Virginia Agricultural Resource Management Plan Regulations
Virginia Farm Bureau, Richmond, Virginia
Friday, December 16, 2011

RAP Members Present

Daniel Belin, Ecology and Environment, Inc.
R.O. Britt, Murphy Brown
Katie Frazier, Virginia Grain Producers Association
Donna Johnson, Virginia Agribusiness Council
Ann Jennings, Chesapeake Bay Foundation
Stephanie Martin, Department of Conservation and Recreation
Jacob Powell, Virginia Conservation Network
Tom Simpson, Water Stewardship, Inc.
Matt Shreckhise, Shreckhise Nurseries
Wilmer Stoneman, Virginia Farm Bureau
Bill Street, James River Association
Meaghann Terrien, Three Rivers Soil and Water Conservation District
Don Wells, Virginia Association of Soil and Water Conservation Districts
Charles Wootton, Piedmont Soil and Water Conservation Districts

Technical Support

Darrell Marshall, Department of Agriculture and Consumer Services
Matt Poirot, Department of Forestry
Chad Wentz, Natural Resources Conservation Service
Blaine Delaney, Natural Resources Conservation Service
Neil Zahradka, Department of Environmental Quality
Mike Foreman, Department of Conservation and Recreation
Christine Watlington, Department of Conservation and Recreation
Bob Waring, Department of Conservation and Recreation
Diane Beyer, Department of Conservation and Recreation
Mark Hollberg, Department of Conservation and Recreation
Ginny Snead, Department of Conservation and Recreation

Others in attendance

Jack Bricker, Natural Resources Conservation Service
Chris Lawrence, Natural Resources Conservation Service
Jack Frye, Chesapeake Bay Commission
Adrienne Kotula, James River Association
Peggy Sanner, Chesapeake Bay Foundation
Mindy Selman, World Resources Institute
Sara Walker, World Resources Institute

Reese Peck, Department of Conservation and Recreation
David Johnson, Department of Conservation and Recreation
James Davis-Martin, Department of Conservation and Recreation
Bill Keeling, Department of Conservation and Recreation
Tim Sexton, Department of Conservation and Recreation
Anthony Moore, Assistant Secretary for Chesapeake Bay Restoration
Blair Krusz, Virginia Agribusiness Council

Welcome and Introductions

Ms. Martin called the meeting to order. She said that the day was basically a presentation day to hear about the various technologies. She said that this meeting would not include a review of the regulations.

She said that the presenters would give their presentations and then allow for questions.

Conservation Plan Development (NRCS)

Chad Wentz from NRCS gave the following presentation. A full copy of the presentation is available on the DCR website.

Overview of the NRCS Conservation Planning Process and RUSLE2

What is a conservation plan?

- A voluntary, site specific, comprehensive, and action-oriented plan…
- Based on natural resource information and a record of decisions made by the client…
- Which describes a system of practices and activities needed to solve identified natural resource problems and take advantage of opportunities.

Mr. Wentz said that this was done with the client in the field, working one on one.

Types of Plans and Associated Planning Requirements:

- ACS and BCS Plans
  Alternative Conservation System and Basic Conservation System Plans – Developed to carry out the provisions of the Food Security Act
- RMS Plans
  Resource Management System Plan
- Progressive Planning
- CNMPs
  Comprehensive Nutrient Management Plans – Developed for Animal Feeding Operations

How do we get there?

