

Timber, Fish, & Wildlife (TFW) Policy Committee  
February 2, 2017 DRAFT Meeting Summary

Decisions and Action Items

<b>Decision</b>	<b>Notes</b>
Approved the Model Development and Evaluation of Default Physical Criteria problem statement, objectives, and critical questions with edits.	Conservation caucus sideways, all other caucuses thumbs up.
Gave direction to the AMPA and the Fish Habitat Technical Group (FHTG) regarding the development of a fish habitat assessment method: <ol style="list-style-type: none"> <li>1. The AMPA will send the FHTG conceptual framework to contractor team to include in their evaluation.</li> <li>2. The FHTG will continue meeting and focus on identifying potential criteria for Potential Habitat Breaks but not limited to that item. They will coordinate with Ray Entz to incorporate input from eastside tribes.</li> <li>3. The FHTG will report their status of work back to Policy at the March 2 meeting.</li> </ol>	Federal caucus sideways, all other caucuses thumbs up.
DNR invoked Stage 2 dispute resolution on developing a fish habitat assessment method	
The Conservation Caucus invoked Stage 2 dispute resolution on off-channel habitat.	
Agreed to use mediation for both Stage 2 disputes.	Consensus from all caucuses
Approved language on the WTMF map point dispute, ending dispute resolution on that topic.	Consensus from all caucuses

<b>Action</b>	<b>Assignment</b>
By February 9, identify any conflicts with the June 1 <sup>st</sup> and 2 <sup>nd</sup> meeting and field trip in the Spokane area and any conflicts with April 5 and 7 as dates for mediation.	Caucus representatives
By February 21, Budget Subgroup to meet and review draft budget for March Policy meeting.	Hans Berge, Karen Terwilleger, Rich Doenges, Ray Entz
Write a Co-Chairs' cover memo for the Board with updates on the water typing disputes.	DNR
Provide legislative briefing language on the fund shift to Policy.	Karen Terwilleger
Continue Fish Habitat Technical Group meetings and focus on identifying potential criteria for Potential Habitat Breaks but not limited to that item. Coordinate	FHTG

with Ray Entz to incorporate input from eastside tribes. Report back to Policy at March meeting.	
Send FHTG conceptual framework to contractor team to include in their evaluation.	Hans Berge
Review and edit working off-channel habitat language; share with other caucuses as soon as possible.	Karen Terwilleger and Mary Scurlock
Meet with mediator to discuss assessment before March or April meeting.	Co-Chairs

**Opening** – Ray Entz and Scott Swanson, Co-Chair of the Timber, Fish, & Wildlife Policy Committee (“Policy”), welcomed participants and led introductions (*please see Attachment 1 for a list of participants*). The goal of this meeting was to focus on continuing the discussions on outstanding issues of the permanent water typing system, plus taking action on other Policy workload items.

**Announcements and Co-Chairs’ Updates** –

- Scott Swanson has replaced Adrian Miller and joined Ray Entz as Co-Chair.
- There may be an opportunity for a principals’ meeting with the new Commissioner of Public Lands. One topic for this principals’ meeting may be caucus representation and participation across SAGs, CMER, and Policy.
- The Co-Chairs reminded Policy to keep to one consistent voice within their caucus.
- Michelle Wilcox, EPA, has joined the federal caucus. Scott Anderson at National Marine Fisheries Service will soon be that agency’s representative to the federal caucus.
- Karen Terwilleger discussed WFPA’s bills relating to HPA permitting, HB1275 and SB5393.
- Marc Ratcliff informed Policy that DNR will request that electronic signatures and electronic payments be added to Board Manual Section 20. DNR anticipates submitting draft language to the Board in August.
- Policy decided to hold its June meeting and field trip in Spokane. June 1 will be the meeting date; June 2 will be the field trip date.
- The Small Forest Landowners template subgroup hopes to reconvene its regular meetings soon.

**Meeting Summaries** – The meeting summary from January 5<sup>th</sup>, 2017, was revised per Policy comments and accepted by vote as final.

**Budget Review** – The Adaptive Management Program Administrator (AMPA) and Co-Chairs introduced their suggested revisions to the process of finalizing the Policy and CMER biennial workplan and budget for the Board. Karen Terwilleger, Rich Doenges and Ray Entz will work with the AMPA as an ad-hoc Budget Subgroup. This Subgroup will help with initial vetting, structuring the budget, and presenting the budget to Policy. The Subgroup will not make decisions for Policy.

