Commont #	Dogo	ш і:	o # Daviewer	Duiovitu	Reviewer Comment	Author Response to Reviewer	Atta
Comment #	Page	# Lir	e# Reviewer	Priority	Over-Arching Comment #1: Sorry I didn't get to the BAS, although since this isn't my field I might not have had much constructive to suggest. This is an excellent example of what a Scoping/BAS/Alternatives document is meant to be, and it is very refreshing for CMER/Policy to have actual research choices. Thank you for running spell-checker. A little look at commas, caps, periods, particularly in the two big tables because I probably caught the rest of the problems, would be nice.	Thank you Julie, we will review the minor elements.	
	1	3	2 dieu.julie		Over-Arching Comment #2: Washington State has extraordinarily complicated geology, both at the state-wide scale and at the 1:24,000 scale that most of the mapping is done. This is a combination of tectonics, volcanism, massive erosion, and glaciation. During a recent SAF talk, I described Georgia's geology map as muted and related pastels and Washington's as a Jackson Pollack on psychedelics. Lithology and landscape age are creating huge controls on our expression of hydrology and on groundwater conditions/temperature. So as we go into the Study Design, I have some real concerns about HUC 12s and the "inference" from one to the next without very specific consideration of lithology at a pretty small scale. These modeling efforts might have worked well as predictive tools elsewhere, but if so I'd bet it was some place with simpler geology.	process will embrace the variability in lithologies across FFR lands. Multivariate similarity indices can be used to assess similarities by HUC 12 attributes, which include lithology. See text revisions in 1) Alternatives Overview and 2) Alt 2 description. Also see responses to this topic in your comments below.	
	2	3	2 dieu.julie		For policy, can you give an idea of the ballpark range of area that a HUC 8 and HUC12 covers? This may be easier to grasp than WAUs and WRIAs for those without technical backgrounds.	Thank you. Done.	
	3	7	34 Debbie Kay		It would be useful to precisely describe how riparian areas will be (or could be if still tbd) defined in this project, e.g. "The extent of riparian areas sampled in this study will be either 150' or 200' from bankfull	Added riparian width to target population	
	4	8	15 Debbie Kay		edges, depending on the alternative." Maybe Introduction instead of context? Context is a little ambiguous. Also, it may be useful to have an executive summary at the beginning of this document.	"Context" as a section is defined in both the PSM and the recently approved Scoping Document Template. While I desire clear titles, I'd like to stick with the approved structure. Consider brining up this point at CMER to get the PSM and Tempalte changed. We also feel that an Exec. Summary is not needed. We summarize the BAS, recomneded approach, and alternatives in the document. Exec summary is not a defined element in the PSM or Scoping Template, same comment as before.	
	5	9	1 Debbie Kay		What about DFC?	See riparian alternatives where area based metrics that include basal area will be estimated. DFC is a target like temperature that data (e.g., BA) will be used for assessing status (e.g., DFC), etc.	
	6	9	4 Debbie Kay		Red: The FPHCP does not call out "Extensive Monitoring" in Schedule L-1. Under "Effectiveness Monitoring" L-1 describes meeting different targets at different time scales. To remedy, I respectfully request citing the FPHCP verbatim (Schedule L-1, FPHCP Appendix N) which places status and trends monitoring in proper context with "Effectiveness Monitoring" (cause / effect studies) which is what CMER has focused on as directed by the Board. EXMO does not demonstrate cause / effect. This distinction needs to be made clear upfront in the Project Description after citing Schedule L-1. TFW Policy, who reviews and approves CMER Scoping documents, need to be informed of the causal limitations of EXMO studies. <p><p>Schedule L-1 (FPHCP, Appendix N): "Effectiveness Monitoring"<p>"In addition, reasonable timeframes to achieve targets will be part of the process. There<p>will be identification of performance targets that can be met within short (0-10 years),<p>mid (10-50 years) and long-term (50-200 years) ranges of time measured at the landscape<p>scale. There will also be consideration for the time required for the quantity of prescriptions to be applied on the ground to ensure adequate sample sizes for implementing adaptive management. "</p></p></p></p></p></p>	See text change. Thank you.	
	7 8	9 10	6 Chris Mendoza 2 dieu.julie		This breaks basic parentheses rules, but may be weird because it's a link. Just asking.	corrected	
	9	10	14 Debbie Kay		Extensive Monitoring can also help identify where on the landscape and in what situations current rules are not meeting resource objectives over time, which in turn can inform and guide follow up prescription and intensive scale studies.		
	10 11	10 10 10	17 Chris Mendoza 17 dieu.julie		See prior comment. This quote mark doesn't have a mate. Yellow: In the citation you have chosen "effective" does not translate to "effectiveness monitoring" defined in Schedule L-1. By itself, EXMO does not "represent the ultimate test of whether FFR rules are effective" because it does not demonstrate cause/ effect (Effectiveness monitoring). The MDT report makes several statements about how Effectiveness and Extensive monitoring, when conducted in concert, can compliment each other. The way this currently reads, it implies Extensive Monitoring is all that's required to test the rules. Remedy - request taking language from MDT that places in proper context of effectiveness monitoring.	see prior response corrected, thank you. See revision. Thank you.	
•	12	10	25 Chris Mendoza		I haven't double-checked on this. But the Landscape-Scale Effectiveness Monitoring Project (which is arguably the same thing for landslides) has been removed from the CMER Work Plan. IF this is still in the WP, then I can live with its reference here, but we'd better have a broader conversation someday.	Corrected. Thank you.	