Nine Step Planning Process:

1 – Identify Problems and Opportunities
2 – Determine Objectives
3 – Inventory Resources
4 – Analyze Resources
5 – Formulate Alternatives
6 – Evaluate Alternatives
7 – Make Decisions
8 – Implement the Plan
9 – Evaluate the Plan

Technical Criteria

- National Planning Procedures Handbook
- Field Office Technical Guide (FOTG)
  I. General Resource References
  II. Natural Resource Information
  III. Conservation Management Systems
  IV. Practice Standards and Specifications
  V. Conservation Effects

NRCS Conservation Planning Policy

Certification Levels:

- Certified Conservation Planner Designation
- CNMP Planner Designation
  - Manure and Wastewater Treatment Specialist
  - Land Treatment Specialist
  - Nutrient Management Specialist
  - Feed Management Specialist

Mr. Wentz gave the following definitions:

Conservation Plan: A record of the client's decisions and supporting information, for treatment of a unit of land or water as a result of the planning process, that meets FOTG quality criteria for each natural resource (soil, water, air, plants and animals) and takes into account economic and social considerations. The plan describes the schedule of operations and activities needed to solve identified natural resource problems, and takes advantage of opportunities, at a resource management system level. The needs of the client, the resources, and federal state, and local requirements will be met.

Resource Management System (RMS): A combination of conservation practices and resource management, for the treatment of all identified resource concerns for soil, water, air, and animals,that meets or exceeds the quality criteria in the FOTG for resource sustainability.

Progressive Planning: The planning process is progressive when a client is ready, willing, and able to make and implement some, but not all of the decisions necessary to achieve an RMS level of management. The rate of progress in moving to an RMS level will depend on the client's desires and constraints.

Alternative Conservation System (ACS): A conservation system for treating sheet, rill wind, and ephemeral gully erosion on highly erodible land that is documented in the FOTG which achieves a substantial reduction in soil loss rates. This term applies only to conservation plans and conservation systems developed to carry out the provisions of the Food Security Act of 1985, as amended by the Food, Agriculture, Conservation and Trade Act of 1990, and the Federal Agricultural Improvement and Reform act of 1996.

Basic Conservation System (BCS): An erosion control system for treating sheet, rill, wind, and ephemeral gully erosion on highly erodible land. A BCS may be a component of a Resource Management System (RMS). The BCS must achieve soil loss tolerance requirements for the principal soil it is designed to protect and be documented in the FOTG. This term applies only to conservation plans and conservation systems developed to carry out the provisions of the Food Security Act of 1985, as amended by the Food, Agriculture, Conservation, and Trade Act of 1990, and the Federal Agricultural Improvement and Reform Act of 1996.

CNMP is defined as: A comprehensive nutrient management plan (CNMP) is a conservation plan for an animal feeding operation (AFO) that:

(1) Must include the following two components:
    a. The production area, including the animal confinement, feed, and other raw materials storage areas, animal mortality facilities, and the manure handling containment or storage areas.
    b. The land treatment area, including any land under control of the AFO owner or operator, whether it is owned, rented, or leased, and to which manure or process wastewater is, or might be applied for crop, hay, pasture production, or other uses.
(2) Meets Natural Resources Conservation Service (NRCS) quality criteria for water quality (nutrients, organics, and sediments in surface and groundwater) and soil erosion (sheet and rill, wind, ephemeral gully, classic gully, and irrigation induced natural resource concerns on the production area and land treatment area).
(3) Mitigates, if feasible, any excessive air emissions and/or negative impacts to air quality resource concerns that may result from practices identified in the CNMP or from existing on farm areas/activities.

(4) Complies with Federal, State, Tribal, and local laws, regulations, and permit requirements.
(5) Satisfies the owner/operator's production objectives.

A list of minimum qualifications for planner certification is available on the DCR website.

Demonstration of RUSLE 2 and "T" (NRCS)

Chris Lawrence of NRCS gave the following presentation. A full copy of Mr. Lawrence's presentation is available on the DCR website.

