[Ed Cronyn Comments 12-20-2013]

Thank you for an excellent workshop. This was very informative, and also a very good description of all that has gone into the process so far. I have a few comments, which mirror the comments I made during the workshop as well as during the Water Environment work group discussions.

- The new proposed method includes much more extensive spreadsheet input and analysis than the previous method. This may result in too little room for ecological judgment and produce results that are not consistent with the actual value of ecological functions. (However, extensive testing/evaluation/calibration exercises will be a better determination of that, rather than my opinion :)).
- Training/guidance materials are another way to improve consistency and reduce the known errors in the current method, rather than replacing the current method with extensive spreadsheet-based analysis.
- Whether refining the current method or adopting a new, spreadsheet-driven method, I recommend that testing occur in concert with training and guidance materials before rule adoption. This will assure that there is field calibration to determine whether the revised method will yield results that are consistent, repeatable, and compare well with field scientists' ecological judgment. All of these are necessary to assure the method is not arbitrary and is acceptable to practitioners and permit applicants.
- If testing, training and guidance materials are postponed, then it is likely that the method will have similar shortcomings (or perhaps greater shortcomings) than the current method, and the training/guidance materials may not be developed at all.

Thank you for the opportunity to participate in the workshops, and best wishes in your efforts to meet all the objectives established for this rule-revision.

Have a good weekend and merry Christmas!
Ed

Ed Cronyn, PWS
Program Manager/Senior Scientist, West Florida Sciences

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4030 W Boy Scout Rd, Ste. 700, Tampa, FL, 33607 | Tel: +1 (813) 281 8354 | Fax: +1 (813) 636 8583 | Cell: +1 (813) 215 0766