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 **EPA Advisory Report on EPA's
Regional Vulnerability
Assessment (ReVA) Program**

Note to the Reader

The attached is a draft report of an expert Panel established by the U.S. EPA Science Advisory Board (SAB). The draft is still undergoing final internal SAB review, however, in its present form, it represents the consensus position of the panel involved in the review. Once approved as final, the report will be transmitted to the EPA Administrator and will become available to the interested public as a final report. The draft is now being reviewed by the EPA SAB. During the review of this draft report, the Board will consider whether: 1) the original charge questions to the SAB review panel have been adequately addressed; 2) there are any technical errors or omissions or issues that are inadequately dealt with in the report; 3) the report is clear and logical; and 4) any conclusions drawn or recommendations provided, are supported by the body of information in the report. This draft is being released for general information to members of the interested public and to EPA staff. This is consistent with the SAB policy of releasing draft materials only when the Committee involved is comfortable that the document is sufficiently complete to provide useful information to the reader. The reader should remember that this is an unapproved working draft and that the document should not be used to represent official EPA or SAB views or advice. Draft documents at this stage of the process often undergo significant revisions before the final version is approved and published.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

1

OFFICE OF THE ADMINISTRATOR
SCIENCE ADVISORY BOARD

1 Stephen L. Johnson
2 Administrator
3 U.S. Environmental Protection Agency
4 1200 Pennsylvania Avenue, N.W.
5 Washington, D.C. 20460

6

7 Subject: Advisory on EPA's Regional Vulnerability Assessment Program

8

9 Dear Administrator Johnson:

10 The Environmental Protection Agency's (EPA) Office of Research and Development
11 requested that the Science Advisory Board (SAB) provide advice on the methodological
12 approach used in EPA's Regional Vulnerability Assessment (ReVA) Program. The SAB was
13 also asked to provide advice on improving the effectiveness of the ReVA web-based
14 Environmental Decision Toolkit for communicating ecological condition and risk. In ReVA,
15 predictive tools and methods are used to estimate future ecosystem vulnerability and illustrate
16 trade-offs associated with alternative environmental and economic policies. A panel of the SAB
17 Ecological Processes and Effects Committee, augmented by experts in decision science,
18 statistics, analysis of land use change, and the use of geographic information system technology,
19 met to provide advice to EPA on the ReVA methods and Environmental Decision Toolkit. The
20 enclosed SAB report addresses EPA's charge questions to the Panel and provides
21 recommendations for improvements in ReVA.

22

23 The SAB strongly recommends continued support of the efforts of EPA's Office of Research
24 and Development to develop ReVA. The SAB finds that the suite of tools in ReVA can assist
25 local and regional resource managers in assessing current and future conditions. Although
26 ReVA is not yet fully developed, it offers a very promising methodology for compiling and
27 synthesizing spatially integrated data sets in a cohesive way for a region. The major strengths of
28 ReVA are in the areas of data integration and visualization, particularly in the development of
29 tools in these areas for resource managers and planners.

30

31 It is the opinion of the SAB that the utility of ReVA could be better supported by providing
32 additional documentation of the underlying scientific methods. The SAB strongly encourages
33 EPA to develop overarching conceptual models for ReVA and to provide a framework and
34 indicators to assess ecological condition. The SAB also recommends that EPA provide
35 additional documentation on processes for acquiring and assembling data, quality assurance

1 reviews, spatial data integration, and the statistical tools used in ReVA.
2

3 The SAB underscores the need for EPA to provide additional in-house expertise to fully
4 develop ReVA, and to better leverage outside expertise by working closely with other
5 government agencies and academic institutions. The SAB looks forward to your consideration
6 of and response to the enclosed advisory report.
7
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10 Sincerely,
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16 Dr. M. Granger Morgan, Chair
17 EPA Science Advisory Board
18

19 Dr. Kenneth Cummins, Chair
20 Regional Vulnerability
21 Assessment Advisory Panel
22 EPA Science Advisory Board
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NOTICE

This report has been written as part of the activities of the EPA Science Advisory Board, a public advisory group providing extramural scientific information and advice to the Administrator and other officials of the Environmental Protection Agency. The Board is structured to provide balanced, expert assessment of scientific matters related to the problems facing the Agency. This report has not been reviewed for approval by the Agency and, hence, the contents of this report do not necessarily represent the views and policies of the Environmental Protection Agency, nor of other agencies in the Executive Branch of the Federal government, nor does mention of trade names or commercial products constitute a recommendation for use. Reports of the EPA Science Advisory Board are posted on the EPA website at <http://www.epa.gov/sab>.

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3 **Regional Vulnerability Assessment Advisory Panel**
4

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34 Committee)
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3 **1. EXECUTIVE SUMMARY**
4

5 The Science Advisory Board Regional Vulnerability Assessment Advisory Panel was charged
6 with providing advice to EPA's Office of Research and Development on the approach used in
7 the Agency's Regional Vulnerability Assessment (ReVA) program, and on improving the
8 effectiveness of the web-based ReVA Environmental Decision Toolkit (EDT) for
9 communicating ecological condition and risk. Geographic information system technologies and
10 quantitative integration and assessment methods are used in ReVA to derive future vulnerability
11 estimates that include syntheses of modeled ecological drivers of change (i.e., estimated changes
12 in pollution and pollutants, resource extraction, spread of non-indigenous species, land use
13 change, and climate change) and resulting changes in stressor patterns. Integrative and
14 visualization tools incorporated into ReVA can be used to illustrate the trade-offs associated with
15 alternative environmental and economic policies in the context of dynamic stakeholder values.
16

17 EPA's Office of Research and Development sought advice regarding the following questions.
18

19 *Question 1. Strengths and Limitations of the ReVA Approach*
20

21 ReVA is intended to provide an overview of current and future regional conditions. ReVA may
22 also serve as a priority setting tool to target areas for more focused risk assessments of specific
23 problems. Please comment on the strengths and limitations of the ReVA approach as it applies
24 to these uses.
25

26 *Question 2. Effectiveness of the Web-based ReVA Environmental Decision Toolkit*
27

28 Please comment on the effectiveness of the web-based ReVA Environmental Decision Toolkit
29 (EDT) in communicating ecological condition and vulnerability to decision-makers at regional to
30 local scales. Please provide input as to the level of analytical capability needed in ReVA for
31 intended audiences as well as approaches to presenting available information and uncertainty.
32

33 *Question 3. Usefulness of the ReVA Approach to Decision-makers*
34

35 Please comment on the usefulness of the ReVA approach to decision makers in allowing them to
36 see the overall consequences of future development, and mitigation, conservation, and
37 restoration activities.
38

39 *Question 4. Issues Associated with use of ReVA at Multiple Scales and Future Research*
40 *Priorities*
41

42 Please provide input on issues encountered as the information and approaches in ReVA are used
43 at finer scales. Please also provide input on future ReVA research priorities and alternative
44 applications of ReVA methods for decision making at multiple scales.
45

46 It is the opinion of the SAB that the suite of ReVA tools provides an exceptional application

1 opportunity to assist local and regional resource managers with assessments of current and future
2 regional conditions. Use of spatially explicit data, coupled into a statistical platform to facilitate
3 rapid reanalysis and display of data, has a high degree of value to be applied over the range of
4 questions ReVA may intend to address. The SAB notes, however, that there are a number of
5 limitations associated with the methodological approaches used in ReVA and that the application
6 of ReVA could be substantially improved by providing additional documentation of the
7 underlying processes. The SAB strongly encourages EPA to continue efforts to develop ReVA
8 and provides specific comments and recommendations in response to EPA's charge questions.

9
10 *Strengths and Limitations of the ReVA Approach*

- 11
- 12 • Overall, the SAB finds that the major strengths of ReVA are in the areas of data
13 integration and visualization, particularly in the development of tools in these areas for
14 resource managers and planners. The SAB notes that ReVA provides a very promising
15 methodology for compiling existing and other disparate spatially integrated data sets in a
16 cohesive way for a region. ReVA also provides new methods to synthesize existing data
17 in a spatial framework.
18
 - 19 • The SAB acknowledges that development of the ReVA has been an extraordinary and
20 elegant effort by a dedicated and highly skilled team. The SAB also notes that the ReVA
21 Program is not yet fully developed. It is apparent, however, that a good deal of
22 knowledge about what constitutes ReVA resides solely with the developers. Outside
23 reviewers cannot discern what ReVA is from information that is currently available. The
24 SAB feels strongly that ReVA could be substantially improved by providing additional
25 documentation of the underlying processes, and a framework and indicators to assess
26 ecosystem vulnerability.
27
 - 28 • In order to improve ReVA as a tool for providing an overview of regional conditions, the
29 SAB recommends and encourages the ReVA program to develop overarching conceptual
30 models for ReVA by documenting: what ReVA is, the main objectives of ReVA, and the
31 main questions being asked in ReVA; and clear basic documentation on what constitutes
32 the ReVA process, including the underlying processes for acquiring and assembling data,
33 quality assurance reviews, and spatial data integration.
34
 - 35 • The SAB finds that, as presently described, ReVA is not well suited for use as a priority
36 setting tool to target areas for more focused risk assessment. This is further discussed in
37 Section 5.1.2 below. The SAB notes that EPA should use caution when ReVA is applied
38 to aggregate individual stressors into a single map or value. While such aggregations are
39 useful in identification of areas for more focused risk assessment, the underlying
40 statistical methods for aggregating and/or integrating multiple stressors into a single
41 value are still in their infancy. Use of these methods may lead to erroneous
42 interpretations.
43
 - 44 • ReVA's focus tends toward moderate to high probability/lower incremental impact
45 stressors that change gradually over time. This precludes evaluation of important
46 regional differences in ecological qualities such as keystone habitat. At finer scales, such

1 issues emerge as extremely important. A good future application of ReVA would be to
2 evaluate low probability/rapid or “cusp-driven” changes with highly adverse
3 consequences. Examples might include: a sudden shift in agricultural practice to
4 widespread use of genetically engineered crops with reductions in heavy pesticide
5 applications, pulses of organo-phosphorus pesticides into streams in a small county,
6 sudden atmospheric releases of potentially acutely toxic chemicals, and changes in policy
7 relative to timber harvesting. Such events would seem to be more relevant at smaller
8 scale applications where change can be more rapid and pervasive, and would be worthy
9 of additional ReVA research efforts in the future.