Understanding & Achieving "T"

"[Resource management plans] shall include the following, as needed and based upon an individual on-farm assessment:…A soil conservation plan that achieves a maximum soil loss rate of 'T', as defined by NRCS…"

I. EROSION BASICS

1. What is erosion?
- Process by which soil particles are:
  - DETACHED from land surface
  - TRANSPORTED and
  - DEPOSITED elsewhere
- Particles can be deposited
  - Near point of origin
  - Or very far away

2. Where in VA landscapes does erosion occur?
- Almost everywhere!
- But focus today is VA FARM FIELDS:
  - CROPLAND
  - HAYLAND
  - PASTURE

3. What is "soil loss"?
- Any soil detached and transported more than a few feet is "lost"
- To be "lost", soil does not need to leave
  - The slope
  - The field
  - The farm
- No matter where it ends up, loss of soil from place of origin is itself a problem!

4. Isn't erosion "natural"?
    - Mountains and canyons shaped by erosion over GEOLOGIC time.
    - "Natural" annual runoff & erosion rates on native VA landscapes were VERY LOW.
        - – Ecosystem developed under this regime.
    - Human activity in VA accelerated erosion.
        - – Impaired soil, water, and ecosystem function.

5. What are primary agents of erosion on VA farmland?
    - Water (+ gravity):
        - – Dominant erosive agent statewide
        - – Raindrop impact is key to detachment
        - – Water running downhill key to transport
        - – Intense rainstorms play major role
    - Wind
        - – Occasional issue in eastern VA
        - – Only occurs when soil is dry

6. When & where do most intense storms occur in VA?
    - On average:
        - – During summer
        - – In warmer parts of state
    - During any given time period:
        - – Highly variable timing

7. What are primary risk factors for water erosion on VA farmland?
    - Climate:
        - – Warmer location / time of year = higher risk
    - Topography:
        - – Steeper = higher risk
    - Soil type:
        - – Higher runoff rates = higher risk
        - – Loamier soils = higher risk

7. What are primary risk factors for water erosion on farmland? (cont.)
    - Farmer management:
        - – More bare or disturbed soil = higher risk
        - – Less crop residue/canopy to intercept raindrops = higher risk
        - – Less crop roots to bind soil = higher risk
        - – Less soil organic matter and life to maintain the soil sponge = higher risk
        - – Etc.

8. What forms of water erosion occur on VA farmland?
    - Sheet:
        - – Removal of uniform sheet of soil across field
        - – Usually invisible & impossible to measure
        - – RUSLE2 model is used to estimate it
    - Rill:
        - – Random wash patterns on soil surface
        - – Easily erased by tillage
        - – Usually hard to see & impossible to measure
        - – RUSLE2 model is used to estimate it
    - Gully:
        - – Concentrated flow carves away soil from swale or drainage way.
        - – Permanent / always reoccurs in same place
        - – Usually easy to recognize
        - – Can be measured in field
        - – RUSLE2 does not estimate it

9. Why is erosion on VA farmland a problem?

On-site effects
- Less topsoil
- Less infiltration
- More runoff
- Less crop yield
- Less residue
- Less roots
- More erosion
- More runoff
- And so on…

Off-site effects
- More sediment in water
- More sediment-bound nutrients/chemicals in water
- More overall runoff
- More flooding
- More soluble nutrients/chemicals in water

II. INTRO TO “T”

10. What is “T”?
    - Maximum rate of erosion that can occur and still allow crop productivity to be maintained economically.
    - NRCS’ traditional performance target for sustainable soil management.

11. How are “T” values expressed?
    - Tons per acre per year
        - – Long-term average rate of tolerable soil loss

- Each soil type is assigned a T value based on soil characteristics.
- T values range from 1 to 5 ton/ac/year
  – What is depth of 5 ton soil spread over 1 ac?

12. How and when were "T" values established?
    - By panels of experts between1959 and '62
    - Factors considered:
      – Soil depth, other properties affecting root development, soil organic matter, etc.
    - NRCS is planning to revise T values starting in 2012!

13. What is required by VA NRCS to achieve "T" in VA?
    1. No active / visible gully erosion
       – Determined using field observation
    2. Sum of sheet & rill erosion and wind erosion is less than T value
       1. Sheet & rill erosion estimated using RUSLE2
       2. NRCS wind erosion prediction tool not currently in use in VA – assume zero.

