

# John's To Do List

(Suggestions for the new UMAM rule.)



1. Incorporate the proposed scientific basis for scoring as rule guidance.
2. Retain a less cumbersome approach for small impacts or simple systems.
3. Use the detailed scoring protocol as a set of tools when needed to support scoring and resolve conflicts.

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4. Allow preservation lift and enhancement lift to be scored on the same assessment area.
5. Include a N/A option (i.e community structure)
6. Lack of reasonable assurance vs risk
7. Make sure the form(s) can be accessed / updated until complete – not required to complete at one time
8. Allow grouping of homogenous assessment areas
9. Be clear that a minimum level of expertise is necessary but not a rule

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requirement to perform UMAM assessment.

10. Part 1- add questions on hydroperiod, hydroperiods, and general description of vegetation in current condition.
11. Publish web based scores sanctioned by reviewers in advance of permit decision for public review.
12. Revise rule and scoring tool regarding habitat conversion (mitigation by converting one wetland type to another).

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13. Seek consensus on minimal value in exotic infested wetlands.
14. Address over-emphasis on exotics at the expense of hydrologic considerations through guidance memos and training.
15. Reduce number of questions by grouping.
16. Define new terms and concepts in rule narrative.
17. Greater consideration of Part 1 reference site. What is a 3, 6 etc.?

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18. Regular review and update of language to ensure consistent understanding and interpretation.
19. Develop standard field protocol.
20. Address inappropriate density of native vegetation.
21. Read BDA's letter!
22. Recognize habitat suitable for listed species rather than actual observance of listed species.
23. Fix improper weighting of herbaceous wetlands relative to canopy.

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24. Fix improper weighting of herbaceous systems based on robust appropriate exotics.
25. Enable grouping of multiple wetlands.
26. Location/landscape – clarify whether actual current condition or permitted future condition.