

Fish Habitat Structures General Permit Application Instructions

Determine eligibility for this general permit:

- Choose an activity decision module on web, <http://dnr.wi.gov/topic/waterways>, **or**
- Review the eligibility criteria below
 - o If the project does not meet all of the eligibility standards, apply for an Individual Permit

To apply:

- Apply online using our online ePermitting System at <http://dnr.wi.gov/permits/water>
- Include all required attachments. Each document must be less than 15 megabytes and our online system offers a help guide to reduce file sizes,
- Permit processing review times begin when all of the required application materials are received by the DNR. The department may require additional information to evaluate the project.
- If you have questions regarding your application, contact the local Water Management Specialist for your county <http://dnr.wi.gov/topic/Waterways/contacts.html#county>.

Please note, prior to starting any work at the project site, you are responsible for:

- Obtain all necessary local (e.g. city, town, village or county) permits.
- Obtain U.S. Army Corps of Engineer permits or approvals, <http://www.mvp.usace.army.mil/Missions/Regulatory.aspx>.
- Any other applicable state permits

Required attachments - Forms or documents you upload in our online ePermitting System

1. **Application form** - A complete, signed application form "Water Resources Application for Project Permits (WRAPP)" (Form 3500-053).

2. **Application fee** - Payment must be submitted through the ePermitting System as part of the application process. A list of fees can be found at <http://dnr.wi.gov/topic/waterways/documents/PermitDocs/feesheet.pdf>.

3. **Ownership documentation** - (i.e. copy of deed, land contract, current property tax statement/receipt)

4. **Photographs** that clearly show the on-the-ground conditions of the existing project areas. Remember that too much snow cover or vegetation may obscure important details. If possible, have another person stand near the project area for size reference. Color images are preferred.

5. **Site maps** that clearly illustrate the location and perimeter of the project site, and its relationship to nearby water resources (e.g. lakes, rivers, streams, wetlands), major landmarks and roads. Provide copies of relevant maps (e.g. wetland, aerial, topographical, soil, floodplain, or zoning maps), with the project location clearly identified. The department offers a web mapping tool to assist in creating these maps at <http://dnr.wi.gov/topic/surfacewater/swdv/>.

6. **Plans and specifications** that show what you intend to do. Plan drawings should be clear and to scale. Be sure to draw all plans as accurately and detailed as possible. The department reserves the right to require additional information to evaluate the project. Please refer to this sample drawing for assistance developing your plans and specifications, http://dnr.wi.gov/topic/Waterways/sample_drawings/FishSticks.pdf.

7. **Narrative description** of your proposal on a separate page. Please include:

- What the project is, purpose of project, and need for the project
- How you intend to carry out the project, including methods, materials, and equipment
- Your proposed construction schedule and sequence of work
- What temporary and permanent erosion control measures will be used
- The location of any disposal area for dredged or excavated materials
- For disturbances or fill, provide a description of type, composition, and quality of materials
- How you plan to avoid, minimize and mitigate impacts to waterways
- Area (e.g. linear feet) impacted
- Indicate whether to allow**, as part of your permit coverage, to let **new fish sticks sites on the same lake to be afforded coverage under your general permit at a later date** with no additional fee.

8. **Endangered and threatened resources** - The applicant is not required, but is encouraged to request an endangered resources (ER) review letter before applying for the permit. Information on how to obtain a review can be found by visiting the website at <http://dnr.wi.gov/topic/ERReview/Review.html>. The applicant can also visit the NHI Public Portal, <http://dnr.wi.gov/topic/ERReview/PublicPortal.html>, to determine if a full ER Review is required. Read the 'What is an ER Preliminary Assessment and what do the results mean?' section to determine follow-up steps.

9. **Historical and cultural resources** - If you are aware there is a historical or cultural resource present, you are **required** to contact the Wisconsin State Historical Society to verify and receive documentation that the activity will not result in an adverse impact to these resources.

Eligibility standards applicable to all fish habitat projects:

Projects that do not meet all criteria are not eligible for this general permit. If your project does not qualify for this general permit, you may apply for an individual permit.

The fish habitat structure may be located in an area of special natural resource interest, or within a public rights feature as described in Wis. Admin. Code s. NR 1.06, or at a site where the Department requires a permit under Wis. Stats. s. 30.12(2m).