	13	10	29 dieu.julie		Red: As I mentioned at CMER meeting during Q/A of your presentation, please expand the Background explaining "why" there has not been "sustained" Ext. monitoring. Example, most of the EXMO studies following Ehinger (2007-2013) focused on Pilot studies to inform TFW Policy's decision making process on how (methods and costs) or whether or not to proceed with EXMO. CMER held an EXMO workshop for TFW Policy where I presented on CMER's workplan followed by "non-CMER" extensive monitoring presenters (DNR State Lands, Port Blakely, Simpson Timber). There are new TFW Policy members that are likely unaware of this important history who will be making decisions on this scoping document.	Thank you See text change	
;	14	10	34 Chris Mendoza		Not clear what this is - not "aforementioned" because I ran a search. Suspect you mean the "Extensive	See above. We re-inserted a mention above	
•	15	11	15 dieu.julie		Riparian Status and Trends Monitoring - Temperature, Type F/N Westside and Eastside reports" listed in the table above. Please fix. Not sure about this "transferability" word. Real sure you're using it incorrectly in this sentence. And maybe "extrapolation" would be better?	This term came from the Cooke and Devine study that tested how well (accurately) the riparian models developed for the Mashel estimated forest riparian metrics in the OESF. Can you transfer a model to different forest types is the question. Extrapolate is not appropriate term for this	Ξ
•	16	12	4 dieu.julie		Yellow: Regarding temperature, Ehinger (2013, 2019) also pointed out that even when directly measuring in stream termperature (tidbits) one cannot determine what "caused" the temperature due to lack of upstream controls (see prior comments), particularly in watersheds with mixed land uses (e.g. agriculture and forestry). Remedy, add this point to your Ehiinger report summary above this section.	Text added. Thank you.	
		12	9 Chris Mendoza		Yellow: You skipped the EXMO workshop CMER held for TFW Policy as mentioned in my prior comment. This is worth adding as it demonstrates that CMER not only informed TFW Policy of the CMER workplan's EXMO program (fish passage, steep unstable slopes, riparian), but that Policy was informed of "non-CMER" EXMO research being conducted in WA on State lands and by private forest landowners.		
:	19	12 12 12	13 Chris Mendoza27 Debbie Kay28 dieu.julie		Implementation is misspelled in the graphic below. Fix spelling the "Implementation" please.	Thank you. Fixed. Thank you. Fixed.	
	21	12	33 Chris Mendoza		Please see my prior comments on citing Schedule L-1 verbatim. It does not mention "extensive monitoring" outside the context of "effectiveness monitoring". The L1 performance target for LWD/Organic Inputs is: <p>• Westside and high elevation Eastside habitats: riparian stands are on pathways to meet Desired Future Condition (DFC) targets (species, basal area, trees per acre, growth, mortality).<p>• Eastside (except high elevation): DFC; current stands on pathways to achieve Eastside condition ranges for each habitat series.<p><p>As the L1 performance target that most closely addresses the LWD critical questions<p><p>· CQ 3.A What is the riparian stand potential to provide shade and large wood ecological functions on FPHCP lands?<p>· CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions changing on FPHCP lands over time and space?<p> <p>tracking whether stands are on pathway to DFC should be part of the study and made more prominent in the scoping document.</p></p></p></p></p></p></p></p></p>		
:	22	12	33 Debbie Kay				

Attatchments

			Yellow: I don't recall EXMO being designated as a CWA related study by Ecology. It was never on Ecology's "Clean water act milestones" update to the Board given by Mark Hicks and Ecology did to see	Text removed for clarity. Thank you.
23	12	35 Chris Mendoza	this project as a priority is my recollection. I recommend double checking with Ecology before making this claim.	
24	12	35 dieu.julie	And if you find that it is a CWA project, then please explain this up in the Background section in a couple more sentences instead of just dropping it here.	Text removed for clarity. Thank you.
25	13	12 Debbie Kay 13 Chris Mendoza	What is an indicator of stream temperature? Either we're measuring stream temperature (the condition) or some indicator of that stream temperature. This is confusing See my prior comment about citing the EPHCP. Schodule I. 1 verbatim (Appendix N)	"indicator" has been removed for clarity. We are monitoring stream temp, shade, etc. as an indicator of habitat conditions.
26	13		See my prior comment about citing the FPHCP, Schedule L-1 verbatim (Appendix N). What about the indicators?	Citation updated. We have removed the word indicator from our purpose statement for clarity. These are things we will actually assess and report on
27	13	19 Debbie Kay	The challenge I see in all of this material is that the putative effects are all assumed to come from the riparian stands within basins of interest. <p><p>The entire working "argument" of FF HCP is that aquatic resources could be conserved by adequate incorporation of buffers within watershedsbut an intelligent appraisal of available technical information even in the late 1990s would never have arrived at that conclusion.<p><p>I suggest you figure out a basin size that is relatively easy to work with (e.g., 4th order), stratify by the amount of intensive forest management in the basin (e.g., % of basin in stands younger than 50 years), allocate your sample, and estimate whether temperature distributions (or any other response of interest) vary meaningfully.<p><p>As the percent of each basin dominated by younger stands increases so, too, will other factors such as road area that are bound to be associated with aquatic responses of interest.<p><p>We have to move on from these silly preoccupations with stuff such as large wood or the number of rifflesit is all noise that distracts from the bigger issues that have developed in the last 20 years.</p></p></p></p></p></p></p></p>	Agree that aquatic habitat and water quality are influenced by watershed characteristics including forest cover/age. The CQs reflect the Policy questions as indicated in Background section. We can examine cover/forest age post-hoc or develop strata initially, as you propose. The pro/cons could be examined in the study design.
28	13	34 A.J. Kroll	I'm not sure if this is quite the right title. Sample unit and frame is not really a population to be included.	Title updated. Thank you.
29 30	13 13	35 Debbie Kay 38 Debbie Kay	This feels more like a footnote.	We agree. AP to make change
			Will there be any attempt to look at USGS data regarding groundwater level trends in the study areas? In areas with sustained drought, there may be areas that are seasonal due to low water conditions that should be included in the Np stream population, especially in groundwater-fed systems. Also, stream temperatures may be higher than historic levels due to a lower volume of flow from groundwater seeps into the stream channel. The context of current conditions compared to baseline seems important here.	The PT agrees about the importance of large scale trends as something to be considered during this study. Leveraging data and context from outside entities is being highly considered as a part of this project. We will investigate available data and consider context in the study design.
31	14	20 Debbie Kay	Yellow: is this the citation for the CMER Eastside Forest Hydrology Study? If so, I recommend	Yes, this is a citation to that report. The PT doesn't agree that those
32	14	21 Chris Mendoza	summarizing the findings of that study and relate back to your target population. Would it be possible to utilize the sites from CMER's Eastside Forest Hydrology study by incorporating into sampling scheme?	findings need to be summarized here. We have not ruled out using sites/findings/methods from other CMER studies and this will be considered during study design development.