10
11 *Effectiveness of the Web-Based Environmental Decision Toolkit*

- 12
- 13 • Two example data sets were provided by EPA to demonstrate the ReVA Web-based
14 Environmental Decision Toolkit (EDT). The Sustainable Environment for Quality of
15 Life (SEQL) data set in ReVA contained information obtained from counties in the
16 Charlotte, North Carolina region. The Mid-Atlantic Regional Assessment data set
17 contained information from eight states in the Mid-Atlantic region. Both of these data
18 sets were used to demonstrate excellent examples of ReVA applications for very limited
19 regions. The SAB notes that the spatial development maps in the EDT use color
20 effectively. Vulnerability is well described in the EDT. However, ecological condition is
21 not as well described because temporal dynamics have not been captured. This could be
22 addressed by linking the data layers to models that enable consideration of temporal
23 information.
 - 24
 - 25 • The SAB recognizes that the EDT is still under development. However, given the lack of
26 documentation for the EDT, the SAB recommends that EPA compile and publish a
27 separate document on compilation, organization, extrapolation, and types of data/layers
28 in the ReVA EDT. A useful example format that could be used to develop such a
29 document is Table ES-2 in the executive summary of the SAB publication, *A Framework*
30 *for Assessing and Reporting on Ecological Condition* (EPA Science Advisory Board,
31 2002). It would also be helpful to include statements describing quality of, and
32 confidence in, the data.
 - 33
 - 34 • The SAB believes more resource efforts should be expended toward developing
35 mechanistic models to be coupled with the spatially explicit data in ReVA. This is
36 potentially ReVA’s most powerful application. Where models have been developed,
37 those uses should be listed on the ReVA web site (e.g., watershed models and ozone
38 model). One potential application that the SAB would like to see explored is the
39 coupling of ReVA with dose/response models.
 - 40
 - 41 • The strengths and utility of the integration methods in ReVA should be tested using a
42 relatively limited set of environmental and landscape data. The SAB finds that a hind-
43 cast demonstration of ReVA in a simpler system would be an effective way to illustrate
44 the utility and potential power of the methods and to answer focused questions. The SAB
45 recommends that EPA allocate additional resources to the ReVA program to: 1) run hind-
46 casts and conduct field validation of the integration methods; 2) apply the integration

1 methods using a more limited number of land/resource variables; and 3) explore
2 sensitivity and uncertainty in ReVA with hind-casts.

- 3
4 • The elements of the ReVA EDT have been assembled into a web-based application that
5 can be applied by regional and local decision makers to conduct scenario analysis. By
6 scenario analysis the SAB means the articulation of future contexts which could
7 plausibly, not necessarily probably, develop contexts defined by variations in present-day
8 natural and social processes that together could lead to ecological vulnerability and
9 management priorities different from those likely to occur under a continuation of
10 present-day patterns and processes (Ringland, 1998; Schwartz, 1991). The SAB finds
11 that, while developing web-based applications is a laudable goal, the computing power
12 needed to handle and process information is likely to be too great to practically allow
13 such web-based applications in the near future. EPA should be careful to include strong
14 cautions against using the interface tool for actual decision making if the application
15 cannot be practically applied.
- 16
17 • The eleven integration and assessment methods in ReVA have been developed from a
18 vast literature encompassing multiple disciplines, software, and decision tools. These
19 methods offer great promise for further development and future use. The SAB notes,
20 however, that additional documentation should be provided to support the ReVA methods
21 that have been adopted for data integration, landscape modeling, and integrative
22 assessments. The SAB recommends that a methodology document and user's manual
23 approach be prepared as an integral part of the EDT to address these issues. A precise
24 description of each integration and assessment method should be included in the
25 document. Basic documentation of the ReVA process, as well as metadata for the entire
26 process, should also be included. The user's manual should provide information needed
27 to understand how much uncertainty is associated with the EDT presentation of
28 ecosystem vulnerability, and guidance to assist users in selecting methods. It would be
29 useful to include a table of assessment questions and integration methods in the document
30 with an indication of which methods (or suite of methods) are most appropriate for
31 answering the questions.

32 33 *Usefulness of the ReVA Approach to Decision-makers*

- 34
35 • The SAB finds that the usefulness of the ReVA approach to decision makers could be
36 improved by: (1) explicitly acknowledging the differences between forecasting and
37 scenario analyses, (2) continuing efforts to improve or enhance the ecological conditions
38 database, (3) validation and/or improvement of the ecological condition integration
39 methods, (4) incorporation of commercially-available decision-assisting software, and (5)
40 recognition within ReVA that ecological vulnerability decisions must also consider
41 equity, efficiency and effectiveness. Effectiveness means getting the job done (e.g.,
42 reducing vulnerability) regardless of cost; efficiency refers to output divided by input
43 (e.g., benefit-cost ratio), and hence does consider the cost (e.g., use of various resources)
44 involved; equity is some notion of fairness. ReVA's role in measuring ecological
45 vulnerability need not consider equity, efficiency, and effectiveness. However, to the
46 degree that ReVA (or any other entity or tool) concerns itself with priority setting, it

1 should consider equity, efficiency, and effectiveness. The SAB recommends that EPA
2 explore adding tools and data layers to ReVA in these areas to make it more useful in the
3 decision making process.
4

5 *Issues Associated with use of ReVA at Multiple Scales and Future Research Priorities*
6

- 7 • As ReVA is applied at finer scales it is likely to be used by a large number of decision-
8 makers with varying levels of scientific and technical expertise. In order to further
9 develop ReVA for use at finer scales, the SAB encourages EPA to provide additional
10 information documenting and explaining issues related to the choice of methods and
11 indicators, and to provide exemplars where available.
12
- 13 • The SAB has identified a number of research priorities and applications to support further
14 development of ReVA methods for decision making at multiple scales. 1) Research is
15 needed to provide information about the minimum amount of data needed for advice and
16 guidance used in decision making. 2) In addition to providing information about the
17 vulnerability of geographic areas, ReVA should identify geographic areas of highest
18 “value.” 3) Integration methods, applications, and futures tools in ReVA should be
19 validated. 4) ReVA should contain data sets describing simpler scenarios that span
20 resource issues. 5) Analyses should be conducted to determine whether ReVA is
21 providing data describing the critical parameters for assessing vulnerability. 6) Users
22 should be provided information about the confidence in data used for projections. 7)
23 Spatial problems (scale effects) associated with the ReVA map representations should be
24 resolved.
25

26 In summary, the SAB strongly recommends continued support of the efforts of EPA’s
27 Office of Research and Development to develop ReVA. The SAB finds that the ReVA
28 methods and web-based Environmental Decision Toolkit hold great promise as tools that can
29 assist local and regional resource managers in assessing current and future conditions.
30 However, the utility of ReVA could be better supported by providing additional
31 documentation of the underlying processes. The SAB encourages EPA to continue
32 developing ReVA, and to provide documentation on: what constitutes ReVA, the framework
33 and indicators for assessing ecological condition in ReVA, and the conceptual models
34 underlying ReVA. A methodology document and user’s manual should also be developed
35 for the ReVA Environmental Decision Toolkit. The user’s manual should document the
36 ReVA statistical tools in a manner that is clear and accurate with analytical and empirical
37 supporting evidence.
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1
2 **Advisory on EPA’s Regional Vulnerability Assessment**
3 **Methods for Multi-Scale Decision Making**
4

5 **An Advisory by the Science Advisory Board**
6 **Regional Vulnerability Assessment Advisory Panel of the**
7 **Ecological Processes and Effects Committee**
8
9

10 **2. INTRODUCTION**
11

12 This report transmits the advice of the U.S. Environmental Protection Agency (EPA) Science
13 Advisory Board (SAB) Regional Vulnerability Assessment (ReVA) Advisory Panel of the
14 Ecological Processes and Effects Committee. The Panel met on October 26-27, 2004 to provide
15 advice to EPA’s Office of Research and Development on Regional Vulnerability Assessment
16 Methods for Multi-Scale Decision Making. EPA’s Office of Research and Development is
17 developing approaches for comprehensive regional-scale environmental assessments that can
18 inform decision-makers at multiple scales about current and anticipated environmental
19 conditions and vulnerabilities. A suite of predictive tools and methods has been incorporated
20 into the Regional Vulnerability Assessment to enable decision-makers to determine the
21 magnitude, extent, and distribution of current and anticipated environmental vulnerabilities
22 within a geographic region.
23

24 In the context of ReVA, environmental vulnerabilities have been defined as risks of serious
25 degradation of ecological goods and services that are valued by society. Spatial data are used in
26 ReVA to depict: 1) the current patterns of condition and distribution of resources and human
27 demographics in a region, 2) variability in the sensitivity of resources and human populations to
28 various stresses in a region, and 3) the estimated spatial distribution of stressors in a region.
29 Geographic information system technologies and quantitative integration and assessment
30 methods are used in ReVA to derive future vulnerability estimates that include syntheses of
31 modeled ecological drivers of change (i.e., estimated changes in pollution and pollutants,
32 resource extraction, spread of non-indigenous species, land use change, and climate change) and
33 resulting changes in stressor patterns. Integrative and visualization tools incorporated into ReVA
34 can be used to illustrate the trade-offs associated with alternative environmental and economic
35 policies in the context of dynamic stakeholder values. The following two regional case examples
36 were provided to the panel to illustrate the application of ReVA methods and tools: 1) an
37 assessment of data from the Mid-Atlantic region of the U.S., and 2) an assessment of data for
38 decision-makers in a 15-county region around Charlotte, North Carolina.
39

40 **3. CHARGE TO THE PANEL**
41

42 EPA’s Office of Research and Development requested advice from the Science Advisory
43 Board on the approach used in ReVA, and on improving the effectiveness of the ReVA
44 integration toolkit (the ReVA web-based Environmental Decision Toolkit or EDT) for
45 communicating current and future condition and risk to clients and users. Specifically, EPA
46 sought advice regarding the following questions:

1
2 *Question 1. Strengths and Limitations of the ReVA Approach*

3
4 ReVA is intended to provide an overview of current and future regional conditions. ReVA may
5 also serve as a priority setting tool to target areas for more focused risk assessments of specific
6 problems. Please comment on the strengths and limitations of the ReVA approach as it applies
7 to these uses.

8
9 *Question 2. Effectiveness of the Web-based ReVA Environmental Decision Toolkit*

10
11 Please comment on the effectiveness of the web-based ReVA Environmental Decision Toolkit
12 (EDT) in communicating ecological condition and vulnerability to decision-makers at regional to
13 local scales. Please provide input as to the level of analytical capability needed in ReVA for
14 intended audiences as well as approaches to presenting available information and uncertainty.

15
16 *Question 3. Usefulness of the ReVA Approach to Decision-makers*

17
18 Please comment on the usefulness of the ReVA approach to decision makers in allowing
19 them to see the overall consequences of future development, and mitigation, conservation, and
20 restoration activities.

21
22 *Question 4. Issues Associated with use of ReVA at Multiple Scales and Future Research*
23 *Priorities*

24
25 Please provide input on issues encountered as the information and approaches in ReVA are used
26 at finer scales. Please also provide input on future ReVA research priorities and alternative
27 applications of ReVA methods for decision making at multiple scales.

28
29 **4. ADVISORY PROCESS**

30
31 To establish the ReVA Advisory Panel, the EPA Science Advisory Board Staff Office
32 published a *Federal Register* notice requesting nominations to augment the expertise of members
33 on the SAB's Ecological Processes and Effects Committee (EPEC). The SAB Staff Office then
34 identified a subset of nominees for consideration as panelists. The final panel was selected after
35 requesting public comments on the nominees and further evaluating them against EPA Science
36 Advisory Board selection criteria. The members of the advisory panel included ecologists on the
37 Ecological Processes and Effects committee as well as additional members with expertise in
38 decision science and environmental decision making, analysis of land use change, the use of
39 geographic information system technology to analyze environmental stressors and effects, and
40 statistics.

