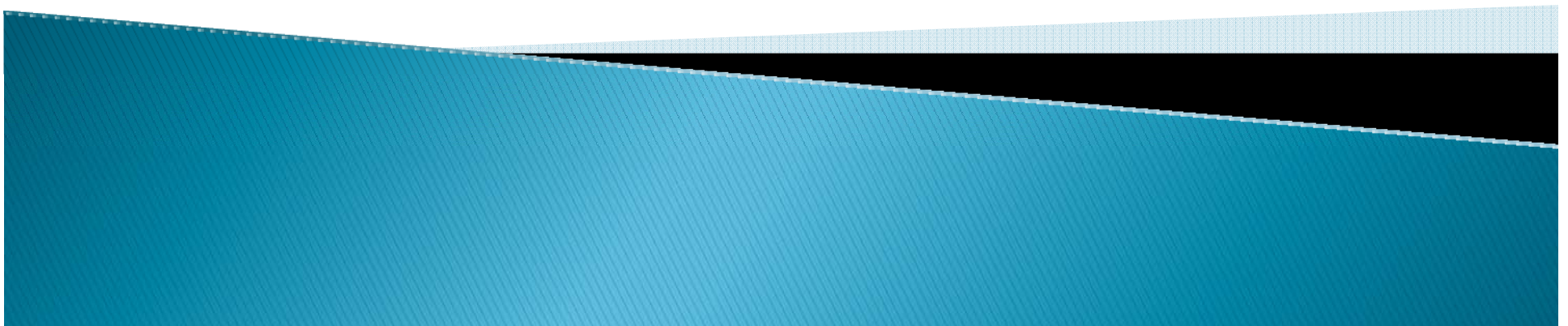


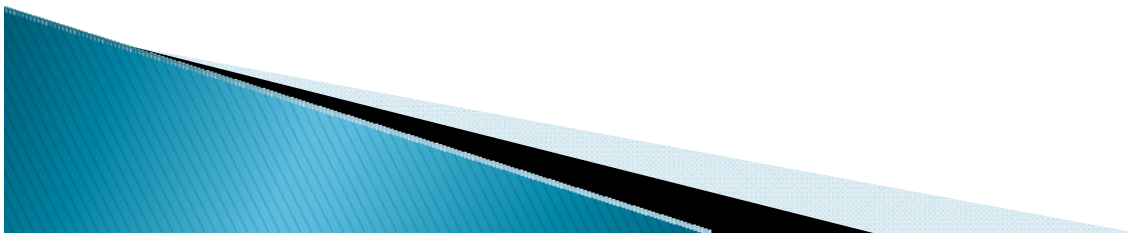
Review of CRAM Implementation Technical Bulletin

Update to CWMW
July 30, 2009



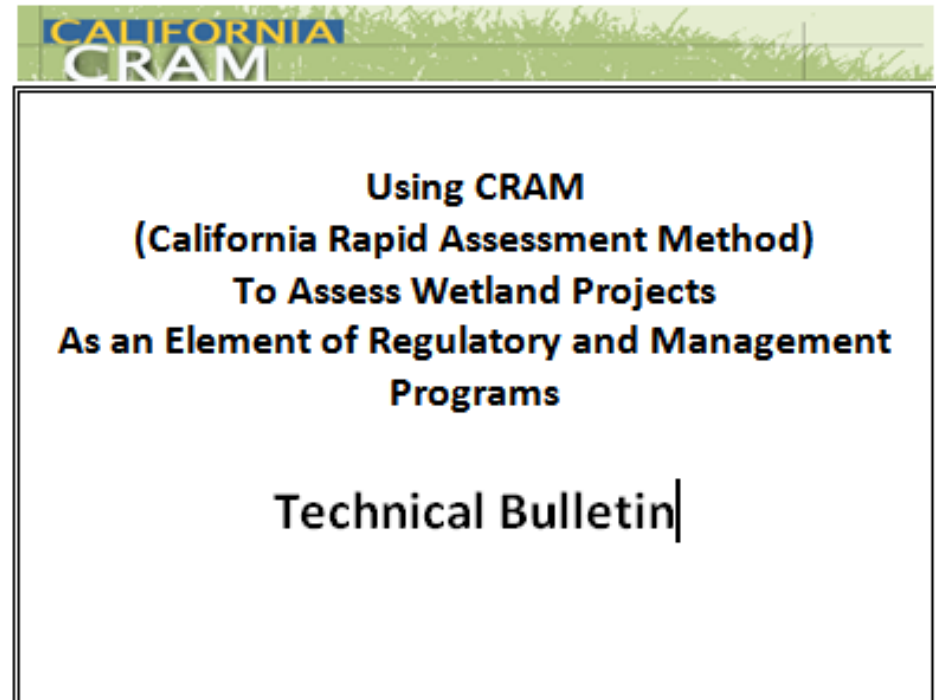
Background

- ▶ Document developed to assist agencies in developing program specific implementation guidelines
- ▶ Developed and vetting by S. Ca. agencies
- ▶ Submitted to all CWMW partner agencies for additional review – June 2009



