

Timber, Fish, & Wildlife Policy Committee  
**Comments on Prioritization Subgroup's Draft Criteria**  
December 27, 2017

**From Northwest Indian Fisheries Commission (Ash Roorbach):**

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- Instead of asking yes/no questions, suggest keeping the questions more open-ended (see suggested language edits below).
- Not fully answering a “definable question” could still reduce uncertainty.
- Change “Draft Criteria” to read: “Prioritization Questions: (These should all be addressed in the CMER workplan and in scoping documents, so not clear why Policy needs to answer them a second time, except for the last question). Maybe it is more an exercise in compiling already existing information rather than on generating ‘new’ information.”
  - New question #1: “What adaptive management problem(s) does this project address?”
  - The new question #2 would be changed to read: “How does the project inform the extent to which rule prescriptions support the goal of meeting the state water quality standards?” Also, what does “inform” mean in this context?
  - The new question #4 would be changed to read: “How does the project directly test the effectiveness of a current rule/prescription in meeting resource objectives and performance targets that support the four FFR goals?”
  - The new question #5 would be changed to read: “How does the project inform adaptive management by itself and/or provide specific information needed for the decision process?” Again, what does “inform” mean in this context?
  - The new question #6 would be changed to read: “To what extent are the project’s implementation and timeline essential to another project that is highly ranked?”
  - The new question #7 would be changed to read: “What specific questions will the project answer to help make adaptive management decisions?” Does “specific questions” refer to study questions?
  - The new question #8 would be changed to read: “What capacity (i.e. cost, time, talent, scope) does the program have to implement the project?”

**From Department of Ecology (Mark Hicks):**

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*See spreadsheet of test-ranking.*

Summary of suggested improvements:

- Rather than Yes or No, use a rating scale where Yes is 1 and No is 4. We could instead use “Maybe” and “Unlikely” to avoid numbers, but it would be used the same in rolling up the results I think.
- Key Principles: Scientific uncertainty should be described in the context of answering priority questions of the AMP and “concern” should be a concern the AMP needs to resolve in order to make a decision on rule effectiveness or rule implementation.
- Delete the first part of Question 4 about informing the AMP.
- Delete Question 7 and replace it with a question asking “if the project is a rule tool needed to correctly implement an existing prescription”.

- Consider adding question asking if study can be implemented without first conducting a significant pre-study.

#### Discussion:

I created a spreadsheet-copy of the AMP MPS showing only the project names and then added columns for each of the prioritization criteria (attached). I then went down the list and tried to rank them based on answering yes or no to the various questions/criteria. I found some of the criteria to be either too broad or too open ended (unspecific) to differentiate between projects.

#### Specific Observations and Suggestions:

1. Using Yes or No answers. I found it impossible to reasonably stick to a choice between “Yes” or “No” and ended up adding “Maybe” and even “Unlikely”. I don’t see any good way to get around having some form of rating scale such as where Yes is 1 and No is 4. I found that if I apply what I know about the topic or the process and where stakeholder are with the issue my answer would be different than if I knew nothing and just assumed a project would be enough to elicit a decision by Policy.
2. Key principles. Almost everything met the key principles. This is almost a given since the first part of the criteria includes “or scientific uncertainty” and the second part includes “helps with ...or concern”. No project is suggested that is not premised on the fact that there is something we don’t know and for which some stakeholders are concerned about. Perhaps it would help if Scientific Uncertainty was placed in the context of uncertainty related to answering priority questions of the AMP. Similarly, “concern” should be a concern that the AMP needs to resolve in order to make a decision on rule effectiveness or to effectively operationally implement a rule element. I also noted that rule tools and exploratory efforts to refine models in particular were hard for me to say Yes to since the efforts could fail and for some the only decision would be that the tool might be useful in some way later if a decision to use it is made at that time.
3. Question 4 should be change to eliminate the first part “informs the AMP by itself” since that is redundant to question 6 “answers specific question that can help make decisions in the AMP”. The double counting reduced the opportunities to differentiate between projects.
4. I found the rating system to be particularly weak when assessing extended monitoring for projects that were clear priorities at the outset. These extended projects retain all the characteristics the originally came with even though the additive value to the AMP and the decision-making process goes down with time. And even if we think we have learned what we need to, it is hard to say that we could not be surprised by a change in trajectory if we continued to monitor out years. This begged for a rating criterion or the ability to say “unlikely” or “maybe”.
5. Question 7 seemed useless since Policy can move budgets and priorities around and the AMP can hire consultants to do the work. I suggest we replace this with a question about whether “the project is a rule tool needed to correctly implement an existing prescription.”
6. What also seems to be missing is a question “a significant pre-study is not needed in order to design the project”. This would create a shovel ready category of a sort.