41
42 The advisory was conducted in a two-day face-to-face public meeting. At the public meeting,
43 the advisory panel heard presentations from EPA's Office of Research and Development on: 1)
44 an overview of the ReVA Program, 2) spatial data and landscape models in ReVA, 3) integration
45 methods in ReVA, 4) future vulnerability estimates, and 5) the ReVA integration toolkit for
46 communicating risk and uncertainty to users and clients. The panel also heard presentations

1 addressing application of ReVA tools and methods to decision making. These presentations
2 were delivered by: EPA’s Office of Research and Development, EPA’s Region 3 Office, and the
3 Land Use and Environmental Planning Division, University of North Carolina – Charlotte Urban
4 Institute. The panel then deliberated on each of the charge questions and developed the final
5 SAB report.

6 7 **5. RESPONSE TO THE CHARGE QUESTIONS** 8

9 The Panel Chair decided that the SAB panel could most effectively respond to EPA’s charge
10 questions if the questions were considered in subparts. Responses to charge question one are
11 therefore provided in two subparts (1a and 1b), responses to charge question two are provided in
12 three subparts (2a, 2b, and 2c), the response to charge question three is provided in one part, and
13 responses to charge question four are provided in two subparts (4a and 4b).
14

15 **5.1 Question 1. ReVA is intended to provide an overview of current and future regional**
16 **conditions. ReVA may also serve as a priority setting tool to target areas for more**
17 **focused risk assessments of specific problems. Please comment on the strengths and**
18 **limitations of the ReVA approach as it applies to these uses.**
19

20 **5.1.1 Question 1a. Comment on the strengths and weaknesses of ReVA as a tool to**
21 **provide an overview of current and future regional conditions.**
22

23 It is the opinion of the SAB that the suite of ReVA tools provides an exceptional application
24 opportunity to assist local and regional resource managers assess current and future regional
25 conditions. Use of spatially explicit data, coupled into a statistical platform (S-Plus) to facilitate
26 rapid reanalysis and display of data, has a high degree of value to be applied over the range of
27 questions ReVA intends to address. The SAB chose to explore limitations (as opposed to
28 “weaknesses”) of ReVA, and found that the lack of documentation on what constitutes ReVA,
29 and the lack of a framework and adequate indicators to assess ecological condition are the most
30 important limitations to application of ReVA.
31

32 *Strengths of ReVA as a Tool to Provide an Overview of Current and Future Regional Conditions* 33

34 Overall, the SAB finds that the major strengths of ReVA are in the areas of data integration
35 and visualization, particularly in the development of tools in these areas for resource managers
36 and planners. The SAB notes the following major strengths of ReVA:
37

- 38 • ReVA provides a very promising methodology for compiling existing (e.g., Mid-Atlantic
39 Integrated Assessment [MAIA]) and other disparate spatially integrated data sets in a
40 cohesive way for a region.
- 41 • ReVA provides new methods to synthesize existing data in a spatial framework.
- 42 • Integration approaches for multivariate data are being developed in ReVA.
- 43 • ReVA offers the power of those simple summary indicators, combined with spatial
44 visualization, for communicating the concept of “vulnerability” to the lay public.
- 45 • Strong emphasis has been placed on integrating ReVA with “customer” needs.
- 46 • An interactive interface is being developed to enable the use of ReVA tools by resource

1 managers and planners.

2
3 *Limitations of ReVA as a Tool to Provide an Overview of Regional Conditions*

4
5 The SAB feels strongly that ReVA is limited by a lack of documentation of the underlying
6 processes, and especially the lack of a framework and indicators to assess ecological condition.
7 While some of these factors are outside of the ReVA developer's control, the SAB finds that the
8 power of the ReVA approach is limited specifically by:

- 9
- 10 • The lack of basic documentation of the ReVA framework and process.
 - 11 • The lack of availability of ecosystem-specific data.
 - 12 • The lack of good indicators of ecological condition.
 - 13 • The complete lack of calibration, verification and sensitivity demonstrations on the
 - 14 ReVA summary indicator models.
 - 15 • Inherent weaknesses in using solely spatial data to make predictions. In this regard,
 - 16 ecological condition is not presently well described in ReVA because temporal dynamics
 - 17 have not been captured in ReVA. This could be addressed by linking data layers to
 - 18 models that enable the consideration of temporal information.
 - 19 • Oversimplification of the complex relationships among stressors and resources to predict
 - 20 "vulnerability."

21
22 *Recommendations to Improve ReVA as a Tool for Providing an Overview of Regional Conditions*

23
24 In order to improve ReVA as a tool for providing an overview of regional conditions, the
25 SAB recommends and encourages the ReVA program develop the following:

- 26
- 27 • Overarching conceptual models for ReVA. The models should clearly document: what
 - 28 ReVA is, the main objectives of ReVA, and the main questions being asked in ReVA.
 - 29 • Clear basic documentation on what constitutes the ReVA process, including the
 - 30 underlying processes for acquiring and assembling data, quality assurance reviews, and
 - 31 spatial data integration.
 - 32 • Documentation on the development and application of the summary indicators in ReVA,
 - 33 including external verification of indicator applicability, sensitivity, and sources of
 - 34 uncertainties.
 - 35 • A process to evaluate the performance of indicators developed in assessing ecological
 - 36 condition.
 - 37 • Increased use of response measures and ecological endpoints.
 - 38 • Use of more sophisticated measures than species abundance to assess condition (e.g.,
 - 39 Index of Biotic Integrity).
 - 40 • Common goals for ecological valuation and assessment within EPA.
 - 41 • Increased transparency in providing information on data sets used in ReVA.

42
43 *Discussion of Strengths and Limitations of the ReVA Process and Toolkit*

44
45 In seeking a basic understanding of what comprises ReVA and the ReVA "toolkit," the SAB
46 discussed questions relative to: 1) whether ReVA is a tool ready for immediate implementation;

1 2) whether ReVA is a process for assembling data and information into a format against which
2 local or regional decision processes can be developed for specific questions; and 3) whether the
3 broad definitions, data sets, futures projection methods, and statistical integration methods used
4 to develop a single index of “vulnerability” are appropriate for their intended use. Much of this
5 discussion focused on whether ReVA processes and tools were sufficiently documented and
6 transparent.

7
8 *Transparency of ReVA*
9

10 While the SAB acknowledges that development of the ReVA has been an extraordinary and
11 elegant effort by a dedicated and highly skilled team, it is apparent that a good deal of knowledge
12 about what constitutes ReVA resides solely with the developers. Outside reviewers cannot
13 discern what ReVA is from information that is currently available. In the parlance of EPA’s
14 Risk Assessment Paradigm (U.S. EPA, 1984), ReVA is not transparent. The SAB notes, based
15 upon its working understanding of the ReVA Program, that EPA has completed, or is working
16 on, the following ReVA activities:
17

- 18 • Developed clearly articulated goals and objectives as represented by the research strategy
19 (Smith et al., 2000);
- 20 • Compiled an extensive set of spatially-explicit data on the Mid-Atlantic from several
21 sources as a pilot set of information from which to develop and test integration and
22 vulnerability methods;
- 23 • Developed and applied a set of quality assurance, data and spatial normalization
24 procedures, and compiled the data into a single GIS-database;
- 25 • For certain data, extrapolated limited information sets to broader regional scales using
26 commonly accepted statistical interpolation methods for geographic data;
- 27 • Demonstrated the utility of coupling the spatially-explicit data sets with mechanistic
28 models that provide a method for forecasting changes in certain environmental
29 parameters;
- 30 • Developed novel and potentially applicable statistical methods to integrate a divergent set
31 of environmental parameters into a single assessment of “vulnerability;”
- 32 • Developed web-based tools to explain what ReVA is and demonstrate how the data sets,
33 interpolations, and integration methods can be combined to help make environmental
34 decisions; and
- 35 • Has begun to develop specific regional decision-assisting tools for a range of clients
36 including EPA program and regional offices, sister federal agencies, and state and local
37 agencies.
38

39 From this understanding, the SAB believes that ReVA is a *process*. The strength of ReVA
40 lies in the standards for assembling the data sets, quality assurance reviews, and methods for
41 interpolating limited data with an eye to understanding and addressing specific regional
42 questions. ReVA’s greatest opportunity lies in developing the application and integration
43 methods to address specific problems in specific regions. Having said that, ReVA suffers from
44 not having a single source document that articulates what it is, and the specific procedures
45 followed to compile data, provide quality review, and apply these data. The SAB explicitly
46 recommends that EPA develop and make available to the public and ReVA clients a concisely

1 written description of the ReVA process, and the tools that have been and may be developed
2 with ReVA.

3
4 *The ReVA “Toolkit”*

5
6 From the understanding that ReVA is a *process*, the SAB has sought to distinguish between
7 the process and what has been termed the ReVA “toolkit.” The ReVA developers used the terms
8 “process” and “toolkit” interchangeably; this injected ambiguity into the SAB’s understanding.
9 The SAB recommends that “toolkit” should be reserved to mean the decision-assisting elements
10 nested within the overall ReVA process and presented on the ReVA websites. In the response to
11 charge question two, the SAB identified strengths and limitations of the elements that comprise
12 the “toolkit,” and has provided recommendations for further development of those “toolkit”
13 elements.

14
15 The SAB believes it is imperative that when EPA is developing applications for the ReVA
16 process, the developers must make clear the difference between “forecasting” and “scenario
17 analysis” to project future vulnerability. While this is discussed more fully in the response to
18 charge question three, the SAB intends “forecasting” to mean application of well defined,
19 calibrated and validated mechanistic models. Mechanistic models are applied using the baseline
20 spatial data as inputs to the model, with outputs as changes over time with quantifiable
21 uncertainties. An example of a forecast is the application of the “PM2.5” model to project future
22 ozone levels for the Clear Skies Initiative. Scenario analysis is the exploration of potential
23 changes in the overall landscape using the baseline spatial data coupled with the good
24 visualization tools presented with geographic information technology. For example, if
25 populations grow by 20% and the impacts associated with population growth are known, a
26 scenario analysis can be conducted. The planned use of ReVA in the Sustainable Environment
27 for Quality of Life (SEQL) program in Charlotte North Carolina is an example of a scenario
28 analysis.

29
30 **5.1.2 Question 1b. Comment on the strengths and weaknesses of ReVA as a priority
31 setting tool to target areas for more focused risk assessment.**

32
33 The SAB finds that, as presently described, ReVA is not well suited for use as a priority –
34 setting tool to target areas for more focused risk assessment. The strengths and limitations of
35 ReVA for this use are discussed below. The SAB notes that EPA may wish to consider
36 developing ReVA as a tool for measuring or characterizing vulnerability and/or helping clients to
37 conceptualize and measure vulnerability well for their purposes and, as discussed below, to
38 assist in priority-setting.