14. How does soil loss for T relate to sediment delivery to water?
    - In general, less erosion in farm field = less sediment delivered to water.
    - But can't correlate soil loss for T directly with amount of sediment reaching water.
    - Depends largely on what opportunities for sediment deposition exist between eroding slope and water body.

    Example 1 – T achieved
    - T = 5 t/ac/yr
    - Soil loss estimate = 3 t/ac/yr
    - T is achieved
    - But no deposition or buffer before creek
    - All eroded soil delivered to creek

    Example 2 – T not achieved
    - T = 3 t/ac/yr
    - Soil loss estimate = 6 t/ac/yr
    - T is not achieved
    - But runoff crosses significant deposition area or buffer before creek
    - No sediment delivered to creek

15. Would achieving T on all VA farmland improve water quality?
    - YES!
    - But can't quantify by how much…

III. Assessing Sheet & Rill Erosion with RUSLE2

16. What is RUSLE2?
    - NRCS' official tool for estimating sheet & rill erosion.
        - – Revised Universal Soil Loss Equation 2.
        - – Latest version of USLE, which was first put into use in 1965

17. What info does the user input into RUSLE2?
    - County:
        - – This loads rainfall & climate data
    - Soil type:
        - – This loads data on soil runoff & erodibility characteristics
    - Slope length (feet) & steepness (%)
        - – Highly simplified representation of field's topography
    - Crop management details:
        - – Duration of crop rotation
        - – Dates of field operations
        - – Types of field operations
    - Planting, tillage, harvest
        - – Crop species grown
        - – Expected crop yields
        - – Manure applications
    - Support practice details:
        - – Contouring
        - – Contour buffer strips
        - – Stripcropping
        - – Etc.

18. Where does user get info to input into RUSLE2?
    - County & soil type:
        - – Soil survey, maps
    - Slope length & steepness
        - – Field visit
    - Crop management & support practice details
        - – Farmer interview
        - – Field visit

19. What outputs come out of RUSLE2?
    - Soil loss for conservation planning
        - – Long-term estimate of sheet & rill erosion
        - – Expressed as annual average soil loss
    - Tons per acre per year
        - – To compare directly with T!

- Multiple other advanced outputs
  - – Soil organic matter trend score (SCI)
  - – Tillage intensity score and fuel use estimate
  - – More detailed erosion-related outputs
- Erosion by month, week, day erosion
- Residue cover estimates.
  - – Evaluation of sediment trapping in buffers
  - – Etc.

20. RUSLE2: what are the pros?
    - Powerful software – can rapidly calculate and compare soil loss for wide range of scenarios
    - Outputs generally reliable and replicable.
    - Advanced outputs can be very useful
      - – E.G., soil organic matter score (SCI) complements T for more complete assessment of soil quality and sustainability.

21. RUSLE2: What are the cons?
    - Cumbersome set-up & maintenance
    - Software bugs
    - Not well supported by NRCS nationally
      - – Limited tech support / training /documents
      - – State level leaders must fill gaps
    - Too much detail, too many input choices
      - – State level leaders must streamline/simplify

IV. Conservation Planning to Achieve T

22. What does NRCS do if farmer is not achieving T?
    - Plan one or more management alternatives that meet T
    - Encourage farmer to select and implement one of these alternatives

23. What practices will help farmer achieve T? (in R2)
    - Conservation tillage
      - – Mulch till, no-till/strip-till, continuous no-till
    - Crop rotation
      - – Rotation to perennials
      - – Rotation to high residue crops
      - – Cover crop

23. What practices will help farmer achieve T? (in R2 - cont.)
    - Other
      - – Anything that increases yield
      - – Anything that adds organic matter

- Traditional support practices
  - – Contouring
  - – Strip cropping
  - – Contour buffer strips

24. What practices will not help farmer achieve T? (in R2)
    - Nutrient management
    - Bottom of slope filter strips
    - Edge of field buffers
    - Etc.

