

Alan Krupnick's Comments on August 10, 2005 REM Draft Report

Jack: I am having a hard time carving out time to review the document. So far I read the ES and the "bolded" sentences of the report. Given that the ES is the only (or main) thing most people will read, I think it could be improved. The third para (the first substantive paragraph) has an incomplete sentence in it (sentence two) and is mostly about the writing of the document, not being about substance. I think the most important recommendations should be first, although I recognize that there are other reasonable ways to organize an ES. Perhaps it could be organized according to the charge questions, but said in a more accessible way, with key points made under each charge. As it stands, the reader of the ES doesn't know why the panel is involved. More motivation is needed.

Also, as I recall, there are many parts of the agency that go their own way with modeling protocols. If we think a single system is needed, and I think we agree on that, then we should say so -- and in the ES. The recommendation on page 48, lines 21-27 gets at this point in part.

We should also say in the ES that the modeling group at EPA needs the resources to keep up their efforts. Something like this is in the little type on page 45, lines 32-38, which should not be a footnote; indeed, I think it should be bolded. I also think the recommendation on page 48 about including model lifecycles is very important and innovative and should be highlighted in the ES.

In the chapters, the use of bolding is not explained. The reader interested in skimming the document should be told to read these sentences to quickly understand the main findings and recommendations of the Panel. To be used in this way, the bolded sentences might need some editing to be more self-explanatory.

Searching for "recommends" in the document reveals places where there is no bolding. What determines whether a recommendation is bolded or not?

There are terms used that are not defined, such as "application niche uncertainty."

I had a number of assignments from the last call. (1) Our report to EPA on uncertainty is not due until September 30. So it may be possible after that to put some of our language into the document. But the Panel report may be finished before we are ready. (2) Randy did a nice job of integrating comments on the three models we examined through the MKB.