39
40 *Strengths of ReVA as a Priority Setting Tool to Target Areas for More Focused Risk Assessment*

41
42 As noted above, ReVA’s strengths include: its value as a tool for presentation of complex
43 information and integration of multi-variate data, the unique and promising integration tools in
44 ReVA, and the ability ReVA provides to conduct exploratory analyses with the data layers and
45 weighting factors coupled in the toolkit. Stressor/resource overlays are a powerful application of
46 spatially explicit data and may be used, with other information, to assist in priority setting and

1 targeting areas for more focused risk assessments of specific problems. As discussed below,
2 ReVA presently has limited overall use as a priority setting tool, but it can assist in the arduous
3 task of priority setting by providing useful tools for this task. Within the same set of strengths
4 and limitations described previously, ReVA has the following additional strengths for use in risk
5 assessment:
6

- 7 • Within the ReVA layers, the impacts of individual stressors can be assessed and
8 evaluated using GIS-analysis tools and presentations. The power of GIS is the overlays
9 that can be generated and viewed for multiple stressors.
- 10 • Overlays of multiple stressors can be used to help target geographic areas where it may
11 be appropriate to conduct focused risk assessment and/or restoration activities.
- 12 • Mechanistic models can be coupled to the baseline GIS-data to project future risks and
13 uncertainties.
- 14 • ReVA enables relatively easy risk-communication with the visual display of complex
15 spatial information.

16
17 *Limitations of ReVA as a Priority Setting Tool to Target Areas for More Focused Risk*
18 *Assessment*
19

20 The same limitations noted previously are applicable to ReVA's potential use in risk
21 assessment. The SAB also notes that EPA should use caution when ReVA is applied to
22 aggregate individual stressors into a single map or value. While such aggregations are useful in
23 identification of areas for more focused risk assessment, the underlying statistical methods for
24 aggregating and/or integrating multiple stressors into a single value are still in their infancy. Use
25 of these methods may lead to erroneous interpretations. For the following reasons the SAB finds
26 that ReVA presently has limited overall use as a priority-setting tool.
27

- 28 • The SAB notes that the Stressor-Resource Matrix Analysis in ReVA is based on
29 summing correlation coefficients. Summing these coefficients has little meaning and is
30 misleading. However, the correlation coefficient does provide an indication of indirect
31 cause-effect links. The SAB suggests that EPA may wish to consider using graph-
32 theoretic approaches that utilize adjacency and reachability matrices (Bodini, Giavelli
33 and Rossi, 1994; Chorley and Kennedy, 1971; Craig, 1981; Gould, 1986; Hage and
34 Harary, 1983; Harary, Norman and Cartwright, 1965; Levins, 1974; Maruyama, 1963;
35 Maruyama, 1968; Phillips, 1993; Puccia and Levins, 1985; Puccia and Levins, 1991;
36 Roberts, 1976; Roberts, 1978; Slingerland, 1981). These are easy to program and
37 explain, do not require quantitative (ratio or interval-level) data, and are found in almost
38 all introductory texts on graph theory. The outcome will indicate the number of n^{th}
39 order paths leading from one variable (cause) to another (effect). Since this approach
40 also identifies the variables and phenomena involved, it is more useful for management
41 and policy purposes than correlation. However, it will be necessary to provide expert
42 judgment to set up the original adjacency matrices. Expert judgment may be provided
43 by the developers or users of ReVA. However, if the users provide expert judgment,
44 their sense of ownership will increase, and their understanding will likely be greater as
45 well. The SAB recommends that EPA link graph theory with the notion of stability and
46 instability, since the latter can be viewed as a dimension or manifestation of

1 vulnerability. In particular, the SAB recommends that EPA should look into pulse
2 stability and loop analysis. Loop analysis and the theory of pulse processes are two
3 methods that use only the information portrayed in signed digraphs to enable inferences
4 about system stability. Pulse processes, the less complicated of the two, is treated fully
5 in Roberts (1976). Loop analysis was introduced by Levins (1974) and popularized by
6 Puccia and Levins (1985). A chapter-length overview is provided in Puccia and Levins
7 (1991), and examples of applications are available in Bodini, Giavelli, and Rossi (1994)
8 and Slingerland (1981).

- 9
- 10 • The concept of “valued resources” in ReVA is simplistic. It appears to be defined
11 without respect to people and/or their need for or interest in the “resource” (i.e., in
12 disregard of the demand for the resource and its constituent factors such as accessibility).
13 The value of resources appears to be assessed only with respect to the “resources in
14 watersheds,” yet the concept of resources as something of value to people or society
15 appears to be absent.
 - 16 • As illustrated in the following three expressions, considerable differences may exist in
17 the possible conceptualization of risk, vulnerability, and related factors:
18
19 a) Vulnerability = (Stressors) X (Resources) This represents the ReVA approach.
20 b) Risk to Watershed = (Probability of Event, Situation, etc.) X (Damage) X
21 (Vulnerability of the Watershed)
22 c) Risk = (Probability) X (Damage) X (Trust) X (Liability) X (Consent)
23

24
25 The second two expressions clearly suggest that: society may wish to prioritize actions as
26 they affect risk and not vulnerability, and that those who must prioritize actions will face
27 multiple, conflicting objectives. These objectives are determined by factors such as
28 which risks to minimize or mitigate and which aspects of risk to minimize (e.g., expected
29 risk, worst-case risk, and variance or semi-variance). The SAB notes that the ReVA team
30 cannot be expected to know what the objectives will be, or how the decision-makers and
31 stakeholders will wish to prioritize them.

- 32
- 33 • Priority setting is difficult because “vulnerability” encompasses many different
34 dimensions and is related to a host of concepts that are poorly defined in any consensual
35 way (e.g., stability, resilience, resistance, elasticity, robustness, viability, ecological
36 condition, etc.). Vulnerability is ambiguous enough to often be left out of policymaking.
37 Vulnerability under differing contextual environments, under cumulative effects and
38 impacts, and in the light of conflicting expert opinion is only rarely addressed in a
39 coherent way. However, the SAB notes that if ReVA were viewed more as an expert
40 system than as an education/facilitation tool, some selected effects could always be
41 evaluated regardless of whether they were identified as important by different users.
42

43 *Use of ReVA to Target Areas for More Focused Risk Assessment at Different Temporal and* 44 *Spatial Scales*

45
46 The response to charge question 4a below discusses issues associated with application of

1 ReVA at finer scales. The SAB also notes that as ReVA evolves, EPA should consider
2 addressing the following issues encountered when risk assessments are conducted at different
3 temporal and spatial scales. More focused (local scale or shorter times) risk assessments are
4 more likely to have relatively abrupt, intense, and less incremental stressor scenarios than larger
5 regional studies. ReVA is presently structured to be applied in assessments of large scope (i.e.,
6 regional-level assessments). All areas needing closer scrutiny may not be identified when ReVA
7 is initially used to target areas for further study. This is because factors applied in ReVA to drive
8 the identification of vulnerabilities at coarse scales are not as well defined at fine scales (e.g.,
9 factors such as percent forest cover, percent agricultural land cover on slopes, and non-native
10 species distribution). As ReVA is used at finer scales, these issues will become important.

11
12 ReVA's focus tends toward moderate to high probability/lower incremental impact stressors
13 that gradually change through time. This precludes evaluation of important regional differences
14 in ecological qualities such as keystone habitat. For example, the flatwoods of the Carolinas and
15 Georgia contain small features (Carolina Bays) that are important beyond their physical size to
16 determining biodiversity in an area. At finer scales, such issues emerge as extremely important.

17
18 A good, future application of ReVA would be to evaluate low probability or rapid changes
19 with highly adverse consequences. Examples might include: a sudden shift in agricultural
20 practice to widespread use of genetically engineered crops with reductions in heavy pesticide
21 applications, pulses of organo-phosphorus pesticides into streams in a small county, sudden
22 atmospheric releases of potentially acutely toxic chemicals, and changes in policy relative to
23 timber harvesting. Such events would seem to be more relevant at smaller scale applications
24 where change can be more rapid and pervasive, and would be worthy of additional ReVA
25 research efforts in the future.

26
27 The SAB also notes that the ReVA approach as presented focuses on watersheds and requires
28 the fitting of data that do not blend into this context seamlessly (e.g., air pollutants that distribute
29 in airsheds or ecological entities that conform to ecoregions or other spatial units). Economic,
30 infrastructure, and demographic information do not conform to the watershed context. This
31 causes a certain level of difficulty in vulnerability assessment or decision making. With more
32 focused studies, the watershed context may be more relevant yet other larger scale issues
33 involving airsheds, human demographics or economics may simply become ambient
34 "background."

35
36 As the scale of the application becomes finer, the ratio of partially informed to fully informed
37 people involved in applying ReVA will increase. As the focus of vulnerability assessments
38 changes from a broad to narrow focus, it will also be necessary to involve different groups of
39 people in the assessment. This will place a heavy burden on the participants in the assessment,
40 and those who must coordinate the participation of others in the assessment. The SAB notes that
41 ReVA does not presently contain much specific guidance for application of methods and tools.

42
43 The SAB notes that an important future consideration for the developers of ReVA is the
44 benefit of making assessment tools available to skilled and knowledgeable professionals versus
45 the inherent dangers associated with making "decision tools" available to less knowledgeable
46 public or private groups. One can assume that finer scale applications of ReVA will be

1 undertaken with less input from diverse professionals and with fewer resources. Also, as scales
2 change in assessment, the participants and concerns also shift. This means that local
3 professionals must address different sets of concerns in order to effectively use ReVA to identify
4 areas for more focused risk assessments. Use of professional or best judgment is central in many
5 places throughout the ReVA approach and implementation of the associated web tool. However,
6 ReVA provides minimal guidance about how to approach this aspect of the process. The SAB
7 notes that this is unfortunate because, in the absence of such guidance and presence of so many
8 options, the cumulative application of the ReVA by diverse, smaller groups may result in a
9 chronic degree of discord. The SAB suggests that straightforward Bayesian techniques such as
10 Bayesian belief networks could be incorporated into ReVA to fill this gap and to help the
11 professional judgment activities. Application of Bayesian belief networks in systems that
12 interact directly with human users, such as decision support systems, requires effective user
13 interfaces. The Bayesian Belief Network exploits probability theory to provide a single
14 framework for supporting multiple calculations and communications. It also allows for unbiased
15 inspection and interrogation for a wide range of observers. Relevant examples and information
16 concerning application of Bayesian belief networks are available in the literature (Borsuk, Stow,
17 and Reckhow, 2003; Druzdel, 1996; Hukkinen, 1993; Probability Theory and Bayesian Belief
18 Nets, 2005; Varis and Kuikka, 1989). While ReVA in this connection is not expected to be a
19 decision making tool, it may be developed as an interface tool, becoming more useful in the
20 decision making process. While ReVA is not expected to become a priority-setting tool, it is
21 however expected to be of assistance in the arduous task of priority setting by making
22 appropriate tools available. Examples may be seen in the literature discussing such methods and
23 tools inclusive of partially ordered sets and Hasse diagrams (Patil and Taillie, 2004a).

