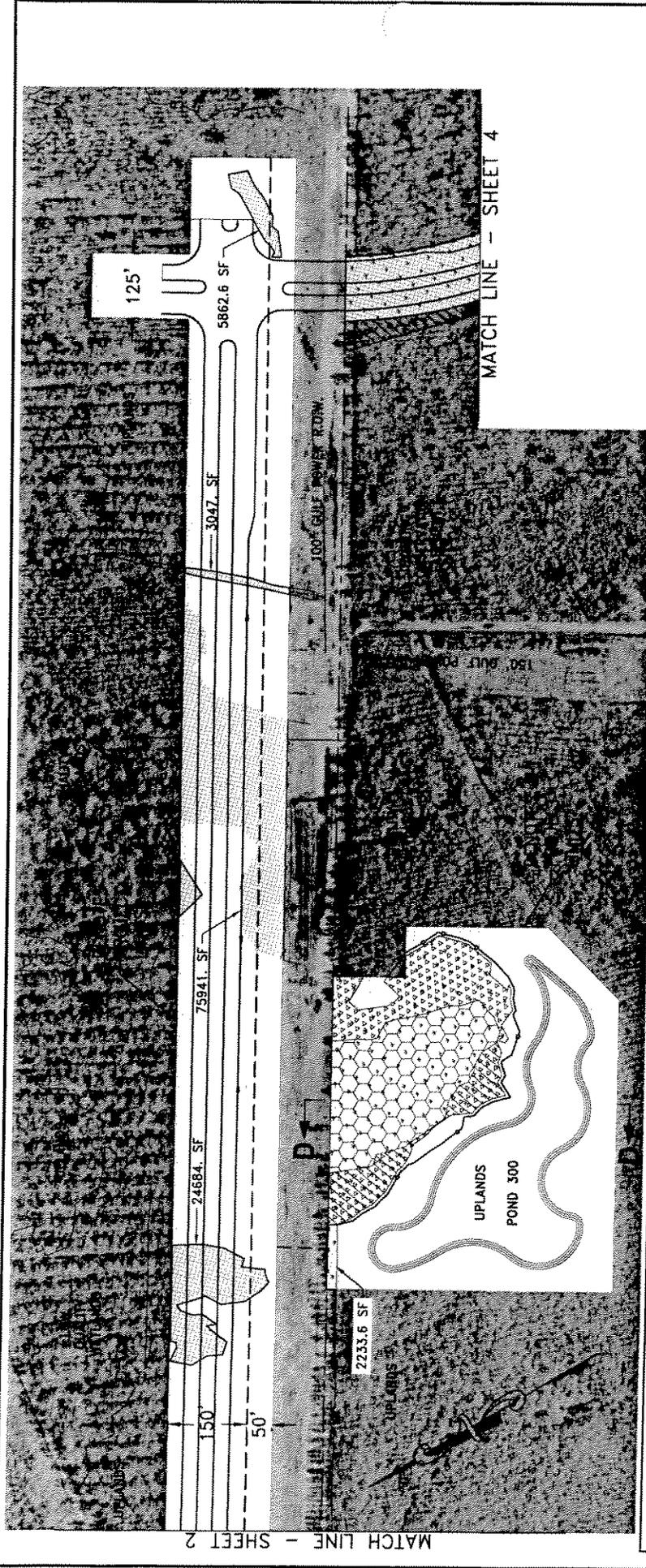
DRMP
ENGINEERS • SURVEYORS • PLANNERS • SCIENTISTS
Certificate of Authorization No. 26448
100 Beckwith Road, Suite 120 - Panama City Beach, Florida 32407

DATE	REVISIONS	REVIEWED BY	CHECKED BY

WARNING
IF THIS HAS BEEN
NOT MEASURED 1/2"
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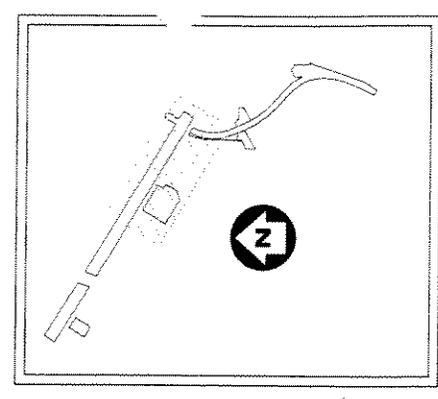
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DMB	11/04
DRAWN BY	DATE
INT	04/17
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APPROVED BY	DATE
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13,007.00
REVENUE TO STATE PROPRIETARY EDGE OF PAYMENT