V. The Bottom Line: Can Farmers Achieve T in VA?

One way to divide up all VA farmland acreage

1. ALREADY achieving T
2. WILL achieve T
   - – Low cost options, high probability
3. MIGHT achieve T
   - – Moderate cost options, moderate probability
4. WON'T achieve T
   - – High cost options, low probability
5. CAN'T achieve T
   - – No options

25. What's the good news?
    - The majority of the acreage:
      - – ALREADY achieving T
      - – WILL achieve T
    - Many farmers moving this way by choice
    - The minority of the acreage (in descending order):
      - – MIGHT achieve T
      - – WON'T achieve T
      - – CAN'T achieve T

26. What's the bad news?
- There will always be at least a few acres in these categories:
  - – WON'T achieve T
  - – CAN'T achieve T

VI. News from the north

27. What's happening in PA?
    - PA state law has imposed similar mandate

• State agencies, land grant, and NRCS have been looking at different alternatives to streamline planning to T
• Can VA learn any lessons from them?

Chesapeake Bay TMDL Watershed Implementation Plan Compliance (DCR)

James Davis-Martin gave the following presentation. A full copy is available on the DCR website:

RMP Legislative Language

> § 10.1-104.5. Resource management plans; effect of implementation; exclusions.
> A. Notwithstanding any other provision of law, agricultural landowners or operators who fully implement and maintain the applicable components of their resource management plan, in accordance with the criteria for such plans set out in § 10.1-104.6 and any regulations adopted thereunder, shall be deemed to be in full compliance with (i) any load allocation contained in a total maximum daily load (TMDL) established under § 303(d) of the federal Clean Water Act addressing benthic, bacteria, nutrient, or sediment impairments; (ii) any requirements of the Virginia Chesapeake Bay TMDL Watershed Implementation Plan; and (iii) applicable state water quality requirements for nutrients and sediment.
>
> § 10.1-104.6. Resource management plans; criteria.
> B.4. Include agricultural best management practices sufficient to implement the Virginia Chesapeake Bay TMDL Watershed Implementation Plan and other local total maximum daily load water quality requirements of the Commonwealth;

Virginia Assessment and Scenario Tool (VAST)

- http://VastTool.org
  - Develop BMP implementation scenarios
  - Current progress
- 2025 Local implementation scenario
- Estimate loads from implementation scenarios
  - Assess reductions
  - Meet local targets
  - Intent is to be consistent with 5.3.2. Model
  - Will be modified as changes are made to the model
- Document land use data
- Submit BMP implementation scenarios and land use data to DCR

- VAST used to develop a Resource Management Plan Scenario

Assumptions

- Aligns with legislative language
- Consistent with Agricultural Cost-Share Program standards
- Broad voluntary adoption of RMP practices
- Nutrient Management treated as efficiency BMP
- Utilize basic level BMPs to allow for future upgrades

RMP Implementation Scenario

- Row Crop
    - Nutrient Management – 95%
    - Grass Buffers – 35' average width – 95%
    - Cover Crop – 50%
    - Conservation Tillage – 95%
    - Soil Conservation BMPs (Terraces, Diversions, etc) – 95% above fall line

- Hay
    - Nutrient Management – 95%
    - Grass Buffers – 35' average width – 95%
    - Soil Conservation BMPs (Terraces, Diversions, etc) – 95% above fall line

- Pasture
    - Nutrient Management – 95%
    - Stream Access Control with Fencing – 35' average width – 95%
    - Prescribed Grazing - 95%
    - Soil Conservation BMPs (Terraces, Diversions, etc) – 95% above fall line

Projected Loads

- VAST estimates for the RMP scenario compared to WIP I scenario
    - Nitrogen loads meet the WIP I
    - Phosphorus loads meet the WIP I
    - Sediment loads meet the WIP I

- VAST estimates for RMP scenario compared to WIP I model outputs
    - Nitrogen reductions at 99.7% of WIP I
    - Phosphorus loads meet the WIP I
    - Sediment reductions at 72.4% of WIP I

- Conclusions
    - The RMP scenario appears to be sufficient to meet the WIP I loads

- An official model run is needed to verify the VAST estimates

Demonstration of NutrientNet (World Resources, Inc.)

