vironment

Vetlands Proposal Draws Fire rom Environmentalists

nes S. Russell

low wet is wet? At least 15 days, says the J. S. Army Corps of Engineers. This non sequitur is part of proposed changes in the *Vetlands Delineation Manual*, in effect ince 1989 in an evolution of regulation that egan in 1975. The definition is important because designated wetlands may be subject to levelopment restrictions. Published in August and now in a 60-day period of public comment, the new regulations would redefine a wetland as soil having standing water for 15 consecutive days, or surface saturation for 21 days, during a growing season. The much broader 1989 definition covered areas of peat-based soil, or those that had water within 18 inches of the surface for at least seven days during a growing season.

The changes could open up previously protected acreage nationwide to developers and farmers. Most affected are marshlands in areas that are key to wildlife migrations, such as Eastern Long Island and the Chesapeake Bay on the East Coast, as well as the "prairie potholes" of the Midwest, where water "pools" or "ponds." Thousands of acres of the Everglades could open to development.

No hard figures are available, but Steve Moyer of the National Wildlife Federation says that up to a third of the 100 million acres of wetlands could be affected. But Mike Luzier, director of environmental regulations at the National Asso-ciation of Home Builders, calls such estimates unreliable. "I don't think there's a credible answer to the question of how much land this affects." Luzier points out that while the standards will change, the indicators that determine a wetland will remain substantially in place, slowing the redefinition process. Many so-called wetlands don't function as such, argues Luzier, "and we would like to see those areas free of regulation as wetlands."

Once the public-comment period is over, the four federal agencies that administer wetlands regulation—the Corps, the EPA, the Fish & Wildlife Service, and the Soil Conservation Service—will issue a final set of regulations, probably early next year. The Administration, says Moyer, "will be hard-pressed to ignore the evidence" that its election-year promise of "no net loss" to wetlands is being broken. *P. D. S.*

Construction Technology

Preventive Medicine for Sick Buildings

Though there's much to argue about the causes and cures for indoor-air quality problems [RECORD, November 1990, page 105-106], the consensus is that problems are most severe right after occupancy of a new or remodeled space. An article in the May 1991 issue of *Indoor Air Bulletin*, edited by indoor-air expert Hal Levin, focuses on detoxification, and on solutions for construction in occupied buildings.

Construction-period problems are easy to overlook during design, yet air-quality problems that begin during construction may well carry over into occupancy. Among Levin's recommendations: take a wide-ranging "building ecology" approach to managing air quality; i.e., look at the whole picture. Select building materials carefully, avoiding strong "emitters" or toxins; isolate construction zones in occupied buildings; air out construction areas 100 percent before occupancy; maximize ventilation by sealing return air ducts and using direct exhaust; and, crucially, *commission* the hvac system, defining performance criteria and measuring results. Levin points out that controlling pollution sources at the outset, rather than trying to fix problems later through improved ventilation, contributes to financial as well as environmental health. Levin's newsletter may be had by writing to P. O. Box 8446, Santa Cruz, Calif. 95061. ■