There was no escaping the subjective nature of this effort and I ended feeling like it needed more work and more refinement of the questions if it is to help Policy prioritize projects. However, when I colored in all the cells that I answered Yes to, it seemed to provide a general sense of priority that matched what I thought was true before I started. Maybe that is a good sign. The real test will be to see how much agreement there is on the ratings among participants.

**From Department of Fish & Wildlife (Don Nauer):**

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*See spreadsheet of test-ranking; added comments to Mark Hicks' spreadsheet.*

Additional comments:

- Consider how valuable this exercise is since both the questions and answers are not all so black and white.
- Maybe the criteria could be used as a simple screen, but there clearly are differential weights and qualifications that need to be applied; all of which means you could answer the questions in different ways.

**From Department of Natural Resources (Marc Engel):**

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- Change the first bullet under “Clarity in the process” to read as a preamble: “Determining how Policy will rank the projects to make recommendations to the Board (including new issues, extended monitoring, other Policy, CMER, AMPA, or Board projects). Procedure must take into consideration:
  - “Resource risks and uncertainties”
- In the “Considerations when prioritizing projects” section, add another higher priority issue/question as the first open bullet: “Unstable slopes”.

**From Washington Forest Protection Association (Karen Terwilleger):**

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General comments on criteria:

- Yes/no answers may not be adequate for ranking.
- Add existing status of the projects in the prioritization discussion; may include assessment of extensions.
- Question 3 language “directly test the effectiveness” may be too specific and fail to account for variation in study sites.
- Question 3: Add: “And will data from the study help to define metrics that will lead to an effective rule or prescription?”
- Change Question 4 to: “Will the findings inform how a specific prescription or BMP needs to be changed to achieve rule effectiveness? (Y/N)”
- Does project include assessments of landscape level review?
- How does the project “fit” in the decision-making process for the near term?
- Does the project incorporate applicability of findings and extent of the inferences to a potential decision?”
- How big is the risk to resources? For the study issue, are we seeing widespread outcomes on the landscape from the rule or prescription? Perhaps we should consider revisiting the current list with the CMER workplan assessments: ranking scientific uncertainty and resource risks at on a H/M/L scale. Include assessment of size, location and timing of risk.

Forest health: need to determine how/whether forest health is an FFR priority? Forest practices don't mitigate fungus, fire, or bugs.

Fire: more discussion with other land uses needed about how is treated on the landscape.

### Further thoughts...

- In many cases we are looking for absolute metrics when Policy maybe should examine tolerance to change. The natural system changes with or without us, understanding the magnitude of that in concert with the impact of land management activities may help guide agreement on a limit. The rules allow for economic activity and therefore acknowledge impact. How great and how long can that impact be given what we know about the natural variation is what Policy needs to understand and use in rule making. CMER, and other, studies will provide a set of metrics that fit the timing, location, and variables of each study. The question isn't if there is change it is how much can the system and Washington's stakeholders tolerate.
- Including the overall impact of an issue on the FFR lands – what's the problem? Through BAS and GIS analysis is there enough impact to warrant a higher priority or would the data just fill a gap to fill a gap? This may mean that the first part of a project is one that determines the landscape/statewide impact of a rule.