The project purpose is to place a fish habitat structure solely for the purpose of improving fish and wildlife habitat, or fish stocking, and the placement does not result in significant adverse impacts to the public rights and interests, cause environmental pollution as defined in Wis. Stats. s. 299.01(4), or result in material injury to the riparian rights of any riparian owner pursuant to Wis. Stats. s. 30.206(3r)(a)2., nor does it cause more than minimal adverse environmental impacts, materially interfere with navigation, nor have an adverse impact on the riparian property rights of adjacent riparian owners pursuant to Wis. Stats. s. 30.206(1)(am).

The applicant or co-applicant is the riparian owner.

<p>The fish habitat or stocking structure must be placed entirely within the riparian zone of interest as determined by one of the methods outlined in Wis. Admin. Code s. NR 326.07. Certain habitat structures may be placed waterward of the line of navigation where allowed by activity specific standards contained in this general permit.</p>	
<p>The riparian owner or the person who places fish habitat or stocking structures under coverage of this General Permit must have the approval of the local Department Fisheries Biologist before placing the structure. A list of fisheries biologists can be found at http://dnr.wi.gov/topic/fishing/people/index.html.</p>	
<p>Fish Spawning. To minimize adverse impacts on fish movement, fish spawning, and egg incubation periods, structures may not be placed during the following time periods: September 15th through May 15th for all trout streams; and upstream to the first dam or barrier on the Root River (Racine County), the Kewaunee River (Kewaunee County), and Strawberry Creek (Door County). To determine if a waterway is a trout stream, you may use the WDNR website trout maps which can be found at http://dnr.wi.gov/topic/fishing/trout/streammaps.html March 1st through June 15th for ALL waters. The regional Department Fisheries Biologist may waive or modify timing restrictions in writing. To find your biologist and request in writing a waiver or modification of fish spawning timing restrictions for your project use the WDNR website at: http://dnr.wi.gov/topic/fishing/people/index.html.</p>	
<p>The placement of structures must be conducted in a manner that prevents the collection, removal or dispersal of sediment away from the project site to the maximum extent practicable. Temporary sediment control measures used to accomplish this should be completely removed from the waterbody no more than 24 hours after the project is completed.</p>	
<p>All temporary sediment control measures must follow all state lighting requirements and cannot materially obstruct navigation.</p>	
<p>Live, living or growing aquatic plants may not be removed unless the removal is exempt under Wis. Stats. s. 23.24 (4) or complies with the provisions for waiver of the permit requirement under Wis. Admin. Code s. NR 109.06.</p>	
<p>Removal of material above the ordinary high water mark is a land grading activity and is not authorized under this general permit.</p>	
<p>Dredging under Wis. Stats. s. 30.20(1g) (b) 1., is not allowed for the placement of a fish habitat or stocking structure. This general permit does not authorize the removal of native bed and bottom material which includes sand, cobble, silt, detritus, and other organic material. Dredging does not include "de minimus" activities.</p>	
<p>A deposit of sand, gravel or stone under Wis. Stats. s. 30.12(1g) (a), may be associated with the placement of a fish habitat or stocking structure provided the deposit is limited to the area immediately underneath or within one foot of the structure and is less than 2 cubic yards.</p>	
<p>Erosion control measures must meet or exceed the technical standards for erosion control approved by the department under Wis. Admin. Code subch. V of ch. NR 151. Any area where topsoil is exposed during construction must be immediately seeded and mulched or riprapped to stabilize disturbed areas and prevent soils from being eroded and washed into the waterway. Note: These standards can be found at the following website: http://dnr.wi.gov/topic/stormwater/standards/.</p>	
<p>Unless part of a permanent stormwater management system, all temporary erosion and sediment control practices must be removed upon final site stabilization. Areas disturbed during construction or installation must be restored.</p>	