33	14	23 Debbie Kay	Can you please elaborate here? Maybe reference the glossary here?	Sentence has been rewritten for clarity thank you. We have updated the glossary with an expanded HUC definition. Thank
34	14	26 Debbie Kay	This summary reads more like an attempt to convince the reader of a preferred alternative than an	you. This is a good suggestion. Text was changed using your suggestions with
25	1.4	21 Dobbio Kov	objective presentation of the state of the science. Perhaps include this kind of language when describing the pros and cons of different study alternatives, but recommend not including here as part	some additional information.
35 36	14 15	31 Debbie Kay7 Debbie Kay	of the BAS summary. Here is a streamlined version of the information below for consideration. It would replace the rest of the section.	Text updated with your suggestions.
37	15	32 Chris Mendoza	Green: I completely agree the add-ons are for Policy decision not CMER. See comment above about current groundwater levels compared to baseline/average years	Thank you. See above comment response. Thank you. The PT does not feel that groundwater data is available at a practical/effective scale for our target
38	16	29 Debbie Kay	What about stand growth models to estimate trajectory to DFC? E.g. FVS, DFC Model, Organon	population. These type models are listed in section "Modeling Future Conditions". The DFC model can not be used at an extensive scale, other models can
39	16	32 Debbie Kay		potentially be used this way, see riparian alternatives below.
			It would be very useful to have a summary table/matrix that rates all of the same strength and weakness factors for all the alternatives on a scale (1-5, 1-10) in one place. This could prevent assumptions based on things like a specific strength being mentioned in one but omitted in another.	We did our best to compare objectives in Tables 4 and 5.
40	16	39 Debbie Kay	Perhaps consider incorporating some of the images from the CMER Ex Mo presentation into the	done
41	16	39 Ash Roorbach	Alternative analysis section. Yellow: as per my prior comments, emphasizing this point to TFW Policy - also made by Ehinger (2013, 2019) - is paramount to them understanding the limitations of EXMO. e.g. There are many watersheds that have mixed agriculture and forestry so the temperature readings that will be taken cannot be attributed to a specific land use type or particular forest practice because EXMO does not demonstrate cause/ effect.	Indeed, extensive monitoring programs are designed to characterize patterns at the regional / landscape-scale, and not at the local scale that might be of more interest to land managers. We suggest that this has been articulated in this scoping document sufficiently (e.g., our critical questions). The initial direction given to the PT hinted at looking across landownerships, but this was revised to only FFR lands. In the alternatives which sample within selected watersheds (by default here,
				this is listed as HUC 12's), we can define a threshold (e.g., 80% FFR lands) as we further refine our sampling protocol in the study design. This will reduce the effects of mixed land use on the variables of interest. Added several bits of text (see end of paragraph, for instance) that refer to this problem of confounding land uses throughout alternatives descriptions.
42	17	29 Chris Mendoza	Yellow: I had this question during Jenelle's part of the presentation at CMER, and think this is "sort of" the answer. Please be crystal clear that a new set of random points would be used. And wouldn't there be a better "trend" assessment by using the original points? Or isn't that at least a sub-alternative?	Good question. the selected method could include a rotating panel, which would allow repeated measures at sample units. We did not choose to go into detail here. It is not necessarily the case that a new set of points would be used, though there are reasons why a new set, or combination of old and new (as Mark noted) could be desirable. I think that would be a study design question.
43	18	22 dieu.julie	To my previous point - why wouldn't you use, at least to some level, the earlier points?	That could conceivably be part of the study design. We were thinking that would be a study design topic, but perhaps could be incorporated
44	18	36 dieu.julie	Also, really expensive, logistically challenging, potential access issues	here. Yes, this would be the most expensive alternative (next section) and
				would not provide the network-level information as other alternatives. The logistical challenges and potential access issues might be common to all alternatives to some degree, but I agree it would most likely be greatest for this one given the "shotgun" sampling approach. Those drawbacks were already noted but text revised in response to another
45	19	4 Debbie Kay	Yellow: State how much it limited scope of inference as cited in Ehinger 2019. From CMER Answers to 6Qs and Findings report (2019). P> <p>"Three difficulties were encountered during implementation: P>· For both Type F/S and Type Np waters, small forest landowners were much less likely to participate than industrial forestland owners. As a result, a proportion of the land base was not sampled. However, there was no evidence this introduced substantive bias into the study. There were errors in the sampling frame that resulted in misclassification of some sampling sites (i.e., wrong water type or incorrect land use). These errors were relatively minor and expected when applying a regulatory definition to GIS-derived stream layers. P>· Some Type Np streams had too little water in the summer to submerge data loggers. P>Given the difficulties noted above, the estimated scope of inference was 70% and 68% of the original sample frame for Type F/S and Type Np streams, respectively, and this</p>	comment. Agree - this study does not evaluate a causal relationship between riparian management and stream temperature. With Add-on 2, this question could be explored as a correlation between these after accounting for other selected variables. The purpose is to characterize the state of stream temperature for a given year and for a trend over years. The types of analyses that could be employed using these data are numerous. For example, the characteristics of eastside streams you mentioned above will be further enumerated. It is worth noting that the questions that might be posed in 20 years may
			study is the only unbiased estimate available for commercial forestlands. <p> What does the study not tell us? <p> The study established a baseline temperature profile based on a random sample of Type F/S and Type Np streams in western Washington commercial forestlands. It does not provide trend data that can be used to infer how temperatures have changed over time.<p><p> The study does not evaluate the effectiveness of specific forest practices rules. " <p><p></p></p></p></p></p></p>	outside of types of questions relevant today. Our goal is to provide a robust dataset that could be analyzed to address not only questions relevant to today's questions, but undefined concerns of the future. In terms of the bias associated with sample unit access, the modeling efforts may be able to interpolate between sample points as well as apply modeled relationships derived from similar watersheds (e.g., multivariate "similarity"). Thank you for the text quote. See revision.

			Consider describing the cost scale in the introduction of this section. This would prevent the need for the same footnote in so many places.	Thank you. In previous iterations of this document we did as you described and got feedback that it was preferred to describe the cost	
47	19	18 Debbie Kay		scale this way. If you feel quite strongly, then we can make this change at CMER.	
		•	Maybe move figure 3 or a similar map to here to give reader a senses of HUC 12 size/scale when reading about the alternatives.	Done above in the alternative overview section. Also added in figures	
48	20	4 Debbie Kay	I found this sentence very confusing. Please accept my suggestion or try something else, but "consisting	here specific to Alternative 2. Thanks for you edits!	