Additionally, the AMPA shared that if Master Project Schedule (MPS) projects are delayed, several problems could occur. The Budget Subgroup will bring considerations to Policy at the March meeting for how to anticipate this problem.

*Discussion:*

The Conservation Caucus proposed asking the legislature to arrange the funds so that they roll over. The Industrial Timber Landowners Caucus offered to share legislative language they have worked on regarding the AMP funding.

**Bull Trout Update** – The Federal Caucus introduced Judy Neibauer from the USFWS Central Washington Field Office in Wenatchee. Judy presented on the biology, migrations, and recovery planning for this species.

A bull trout needs cold, clean, and connected habitat for spawning, overwintering and rearing. They require complex habitat with deep pools for overwintering and avoiding predators. Bull trout are repeat spawners, so they require habitat with good food sources connected to spawning habitat. Bull trout are sexually mature at ages 5-7 and can live to 10-13 years. Bull trout typically spawn on 1” gravels. Eggs typically incubate at 2-6°C for over 200 days. It is possible that this extended incubation period leads to hardier adults than other salmonids. At 8-10°C survival of eggs is between 0% and 20%. Juveniles need several years of an invertebrate prey base. Juveniles are difficult to survey during the daytime because they hide on the bottom of the water, but they are easily found and caught at night. There are both resident and migratory forms of bull trout. Migratory forms will migrate to rivers, lakes, or marine bodies of water, and then return to their natal streams to spawn. Migratory adults are an apex predator. Bull trout and brook trout can hybridize. Impacts to bull trout include high culverts, mass wasting, sediment deposit, and dams.

Telemetry studies, Passive Integrated Transponder (PIT) tagging, and other methods show that bull trout can migrate long distances, even as subadults. The PIT Tag Information Systems Program (PTAGIS) system collects bull trout tracking data. Connectivity allows the fish to pursue diverse migrations within a single population. Access to depth and cold pockets of water is important to their movements.

Overall, USFWS has found that bull trout are not recovering in Washington. The new Final Recovery Plan was released in September 2015. Critical habitat maps are available. Bull trout are considered a metapopulation, with populations in core areas. The distinct population segment has six recovery units in the northwest. Lake Chelan is a historical habitat, but bull trout are functionally extirpated there. It may be possible to reintroduce bull trout to Lake Chelan. Bull trout are widely distributed but have low population numbers in most places. Some populations only have 50-100 spawners, or may have more but without connectivity (e.g., behind a dam). The overall goal of the recovery plan is to manage threats and ensure sufficient distribution and abundance to improve the status of bull trout. The Columbia Headwaters has its own recovery unit implementation plan (RUIP). Barrier projects need to consider the potential to introduce brook trout as a side effect.

*Discussion highlights:*

- The Eastside Tribal Caucus asked how local governments are affected by the Recovery Plan. Under the Endangered Species Act (ESA), local government does not have the mandated response that the federal government has. However, the Yakima Basin has an engaged recovery planning board.
- The Industrial Timber Landowners Caucus asked how USFWS coordinates with DNR on the Road Maintenance and Abandonment Plan (RMAP) goals for the Habitat Conservation Plan (HCP). USFWS receives the RMAP reports which are rolled into the HCP like an HCP annual report. USFWS and DNR coordinate on roads, sediment, and other issues.

**Glacial Deep-Seated Landslides (GDSLs) and Groundwater Recharge Literature Review & Findings Report**

– Policy is not tasked with approving or editing this findings report and literature review. Policy can decide what to do with the literature review, or decide to take no action. Casey Hanell, DNR and UPSAG Co-Chair, presented the literature review to Policy. The objectives of the literature review were to focus on the effects of forest practices on GDSLs and groundwater recharge. There was renewed interest in this research and its implications for public safety following the Oso landslide.

The key question of the GDSL review was “Does harvesting of the recharge area of a glacial deep-seated landslide promote its instability?” Casey Hanell reminded Policy that GDSLs have many sub-classifications. The literature synthesis, led by Daniel Miller with M2 Environmental Services, reviewed 142 papers. An external scientific advisory panel provided review. The literature review and synthesis was reviewed and approved by UPSAG and CMER.

