

Memo

To: Craig Varn
From: Len Lindahl and Kristine Morris
Date: October 20, 2016
Re: Request for WRAT to assist Reg Team

Request: The Regulatory Team would like to request that the MOC approve the WRAT's consideration of the below referenced questions that will assist the regulatory team in developing a uniform definition of harm within the CFWI.

Background: A significant issue to be considered by the Regulatory Team is whether or not a numeric threshold, or screening tool, would be valuable in considering harm to natural systems, including wetlands. Prior to considering the pros and cons of such a numeric tool, the regulatory team would like to know whether such a numeric value is possible and, if so, would it be able to be consistently applied throughout the CFWI. Therefore, the regulatory team would like to request that the WRAT consider and respond to the below questions. If the answer to both questions is yes, the regulatory team will consider whether or not a numeric threshold or screening tool would be valuable.

Questions for WRAT:

1. Is it possible to apply a wetlands numeric standard for harm to all wetlands (or types of wetlands) across all physiographic regions (or types of regions) of the CFWI with a high reliability that the standard would act as a screening tool for harm and to develop such a tool within 1 year?
2. Will a model be available and ready to use within 1 year that would allow the districts to consistent apply a numeric standard across the CFWI?