49	20	19 dieu.julie	of the minimum" is obtuse. See my over-arching comment about WA geology. Right here is the crux of my problem, because HUC 12s individually have great variance in lithology, never mind what the neighbors look like.	Good point, so can you suggest how to stratify by geology groups? Or are you suggesting basins should be smaller than HUC 12 to minimize heterogeneity of geology. There is an issue of balancing basin size that are large enough to include N and F water types and channel sizes to provide useful data about resource conditions in a connected network, but small enough to have a high percentage of FFR lands to reflect conditions associated with FPHCP rules. We also will likely just have to live with and embrace some geologic variation as a source of variance within the clusters. We might find that the simplified competent/incompetent classifications used in other studies show up as a significant factor in the analyses. The modern statistical analyses we will be using include reporting on which factors are influencing the analyses. We have also allowed that the focus watershed basin sizes might be altered in the study design phase for a multitude of reasons.	HUC 12s with >10% FPHCP Overlaid on Surface Geology HUC 12s with >10% FPHCP Overlaid on Competence of Surface Geology
50	21	4 dieu.julie	Do you intend to analyze the date?	They will be comparized to a Table 2) but additional analysis will be	
51	21	19 A.J. Kroll	Do you intend to analyze the data?	They will be summarized (e.g., Table 2) but additional analysis will be possible, as requested. See revision.	
52	21	19 Debbie Kay	Why is that a strength? Lower costs? Not relying on modeling gives more confidence on the findings?	see additional text	
53	21	21 A.J. Kroll	I am confused as to how you are using the phrase "scope of inference". If you draw a random sample from a clearly defined population, you can make inference.	see revision	
54	21	21 Debbie Kay	Also confused by the term "scope of inference." Is there a simpler way to state this whole statement that's easier for policy to understand?	see revision	
55	22	31 dieu.julie	Yellow: This could be actually tested with a couple of additional HUC 12s.	Good idea - as with the development of the temperature model within the HUC (validation data set not used to develop the model), this approach could be used to test the validity of the model from one HUC to assess the predictions to a similar HUC 12. Such details will be explored in the study design phase.	
56	23	4 Debbie Kay	As stated above, this would be a nice frame of reference if placed at the beginning of alternative 2.	done	
57	23	10 Debbie Kay	With who? Perhaps mention specific datasets that you are interested in using in case there are federal changes that make it hard to continue to work with agencies and those data are moved.	more specifics are provided in descriptions below. Datasets of interest are owned by Washington State.	
			If this is so unlikely to provide useful data, why is it being presented as an option? Also, lack of certainty that you will have consistent access to NOAA seems like an additional weakness.	We think the models DO provide useful information, just not for small, high-gradient streams. Those streams are also the ones we are unlikely to be able to obtain summer temperatures on anyway.	
58 59	24 26	30 Debbie Kay 8 dieu.julie	Yes, this would help (see previous comment about actually monitoring a couple of replicate HUC 12s). Anyway, this is a good point that I think you failed to make in the Alternative 4 Approach (and could go add it in).	added to Alt 4 Approach. The landscape-level temperature models will have validation datasets (data not used in model construction).	
	20		Yellow: So the HUC 12 intensive monitoring would be used to validate other models? Acknowledging we're in scoping phase and study design will come later, but I'm unfamiliar the cooperative models input variables / outputs. I'm assuming the HUC 12 data collection effort / meithods would provide more detail than copperative models. If so, suggest adding that point of clarification for readers.	these data will also be used to inform the landscape - level model (s). The validation strategy takes advantage of both sampling units not used to develop the models and the comparison of predictions of the two models developed at different spatial scales (the predictions of the larger-scale model to those of the finer scale model). See edit to reflect your suggestion relating to the more detail provided by	
				the HUC-level models.	
60	26	10 Chris Mendoza	Did I miss something? Is this actually talked about somewhere (or maybe it needs to be)?	the HUC-level models. Yes, this is described in Alternative 2. Added reference to that in text.	
61	26	18 dieu.julie		Yes, this is described in Alternative 2. Added reference to that in text.	
			All I really need a VERB in the sentence, so feel free to try something else. Please elaborate on why this is a strength.	Yes, this is described in Alternative 2. Added reference to that in text. see new version see revision	
61 62	26 26	18 dieu.julie 23 dieu.julie	All I really need a VERB in the sentence, so feel free to try something else. Please elaborate on why this is a strength. Why to we have a second version of this table which appears to be the same as the first one?	Yes, this is described in Alternative 2. Added reference to that in text. see new version see revision moved to recommended alt to summarize the kind of products to be provided	
61 62 63 64	26 26 26 27	18 dieu.julie 23 dieu.julie 31 Debbie Kay 2 dieu.julie	All I really need a VERB in the sentence, so feel free to try something else. Please elaborate on why this is a strength.	Yes, this is described in Alternative 2. Added reference to that in text. see new version see revision moved to recommended alt to summarize the kind of products to be	
61 62 63	26 26 26	18 dieu.julie 23 dieu.julie 31 Debbie Kay	All I really need a VERB in the sentence, so feel free to try something else. Please elaborate on why this is a strength. Why to we have a second version of this table which appears to be the same as the first one? Please add this term to the glossary for policy. Also, consider writing a brief definition of each of the	Yes, this is described in Alternative 2. Added reference to that in text. see new version see revision moved to recommended alt to summarize the kind of products to be provided Added to glossary of terms. Thank you. First. Policy asked for monitoring of riparian conditions and functions which are the objectives for each alternative. Data collected by each alternative will enable estimates of DFC. DFC is a target just like temperature for assessing status and will be evaluated as noted in the descriptions. Also, note that the suitability of riparian functions of stands at DFC has not been validated. Therefore, we would not simply assess DFC and call it good. The desired functions are assumed as stated in the definition "DFC is defined as the condition of a riparian forest stand at 140 years of age. This age is assumed to be representative of a mature forest stand that provides the full range of ecological functions important for the survival and recovery of covered species."	