<p>Eligibility standards applicable to all fish sticks or tree drops: In addition to the standards in Section 1A, the following standards apply to all fish stick or tree drop projects.</p>	
<p>Fish sticks or tree drops may only be placed on lakes, flowages, rivers listed in Wis. Adm. Code NR 102.06(3)(a), and rivers over 250 feet in width. Note: the demarcation separating a river and a flowage is spatially defined using the identify tool on the Department's Surface Water Data Viewer which can be found at: http://dnr.wi.gov/topic/SurfaceWater/swdv/.</p>	
<p>If possible, the structure should not be located within an area narrower than 250 feet in width where boating activity is confined. If the structures are placed in an area narrower than 250 feet in width where boating activity is confined, the structure must allow for 150 feet open water navigation from the end of the structure to the line of navigation associated with the opposing shoreline (3 ft. water depth) as defined in Wis. Admin. Code s. NR 326.03(4).</p>	
<p>The location of the structure may not have an adverse impact on the riparian property rights of adjacent riparian owners, may not cause more than minimal adverse environmental impacts, and may not materially interfere with navigation as provided by Wis. Stats. s. 30.206(1)(am).</p>	
<p>The structure must be placed fully within the riparian zone of interest as defined in Wis. Admin. Code s. NR 326.07, but may extend waterward beyond the line of navigation (3 ft. water depth).</p>	
<p>The structure must be placed at least 100 feet away from all of the following:</p> <ul style="list-style-type: none"> a. a bridge. b. a municipal or commercial marina. c. a designated swimming area that is open to the public that is marked by buoys, ropes, or postings along the shore. This includes publicly accessible swimming areas on private land. d. a publicly accessible boat ramp and piers associated with boat ramps that are solely for the purpose of loading and unloading water craft. e. a designated carry-in only watercraft access point. 	
<p>A portion of the structure must be placed and anchored within 20 feet from the bank toe, or in water depths less than or equal to 3 feet based on normal summertime lows. Note: Bank toe as defined in Section 7 means, "the break in slope at the foot of a bank where it meets the bed."</p>	
<p>There are no restrictions on the placement distance landward of the bank toe.</p>	
<p>Installation of fish sticks or tree drops must use live or recently live trees, harvested within a-year of placement. Recently live is defined by the presence of some buds or leaves on the tree when cut. Rotten, long-dead, or hollow trees are not suitable due to their floating nature.</p>	
<p>If whole trees are grouped, attached or anchored together, the resulting structure must include a minimum of 1 tree with a basal diameter of at least 8 inches. If a single tree is used its basal diameter must be at least 8 inches.</p>	
<p>The removal of living trees above the ordinary high water mark that are harvested within 35 feet of a navigable waterway may be subject to local zoning ordinances which place restrictions on cutting trees in the shoreland zone. The applicant is responsible for ensuring that their project is in compliance with any local zoning requirements.</p>	
<p>Eligibility standards applicable when adding new structure locations for fish sticks or tree drops, for projects already authorized under this permit: In addition to the standards in Section 1A, the following standards apply to all new structure locations for fish stick or tree drop projects.</p>	

To facilitate lake-wide management efforts under the public trust that will cumulatively restore and enhance fish habitat in the near-shore littoral zone area and result in healthy fish populations, the standards contained in this part of the general permit allow for the option of adding new structure sites to fish sticks or tree drops projects on the same waterbody already granted coverage under this general permit with no additional permit fees.

To see if coverage for fish sticks or tree drops that allows adding new structure locations has been issued under this General Permit for a specific waterway, you can ask your local Lake District or group or use the Departments Surface Water Data Viewer found at:

<http://dnr.wi.gov/topic/SurfaceWater/swdv/> to view permits issued on your lake.

The following are eligibility standards that are applicable when adding additional structure sites to fish sticks or tree drops projects on the same waterbody that have already been granted coverage under this general permit.

An applicant who applies for coverage under this general permit for the placement of fish sticks or tree drops must indicate in the initial application whether the applicant seeks permit coverage that allows new structure sites that meet the general permit standards to be added and afforded coverage under the same general permit at a later date. Note: For additional locations authorized to be covered under an existing general permit, all general permit terms and conditions will apply. General permit conditions are found in Section 4. If a person other than the original applicant for general permit coverage wants to place structures at newly added locations under the existing general permit coverage, the new applicant is responsible for ensuring that the structures at the new additional locations comply with all applicable general permit standards and is responsible and liable for those new structures.

