The revision of the federal wetlands delineation manual, used by the Army Corps of Engineers and Environmental Protection Agency since 1989, spells out several concerns with the guidelines and responses to those concerns.

Greatest among those matters are:

- That wetlands determinations are being based on less than all three of the basic parameters that decide if an area is a wetland — hydrology, soils and vegetation. In fact, in 30% of cases, officials have declared an area a wetland if it meets only one parameter.

The proposed solution is that all three criteria must exist, and — with exceptions — a determination that one parameter exists cannot be based on evidence of other parameters.

- That one week of wetness during the growing season was enough to create wetlands.

The response is to require that an area be "wet" for more than 14 days during the growing season before it can be declared a wetland.

- That areas that were dry at the surface (potentially all year round) were considered wetlands based on the presence of water as much as 18 inches below the surface. ("Our entire district is a wetland," Shaw said.)

The revision would require situations to be at the surface for more than 14 days. The Office of Management and Budget proposed mandating a 21-day period of water being at the surface, the same as the Hayes' bill proposes, said Rhod Shaw of Louisiana Rep. Jimmy Hayes' office.

- That hydrology could be considered demonstrated even without strong evidence of the presence of water.

The proposed solution is to require "strong evidence of the presence of water, where the indicators of hydrology being relied upon are not strong, supporting evidence is required," Shaw said.

"If it goes into effect as proposed, you'll see a lot of forested wetlands — "wet woods" — drop out of jurisdiction. And it will open a lot of land for development." — Mike Kelly, environmental consultant

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