No empirical studies document observed relationships between timber harvest in the recharge zone and movement of a glacial deep-seated landslide. The consultants put together a conceptual model based on the available literature on the hydrologic budget. This model does not include how much water goes to the groundwater if it is not evapotranspired. Timber harvest reduces evapotranspiration by 10-15% of total annual precipitation. This increases effective precipitation (runoff and recharge). Recovery back to hydrologic maturity takes between 12 and 25 years. The site-specific potential effects of timber harvest depends on size of the harvest unit relative to recharge area, location of the harvest unit relative to the landslide, distribution of substrates and surface drainage, sensitivity of landslide to increased recharge, and relative effect on pore pressures within a landslide.

Some GDSLs respond to increased groundwater head above a certain threshold. Once triggered, movement can persist as long as groundwater remains above the threshold. Rates of movement of existing landslides can increase with increased water.

Knowledge gaps identified in the synthesis include:

- Styles, histories and controls on movement of characteristic DSL types in Washington
- Spatial and temporal groundwater flow and response
- Spatial and temporal landslide response (or lack of) to precipitation and land use
- Commonly available tools for assessment of landslide sensitivity to forest practices

The recommendations of the literature synthesis and findings report include:

- Develop standard tools and protocols for site characterization, including GIS toolkit
- Create a standard set of observations and measurements for landslide risk assessments
- Characterize a representative sample of GDSLs
- Use characterizations to assess landslide sensitivity
- Collect data to improve models
- Explore soil-water budget models
- Use collected data and models to inform where to conduct site-specific long-term field monitoring and paired basin studies

*Discussion:*

- The Federal Caucus asked if modeling was appropriate given site-specificity of GDSLs. UPSAG would like to identify the different categories of GDSLs that would group site-specific characteristics appropriately for modeling. These bins might respond the same way to a management activity. The first step towards this would be a study of land use history and land activity levels.
- UPSAG will put together a GDSL research strategy that will expand on Miller and Sias, 1998. Dan Miller is also looking at bedrock DSLs through his existing contract.
- The Industrial Timber Landowners Caucus asked if new datasets were needed. DNR's Geology Division is currently putting together a landslide inventory based on high-quality LiDAR data. This LiDAR data is mainly focused on urban areas, but is more comprehensive in some areas, such as Pierce County, which is complete. This landslide inventory does not identify if landslides are DSLs.

**UPSAG Report** – Casey Hanell gave Policy feedback on their direction to UPSAG at the January meeting.

**Topic #1: Complete the work through the existing contract by June 2017 at the latest:** UPSAG will use their existing contract with Dan Miller.

**Topic #2: Complete the work as a conversation at the next UPSAG meeting and report back to Policy in March with a written document or presentation:** UPSAG will come back to Policy with an update in March.

**Topic #3: Come back to Policy with a timeframe at the February Policy meeting:** UPSAG will look through the Board Manual to look at the options for assessing runout risk. UPSAG will discuss additional science needed to inform a different runout model. Casey Hanell reminded Policy that no management activity that contributes to or causes a landslide that reaches a public resource is allowed.

*Discussion:*

- DNR encouraged UPSAG to use existing resources.
- AMPA encouraged UPSAG to not limit themselves to the Board Manual.
- The Industrial Timber Landowners Caucus asked if a screening tool would be created. UPSAG feels it is a Policy question on what a screening tool would apply to. DNR suggested that multiple runout models would be needed for a variety of geographies.
- The Conservation Caucus suggested that after this scoping exercise, Policy would make a decision on what it would take to produce runout model(s). Policy should come to a common understanding on what the benefit of such a tool or tools may be. The Industrial Timber Landowners Caucus and DNR agreed.
- Policy discussed whether or not calculating runout after a slide hits a stream is Policy's prerogative.

**Model Development and Evaluation of Default Physical Criteria Problem Statement** – The AMPA presented a new draft of this document, based on comments on the previous draft from WDFW, WFPA, the Conservation Caucus, the West Side Tribal Caucus, and Ecology. The commenters, Policy members, and AMPA met on January 31, 2017, to review and address the changes. Policy reviewed the changes and made further changes.