Previous Review

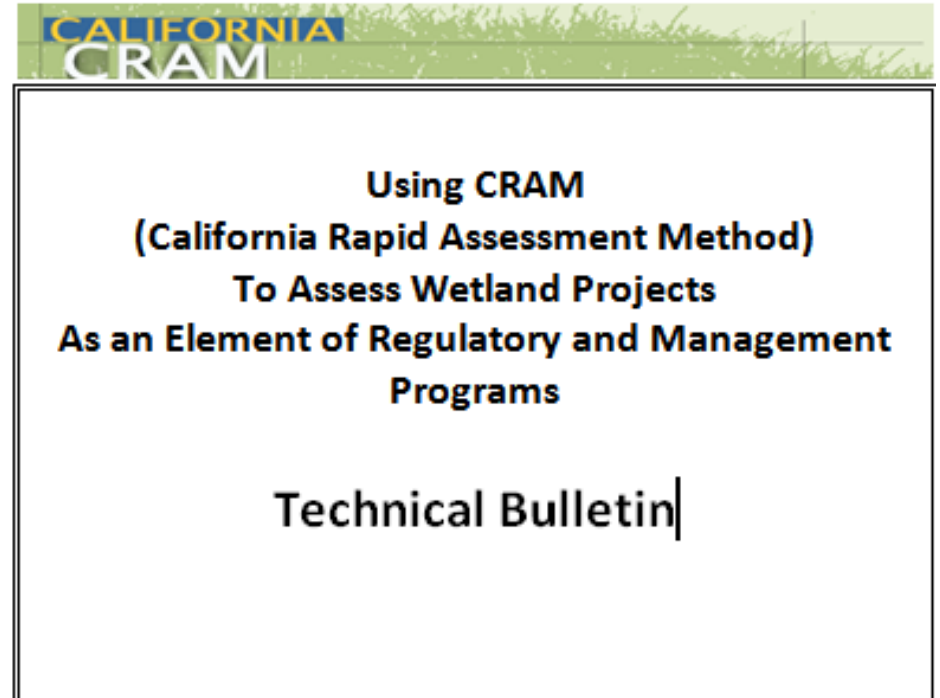
- ▶ State Water Board
- ▶ Regional Boards 4, 8, 9
- ▶ LA District Corps
- ▶ USEPA
- ▶ NOAA/NMFS
- ▶ USFWS – Carlsbad
- ▶ CDFG – S.CA.
- ▶ Coastal Conservancy



June 5, 2009

Most Recent Comments

- ▶ Regional Board 2
- ▶ Consolidated Corps Districts
 - Sacramento
 - Los Angeles
 - San Francisco
- ▶ No additional agencies provided comments



June 5, 2009

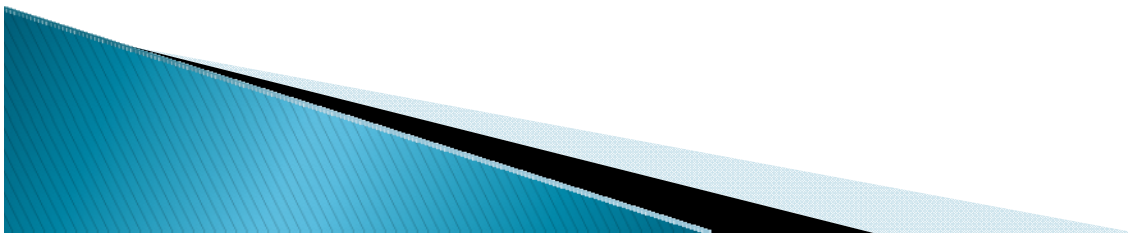
Summary of SF Regional Board Comments

- ▶ Confusion between “functional capacity” and “condition”
- ▶ Clarify definition of project relative to Regional Board programs
- ▶ Disagree with several stated appropriate uses
 - Design and monitoring of riverine wetlands restoration projects
 - Evaluation of Beneficial Uses
 - Evaluation of impacts associated with unauthorized (enforcement) actions
 - Assessment of Mitigation Compliance.
 - Comparison of proposed alternatives,



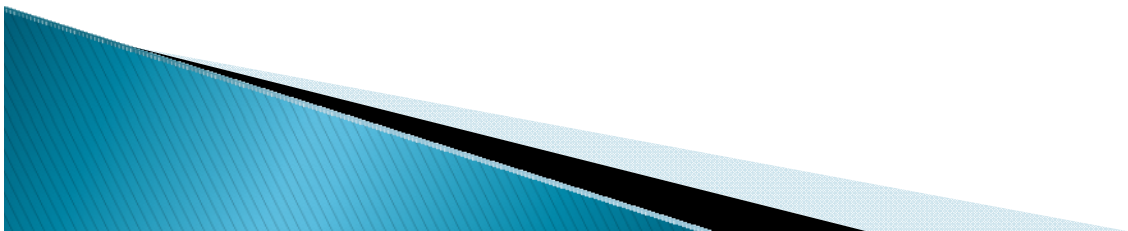
Summary of SF Regional Board Comments (cont.)

- ▶ Suggest that some stream types not be referred to as “wetland”
- ▶ “Some Water Board staff are not convinced that CRAM has passed the appropriate peer reviews for application in riverine systems”



Summary of Corps of Engineers Comments

- ▶ Concern over use of term wetlands for some types of riverine (e.g. ephemeral streams)
- ▶ Clarify that CRAM is appropriate for consideration of mitigation ratios and performance standards – one of the preferred uses
 - NOTE – conflicts with Regional Board 2 recommendation



Next Steps (recommended)

- ▶ Meet with Regional Board 2 staff to discuss concerns
 - September 10, 2009

- ▶ Final revisions to Technical Bulletin
 - NOTE – cannot address all agency concerns
 - Goal = balanced, technically sound document
 - Non-binding for agencies
 - Aid in CRAM implementation

- ▶ Produce Technical Bulletin as a “CWMW product” and post to the web