An additional permit fee is not required to place fish stick structures at additional locations under an existing general permit coverage where the initial applicant was granted permit coverage for additional locations. A person seeking to place additional structures under an existing permit coverage must provide to the Department a request containing all the following:

- a. The docket or identification number of the initial general permit coverage to which you seek to add new locations.
- b. First and last name of applicant seeking coverage of new locations.
- c. Applicant's contact information, including but not limited to, street address, city, state, zip code, telephone, and e-mail.
- d. A copy of the deed or similar proof of ownership of the site where the activity will occur. If you do not own the site, also include proof of any notice(s) and permission(s) required by Section IA, Standards 2 and 3 of this General Permit.
- e. Project diagram that shows all the following:
 - i. The location of the project relative to the OHWM and the bank toe.
 - ii. The location of silt fences or any other sediment control devices.
 - iii. A description of materials and equipment to be used for the placement of the fish habitat structure, including the location of the live trees to be used and the purpose and need for the placement.
- f. Maps of the project site that include all the following:
 - i. Property lines for the property where the project will occur including identification of the riparian zone area from the OHWM to the line of navigation.
 - ii. The location of the proposed fish habitat structure.
- g. Photographs that represent existing site conditions where the project will occur.
- h. Signature. The signature on any cover letter submitted for the purpose of applying to be covered under existing general permit coverage will certify that the applicant meets the requirements under Section 3 of this general permit.

Permit coverage for additional structure locations terminates 5 years from the issuance date granting coverage for the additional structure locations.

Eligibility standards applicable to fish cribs:

In addition to the standards in Section 1 A, the following standards apply to all fish crib projects.

Fish cribs must have a minimum of 5 feet of water over the top of the structure. The depth and clearance of the fish cribs must be based on the normal lowest water level condition during a calendar year.

Fish cribs must be constructed of biological materials except for any fastening and anchoring devices.

The maximum dimensions of a fish crib must be 8 feet tall by 8 feet long by 8 feet wide.

Fish cribs may not be placed within 100 feet of swimming beaches or swim rafts.

Fish cribs may not be located in soft sediment or muck if the sediment or muck is more than 12 inches deep.

Fish cribs may not be placed in locations where the contour of the waterway bed exceeds a slope of 4-foot horizontal to one-foot vertical.

Fish cribs must be adequately anchored to prevent movement.

<p>Eligibility standards applicable to walleye or sauger spawning reefs: In addition to the standards in Section 1 A, the following standards apply to all spawning reef projects:</p>	
<p>The waterbody has a history of naturally reproducing walleye or sauger as evidenced by at least 2 years of young-of-year catch rates \geq 1 fish per shoreline mile during non-stocked years.</p>	
<p>Walleye or sauger spawning reefs must be constructed of an aggregate of clean, uncrushed gravel and rock 2 to 8 inches in diameter, with approximately 30% of the gravel and rock 2 to 4 inches in diameter and approximately 70% of the gravel and rock 4.1 to 8 inches in diameter.</p>	
<p>Walleye or sauger spawning reefs must be placed in a linear form parallel to the shore.</p>	
<p>Walleye or sauger spawning reefs must be no longer than 100 feet along the shoreline and no wider than 30 feet perpendicular to shore and may not be placed more than 100 feet from shore.</p>	
<p>Walleye or sauger spawning reefs must be placed where water depths range from 0 to 5 feet.</p>	
<p>Walleye or sauger spawning reefs may not be placed in locations where the contour of the waterway bed exceeds a slope of 4-foot horizontal to one-foot vertical.</p>	
<p>To minimize navigation hazards, a spawning reef must be placed within 100 feet of shore if it is located in water less than 5 feet deep and on a waterway bed with a contour slope less steep than 10:1.</p>	
<p>Walleye or sauger spawning reefs may not be placed in locations with a bottom substrate of less than 90% clean sand. Note: This condition prevents spawning reefs placement in locations that already provide natural walleye spawning habitat. Walleye or sauger spawning reefs require moderate wave action to keep substrate clean of algae and adequately circulate water for incubating eggs. Natural walleye or sauger spawning reefs generally consist of substrate materials 2-8 inches in diameter with rounded edges located in shallow water adjacent to gently sloping shorelines. A predominately sand substrate does not provide natural walleye spawning habitat because sand grains are too small and wave action that allows a 90% sand substrate to accumulate is too gentle to adequately circulate water for incubating walleye eggs.</p>	
<p>Any person placing a spawning reef must, within 30 days after placement, provide written notice to the president or chair of any lake association, property owners association or Lake District. The notice must include a description of the spawning reef and a lake map identifying the exact location of the reef. The person placing the reef is also responsible for posting a laminated copy of the same map, within 30 days after placement, at all public boat landings on the waterbody where the reef is located and ensuring that the map remains posted for at least one year.</p>	
<p>Eligibility standards applicable to wing deflectors: In addition to the standards in Section 1 A, the following standards apply to all wing deflector projects:</p>	
<p>Design and placement of wing deflectors must follow the recommendations in Guidelines for Management of Trout Stream Habitat in Wisconsin by Ray J. White and Oscar M. Brynildson. Note: Copies of these publications may be downloaded at http://digital.library.wisc.edu/1711.dl/EcoNatRes.DNRBull39. Hard copies can be requested by contacting the local department fisheries biologist or your public library. A list of fisheries biologists can be found at http://dnr.wi.gov/topic/fishing/people/index.html.</p>	
<p>Wing deflectors may only be placed in navigable streams that are less than 5 feet wide measured from ordinary high water mark to ordinary high water mark.</p>	