61 62 63 64	26 26 26 27	18 dieu.julie 23 dieu.julie 31 Debbie Kay 2 dieu.julie	All I really need a VERB in the sentence, so feel free to try something else. Please elaborate on why this is a strength. Why to we have a second version of this table which appears to be the same as the first one? Please add this term to the glossary for policy. Also, consider writing a brief definition of each of the terms in this column to keep policy from needing to flip back and forth to understand. Red comment: <p><p>First, The FPHCP EIS uses attaining DFC (Desired Future Conditions) as a surragate for meeting Key riparian functions (shade, long-term LWD recruitment, nutrients, streams meeting state CWA standards, etc.). Please provide background at the beginning of this section citing FPHCP and the importance of meeting DFC linked to key riparian functions<p><p>Second, The CMER Type F Exploratory report authors / project team (me included) made a recommendation to CMER/ TFW Policy to include those study sites in the EXMO scoping/ study design. The purpose for inclusion is 1) continue to record trends in stand composition of those Type F RMZs to ensure they continue to "hold up" in meeting key riparian functions and 2) follow the DFC trajectories of all stands over time given DFC linkage to meeting key riparian functions. TFW Policy approved this recommendation I believe (have to check their meeting minutes),<p><p>PPlease provide the above background before launching into</p></p></p></p></p></p>	Yes, this is described in Alternative 2. Added reference to that in text. see new version see revision moved to recommended alt to summarize the kind of products to be provided Added to glossary of terms. Thank you. First. Policy asked for monitoring of riparian conditions and functions which are the objectives for each alternative. Data collected by each alternative will enable estimates of DFC. DFC is a target just like temperature for assessing status and will be evaluated as noted in the descriptions. Also, note that the suitability of riparian functions of stands at DFC has not been validated. Therefore, we would not simply assess DFC and call it good. The desired functions are assumed as stated in the definition "DFC is defined as the condition of a riparian forest stand at 140 years of age. This age is assumed to be representative of a mature forest stand that provides the full range of ecological functions important	
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Consider describing the cost scale in the introduction of this section. This would prevent the need for Thank you. In previous iterations of this document we did as you

			See my prior comment. I think TFW Policy already approved this when they responded to CMER's Answers to 6Q for Type F Exploratory report. Check Policy's meeting meeting minutes since it was a recommendation we (the Project team approved by RSAG/CMER) made on next steps.	Policy has not formally approved this Type F project team recommendation, but can opt to do this work through this Scoping Document Alternative/add-on selection process.
81	43	4 Chris Mendoza		
82	43	17 dieu.julie	Or see the comment below.	See revised text.
			This is the comment below: IF this is what you're hoping to accomplish first, then reword S.3.A. so that it	See edit. That was not a primary objective of this add-on. However we
83	43	30 dieu.julie	reflects not "Status" but "Calibration of Methods" concept.	have added a third possible critical question.
			Red comment: The recommendation we / CMER made to incorporate / add-on the Type F Exploratory	Thank you Chris. TFW Policy approved the Type F PT's recommendation
			report sites to EXMO was contingent on our related recommendations to Policy to not pursue the Type F	to skip the Westside Type F Riparian Prescription Effectiveness project
			Prescription Effectiveness Study (testing current Type F rules) and instead pursue the Type F	(phase 3) and instead continue with the Westside Type F Experimental
			Experimental Study testing altnernative prescriptions. As per my prior comment on providing more	Buffer Treatment Project. I have personally confirmed this with TFW
			background to opening of this Riparian EXMO section - Including the Type F Exploriaty sites in EXMO is	Policy and TFW Policy chairs. Our text is clear. We recommended adding
			the AMP's "insurance policy" that Type F buffers under current rules will continue to provide key	Type F sites to study, but they are not essential. Our text is clear. We
			functions long-term, not just 4-6 years post harvest. Not doing so negates our recommendation to	recommended adding Type F sites to study, but they are not essential.
			pursue the Type F Experimental study. Please make that point clear.	Please see November 27, 2024 TFW Policy Meeting Notes
84	44	7 Chris Mendoza		
			Yellow comment: Make clear that joining other state / federal agencies is part of your preferred altnerative and further elaborate on why (e.g. using similar / comparable methods and cost savings).	Good note. Added note to Strengths of Alt 5.

This should be emphasized as major benefit.

44 37 Chris Mendoza

Comment #		Line # Reviewer 29 Debbie Kay	Priority	Reviewer Comment This information may be better placed in the introduction than as a summary/conclusion. https://bcreptilesandamphibians.ca/wp-	Author Response to Reviewer PT agreed to restructure the text. Clarified that some research
87	7 19	43 A.J. Kroll		content/uploads/2024/03/Kroll_etal_2010.pdf <p><p>https://www.sciencedirect.com/science/article/abs/pii/S0378112708002399</p></p>	does exist and gave suggested example.
88	3 20	22 A.J. Kroll		https://d1wqtxts1xzle7.cloudfront.net/47196408/Concerns_regarding_the_use_of_a mphibians20160712-10717-ddjwgu-libre.pdf?1468355906=&response-content-disposition=inline%3B+filename%3DConcerns_regarding_the_use_of_amphibians.pdf&Expires=1753146296&Signature=bBnVjUwTOnlTCYFrWvCPi0e4Oa~VmVHvMVUJMBKVnm8XlaslLRi~4UKBYpmtU5v5w8mNpbP8paW~SZ4oVijkE0HmPyu~N8Yl4iH4fQ8aHkDkBfBWfb3ND7rVQDo5tnAxkxSTzqR4okDMgY3w701TxROzrhl8~rY-klj0kNMDEH5xEKFOzpJtjlNawXLFyz8UOVkbWioyk59rJGnhKzKusl2SYVwru48tR-tsP2TkX4FW5lNqWZ9o8oXS-lhdCEbsvlm5OuU2G1bqvtlUawgFu0kjJ1sGgmXedVxQTrNsSXlSDwbprQkomeUQtoZ6p3g6dmh1-jJNcIR-KT-z8TQzZg&Key-Pair-Id=APKAJLOHF5GGSLRBV4ZA	Clarified that some research
89	9 21	42 Debbie Kay		This language reads better as a part of the introduction. Does this BAS need a Summary/Conclusion? other than maybe a cautionary reminder that remote sensing technologies continue to advance, evolve and change etc. and what works and is available today may be outdated or unavailable for future sampling events. So continual evaluation of remote sensing technologies should remain a part of the extensive monitoring program moving forward.	Debbie's ideas have been included and the section has been updated. The section is also written in Scoping under Summary of Best Available Science.

