

## **CFWI MFL CONSISTENCY ISSUES**

1. Identification and Re-Evaluation of MFL Water Bodies Within the CFWI
  - a. There should be a recognition that all MFL water bodies may be impacted by withdrawals or other hydrologic alterations in adjacent WMDs.
  - b. Identification of new MFL water bodies and the re-evaluation of existing MFL water bodies should be based on historical data and sound science as well as coordinated among the three WMDs prior to priority list submission.
2. MFL Establishment within the CFWI
  - a. There should be a consistent definition of significant harm for MFLs.
  - b. There should be a consistent means of expressing MFLs.
  - c. There should be a consistent methodology for determining MFL status assessment.
3. Prevention and Recovery Strategies Within the CFWI
  - a. Prevention and Recovery Strategies for MFLs should be developed with regional and cumulative considerations.
  - b. All three WMDs should adopt a single prevention and recovery strategy for each MFL or group of MFLs within the CFWI and implement this prevention and recovery strategy consistently across WMD boundaries within the CFWI.
  - c. Changes in non-withdrawal impacts should be taken into account in the development of prevention and recovery strategies within the CFWI.
  - d. Prevention and recovery strategies adopted within the CFWI should not adversely interfere with the SWUCA recovery strategy, but the SWUCA recovery strategy should not cause inequitable impacts to water uses located outside the SWUCA.
4. Use of MFLs in CUP Process Within the CFWI
  - a. Impacts to MFLs should be evaluated consistently across WMD boundaries.
  - b. Proposed MFLs should not be utilized in the CUP process; provided, this would not prevent use of the underlying science.
  - c. Recovery and prevention strategies should be developed concurrently with the adoption of new MFLs within the CFWI. Existing MFLs requiring a recovery and prevention strategy should have the strategy developed within the next two years.
  - d. The regulatory component of any prevention or recovery strategy established for MFLs should be the same for all three WMDs.
  - e. MFL prevention and recovery strategies should recognize existing legal uses.