LEGEND

- LO LOW QUALITY WETLAND LINE
- HQ HIGH QUALITY WETLAND LINE
- SILT FENCE
- JURISDICTIONAL WETLANDS WITHIN PROJECT LIMITS
- UPLANDS
- LOW QUALITY IMPACT
- LOW QUALITY PRESERVATION
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- 50' AVG. HIGH QUALITY WETLAND BUFFER
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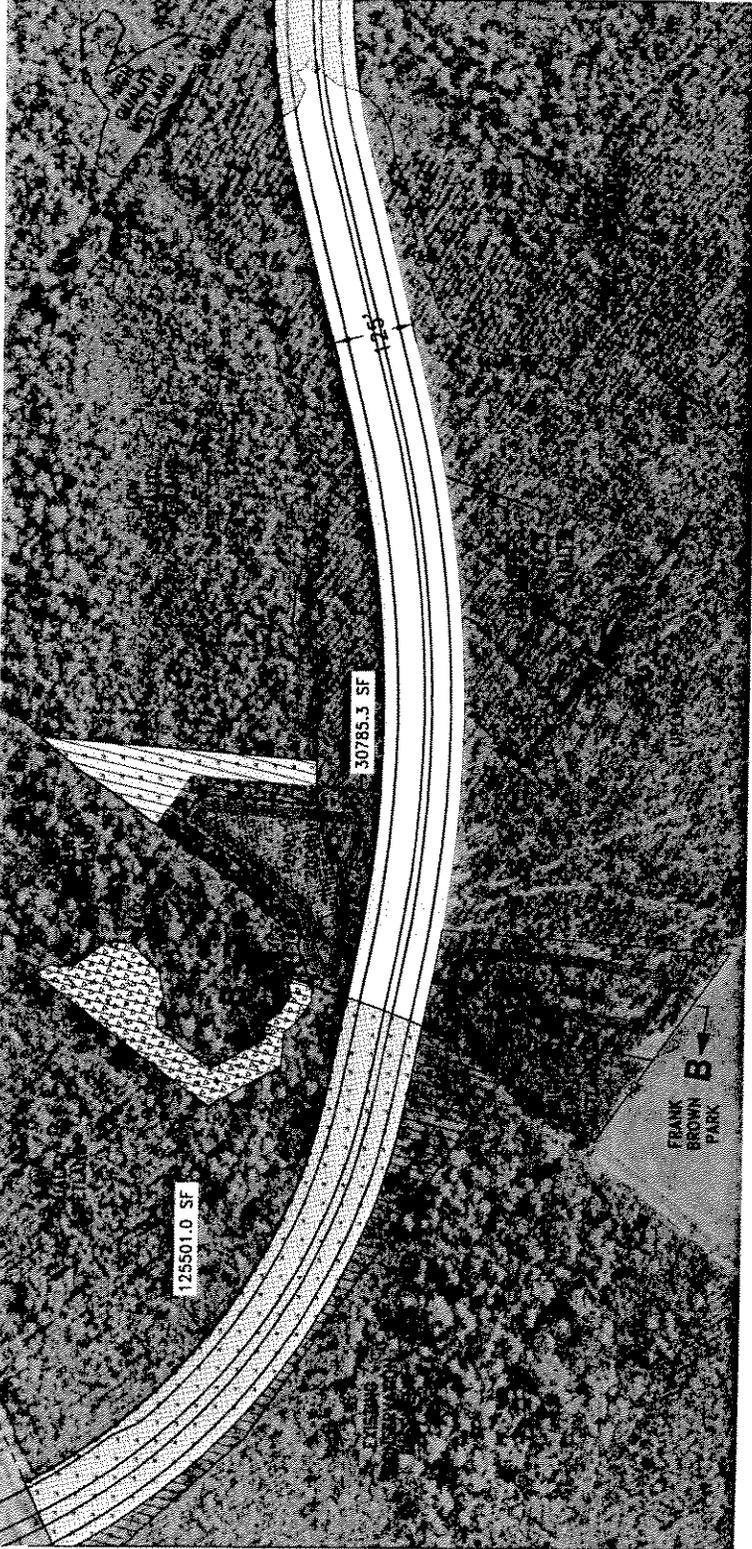
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DATE	NAME	DATE	DATE
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APPROVED BY	INT	04/77	