3 dieu.julie 7/25/2025 12:56 Over-Arching Comment #1: Sorry I didn't get to the BAS, although since this isn't my field I might not have had much constructive to suggest. This is an excellent example of what a Scoping/BAS/Alternatives document is meant to be, and it is very refreshing for CMER/Policy to have actual research choices. Thank you for running spell-checker. A little look at commas, caps, periods, particularly in the two big tables because I probably caught the rest of the problems, would be nice. 3 dieu.julie 7/25/2025 13:05 Over-Arching Comment #2: Washington set a geology and the "inference" from one to the next without very specific consideration. During a recent SAF talk, I described Georgia's geology and the "inference" from one to the next without very specific consideration of lithology and the "inference" from one to the next without very specific consideration. During a recent SAF talk, I described Georgia's geology, both at the state-wide send washington's as a Jackson Pollack on psychedelics. Lithology and landscape age are creating huge controls on our expression of hydrology and the "inference" from one to the next without very specific consideration. During a recent SAF talk, I described Georgia's geology, both at the state-wide send washington's as a Jackson Pollack on psychedelics. Lithology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression, and glaciation. During a recent SAF talk, I described Georgia's geology, both at the state-wide send at the 1:24,000 scale that most of the mapping is done. This is a combination of lithology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls on our expression of hydrology and landscape age are creating huge controls and lands 7 34 Debbie Kay 7/24/2025 16:47 For policy, can you give an idea of the ballpark range of area that a HUC 8 and HUC12 covers? This may be easier to grasp than WAUs and WRIAs for those without technical backgrounds. 8 15 Debbie Kay 7/24/2025 15:19 It would be useful to precisely describe how riparian areas will be (or could be if still tbd) defined in this project, e.g. "The extent of riparian areas sampled in this study will be either 150' or 200' from bankfull edges, depending on the alternative." 9 1 Debbie Kay 7/24/2025 15:21 Maybe Introduction instead of context? Context is a little ambiguous. Also, it may be useful to have an executive summary at the beginning of this document. 9 4 Debbie Kay 7/24/2025 15:25 What about DFC? 6 Chris Menditoring which is described by the Board of the cause / effect is a different in general set of the cause / effect is a different in general set of the cause of th 10 2 dieu.julie 7/24/2025 15:54 This breaks basic parentheses rules, but may be weird because it's a link. Just asking. 10 14 Debbie Kay 7/24/2025 15:37 Extensive Monitoring can also help identify where on the landscape and in what situations current rules are not meeting resource objectives over time, which in turn can inform and guide follow up prescription and intensive scale studies. 10 17 Chris Mendoza 7/23/2025 9:30 See prior comment. 10 25 Chris Mendoza 7/23/2025 9:44 Yellow: In the citation you have chosen "effectiveness monitoring" defined in Schedule L-1. By itself, EXMO does not "represent the ultimate test of whether FFR rules are effectiveness monitoring, when conducted in concert, can compliment each other. The way this currently reads, it implies Extensive Monitoring is all that's required to test the rules. Remedy - request taking language from MDT that places in proper context of effectiveness monitoring. 10 29 dieu.julie 7/24/2025 15:57 I haven't double-checked on this. But the Landscape-Scale Effectiveness Monitoring Project (which is arguably the same thing for landslides) has been removed from the CMER Work Plan. IF this is still in the WP, then I can live with its reference here, but we'd better have a broader conversation someday. 10 34 Chris Mendoza 7/23/2025 9:55 Red: As I mentioned at CMER meeting during Q/A of your presentation, please expand the Background explaining "why" there has not been "sustained" Ext. monitoring to costs) or whether or not to proceed with EXMO. CMER held an EXMO workshop for TFW Policy's decision making process on how (methods and costs) or whether or not to proceed with EXMO. CMER held an EXMO workshop for TFW Policy members that are likely unaware of this important history who will be making decisions on this scoping document. 11 15 dieu.julie 7/24/2025 16:01 Not clear what this is - not "aforementioned" because I ran a search. Suspect you mean the "Extensive Riparian Status and Trends Monitoring - Temperature, Type F/N Westside and Eastside reports" listed in the table above. Please fix. 4 dieu.julie 7/24/2025 16:03 Not sure about this "transferability" word. Real sure you're using it incorrectly in this sentence. And maybe "extrapolation" would be better? 9 Chris Mendoza 7/23/2025 10:16 Yellow: Regarding temperature, Ehinger (2013, 2019) also pointed out that even when directly measuring in stream termperature and forestry). Remedy, add this point to your Ehiinger report summary above this section. 13 Chris Mendoza 7/23/2025 10:21 Yellow: You skipped the EXMO workshop CMER held for TFW Policy as mentioned in my prior comment. This is worth adding as it demonstrates that CMER workplan's EXMO program (fish passage, steep unstable slopes, riparian), but that Policy was informed of "non-CMER" EXMO research being conducted in WA on State lands and by private forest landowners. 12 27 Debbie Kay 7/24/2025 16:05 Implementation is misspelled in the graphic below. 12 28 dieu.julie 7/24/2025 16:05 Fix spelling the "Implementation" please. 12 33 Chris Mendoza 7/23/2025 10:31 Please see my prior comments on citing Schedule L-1 verbatim. It does not mention "extensive monitoring" outside the context of "effectiveness monitoring". 7/24/2025 16:09 The L1 performance target for LWD/Organic Inputs is: <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands over time and space? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood ecological functions on FPHCP lands? <P>• CQ 3.B How is the distribution of riparian stand potential to provide shade and large wood 12 35 Chris Mendoza 7/23/2025 10:57 Yellow: I don't recall EXMO being designated as a CWA related study by Ecology. It was never on Ecology's "Clean water act milestones" update to the Board given by Mark Hicks and Ecology did to see this project as a priority is my recollection. I recommend double checking with Ecology before making this claim. 12 35 dieu.julie 7/24/2025 16:07 And if you find that it is a CWA project, then please explain this up in the Background section in a couple more sentences instead of just dropping it here. 13 12 Debbie Kay 7/24/2025 16:11 What is an indicator of stream temperature? Either we're measuring stream temperature (the condition) or some indicator of that stream temperature. This is confusing 13 Chris Mendoza 7/23/2025 11:00 See my prior comment about citing the FPHCP, Schedule L-1 verbatim (Appendix N). 