Wing deflectors may not extend more than 25% across the stream width measured from ordinary high water mark to ordinary high water mark.	
Eligibility standards applicable to half-logs: In addition to the standards in Section 1 A, the following standards apply to all half-log projects.	
Half-logs must be constructed from green logs with a minimum diameter of 10 inches. Spacers may not exceed 12 inches in height.	
Half-logs must be placed where the bottom substrate composition consists of sand or gravel, or both.	
Half-logs may not be placed in water deeper than 5 feet.	
Half-logs placed in lakes and flowages may not be located more than 100 feet from shore or within 100 feet of a swim raft.	
Eligibility standards applicable to net pens: In addition to the standards in Section 1 A, the following standards apply to all net pen projects.	
The project purpose is the placement of a net pen(s) for holding or rearing fish for noncommercial purposes.	
A cooperative fish rearing agreement with the department is required before the placement of fish in any public waterway. This includes the placement of fish in a net pen(s) authorized under this general permit. For information on how to obtain a cooperative fish rearing agreement, contact your fisheries biologist. A list of fisheries biologists can be found at http://dnr.wi.gov/topic/fishing/people/index.html .	
Net pens may only be placed in Great Lakes water bodies or tributaries of Great Lakes waterbodies.	
Net pens may not be located within a public rights feature as described in Wis. Admin. Code s. NR 1.06.	
There is no limit to the number of times that a person may place a net pen(s) in a Great Lakes water body or a tributary of a Great Lakes water body under the authority of this general permit.	
A WPDES permit is required if the holding or rearing of fish in net pens authorized under this general permit meets the criteria for a concentrated aquatic production facility under 40 C.F.R. 122.24.	
The applicant is the riparian owner or if the project location is waterward of the line of navigation (3 foot water depth), the applicant has notified the riparian owner of the intention to place a net pen(s) for holding or rearing fish.	
The applicant is the riparian owner or if the project location is landward of the line of navigation (3 foot water depth) in the riparian zone of interest (as determined by one of the methods outlined in Wis. Admin. Code s. NR 326.07), the applicant has obtained permission of the riparian owner to place a net pen(s) for holding or rearing fish.	
If the water is a tributary to a Great Lakes water body, the applicant has obtained permission of the bed owner (who may be the riparian owner) to place a net pen(s) for holding or rearing fish.	
A net pen(s) for the purpose of holding or rearing fish for noncommercial purposes may be placed for a period not to exceed 8 weeks.	
The department must be present when fish are being placed into a net pen(s).	