DRMP
 ENGINEERS - SURVEYORS - PLANNERS - SCIENTISTS
 Certificate of Authorization No. 2648
 100 Beckwith Road, Suite 120 - Panama City Beach, Florida 32407

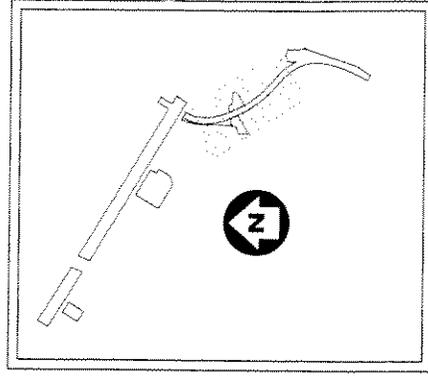
MATCH LINE - SHEET 5



MATCH LINE - SHEET 3

LEGEND

- LO LOW QUALITY WETLAND LINE
- HQ HIGH QUALITY WETLAND LINE
- SILT FENCE
- JURISDICTIONAL WETLANDS WITHIN PROJECT LIMITS
- UPLANDS
- LOW QUALITY IMPACT
- LOW QUALITY PRESERVATION
- HIGH QUALITY PRESERVATION
- 50' AVG. HIGH QUALITY WETLAND BUFFER
- PREVIOUSLY PERMITTED BY CITY



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DATE	REVISIONS									

NO.	DESCRIPTION	DATE	BY	CHECKED BY
1	DESIGNED BY	11/04	DMB	DMB
2	DRAWN BY	01/07	DMB	DMB
3	CHECKED BY	01/07	DMB	DMB
4	APPROVED BY	01/07	DMB	DMB

		DRMP ENGINEERS • SURVEYORS • PLANNERS • SCIENTISTS Certificate of Authorization No. 2648 100 Beckrob Road, Suite 120 - Panama City Beach, Florida 32407
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Compensatory Mitigation Plan for Pier Park Loop Road

I. Compensatory Mitigation Plan Summary: Pier Park Loop Road

II. Preservation of On-site Wetland Habitat: Pier Park Loop Road

A. Management Plan - Preservation of On-site Wetlands

1. Goals & Objectives
2. Site Location

B. Conservation Easement

III. Preservation of Off-site Wetland Habitat: Southwest West Bay Sub-basin

A. Management Plan - Preservation of Off-site Wetlands

1. Goals & Objectives
2. Site Location

B. Conservation Easement

IV. Restoration of Off-site Wetland Habitat: Breakfast Point Mitigation Bank (BPMB)

A. Management Plan – Restoration of Silviculture Degraded Wetland Systems

1. Goals & Objectives
2. Site Location

V. Preservation of Conservation Units

I. Compensatory Mitigation Plan Summary: Pier Park Loop Road

To satisfy terms of the Regional General Permit, SAJ-86 and the Ecosystem Management Agreement, compensation is made for the wetland impacts associated with the construction of the Pier Park Loop Road. A combination of on-site ecosystem preservation, off-site preservation, and off-site restoration is proposed. Off-site restoration is proposed at the Breakfast Point Mitigation Bank (BPMB). The BPMB restoration consists of restoration of silviculture impacted habitat to the historic native community. Since the proposed development impacts over 20% of low quality on-site wetlands, off-site preservation will be located north of the site and east of State Road 79 within the Southwest West Bay Sub-basin. A conservation easement will be placed on the on-site wetland preservation, off-site preservation area, and the off-site mitigation area with FDEP as the grantee. There are three areas designated as conservation units in the Southwest West Bay Sub-basin. The impact site encompasses approximately 1.88 % of developable area within the sub-basin, which will be offset by preserving 1.88 % of the conservation units within the sub-basin. The proposed total acreage of impact is 10.13 acres of FDEP and Corps regulated wetland habitat. The mitigation includes 6.36 acres of on-site preservation, an additional 35.71 acres of off-site wetland preservation, and 1.88% of the Southwest West Bay Sub-basin's conservation units. Off-site mitigation will be placed at the BPMB with 6.58 credits used.