13 19 Debbie Kay 7/24/2025 16:19 What about the indicators? 7/21/2025 15:17 The challe gent appraisa of each basin (e.g., 4th order), stratify by the amount of interest. P><P>Not a so in terest of interest of i 13 35 Debbie Kay 7/24/2025 16:30 I'm not sure if this is quite the right title. Sample unit and frame is not really a population to be included. 13 38 Debbie Kay 7/24/2025 16:21 This feels more like a footnote. 14 20 Debbie Kay 7/24/2025 16:34 Will there be any attempt to look at USGS data regarding groundwater fed systems. Also, stream temperatures may be higher than historic levels due to a lower volume of flow from groundwater seeps into the stream channel. The context of current conditions compared to baseline seems important here. 14 21 Chris Mendoza 7/23/2025 11:12 Yellow: is this the citation for the CMER Eastside Forest Hydrology Study? If so, I recommend summarizing the findings of that study and relate back to your target population. Would it be possible to utilize the sites from CMER's Eastside Forest Hydrology study by incorporating into sampling scheme? 14 23 Debbie Kay 7/24/2025 16:42 Can you please elaborate here? 14 26 Debbie Kay 7/24/2025 16:44 Maybe reference the glossary here? 14 31 Debbie Kay 7/24/2025 16:49 This summary reads more like an attempt to convince the reader of a preferred alternative than an objective presentation of the state of the science. Perhaps include this kind of language when describing the pros and cons of different study alternatives, but recommend not including here as part of the BAS summary. 15 7 Debbie Kay 7/24/2025 16:56 Here is a streamlined version of the information below for consideration. It would replace the rest of the section. 15 32 Chris Mendoza 7/23/2025 11:19 Green: I completely agree the add-ons are for Policy decision not CMER. 16 29 Debbie Kay 7/24/2025 17:01 See comment above about current groundwater levels compared to baseline/average years 16 32 Debbie Kay 7/24/2025 17:00 What about stand growth models to estimate trajectory to DFC? E.g. FVS, DFC Model, Organon... 16 39 Debbie Kay 7/24/2025 17:08 It would be very useful to have a summary table/matrix that rates all of the same strength and weakness factors for all the alternatives on a scale (1-5, 1-10) in one place. This could prevent assumptions based on things like a specific strength being mentioned in one but omitted in another. 16 39 Ash Roorbach 7/25/2025 16:18 Perhaps consider incorporating some of the images from the CMER Ex Mo presentation into the alternative analysis section. 17 29 Chris Mendoza 7/23/2025 11:31 Yellow: as per my prior comments, emphasizing this point to TFW Policy - also made by Ehinger (2013, 2019) - is paramount to them understanding the limitations of EXMO. e.g. There are many watersheds that have mixed agriculture and forestry so the temperature readings that will be taken cannot be attributed to a specific land use type or particular forest practice because EXMO does not demonstrate cause/ effect. 18 22 dieu.julie 7/25/2025 10:23 Yellow: I had this question during Jenelle's part of the presentation at CMER, and think this is "sort of" the answer. Please be crystal clear that a new set of random points would be used. And wouldn't there be a better "trend" assessment by using the original points? Or isn't that at least a sub-alternative? 18 36 dieu.julie 7/25/2025 10:24 To my previous point - why wouldn't you use, at least to some level, the earlier points? 19 4 Debbie Kay 7/24/2025 17:10 Also, really expensive, logistically challenging, potential access issues 19 The contract contr 19 18 Debbie Kay 7/24/2025 17:12 Consider describing the cost scale in the introduction of this section. This would prevent the need for the same footnote in so many places. 20 4 Debbie Kay 7/24/2025 19:51 Maybe move figure 3 or a similar map to here to give reader a senses of HUC 12 size/scale when reading about the alternatives. 20 19 dieu.julie 7/25/2025 10:28 I found this sentence very confusing. Please accept my suggestion or try something else, but "consisting of the minimum" is obtuse. 4 dieu.julie 7/25/2025 10:30 See my over-arching comment about WA geology. Right here is the crux of my problem, because HUC 12s individually have great variance in lithology, never mind what the neighbors look like. 21 19 A.J. Kroll 7/21/2025 14:52 Do you intend to analyze the data? 21 19 Debbie Kay 7/24/2025 19:52 Why is that a strength? Lower costs? Not relying on modeling gives more confidence on the findings? 21 A.J. Kroll 7/21/2025 14:35 I am confused as to how you are using the phrase "scope of inference". If you draw a random sample from a clearly defined population, you can make inference. 21 Debbie Kay 7/24/2025 19:54 Also confused by the term "scope of inference." Is there a simpler way to state this whole statement that's easier for policy to understand? 22 31 dieu.julie 7/25/2025 10:34 Yellow: This could be actually tested with a couple of additional HUC 12s. 23 4 Debbie Kay 7/24/2025 19:55 As stated above, this would be a nice frame of reference if placed at the beginning of alternative 2. 23 10 Debbie Kay 7/24/2025 19:57 With who? Perhaps mention specific datasets that you are interested in using in case there are federal changes that make it hard to continue to work with agencies and those data are moved. 24 30 Debbie Kay 7/24/2025 20:01 If this is so unlikely to provide useful data, why is it being presented as an option? Also, lack of certainty that you will have consistent access to NOAA seems like an additional weakness. 8 dieu.julie 7/25/2025 10:40 Yes, this would help (see previous comment about actually monitoring a couple of replicate HUC 12s). Anyway, this is a good point that I think you failed to make in the Alternative 4 Approach (and could go add it in). 26 10 Chris Mendoza 7/24/2025 12:09 Yellow: So the HUC 12 intensive monitoring would be used to validate other models? Acknowledging we're in scoping phase and study design will come later, but I'm unfamiliar the cooperative models. If so, suggest adding that point of clarification for readers. 26 18 dieu.julie 7/25/2025 10:47 Did I miss something? Is this actually talked about somewhere (or maybe it needs to be)? 26 23 dieu.julie 7/25/2025 10:49 All I really need a VERB in the sentence, so feel free to try something else. 26 31 Debbie Kay 7/24/2025 20:03 Please elaborate on why this is a strength. 27 2 dieu.julie 7/25/2025 10:50 Why to we have a second version of this table which appears to be the same as the first one? 5 Debbie Kay 7/24/2025 20:05 Please add this term to the glossary for policy. Also, consider writing a brief definition of each of the terms in this column to keep policy from needing to flip back and forth to understand. 