<p>The fish held or reared in the net pen(s) must be stocked by the department or by a person who is in compliance with Wis. Stats. s. 29.736.</p>	
<p>The fish held or reared in the net pen must be released by the department or by a person who is in compliance with Wis. Stats. s. 29.736 into the same body of water in which the net pen(s) is placed.</p>	
<p>The placement and location of the net pen(s) and the holding or rearing of fish therein will not materially interfere with navigation, cause environmental pollution as defined in Wis. Stats. s. 299.01(4), or result in significant cumulative adverse environmental impacts, injury or significant adverse impacts to the public rights and interests in the waterway, material injury to the rights or riparian rights of any riparian owner, or adverse impacts to the riparian property rights of adjacent riparian owners, pursuant to Wis. Stats. s. 30.206(1)(ag) and (3r)(a)2.</p>	
<p>The net pen structure(s) must be placed fully within the riparian lines of the riparian property as determined by one of the methods in Wis. Admin. Code s. NR 326.07, but may be placed or extend water ward beyond the line of navigation (3 ft. water depth).</p>	
<p>If possible, a net pen(s) should not be placed at a location where the area for boating traffic and open water navigation is narrower than 250 ft. A net pen(s) placed in such a location must allow an area for boating traffic and open water navigation at least 150 ft. wide between the waterward side of the net pen(s) and the opposite shore's line of navigation (3 ft. water depth as defined in Wis. Admin. Code s. NR 326.03(4)).</p>	
<p>The structure must be placed at least 100 feet away from all of the following: i. a bridge. ii. a designated swimming area open to the public and marked by buoys, ropes, or postings along the shore. This includes publicly accessible swimming areas on private land. iii. a designated carry-in only watercraft access point. iv. swim rafts.</p>	
<p>Net pens must be adequately marked with buoys and reflectors or any other visual warning mechanism that is highly visible and that is reflectorized, fluorescent, or lighted.</p>	
<p>Net pens must be adequately secured or anchored to prevent movement.</p>	
<p>Any person placing a net pen must, prior to placement, provide written notice to the harbor master or equivalent representative within the local municipality. The notice must include a description of the net pen and a map identifying the exact location.</p>	
<p>A net pen(s) must be placed in a manner that prevents sediment from accreting up-drift or eroding down-drift of the net pen(s) or being transported away from the net pen(s) to the maximum extent practicable.</p>	
<p>A net pen(s) must be placed in a manner that prevents the collection, removal or dispersal of sediment away from the project site to the maximum extent practicable.</p>	
<p>Temporary sediment control measures to control erosion, accretion, and dispersal of sediment should be completely removed from the water body no more than 24 hours after the project is completed.</p>	
<p>All temporary sediment control measures must follow all state lighting requirements and may not materially obstruct navigation.</p>	

<p>Erosion control measures must meet or exceed the technical standards for erosion control approved by the department under Wis. Admin. Code subch. V of ch. NR 151. Any area where topsoil is exposed during construction must be immediately seeded and mulched or riprapped to stabilize disturbed areas and prevent soils from being eroded and washed into the waterway. Note: These standards can be found at the following website: http://dnr.wi.gov/topic/stormwater/standards/.</p>	
<p>Live, living or growing plants may not be removed unless the removal is exempt under Wis. Stats. s. 23.24 (4) or complies with the provisions for waiver of the permit requirement under Wis. Admin. Code s. NR 109.06.</p>	
<p>Dredging under Wis. Stats. s. 30.20(1g) (b) 1., is not allowed for the placement of a net pen structure. This general permit does not authorize the removal of native bed and bottom material which includes sand, cobble, silt, detritus, and other organic material. Dredging does not include "de minimus" activities.</p>	
<p>Eligibility standards applicable when adding new locations for fish sticks, tree drops, fish cribs or half logs on a single riparian property: An applicant may place structures authorized under this general permit on additional sites not originally specified in the project plan if all of the following conditions apply:</p>	
<p>The additional site location complies with all of the applicable eligibility standards in section 1A and any other applicable sections of the general permit.</p>	
<p>The original applicant will place and maintain the additional structure(s) within their riparian zone.</p>	
<p>The fisheries biologists or water management specialist approves the additional site location as a beneficial location to improve fish or wildlife habitat.</p>	
<p>Additional structures may not be placed after the expiration date of this general permit.</p>	
<p>An additional permit fee is not required to place fish stick structures at additional locations under an existing general permit coverage. A person seeking to place additional structures under an existing permit coverage must provide to the Department an informal request containing all the following:</p> <ol style="list-style-type: none"> a. The docket or identification number of the initial general permit coverage to which you seek to add new locations. b. First and last name of applicant seeking coverage of new locations. c. Applicant's contact information, including but not limited to, street address, city, state, zip code, telephone, and e-mail. d. Project diagram that shows all the following: <ol style="list-style-type: none"> i. The location of the project relative to the OHWM and the bank toe. ii. The location of silt fences or any other sediment control devices. iii. A description of structure(s) to be placed. iv. A description of materials and equipment to be used for the placement of the fish habitat structure, including the location of the live trees to be used and the purpose and need for the placement. 	