II. Preservation of On-site Wetland Habitat: Pier Park Loop Road

A. Management Plan: Preservation of On-site Wetlands

- 1. Goals & Objectives:** 6.36 acres of on-site preservation is proposed. This area includes 4.81 acres of low quality wetlands and 1.55 acres of high quality wetlands. The on-site preservation is being proposed in order to demonstrate minimization and avoidance of on-site wetland impacts. In addition, preservation of the on-site wetland will eliminate the concern for potential cumulative impacts that could be associated with future development. The primary ecological benefits derived from the on-site preservation will be habitat for wildlife and water quality benefits.
- 2. Site Location:** The on-site areas proposed for preservation are located throughout the site. A specific location map is included in the dredge and fill exhibits.

B. Conservation Easement: The on-site wetland habitat proposed for preservation will be placed into a conservation easement with FDEP Board of Trustees as grantee that will be recorded in Bay County. Hence, the preservation site will be preserved in perpetuity.

III. Preservation of Off-site Wetland Habitat: Southwest West Bay Sub-basin

A. Management Plan: Preservation of Off-site Wetlands

- 1. Goals & Objectives:** As required by the 80/20 rule in the RGP and EMA, 35.71 acres of off-site preservation is needed. A total of 35.71 acres of off-site low quality wetland preservation is proposed that will eliminate the concern for potential cumulative impacts that could be associated with future development. The primary ecological benefit derived from the off-site preservation will be habitat for wildlife and water quality benefits.
- 2. Site Location:** The wetland area proposed for preservation is located within the Southwest West Bay Sub-basin, north of the project site and east of State Road 79. It is within the

same sub-basin as the impact site. A specific location map is included in the compensatory mitigation package.

- B. Conservation Easement:** The off-site wetland habitat proposed for preservation will be placed into a conservation easement with FDEP as grantee that will be recorded in Bay County. Hence, the preservation site will be preserved in perpetuity.