24
25 The SAB also notes that priority setting, if done properly, should be tailored to the following
26 available information:

- 27
28 • The kind of *input* information available. The measurement scale (categorical, ordinal,
29 interval, ratio) of the data and the expressions of preferences should be considered.
- 30
31 • The kind of *output* needed. The output needed might include a complete ranking (e.g.,
32 best to worst); an incomplete ranking (e.g., acceptable sites versus unacceptable ones,
33 sites needing attention versus those that do not, and the best site out of candidate sites
34 considered); ratio-level weights (e.g., for resource allocation).
- 35
36 • The level and kind of uncertainty involved with the input and output information (e.g.,
37 40% chance that site A is the best, and 60% that it is second-best).

38
39 **5.2 Question 2. Please comment on the effectiveness of the web-based ReVA**
40 **Environmental Decision Toolkit (EDT) in communicating ecological condition and**
41 **vulnerability to decision-makers at regional to local scales. Please provide input as**
42 **to the level of analytical capability needed in ReVA for intended audiences as well as**
43 **approaches to presenting available information and uncertainty.**
44
45
46

1 **5.2.1 Question 2a. Comment on the effectiveness of the ReVA Environmental Decision**
2 **Toolkit (EDT) in communicating ecological condition and vulnerability to decision**
3 **makers.**
4

5 The SAB reviewed three different versions of the web-based EDT (the public, client, and
6 research versions). These versions of the EDT are on different websites in various stages of
7 development. The SAB found that it was somewhat difficult to follow pathways on different
8 websites to evaluate the EDT. Two example data sets were provided by EPA to demonstrate the
9 EDT. The Sustainable Environment for Quality of Life (SEQL) data set contained information
10 obtained from counties in the Charlotte, North Carolina region. The Mid-Atlantic Regional
11 Assessment data set contained information from eight states in the Mid-Atlantic region. Both of
12 these data sets were used to provide excellent examples of ReVA applications for specific
13 regions representing different spatial scales. The SAB notes that the spatial development maps
14 in the EDT use color effectively. Vulnerability is well described in the EDT, but ecological
15 condition is not as well described because temporal dynamics have not been captured. This
16 could be addressed by linking the data layers to models that enable the consideration of temporal
17 information.
18

19 The SAB recognizes that the EDT is still under development. However, given information
20 that is currently available, the SAB notes the following concerns about the effectiveness of the
21 EDT in communicating ecological condition and vulnerability to decision-makers. Most of these
22 concerns focus on uncertainty and the lack of available documentation for the EDT.
23

- 24 • As indicated previously, it is difficult to understand from currently available information
25 what the toolbox is, what tools are in the toolbox, and where the toolbox is located. The
26 SAB questions whether EPA has defined the tools as maps, indices or the techniques
27 used to generate maps and indices.
28
- 29 • It is difficult to understand what decisions the EDT was developed to influence. The
30 model and tools in the EDT are presented without a major justification that they are
31 needed.
32
- 33 • Lack of quantification is a problem in some components of the EDT. In particular, units
34 on the maps are confusing.
35
- 36 • It appears that the tools in the EDT are, at present, limited to relatively few
37 environmental issues.
38
- 39 • Information provided to the SAB suggests that the EDT will be used by “the public,”
40 “clients,” and “researchers,” but it is difficult to determine specifically who will use the
41 EDT.
42
- 43 • For the most part the models applied in the EDT are “behind the scenes.” Conceptual
44 models have not been presented and it is not possible to evaluate the underlying science
45 supporting the EDT. This science should be carefully and transparently documented.
46

- Too much text is included on the websites where the EDT is located. There appears to be little difference between reading a report and viewing the EDT websites.
- Flow diagrams of ecosystems and underlying mechanisms are needed in the EDT, not just cause and effect models.

Strengths and Limitations of Elements in the EDT

The following is a listing of what the SAB believes comprises the strengths and limitations of various elements of the ReVA EDT. The SAB provides recommendations for further development for each of those EDT elements:

Element 1. An extensive set of spatially explicit data, formulated to be displayed on a map system that has gone through a “standardized” evaluation for data quality.

Strengths: ReVA’s real power to date is in the demonstrated exercise to bring divergent spatial data into a single, useable source. Analysis using spatially explicit data is a well-founded, scientifically defensible method for extrapolating and interpreting broader conditions from limited existing data. Representation of spatial data is a powerful tool for risk communication to users and the general public.

Limitations: As noted previously, ReVA currently provides very limited documentation of available databases/layers; and limited transparency of construction/extrapolation of data layers, scale, and definition of uncertainty in extrapolation of data. The connections between the current data layers used to indicate vulnerability, and actual ecological condition are tenuous, at best.

Recommendations: The SAB recommends that EPA compile and publish a separate document on compilation, organization, extrapolation, and types of data/layers in the ReVA toolkit. An example format that could be used to develop this document is Table ES-2 in the executive summary of the SAB publication, *A Framework for Assessing and Reporting on Ecological Condition*. It would also be helpful to include a statement of the quality and confidence levels of the data.

Element 2. Mechanistic models that can be applied to the base spatial data to project future conditions or trends. These mechanistic models may have been developed within the ReVA program, or by separate/independent researchers that use the base data for projections.

Strengths: Mechanistic models are a well-defined, scientifically defensible means of forecasting future trends. When coupled with spatially explicit data, they are a powerful tool for forecasting future trends and defining the uncertainties associated with projections. Coupled with geographically based displays, these are a powerful tool for communicating risks to decision makers and the general public.

Limitations: The spatial data in ReVA appear to have been coupled with a number of mechanistic models but the inventory of coupled models was not apparent at the ReVA

1 website or in the literature provided to the SAB. Mechanistic models used in ReVA
2 appear to be narrowly focused on forecasting changes in relatively few parameters (e.g.,
3 eutrophication, air quality [ozone, sulfur, urban growth]), and are constrained by the data,
4 assumptions, and calibration.

5
6 Recommendations: The SAB believes that EPA should focus more resources on
7 developing mechanistic models to be coupled with the spatially explicit data in ReVA.
8 This is potentially ReVA's most powerful application. Where models have been
9 developed, those uses should be listed on the ReVA web site (e.g., watershed models and
10 ozone models). One potential application that the SAB would like to see explored is the
11 coupling of ReVA with dose/response models.

12
13 Element 3. A series of data integration methods.

14
15 Strengths: As noted previously, when the integration methods are combined with spatial
16 visualization tools in ReVA, they offer simple, understandable summary indicators for
17 communicating the concept of "vulnerability" to the lay public.

18
19 Limitations: The SAB believes that the statistical integration methods developed and
20 used in ReVA have not been demonstrated to be statistically sound. The methods should
21 be validated and the levels of uncertainty associated with the methods should be
22 identified. The underlying statistical models are not transparent. Complete
23 documentation on those models should be made available. Furthermore, for the models
24 to have utility, they should be subjected to field verification and/or validation, with some
25 assessment of external sensitivity and uncertainty. The models also assume ecological
26 relationships that are not implicitly evident from landscape data. Finally, the models may
27 be too ambitious; attempting to integrate too many factors at once. The SAB notes that
28 validating the integration methods may be challenging because some subjectivity is
29 associated with the concept of ecological condition. However, the ReVA data integration
30 methodology requires some level of understanding about whether the assignment of an
31 index of vulnerability is adequate and accurate, or at least bounding the uncertainty. The
32 SAB also notes that there are several applications in ReVA that could lend themselves
33 well to a validation exercise if adequate data are available. Three such applications are
34 EDT future projections concerning invasive species, resources extraction, and pollutants.
35 For example, modeled predictions of endangered species spread could be compared with
36 actual observations.

37
38 Recommendations: The strengths and utility of the integration methods should be tested
39 using a relatively limited set of environmental and landscape data. The SAB
40 recommends that a "hind-cast" demonstration of ReVA in a simpler system to answer
41 focused questions would be an effective way to illustrate the utility and potential power
42 of the methods. The SAB recommends that EPA allocate additional resources to the
43 ReVA program to: 1) run hind-casts and conduct field validation of the integration
44 methods; 2) apply the integration methods using more limited number of land/resource
45 variables; and 3) explore sensitivity and uncertainty with hind-casts. A recommended
46 system that might be used to complete this work is described in the response to charge

1 question three.

2
3 *Use of Web-based Interface Tool*

4
5 The elements of the ReVA EDT have been assembled into a web-based application that can
6 be applied by regional and local decision makers to conduct scenario analysis. The SAB finds
7 that, while this is a laudable goal, the computing power needed to handle and process
8 information is likely to be too great to practically allow such web-based applications in the near
9 future. ReVA's current demonstration product on the web is a good, functional demonstration
10 for marketing the tool to potential regional and local decision makers. The SAB endorses EPA's
11 efforts to develop front-end, user-friendly interfaces for decision makers to explore the effects of
12 land use changes on environmental resources. However, EPA should be careful to include strong
13 cautions against using the interface tool for actual decision making. This is further discussed in
14 the response to charge question three.

15
16 **5.2.2 Question 2b. Provide input as to the level of analytical capability needed in the**
17 **ReVA EDT for intended audiences.**

18
19 *General Comments on Analytical Capability*

20
21 EPA has indicated that ReVA is expected to be a priority setting tool to target areas for more
22 focused risk assessment. The strengths and limitations associated with using ReVA for that
23 purpose have been discussed above. The SAB notes that ReVA has also been presented as a
24 framework for environmental decision making and for communicating ecological condition and
25 vulnerability at multiple scales. Dual products of ReVA are: 1) the integration and assessment
26 methods in the "tool box" described in the EPA document, "Regional Vulnerability Assessment
27 for the Mid-Atlantic Region: Evaluation of Integration Methods and Assessment Results"
28 (Smith, E, L. Tran, and R. O'Neill, 2003), and 2) the web-based Environmental Decision Toolkit
29 (EDT) for data analysis and visualization. The two products have distinct roles in accomplishing
30 ReVA's purposes but are also intimately related.

31
32 The SAB finds that the analytical capability needed in ReVA is a multi-faceted issue. It
33 appears that ReVA is expected to provide and become for EPA the environmental decision
34 making space-time intelligence system for several intended audiences, such as the science
35 audience, the decision-maker audience, and the public audience. It is not exactly clear, however,
36 who the intended audiences are and what their needs are. The science audience expects scientific
37 credibility, quantitative accuracy, and rigorous exposition. The decision maker audience expects
38 simplicity, defensibility, and visualization. The public audience expects transparency and user-
39 friendliness. To use the ReVA EDT wisely, all audiences should know the key assumptions and
40 provisos behind the analytical models and their input data.