**Decision:** Policy voted to approve the document (Conservation Caucus sideways, all other caucuses thumbs up).

**Type F Dispute Resolution: Fish Habitat Assessment Method** – Some member(s) of the contractor team will be available at the March meeting to give a presentation and answer questions. The AMPA will check if the report will be ready for the March meeting mailing date, given that February is a short month. The Co-Chairs noted that it is incumbent on the caucuses to be ready for a decision at the next meeting, if possible. The crux of the report will be a matrix with the strengths and weaknesses of the different proposals. The contractors may create a new proposal with the best elements of the caucus proposals.

The Co-Chairs reminded Policy that they can resolve any issue at any time to exit Dispute Resolution. At this meeting, they were allowed to vote to continue Stage One, or to move to Stage Two in order to maintain the May end date. The Co-Chairs recommend that Policy move to Stage Two at this meeting. The Co-Chairs and AMPA have selected a mediator, although the contract is not finalized.

The fish habitat technical group (FHTG) (Jason Walter, Sarah Zaniewski, Brian Franson, Don Nauer, Debbie Kay, Derek Marks, Chris Mendoza, and Jamie Glasgow) presented a Conceptual Framework for Fish Habitat Assessment Method. This Conceptual Framework was based on a technical memo from December 2016 and draws from the proposals from caucuses. The FHTG reviewed alternatives from caucuses, identified commonalities and differences, focused on further development of common approaches between alternatives. They developed a conceptual method for identifying potential habitat breaks (PHBs), recommended data sources defining PHBs, and identified remaining unsolved issues.

A PHB is a permanent, distinct, and measurable change to in-channel physical characteristics. PHBs are typically associated with underlying geomorphic conditions, and may consist of:

- permanent natural barriers that physically prevent fish access to upstream reaches
- a distinct and measurable change in channel gradient, size, or a combination of the two
- secondary criteria: channel morphology/classification, substrate, confinement

PHBs are not deformable, transient, and/or potentially mobile non-permanency features such as log jams, sediment or wood steps, etc.

The FHTG presented a conceptual framework for Alternative Protocol Survey, though they have not yet produced a revised e-fishing survey protocol. The FHTG believes their framework meets key Board and Policy elements: an overall reduction in electrofishing, a systematic approach to electrofishing. They also believe the framework meets the DNR objective of being “repeatable, enforceable, and implementable.”

*Discussion:*

- The FHTG is now looking forward to what comes out of the contractor evaluation of the FHAM caucus proposals.
- The survey protocol could use e-DNA instead of electrofishing if that became an approved technique in the future.
- The Eastside Tribal Caucus noted that the process of identifying PHBs should rely on something more than professional judgement.

- The FHTG requested eastside tribal representation out of consideration for the unique situation on the east side. The Eastside Tribal Caucus intends to participate if the FHTG moves forward, and asked the FHTG to coordinate with Ray Entz for eastside tribal participation.
- The Federal Caucus expressed concern about the detection probability for fish and concerned that the FHTG will that specific agreements are much more difficult than conceptual agreements.
- The Federal Caucus proposed that FHTG flesh out criteria or parameters for PHBs.

**Decision:** Policy voted on the following direction from Policy to the FHTG. (Federal caucus sideways, all other caucuses thumbs up):

1. The AMPA will send the Fish Habitat Technical Group (FHTG) conceptual framework to contractor team to include in their evaluation.
2. The FHTG will continue meeting and focus on identifying potential criteria for Potential Habitat Breaks but not limited to that item. They will coordinate with Ray Entz to incorporate input from eastside tribes.
3. The FHTG will report their status of work back to Policy at the March 2 meeting.

DNR invoked Stage 2 on FHAM based on the ongoing state of inquiry, Policy's commitment to have FHAM developed by May 1, and lack of resolution in Stage 1. The Eastside Tribal Caucus moved to use mediation in all Stage 2 disputes (all caucuses thumbs up).

**Type F Dispute Resolution: WTMF Map Points** – The Co-Chairs acknowledged the small group that met between meetings. The small group (Mary Scurlock, Karen Terwilleger, Marc Engel, and Jim Peters) presented a tentative resolution of the dispute over WTMF-based Map Points. Policy then live-edited the subgroup's recommendation.

**Decision:** Policy voted to accept the WTMF language (attachment 4) and end the dispute (all caucuses thumbs up). DNR and the Co-Chairs will work together on a memo to the Board.