IV. Restoration of Off-site Wetland Habitat: Breakfast Point Mitigation Bank (BPMB)

A. Management Plan: Restoration of Silviculture Degraded Wetland Systems

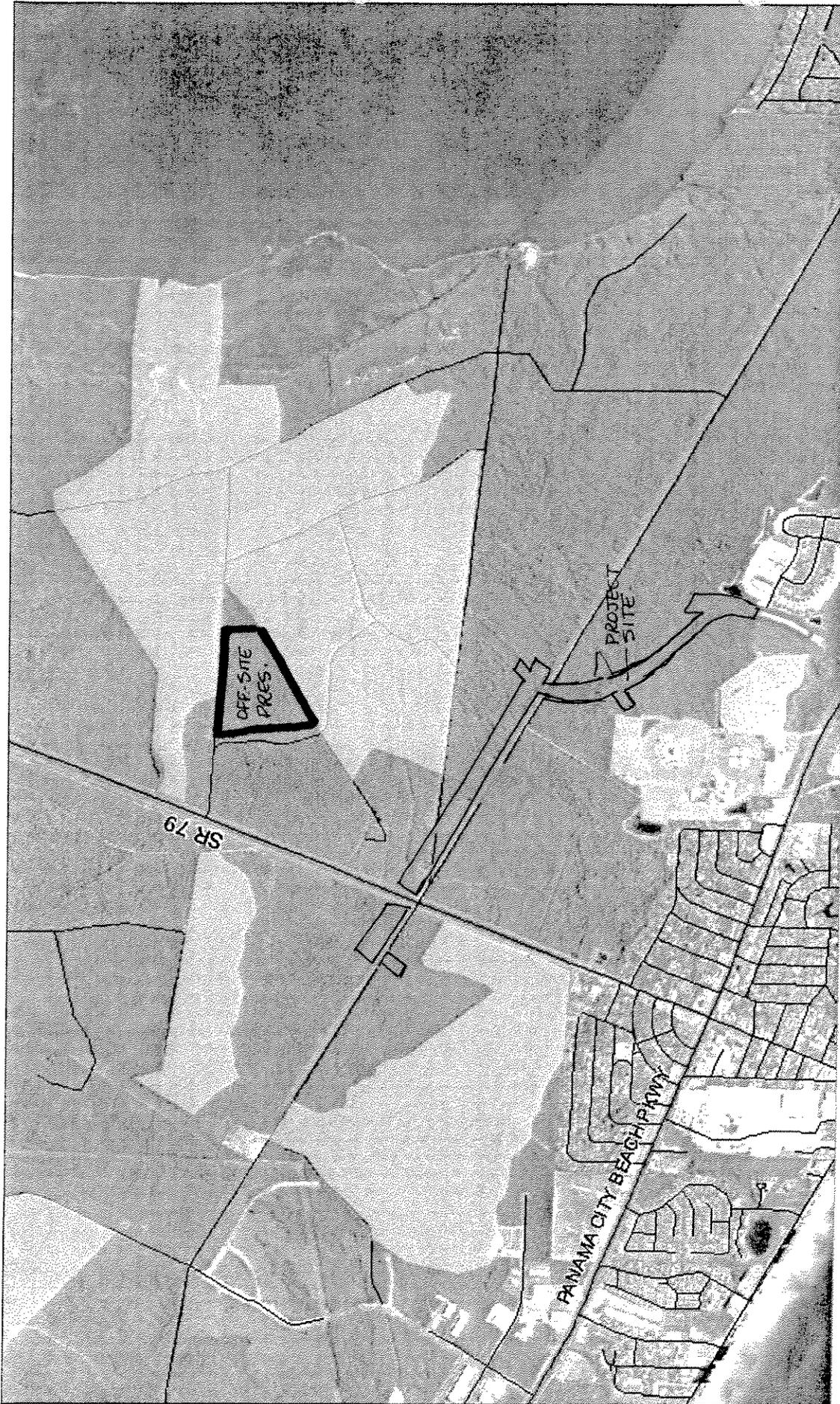
- 1. Goals & Objectives:** The 6.58 credits pulled from the BPMB will be used to restore managed planted pine habitats into the ecosystems that were historically located on the Breakfast Point Mitigation Area. The goals include restoration of the (1) ecological integrity of the mitigation area as defined by species composition, community structure, and biodiversity (2) ecosystem health as defined by function and structure, and (3) ecosystem stability. Successful restoration of the site is proposed utilizing currently available data, supplemented with the opinions of scientists with extensive experience examining the target ecosystem type and responses of the ecosystems to manipulations.

Specifically, the mitigation goals and objectives are to enhance the environmental parameters on the Breakfast Point Drainage Basin that include wildlife habitat, water storage and conveyance, groundwater recharge, water treatment, plant community development, aquatic and wildlife habitat support, erosion control, and aesthetics, thus increasing overall net environmental function and quality of life for the public. Another goal of the mitigation plan is to provide a landscape level environmental benefit by preserving and restoring the ecological function of the on-site upland and wetland ecosystems that are essential habitats for numerous floral and faunal species.

- 2. Site Location:** The mitigation area is located in Sections 5 and 8 of Township 3 South, Range 16 West, Bay County, Florida. The mitigation property is a component of a larger mitigation area that provides a continuum of upland and wetland ecosystems that are habitat for the referenced species. The acreage of the proposed mitigation area, in conjunction with surrounding lands, is sufficient not only to support wildlife and vegetative species but also provide water quality benefits on a watershed level.

V. Preservation of Conservation Units

The total developable area within the Southwest West Bay Sub-basin is approximately 3,093.7 acres. The total developable area of the impact site is 58.25 acres. The impact site encompasses 1.88% of the total area of the sub-basin. There are three areas of conservation units within the Southwest West Bay Sub-basin. An amount equivalent to the percentage of developable area in the sub-basin (1.88%) will be placed in perpetual conservation easements with FDEP as the grantee.



Legend

-  Conservation Units
-  Off-site Preservation Area (35.7 +/- Acres)
-  Site Boundary
-  Roads



1:24,000

2005 True Color

04-251
ssb 12.7.06



**Pier Park Loop Road
Off-site Preservation Area Map**