41
42 The SAB finds that the current ReVA approach provides more layered geographic
43 information content than quantitative analytics. However, the eleven integration and assessment
44 methods in ReVA have been developed from a vast literature encompassing multiple disciplines,
45 software, and decision tools. These methods offer great promise for further development and
46 future use. The SAB notes, however, that the ReVA methods for data integration, landscape

1 modeling, and integrative assessments appear to have been adopted through what might be
2 viewed as a somewhat ad hoc process that could be improved by documentation of additional
3 reasoning or validation. The SAB notes that the credibility of the ReVA toolbox and toolkit
4 needs to be addressed.

5
6 The SAB believes that careful definitions and descriptions, statistically sound methods, and
7 independently reproducible calculations must be provided in ReVA. Currently, ReVA's
8 discussions of limitations and sensitivities generally evolve into declarations with limited
9 supporting evidence. The SAB therefore recommends that appropriate personnel provide
10 critically needed expertise on data, analytical methods, and ecological interpretation to further
11 develop ReVA. In this regard, ReVA needs to be able to address the issues of uncertainty and
12 the currently missing, but extremely important, elements of statistical and practical importance:
13 false alarm, false discovery rate, and scale effects. Additionally, ReVA needs a methodology
14 handbook that provides careful documentation of the ReVA statistical tools in a manner that is
15 clear and accurate with analytical and empirical supporting evidence. To accomplish all of this,
16 the SAB recommends that the ReVA Program add to its existing manpower. It appears to be
17 quite unlikely that the ReVA Program will be able to satisfactorily address these critical needs
18 within the limits of its current manpower resources.

19
20 The SAB believes that the ReVA Program is an important EPA initiative, and finds that it is
21 applying 20th century methodologies and technology with considerable skill and insight. For
22 example, critical areas are identified as extreme score watershed neighborhoods in the GIS-
23 layered maps, and rankings are largely procured using index-crunching methods involving
24 uncertainty and ambiguity. The SAB notes, however, that the ReVA Program may also benefit
25 by recognizing the more plausible view of critical areas identified as neighborhoods that have
26 extreme scores, and prioritizing them without having to crunch indicators criteria into indexes
27 (Patil and Taillie, 2004b).

28 29 *Specific Comments on Analytical Capability*

30
31 The SAB finds that the analytical concepts, definitions and descriptions of ecological
32 condition and vulnerability provided in the ReVA documentation are insightful, although in
33 places they are not complete, clear, accurate, or precise enough. The SAB provides the
34 following observations and suggestions to clarify and improve the presentation of relevant
35 integration and assessment methods.

- 36
37 • Explanation of "correlation." Many decision-makers confuse correlation with causation.
38 Decision-makers need to know the problems associated with any analysis that sums
39 correlation coefficients (as is done in the Stressor-Resource Matrix approach to
40 vulnerability analysis).
- 41
42 • Title of the "Toolbox" Document. The title is misleading and could be changed to
43 "ReVA for Mid-Atlantic Region: Evaluation of Integration and Assessment Methods."
44 This would help clarify the expectations.
- 45
46 • Conceptualization of Ecological Condition and Vulnerability. A case has been made for

1 vulnerability to have both a single directional gradient and a multidirectional gradient. A
2 clearer conceptualization for ecological condition would also be helpful.

- 3
- 4 • Simple Sum. The discussion of the Simple Sum method should be clarified to ensure that
5 it is accurate and that statements concerning skewness and its effects on values, averages,
6 and variabilities are not misinterpreted by the reader.
7
- 8 • Methods Ranking Distance to a Reference Condition. Methods used to rank watersheds
9 by distance to a reference condition include the “state-space method,” “principal
10 component analysis” (PCA), and “criticality analysis.” The SAB notes that it is not clear
11 how such a distance measure describes criticality analysis and PCA. In the case of PCA,
12 after axes have been rotated through any one of a number of different algorithms, the
13 concept of “distance to a benchmark” appears to be so distant as to be meaningless. It is
14 the opinion of the SAB that a method known as Technique for Order-Preference by
15 Similarity to Ideal Solution (TOPSIS) would be more relevant (Hwang and Yoon, 1981).
16
- 17 • Principal Component Analysis. The discussion of Principle Component Analysis could
18 be improved by providing a clearer and more detailed discussion concerning combining
19 principal components and the roles of eigenvalues and eigenvectors. The discussion
20 should be clarified to ensure that it is accurate and is not misinterpreted.
21
- 22 • State Space Analysis. The SAB notes that this is an innovative concept but it needs more
23 work. The SAB recommends that EPA move beyond consideration of the most
24 vulnerable corner into the consideration of the most vulnerable candidate watersheds
25 closest to the corner.
26
- 27 • Criticality Analysis. The SAB finds that the concept of natural state in the ReVA
28 documentation is interesting. However, the documentation tends to be overly simplistic
29 concerning issues of ambiguity and uncertainty. It is the finding of one SAB ReVA
30 Advisory Panel member that the triangular and rectangular aspects of fuzzy numbers are
31 over-rated and that sensitivity to location is under-rated. This is addressed in more detail
32 in Appendix A of this report provided by ReVA Advisory Panel member Dr. Ganapati
33 Patil.
34
- 35 • Cluster Analysis. The SAB notes that it is good to see the limitations of cluster analysis
36 described and analyzed in terms of the instabilities of the clustering methods. ReVA
37 might benefit from consideration of the spatially constrained clustering tools. Spatially
38 constrained clustering helps locate the edges of homogeneous regions, resulting in closed,
39 areal boundaries. Spatially constrained clustering has been applied in landscape ecology.
40 Applications have involved ecological variables, environmental variables, and
41 biophysical variables for exploring ecologically homogeneous as well as geographically
42 contiguous clusters such as habitat patches, biophysical settings, and soil zones
43 (Burrough, 1989, Fortin, 1994; Fortin and Drapeau, 1995; Legendre, 1987; Legendre and
44 Fortin, 1989). Software for the analysis is also available (Boundary Seer, 2001).
45
- 46 • Change Analysis. The SAB notes that the ReVA documentation appears to confuse

1 change and difference analysis. It should refer to difference analysis for method-based
2 rating comparisons and change (map) analysis for future-present comparisons.

- 3
- 4 • Self-Organizing Maps. The SAB believes that issues of watershed incomparability and
5 meaningfulness of the ordination in terms of environmental features should be examined.
6
- 7 • Analytic Hierarchy Process. The ReVA documentation is not clear in this area,
8 particularly with regard to the hierarchical levels and their numbers. No differential
9 weights have been assigned to indicators to represent sensitivities to within and between
10 group indicators, particularly when eigenvalues and eigenvectors are available.
11 Ambiguities are not addressed in the discussion. For example, the description of the
12 diagram as hierarchical is confusing because the bottom two levels are not a hierarchy,
13 but a Cartesian product. Further, the method may be reasonable if the correlations within
14 each group of indicators are very high and the between group correlations are very low.
15 However, if the within-group correlations are only moderately high and the between
16 group correlations are low, then better top level weights can be computed from the
17 eigenvalues of the principal components analysis, and better second level weights from
18 the eigenvectors.
19

20 The SAB recommends that a methodology document and user's manual approach
21 (approximately 25 pages in length) be prepared as an integral part of the toolkit to address these
22 issues. A precise description of each integration and assessment method should be included.
23 Basic documentation of the ReVA process, as well as metadata for the entire process, should be
24 included. It would also be useful to include a table of the assessment questions and integration
25 methods in the document, with an indication of which methods (or suite of methods) are most
26 appropriate for answering the questions.
27

28 Much more additional advice should be provided about statistical tools in ReVA and how to
29 use them. The SAB notes that the analytical capabilities provided on the ReVA public website
30 should be perceptive and insightful. As noted above, some targeted audiences need greater
31 analytical capabilities to handle the tools they receive. The SAB recommends that EPA provide
32 more information to decision makers about the analytical methods in ReVA so decision makers
33 can decide which tools to use. Users should be familiar with multivariate statistics in order to
34 understand that different algorithms (e.g., axis-rotation procedures) will yield different or
35 differently weighted principal components or "factors" in factor analysis, and that this may
36 influence the results of analyses. The SAB notes that relatively few users (as opposed to
37 researchers actively using statistical modeling) will have this familiarity. Few users will be
38 familiar with fuzzy data sets and Kohonen self-organizing maps. However, it may not be
39 necessary to provide extensive information about these procedures if simple conceptual
40 explanations of the procedures are available using metaphors and analogies.
41

42 The SAB notes that the analytical capabilities offered to ReVA's users should be
43 sophisticated, but the level of sophistication can be less if information about how to use tools is
44 provided. Clearly, users will need information about the watersheds being compared. This is
45 because the standardization in ReVA (scaling from 0 to 1) implies that watershed evaluation
46 criteria (e.g., number of aquatic species) are comparable among all watersheds evaluated. In

1 fact, the natural biotic diversity of different habitats may vary greatly within a region and there
2 may be significant variation in the best possible criteria values observed under pristine
3 conditions. Without such knowledge, blind reliance on the indices produced can be misleading
4 and the indices can be inaccurate. EPA should provide ReVA users with the capability of
5 performing different kinds of standardization. This will enable users to analyze their own data.
6 In order to complete these kinds of analyses, users need to recognize what the standardization is
7 doing and the ranges within the watersheds. The SAB also notes that it will be helpful if, in
8 developing the EDT, EPA recognizes color-blindness of some users and develops outputs
9 accordingly.

10
11 The SAB's Ecological Processes and Effects Committee recently recommended a hierarchical
12 structure for reporting on ecological condition because it revealed tradeoffs between sets of
13 indicators in meaningful categories as indicators are aggregated upwards. These SAB
14 recommendations were published in the document, "Framework for Assessing and Reporting on
15 Ecological Condition" (U.S. EPA Science Advisory Board, 2002). The SAB notes that ReVA
16 may also benefit from hierarchical integration methods as well. Currently, the only fully
17 hierarchical method explored in ReVA is the analytical hierarchy process (AHP). ReVA
18 documentation should highlight the relationship of AHP to the recommendations provided in the
19 SAB EPEC document cited above.

20
21 **5.2.3 Question 2c. Provide input as to approaches for presenting available information**
22 **and uncertainty in the EDT.**
23

24 As discussed above, the SAB finds that a more extensive "user's manual" is needed to fully
25 understand the adequacy of the approach used to present data in the EDT and the ability of the
26 EDT to present uncertainty. With regard to uncertainty, there are two issues of concern to the
27 SAB. The first issue of concern is that it is difficult to judge the adequacy of the presentation of
28 information and uncertainty without more specific details describing the implementation of
29 ReVA. It is difficult to know definitely whether the information and uncertainties are presented
30 effectively because important details remain unclear. For example, it is not clear how one would
31 weigh or prioritize effects and vulnerabilities using the ReVA approach. It is also not clear what
32 process or rules one would use. In the absence of clear guidance, many diverse decisions will be
33 made and will influence the presentation of the state of vulnerability. Some guidance about
34 selecting methods is included in the ReVA documentation. However, information providing an
35 in-depth understanding of the methods is not presently available. The SAB notes that ReVA
36 users presently appear to explore the use of methods until a feeling emerges that the best
37 integration approach has been found.

