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From: Ann P. Swanson [<mailto:aswanson@chesbay.us>]

Sent: Wednesday, November 05, 2014 2:28 PM

To: John Rhoderick; [kristen@headwaters-llc.org](mailto:kristen@headwaters-llc.org)

Cc: DiPasquale, Nicholas; Jennifer Volk; Marel King

Subject: Nutrient Management

Dear John and Kristin:

The CBC staff has significant concerns about the implications of the Nutrient Management Expert Panel Report and contends that the report recommendations are not ready for approval at the November 6 Ag Workgroup Meeting. Furthermore, the meeting scheduled is in direct conflict with our quarterly Commission meeting precluding our participation.

Specifically, we are concerned about the lack of clarity of practice definitions and the lack of justification of the efficiencies derived. There is a critical need to address not only practice definition and efficiencies but verification as well. How can the value of a NMP double in credit if no additional action is taken or further verified?

We recommend that the Ag Workgroup adhere to the Chesapeake Bay Program Partnership's BMP protocol (July 14, 2014) and involve the verification advisors as it moves forward in building consensus.

Thank you for your attention to this request, Ann