**Type F Dispute Resolution: Off-Channel Habitat (OCH)** – Steve Barnowe-Meyer, Marty Acker, Mary Scurlock, Ray Entz and Hans Berge met to discuss the connectivity of OCH to Type F waters and the extent of Type F waters, and presented a proposal to Policy. Policy live-edited this document but did not come to consensus.

**Decision:** The Conservation Caucus invoked Stage 2 mediation. The Industrial Timber Landowners Caucus and the Conservation Caucus will work together to try to reach agreement before the next meeting. All caucuses will then review and edit the agreement if needed, potentially with the mediator.

**Mediation** – Caucuses suggested that the mediator do assessments with caucuses over the next month. The Co-Chairs noted that it is unlikely to resolve mediation within only the regular policy meetings and asked that caucuses remain flexible to additional meetings or mediated sessions before May.

**Legislative Updates** – DNR has a heavy load this season, with over 60 bills. This year, DNR has noticed that the Administrative Procedures Act, the Growth Management Act, and the Shoreline Protection Act are the topic of a number of bills.

The Co-Chairs adjourned the meeting at 4:50 pm.





Attachment 1 – Attendance by Caucus at 2/2/17 Meeting

**Conservation Caucus**

\*Mary Scurlock, M. Scurlock & Associates  
Chris Mendoza  
Jamie Glasgow, Wild Fish Conservancy

**County Caucus**

\*Scott Swanson, Washington State Association  
of Counties, Co-Chair  
Kendra Smith, Skagit County

**Federal Caucus**

\*Marty Acker, USFWS  
Michelle Wilcox, EPA  
Judy Neibauer, USFWS  
Suzanne Nelson, USFWS

**Industrial Timber Landowners Caucus**

\*Karen Terwilleger, Washington Forest  
Protection Association (WFPA)  
Doug Hooks, WFPA  
Jason Walter, Weyerhaeuser  
Brian Franzen, Weyerhaeuser

**Small Forest Landowners Caucus**

\*Steve Barnowe-Meyer, WFFA

\*Caucus representative

**Others**

Hans Berge, AMPA  
Angela Johnson, DNR  
Casey Hanell, DNR, UPSAG  
Colleen Gronberg, DNR  
Howard Haemmerle, DNR  
Heather Gibbs, DNR

Claire Chase, Triangle Associates  
Rachel Aronson, Triangle Associates

Ken Miller, WFFA

**State Caucus – DNR**

\*Marc Engel, DNR  
Joe Shramek, DNR  
Marc Ratcliff, DNR

**State Caucus – WDFW/Ecology**

\*Rich Doenges, Ecology  
Mark Hicks, Ecology  
Don Nauer, WDFW

**Tribal Caucus – Eastside**

\*Ray Entz, Kalispel/UCUT, Co-Chair  
Marc Gauthier, UCUT (phone)

**Tribal Caucus – Westside**

\*Jim Peters, Northwest Indian Fisheries  
Commission (NWIFC)  
Ash Roorbach, NWIFC  
Curt Veldhuisen, Skagit River System  
Cooperative (SRSC)  
Derek Marks, Tulalip Tribes  
Debbie Kay, Suquamish Tribe (phone)  
Sarah Zaniewski, Squaxin Island Tribe

Attachment 2 – Ongoing Priorities Checklist

<b>Priority</b>	<b>Assignment</b>	<b>Status &amp;Notes</b>
<b>Type N</b>	Type N policy subgroup	Caucuses are encouraged to talk offline about the wet season default methodology.
<b>Type F</b>	Policy	At regular meetings, Policy is working towards responding to the February 2014 Board motions (specific to off-channel habitat and electrofishing) in addition to other related water typing issues (such as default physical criteria, recovery, habitat, etc.).
<b>Small Forest Landowners Westside Template</b>	SFLOs Template Subgroup	Subgroup is meeting separately; co-chaired by Marc Engel and Ken Miller.
<b>Unstable Slopes</b>	Policy	UPSAG hired a contractor to do a glacial deep-seated literature synthesis. Policy is also considering how to respond to the AMPA’s recommendations on the unstable slopes proposal initiation, presented to the Board in February 2016.
<b>Ongoing CMER reports reviewed by Policy</b>	Doug Hooks & Todd Baldwin, CMER Co-Chairs	CMER Co-Chairs to give update(s) as needed at Policy meetings; AMPA to give quarterly reports for when CMER studies to come to Policy.