38
39 The second issue of concern with regard to uncertainty is that it is difficult to know how much
40 uncertainty is associated with the EDT presentation of system vulnerability. This is because the
41 ReVA definition of vulnerability does not include all essential aspects of Cairns' generally
42 accepted definition of ecosystem vulnerability (Cairns and Dickson, 1977). The ReVA
43 presentation of vulnerability appears to be indifferent to some important qualities of ecosystem
44 vulnerability as defined by Cairns. Cairns defined ecosystem vulnerability as "susceptibility of
45 an ecosystem to irreversible damage," and he identified three major issues associated with
46 ecosystem vulnerability: 1) elasticity or the ability to return to an original, pre-stress condition,

1 2) inertia or the ability to resist change in function or structure, and 3) resilience or the number of
2 times that the ecosystem is able to recover to its normal state. The SAB notes that two
3 ecosystem qualities may experience the same level of a stressor but have very different levels of
4 inertia. Two ecosystem qualities may change identically with stress but one may be more capable
5 of rebounding after the stressor is eliminated. Some ecosystem qualities may rebound only once
6 or twice but others could potentially rebound many times before permanent damage is
7 established. The SAB believes that the ReVA EDT should incorporate these differences in key
8 characteristics in order to present ecosystem vulnerability. The SAB finds that the current
9 presentation of vulnerability in ReVA does not appear to allow these qualities to be visualized.

10
11 **5.3 Question 3. Please comment on the usefulness of the ReVA approach to decision**
12 **makers in allowing them to see the overall consequences of future development, and**
13 **mitigation, conservation, and restoration activities.**
14

15 Within the context of improving the ecological evaluation data and integration methods, the
16 SAB endorses the continued development of ReVA. The SAB finds that the ReVA process can
17 be a useful component in evaluating the overall consequences of future development, mitigation,
18 conservation, and restoration activities. While ReVA is not a unique product within the realm of
19 landscape, urban, or decision-planning software tools that use geographic information
20 technology, its important contribution to this field is its emphasis on critical or vulnerable habitat
21 evaluations.
22

23 ReVA's utility can be improved by (1) explicitly acknowledging the differences between
24 forecasting and scenario analyses, (2) continuing efforts to improve or enhance ecological
25 conditions database, (3) validation and/or improvement of the ecological condition integration
26 methods, (4) incorporation of commercially-available decision-assisting software, and (5)
27 recognition within ReVA that ecological vulnerability decisions must also consider equity,
28 efficiency and effectiveness – including social justice issues. The SAB recommends that EPA
29 explore adding tools and data layers to ReVA to make it more useful in the decision making
30 process.
31

32 *Forecasting Versus Scenario Analysis*
33

34 As indicated in the response to charge question one, there are two “futuring” functions that
35 can be used in the ReVA process: 1) mechanistic forecasting models, and 2) scenario analysis.
36 The SAB strongly recommends that the developers of ReVA provide a clear indication of the
37 differences between the functions of forecasting and scenario analysis to project future
38 vulnerability.
39

40 Forecasting mechanistic models are defined as mathematical algorithms designed to answer
41 relatively narrow questions and predict changes to environmental parameters over a defined time
42 frame. The coupling of a comprehensive spatial data set (such as the one provided by ReVA)
43 with well-defined, calibrated and validated mechanistic models provides a powerful ability to
44 predict changes over time in environmental conditions with quantifiable uncertainties. An
45 example of a forecast application mentioned previously is the application of the “PM2.5” model
46 with ReVA to project future ozone levels for the Clear Skies Initiative. Other examples of the

1 utility of geographic information system/mechanistic model coupling and forecasting include the
2 fate, transport, and bioaccumulation prediction functions developed by EPA for risk assessments
3 on the Hudson River, the Housatonic River, and the Lower Fox River. Another excellent
4 example of the linking of spatially–explicit information with dynamic ecological models is the
5 Across Trophic Level System Simulation (ATLSS) (Duke-Sylvester and Gross, 1999). The
6 ReVA process is well suited as a tool to explore regional or watershed level questions such as
7 how agricultural nutrients exported from midwestern states impact the vulnerability of the Gulf
8 of Mexico. The SAB recommends that additional resources be allocated by EPA to further
9 develop ReVA for use in this fashion.

10
11 The SAB believes that development of ReVA and its applications is an effort in scenario
12 analysis; the exploration of potential changes to the overall landscape using the baseline spatial
13 data coupled with good visualization tools presented with geographic information technology.
14 The ReVA web-based Environmental Decision Toolkit, with weighting factors, spatial
15 integrators, and color map representations, appears to be well suited for this use. For example,
16 the SEQL program in Charlotte North Carolina plans to use ReVA to create and compare
17 alternative development scenarios. In this context, ReVA will be used to develop decision tools
18 to help build consensus on density and location of new development in order to minimize
19 creation of new transportation demand, promote clean air, and plan for sustainable community
20 infrastructure while preserving potentially vulnerable habitats.

21
22 The SAB believes that the developers of ReVA must be careful to qualify the limitations of
23 analysis as currently conducted in ReVA, and distinguish it from forecasting. In this regard, the
24 SAB notes that scenario analysis does not prescribe significance and is not probabilistic or
25 predictive in any mechanistic fashion. Scenario analysis is simply application of a set of
26 conditions observed in the past to project a plausible future case. The SAB finds that ReVA in
27 this context is therefore best suited for use as a screening tool. In essence, the ReVA approach is
28 equivalent to low resolution modeling used by landscape planners. An additional problem
29 associated with scenario analysis in ReVA is that as one evaluates more localized areas, small
30 events may have a greater influence on vulnerable habitats. The SAB therefore recommends that
31 ReVA explicitly include conditional statements regarding the predictive (or lack of predictive)
32 power in its scenario analysis components. The SAB also recommends that ReVA not be used
33 as the sole tool for evaluating local conditions. For example existing protocols that utilize
34 Indexes of Biotic Integrity (IBI) can be used in environmental bioassessment.

35 36 *Ecological Conditions Data*

37
38 The limitations associated with the ecological conditions data in ReVA have been discussed
39 above. The SAB notes that the ReVA approach to decision making could be made more useful
40 through increased use of response measures and ecological endpoints, and use of a process to
41 evaluate the performance of indicators developed to assess ecological condition. External
42 verification of indicator applicability, sensitivity and sources of uncertainty is also needed.
43 Again, the SAB EPEC Framework Document, referred to above, can provide useful guidance.

44 45 *Validation and Confirmation of the Ecological Condition Integration Methods*

1 The SAB noted in the response to charge question two that serious questions remain
2 regarding the integration methods used in ReVA. The integration methods are unique and
3 elegant applications. However, there is a need for a careful description of the methodologies, an
4 evaluation of the statistical soundness of the methods, the capability of reproducibility of the
5 methods (demonstration of similar results among multiple users), field validation of the
6 integration methods, and a discussion of uncertainty. The SAB believes these actions are
7 achievable, endorses continued effort in this area, and recommends that EPA provide resources
8 (either direct budget or personnel) to complete this evaluation.
9

10 *Decision making Process and Software*

11
12 The SAB finds that there are serious limitations associated with the decision making tools and
13 process developed for use in ReVA. Although EPA has tried to incorporate a decision process
14 into ReVA, key decision tree concepts are not presently included in the approach. Conceptual
15 models and/or guidelines for setting priorities are important elements that are not presently part
16 of ReVA. The limitations of ReVA as a priority setting tool, discussed in the response to charge
17 question one, limit its usefulness in decision making. A number of commercially available
18 software packages support prioritization and decision assistance. These software packages could
19 be applied to the ReVA process. The SAB believes that EPA should incorporate commercially
20 available decision assistance software into ReVA instead of trying to develop de novo decision
21 assistance software.
22

23 The SAB notes that ecological vulnerability decisions must consider equity, efficiency and
24 effectiveness. Effectiveness means getting the job done (e.g., reducing vulnerability) regardless
25 of cost; efficiency refers to output divided by input (e.g., benefit-cost ratio), and hence does
26 consider the cost (e.g., use of various resources) involved; equity is some notion of fairness.
27 ReVA's role in measuring ecological vulnerability need not consider equity, efficiency, and
28 effectiveness. However, to the degree that ReVA (or any other entity or tool) concerns itself
29 with priority setting, it should consider equity, efficiency, and effectiveness.
30

31 **5.4 Question 4. Please provide input on issues encountered as the information and** 32 **approaches in ReVA are used at finer scales. Please also provide input on future** 33 **ReVA research priorities and alternative applications of ReVA methods for decision** 34 **making at multiple scales.**

35 36 **5.4.1 Question 4a. Provide input on the issues encountered as the information and** 37 **approaches in ReVA are used at finer scales.**

38
39 ReVA has been demonstrated within a region (on a multi-state scale for the Mid-Atlantic
40 Region) and it is being developed for a "local," 15-county area surrounding Charlotte, North
41 Carolina. ReVA may potentially be applied at even larger and smaller scales. The SAB notes
42 two issues in applying ReVA at finer scales than the Mid-Atlantic. The first issue is that at finer
43 scales, the number of stakeholders involved in the analysis frequently increases. Whereas at
44 regional scales, the decision maker may be an agency manager making decisions on regional
45 priorities, at finer scales decisions are made that directly affect the use of lands and the quality of
46 life and will concern a large segment of the population. The implication for ReVA of the

1 increased number of actors using the tools at finer scales is that ReVA must be developed for
2 users with a significantly lower level of scientific and technical expertise. The tool must balance
3 scientific rigor with clarity and simplicity of concepts and application. ReVA's role as an
4 educational tool in relation to its original multicriteria decision making role should increase at
5 finer scales.
6

7 The second issue deals with the choice of indicators to be used at finer scales. ReVA is a
8 framework and an approach, but the choice of condition and resource indicators is left to the
9 discretion of users. Thus users have an opportunity to select indicators myopically, overlooking
10 processes operating at scales above that of the area, or exports of stressors to adjoining areas.
11 Hierarchy theory advises that patterns at any local scale are conditioned by processes at larger
12 scales. For example, an indicator that only considers habitat fragmentation within assessment
13 units in an area could underestimate the overall impacts on migratory bird species if the corridor
14 function is lost. Similarly, an area may be a source of a stressor on a neighboring area even if
15 that stressor does not manifest prominently in the vulnerability assessment of the source region.
16 Agricultural nutrients exported from midwestern states that impact the vulnerability of the Gulf
17 of Mexico exemplify this cross-area issue. This also underscores the importance of selecting
18 indicators that respond to policy options so that the effects of scenarios can be examined. These
19 concerns apply at any scale, but are likely to be most prevalent at finer scales. At these scales,
20 local problems typically dominate the discussion, but local problems may require regional
21 solutions. The SAB encourages EPA to document and explain these issues related to the choice
22 of indicators and provide exemplars where available. Further, EPA should consider tracking
23 exports to adjoining areas as additional information for decision makers. These factors need not
24 be included in the integration methods because they do not affect vulnerability of the assessment
25 units within an area, but they would alert decision makers when a potential decision would
26 creates new problems for someone else.
27

28 **5.4.2 Question 4b. Provide input on research priorities and alternative applications of** 29 **ReVA methods for decision making at multiple scales.** 30

31 The SAB notes that the methods and applications in ReVA can provide the kind of
32 information sought by a wide range of organizations, including conservation groups and other
33 nongovernmental organizations. These organizations often work in areas that are data-poor and
34 ReVA can provide them with important and useful information. The SAB notes that the
35 following research priorities and applications can support further development of ReVA
36 methods for decision making at multiple scales.
37

- 38 • Because many organizations work in regions that are data-poor, research is needed to
39 provide further information about the minimum amount of data needed for advice and
40 guidance in decision making. It is important to examine how much certainty is lost as the
41 amount of available information is reduced, and also whether there is a core set of metrics
42 that will always be needed by decision-makers.
43
- 44 • ReVA currently provides information about the vulnerability of geographic areas. An
45 alternative and very useful application of ReVA would be to provide information that
46 would enable the identification of geographic areas of the "highest value."