1 Chris Mendoza the EXMO scoping for included those the important of the EXMO scoping for included those the important of the extra formation in the extra formation functions for included those the extra formation for the 32 3 Debbie Kay 7/24/2025 20:11 Also, potential to collect understory data, including seedling/sapling estimates 8 dieu.julie 7/25/2025 11:01 I will let this go in the Scoping Document, but if we chose Alternative 1 then I will question spending money to restudy a very well-studied non-issue as the Study Design is developed. 32 Debbie Kay 7/24/2025 20:15 Yes! Trajectory to DFC as a potential key monitoring metric to help assess large wood ecological functions that provide in puts to stand growth models capable of estimating trajectories to DFC. Do not want to see DFC treated as an afterthought or only as a potential key monitoring metric to help assess large wood ecological functions. Include in the evaluation of riparian atternative can provide in puts to stand growth models capable of estimating trajectories to DFC. Do not want to see DFC treated as an afterthought or only as a potential key monitoring metric to help assess large wood ecological functions. Include in the evaluation of riparian atternative can provide in puts to stand growth models capable of estimating trajectories to DFC. Do not want to see DFC treated as an afterthought or only as a potential key monitoring metric to help assess large wood ecological functions. Include in the evaluation of riparian atternative can provide in puts to stand growth models capable of estimating trajectories to DFC. Do not want to see DFC treated as an afterthought or only as a potential key monitoring metric to help assess large wood ecological functions. Include in the evaluation of riparian atternative can provide in puts to stand growth models capable of estimating trajectories to DFC. Do not want to see DFC treated as an afterthought or only as a potential key monitoring trajectories to DFC. Do not want to see DFC treated as an afterthought or only as a potential key monitoring trajectories to DFC. Do not want to see DFC treated as an afterthought or only as a potential key monitoring trajectories to DFC. The after the contract of t 32 33 Debbie Kay 7/24/2025 20:17 Is this area defined as being within a certain distance from the stream edge? Like everything 200 feet or less from a stream edge? 34 10 Debbie Kay 7/24/2025 20:19 What do you mean by potential here? Can you elaborate? 34 10 Debbie Kay 7/24/2025 20:20 Presumably this is to 200' from bank edge? "Wall to wall" maybe suggests something bigger. Not clear what target population means here. 35 15 Debbie Kay 7/24/2025 20:21 Same questions as alternative 3 36 28 dieu.julie 7/25/2025 11:09 List alternative numbers as you did with Alternative 5 for temperature please. 40 37 A.J. Kroll 7/21/2025 15:49 We also know that SAA are widespread in western Washington, including in basins that were harvested once or twice without any form of riparian protection. This piece of information is critical. 41 4 A.J. Kroll 7/21/2025 15:50 Cost effective compared to what?<P><P>I continue to hear people talk about how cost effective eDNA is...but no one seems to have any actual numbers to support the claim. 41 17 dieu.julie 7/25/2025 11:12 Sorry, I did a broad replace to get all capitalized and this was the result. 41 20 dieu.julie 7/25/2025 12:39 Not in your acronym list, and I don't know what it is. Please add. 42 34 Chris Mendoza 7/25/2025 11:50 Yellow: DNR Compliance Monitoring program already does this to some extent. I recommend looking into DNR's past and current Compliance Monitoring efforts so as not to duplicate. 43 4 Chris Mendoza 7/25/2025 11:55 See my prior comment. I think TFW Policy already approved this when they responded to CMER's Answers to 6Q for Type F Exploratory report. Check Policy's meeting minutes since it was a recommendation we (the Project team approved by RSAG/CMER) made on next steps. 43 17 dieu.julie 7/25/2025 12:50 Or see the comment below. 43 30 dieu.julie 7/25/2025 12:51 This is the comment below: IF this is what you're hoping to accomplish first, then reword S.3.A. so that it reflects not "Status" but "Calibration of Methods" concept.

7 Chirs Mendoza 7 Chirs Mendoza 7 (25/2025 12:11 Yellow comment: Make clear that joining other state / federal agencies is part of your preferred altnerative and further elaborate on why (e.g. using similar / comparable methods and cost savings). This should be emphasized as major benefit.

5 29 Debbie Kay 7 2/2/2025 21:21 Yellow comment: Make clear that joining other state / federal agencies is part of your preferred altnerative and further elaborate on why (e.g. using similar / comparable methods and cost savings). This should be emphasized as major benefit.

5 29 Debbie Kay 7 2/2/2025 21:21 Yellow comment: Make clear that joining other state / federal agencies is part of your preferred altnerative and further elaborate on why (e.g. using similar / comparable methods and cost savings). This information may be better placed in the introduction than as a summary/conclusion.

5 29 Debbie Kay 7 2/2/2025 17:05 17:

7 Chris Mendoza 7/25/2025 12:06 Red comment: The recommendation we / CMER made to incorporate / add-on the Type F Experimental study. Please make that point clear. Including the Type F Experimental study testing altrenative prescriptions. As per my prior comment on providing more background to opening of this Riparian EXMO section - Including the Type F Experimental study. Please make that point clear. Including the Type F Experimental study testing altrenative prescriptions. As per my prior commendation to pursue the Type F Experimental study. Please make that point clear. Including the Type F Experimental study testing altrenative prescriptions. As per my prior comment on providing more background to opening of this Riparian EXMO section - Including the Type F Experimental study. Please make that point clear. Including the Type F Experimental study testing altrenative prescription of this Riparian EXMO is the AMP's "insurance policy" that Type F Experimental study testing altrenative prescription of this Riparian EXMO is the AMP's "insurance policy" that Type F Experimental study testing altrenative prescription of this Riparian EXMO is the AMP's "insurance policy" that Type F Experimental study testing altrenative prescription of this Riparian EXMO is the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the AMP's "insurance policy" that Type F Experimental Study testing altrenative prescription of the

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