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**Participant Comments: Florida Chamber's Environmental Permitting Summer School on Marco Island
(Received 7-19-2013)**

John,

As a means of facilitating feedback at today's UMAM course, I asked participants to write answers to two questions: what is/are main issue(s), and how do you recommend fixing it/them? The responses are below. These are from the audience, not necessarily consistent with my perspective, but wanted to pass these along since these are all long-time practitioners whose views should be considered.

- 1) Need to standardize Part I reference systems. Recommend rule-revision for this, including revised form.
- 2) Location/landscape should be considered a limiting factor when evaluating the wildlife value of the two other variables (e.g. 3/9/9 should not be a valid score). This should be addressed via training/guidance.
- 3) Eliminate PAF. Since USACE does not allow preservation, this is a misleading option.
- 4) Re-organize Part I form for clarification (I believe this comment relates to assuring Part I consistently identifies and describes the reference system)
- 5) Include USACE in rulemaking to combine state and federal intent.
- 6) Eliminate two-step option.
- 7) Define Part I--give more guidance.
- 8) Clarify location/landscape.
- 9) Increase training, particularly agency staff.

In addition to these written comments, I'll also pass along that there was extensive Q&A on two topics in particular:

*Appropriate Part I/frame of reference for altered sites. Due to extent of interest and discussion, I would recommend this be an element for each of the working groups to consider, including whether this should be clarified by additional rule language, training, guidance, or other means.

*to what degree mitigation can get credit for improved location/landscape, particularly when mitigation includes preservation of extensive upland buffer/offsite connection. Compare this to reduction in L/L score for sites where a wetland is preserved but uplands are developed.

Thanks for your request for input and feedback. I hope this helps in your ongoing review of UMAM.

Regards,
Ed