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- The SAB notes that alternative applications of ReVA will require validation, and additional data input files are needed to understand uncertainty. Clearly, integration methods must be validated. Validation of ReVA methods is an important research issue.
 - It will be important to determine whether ReVA is providing data that describe the critical parameters for assessing vulnerability. For example, an analysis should be conducted to determine whether the nitrogen and phosphorus thresholds used in ReVA provide information needed for the assessments of vulnerability. If major data sets are not useful to users they should drop out of ReVA. In addition, the “core measures” in ReVA should be identified. The SAB notes, however, that the philosophy of using a single index should not be embedded within ReVA.
 - It would be very useful to provide data sets describing simpler “scenarios.” This would enable the users of ReVA to more easily understand and identify problems that span resource issues. For example, data could be made available from high mountain lakes in California. User groups are interested in the fisheries in these lakes. Exotic species in these lakes have affected native biodiversity and altered community structure, and the U.S. Forest Service is interested in managing the lakes to maintain biodiversity. There are clearly identified resource values associated with the lakes. There are also two primary resource stressors, introduced fish and increased nutrient loading. Data sets from these lakes describe a simpler scenario than the Mid-Atlantic regional information currently provided in ReVA. Well-defined data at a fine scale such as the high mountain lakes in California can be “scaled up” to evaluate the hydrologic cataloging unit and regional levels.
 - Research is needed to develop a roadmap for validation of ReVA futures tools. Validation of ReVA methods will depend upon confidence in the futures data layers. The SAB notes that many of the variables in ReVA are computed from others (e.g., in the case study phosphorus is computed from sediment) and validation of these relationships is necessary. The SAB also notes that two other important aspects of the ReVA futures tools must be validated. Validation of substitution of space for time must be conducted to ensure that ReVA is not extrapolating beyond the range of data. These issues have been carefully examined through research conducted at the U.S. Forest Service H.J. Andrews Experimental Forest in Oregon (Andrews Experimental Forest LTER, 2002). Work must also be conducted to validate predictions made using configurations of data that have not been seen previously. ReVA will be subject to criticism if validation of the futures data layers is not undertaken.
 - The SAB also recommends the following relatively minor but important improvements in the ReVA documentation and visualization: 1) users should be provided information about confidence in data used in the framework for projections; 2) some of the maps in ReVA have defective labels and should be corrected; 3) EPA must be careful in explaining to users what scenarios mean; and 4) spatial problems (scale effects) associated with ReVA map representations should be resolved. For example, if the North Carolina streams biological data currently in ReVA are expressed at a regional scale, the

1 stressor results appear to be different from stressors results associated with individual
2 streams. It is important to examine the relevant scales of stressors in ReVA.
3

4 In summary, the SAB strongly supports the efforts of EPA's Office of Research and
5 Development to develop ReVA. The suite of tools in ReVA can assist local and regional
6 resource managers in assessing current and future conditions. The SAB notes, however, that the
7 usefulness of ReVA could be greatly improved by providing additional documentation. The
8 SAB encourages EPA to continue developing ReVA, and to provide documentation on: what
9 constitutes ReVA, the framework and indicators for assessing ecological condition in ReVA, the
10 conceptual models underlying ReVA, clear basic documentation of the underlying processes for
11 acquiring and assembling data, quality assurance reviews, and spatial data integration. A
12 methodology document and a user's manual should also be developed for the ReVA
13 Environmental Decision Toolkit documenting the ReVA statistical tools in a manner that is clear
14 and accurate with analytical and empirical supporting evidence.
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Appendix A: Sensitivity of the Criticality Measure in ReVA¹

The ReVA report “Regional Vulnerability Assessment for the Mid-Atlantic Region: Evaluation of Integration Methods and Assessments Results” (Smith, E., L. Tran, and R. O’Neill, 2003) claims that the criticality measure is insensitive to the definition of natural state. However, little evidence is actually offered to support this claim. The report simply considers two possible natural states, the second allegedly having greater uncertainty than the first, and observes that empirically (i) there is not much difference in the corresponding criticality values and (ii) typically the criticality values are smaller with the second definition of natural state.

A mathematical analysis of the sensitivity issue indicates that:

- Changing the uncertainty of the natural state has only a slight numerical effect on the measure. Further, the effect is to increase the criticality value when uncertainty is increased.
- The criticality measure can be sensitive to changes of location (in indicator space) of the natural state. The criticality value can increase or decrease depending on the nature of the change of location.
- The criticality measure would be about the same if the “fuzzy” numbers were ignored and criticality was simply defined as the (squared) Euclidian distance from the given watershed to the (midpoint) of the natural state.

The ReVA report does not give a precise definition of the criticality measure. For definiteness, the following may be supposed:

- For each variable, the values associated with actual watersheds are crisp numbers rather than “fuzzy” numbers.
- For each variable, the “fuzzy” number associated with the “natural state” is either symmetric triangular or rectangular over an interval of length L and midpoint M .
- The distribution on the parameter α is uniform.
- Integration is achieved by summing the (squared) fuzzy distances across all the variables.

The report is completely silent on the foregoing issues. The conclusions in this appendix do not depend critically on these issues, except for symmetry of the fuzzy numbers. Of course, antisymmetry of the fuzzy numbers would be an expression of uncertainty about the location of the natural state, i.e., the midpoint of the uncertainty interval would vary with the parameter α .

Fix a particular indicator variable, and let W be the value of that variable on the watershed in question. Putting aside the notational pyrotechnics in the appendix of the report, the (squared) fuzzy distance between the watershed and the natural state is

$$\text{Rectangular: } D_R^2 = (W - M)^2 + \frac{1}{12} L^2 \quad (1)$$

¹ The comments and suggestions in Appendix A were provided by a member of the Panel (Dr. G.P. Patil) and may not represent the views of the Panel

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$$\text{Triangular: } D_T^2 = (W - M)^2 + \frac{1}{36} L^2 . \tag{2}$$

In either case, the fuzzy distance is the sum of two terms: (i) the squared Euclidian distance between the watershed and the midpoint of the fuzzy number and (ii) a correction to account for uncertainty. Three conclusions can be drawn at this point: (i) the uncertainty correction serves to increase the fuzzy distance, (ii) the uncertainty correction is small compared with the locational distance $(W - M)^2$ unless the watershed is located within the interval L of uncertainty, and (iii) those who claim that fuzzy distance is insensitive must also claim that Euclidian distance is insensitive.

For the two natural state scenarios considered in the ReVA report, the most common change was to replace the triangular with the rectangular membership function, keeping L and M the same. The corresponding change in the fuzzy distance is

$$D_R^2 - D_L^2 = \frac{1}{12} L^2 - \frac{1}{36} L^2 = \frac{2}{36} L^2 . \tag{3}$$

If this change is made for N indicator variables, then the integrated criticality measure will *increase* by

$$N \cdot \frac{2}{36} L^2 . \tag{4}$$

This is the effect of incorporating “fuzziness” into the definition of the criticality measure. But, comparing the legends in Figures 9 and 10 of the ReVA report we see that the integrated criticality measure has generally *decreased*. Thus, there must have been other changes—in location—of the natural state that offset this tendency to increase.

This matter can be examined for item (7) on page 18 of the ReVA report - soil loss. The actual data are not available, so it is assumed that the first (lowest) quintile occurs at a value Q and the second quintile at a value $2Q$. Then, for scenario I, the membership function is triangular on the interval from 0 to Q (so $L = Q$ and $M = Q/2$) while for scenario II, the membership function is rectangular on the interval from 0 to $2Q$ (so $L = 2Q$ and $M = Q$). Inserting these values in equations (1) and (2) gives

$$D_I^2 = (W - Q/2)^2 + \frac{1}{36} Q^2$$

and

$$D_{II}^2 = (W - Q)^2 + \frac{1}{12} (2Q)^2$$

Thus,

$$D_{II}^2 - D_I^2 = Q \left(\frac{38}{36} Q - W \right)$$

It follows that $D_{II}^2 > D_I^2$ if and only if $W < \frac{38}{36} Q \approx Q$. Thus, Scenario II results in an increase in criticality only for watersheds in the lower quintile. For watersheds in the upper quintile, criticality can decrease and by a substantial amount as a result of changing the definition of natural state from Scenario I to Scenario II.

One would need the actual data to quantify the numerical decrease. For example, if the watershed values were uniformly distributed across the unit interval, one would have $Q=1/5$ and the upper quintile interval would be (0.8, 1.0). Taking $W=0.9=4.5Q$ to be the midpoint of this interval, gives

$$D_{II}^2 - D_I^2 = Q \left(\frac{38}{36} Q - 4.5Q \right) \approx -3.5Q^2 = -3.5L^2. \quad (5)$$

Comparing with equation (4), one sees that this decrease due to a locational change in one variable would offset the increase due to replacing the triangular with rectangular membership function in about 62 variables. Also, observe that if fuzziness was discarded and the “natural state” intervals were degenerate at their midpoints, the only effect would be to replace 38/36 by 31/36 in the preceding analysis.

A similar analysis was carried out for item 5 (Forest Inventories). This is an interesting example since the definition of “natural state” varies with the particular watershed W . For scenario I, the membership function is triangular on the interval from 0 to W (so $L=W$ and $M=W/2$) while the membership function for scenario II is degenerate at W (so $L=0$ and $M=W$). Here, one finds that

$$D_{II}^2 - D_I^2 = -\frac{10}{36} W^2,$$

where the 10/36 would be replaced by 9/36 if there were no fuzziness, just midpoints. Here, scenario II always has smaller criticality than scenario I. The magnitude of the decreases varies with the watershed; watersheds in the upper quintile produce larger decreases. For a watershed at the midpoint of the upper quintile under uniformity ($W=4.5Q$),

$$D_{II}^2 - D_I^2 = -\frac{10}{36} 4.5^2 Q^2 \approx -2.7Q^2,$$

which is only slightly smaller in magnitude than the decrease given in equation (5).