\*This table notes the Policy Committee priorities that were sent to the Forest Practices Board and any other major topics or issues that arise during the year.

Attachment 3 – Entities, Groups, or Subgroups: Schedule and Notes

<b>Entity/Group/Subgroup</b>	<b>Next Meeting Date</b>	<b>Notes</b>
<b>TFW Policy Committee</b>	March 2	
<b>CMER</b>	February 28	
<b>Type N Policy Subgroup</b>	TBD	
<b>Type F</b>		To be addressed at regular Policy meetings and in mediation.
<b>Forest Practices Board</b>	February 8	
<b>Small Forest Landowners Template Subgroup</b>	TBD	As workload allows.

Attachment 4

Timber, Fish, & Wildlife Policy Committee  
**Resolution of Dispute over WTMF-Approved Break Points**

February 2, 2017

**I. Restatement of Dispute**

On December 2, 2016, Policy voted that the following proposal characterizes the dispute:

*The Conservation Caucus hereby invokes dispute resolution over proposed acceptance of all Water Type Modification Form (WTMF) points as “regulatory points” under the new permanent water typing rule and implementing methodologies.*

*Specifically, we dispute that all Type F/N break points approved through the water type modification process under the interim rule at WAC 222-16-031 should [sic] deemed regulatory F/N breaks for purposes of Forest Practice Applications and reflected as such on the hydro layer. We further dispute that such points should override future breaks that may be established by a sufficiently accurate LiDAR-derived model-map.*

**II. Background of Dispute Resolution**

The Conservation Caucus initially proposed to agree to establish a subset of WTMF-established points “as permanent regulatory points” on the hydro layer if it is determined that these points received full affirmative concurrence by all reviewing parties, did not rely on electrofishing to demonstrate fish absence above man-made barriers, and/or were not determined based on a protocol fish presence survey conducted in a drought year. This solution did not meet with consensus approval at Policy.

The Conservation Caucus, Industrial Timber Landowners Caucus, DNR Caucus, and Westside Tribal Caucus met to propose a resolution to the full Policy Committee. At their February 2, 2017, meeting, Policy reviewed the proposed resolution, made tweaks, and voted unanimously to resolve the dispute as follows.

**III. Resolution**

**1. Policy received clarification of how the current process for review/revision of regulatory points works.**

Discussions during Stage 1 dispute resolution clarified that WTMF-established regulatory break points remain subject to the current process for review and potential revision based on new information.

**2. Policy will recommend the following FPA form changes by DNR to the Board.**

The landowner, in their submitted FPA, will make adequately clear and accessible to a reviewer their

reliance on and the underlying basis for the regulatory break, this will be achieved by:

- a. Adding an additional box to the existing chart in FPA question number 27 for the landowner to indicate when a “regulatory break” has been established for a stream segment shown in the forest practices unit layout;
- b. Including the DNR hyperlink for the Forest Practices Activity Mapping Tool (FPAMT), providing easy access to the full documentary basis for the regulatory break shown on the DNR hydro layer.
- c. Providing easy access to existing data to identify state and private forestland barriers and their repair/removal status. Policy recognizes a data gap regarding barriers located on other jurisdictions such as county or federal ownership, and having access to that information is important for FPA applicants. Policy encourages the Board to reach out to other entities to sync those datasets.

**3. Dispute resolution discussions reached consensus that the current FPA review process allows for an opportunity to bring additional information forward if a reviewer raises a concern that the regulatory break needs revision.**

Policy identified the review process as the following, and will present to the Board:

- Notification of FPA is automatically sent to state and tribal reviewers and any third parties within the geographic area they identified when enrolling in FPARS.
- WTMF reviewers will be notified and can make comments through the DNR Water Type Application (WTA) Database. The status of WTMFs is tracked through the DNR WTA.
- Any reviewer or third party may comment with concerns on an FPA within the 15-day comment period, if warranted DNR will then contact sister agencies, local governmental entities and tribes to discuss the concerns.
- If warranted, DNR will call an ID Team.
- The concerned party will be notified of the final decision and rationale through the Informal Conference Note.
- The FPA appeal procedures remain in place.

**4. Policy will recommend rigorous, improved Stream Typing training for all reviewers as part of its final package.**

This training will ensure a consistent understanding of stream typing criteria going forward, including whether new information bears on prior established points.