Mindy Selman and Sara Walker from World Resources, Inc. gave the following presentation. A full copy of the presentation is available on the DCR website.

A Multistate Water Quality Trading Tool for the Chesapeake Bay

NutrientNet/NTT

NutrientNet:
– Registry
– Marketplace
– Calculation Tools (NTT + GIS + policy)

NTT:
– dynamic biophysical model
– APEX, RUSLE2, Century
– Developed through NRCS
– Nutrients, Sediments & C

Multistate Platform

CIG to create a single multistate WQT platform (NutrietnNet/NTT) that will accommodate:

- Interstate trading
- Unique elements of state programs

Benefits

- Align infrastructure
- Facilitate trades
- Standard basis for determining credits
- Integrated registry
- Facilitate updates

Calculation Considerations

- Trading ratios
- Baselines
  - practice vs. performance
  - farm vs. field

• Allowable practices
• Accommodating evaluation uses
• CBWM

Demonstration of Water Stewardship, Inc. process (Water Stewardship, Inc.)

Tom Simpson of Water Stewardship, Inc. gave the following presentation. A full copy of the presentation is available on the DCR website.

Assessment, verification and continuous improvement to achieve TMDL WIP Targets

Water Stewardship

Our Mission:
A science-based nonprofit working to strengthen private and public sector efforts to reduce nutrient pollution of rivers, lakes and coastal waters

Our work relative to the VA RMP

•On-farm assessment and verification of conservation implementation
•Identification of opportunities and issues to enhance on-farm conservation relative to TMDL WIP (recommendations)
• Quantitative estimates of impact of existing and recommended practices and systems based on CBP WSM loads
•Development of Continuous Improvement Program to achieve WIP
•biennial agreement and add practices to achieve WIP in 4-6 "CIP cycles"
•Biennial assessment of progress towards agreed implementation

Creating a statewide (basin-wide?) model for achieving WIP targets: What we have done so far:

- 2009: Beta test in Shenandoah Valley to develop process
  - Completed 33 beta test farms; starting 2 year reviews
- 2010-11: Pilot project in Shenandoah Valley to verify process developed during Beta test on 50 additional farms
- 2010+: Farm to Table: Testing/adapting approach on ~30 direct marketing farms
- 2011+: Muddy Creek Project: Enroll 75%+ of ag land and animals in WSI program and monitor (with VA Tech) to determine long term changes in wq
- 2011+: Scaling up approach: 40 new farms in Tidewater and Accomack County to adapt approach to "all" major cropping systems in VA and most in CB w/s
- 2011+: Assisting small dairies in implementation needs to meet WIP goals
- 20010-12+: Running scenarios for all NFWF final proposals and running scenarios provided by EPA Enforcement Division following inspections of Pa and
- VA farms to determine impacts of BMP/management changes

Assessment, Verification and Continuous Improvement to meet TMDL WIP Targets

- Assess current implementation, issues and opportunities
- Verify/document existing water quality practices
- Identify and document issues, opportunities and challenges
- Estimate impacts of current management and BMPs
- Identify "issues" that need addressing and potential new practices
- Develop initial CIP to move farm towards WIP targets
- Provide quantitative estimates of reductions from existing and recommended BMPs using WSI Nutrient Load Estimator (NLE)
- Send farmers to project partners -NRCS, SCD, Ext, Crop Advisors, etc

Water Stewardship's Approach

- Farm enrollment; sign confidentiality agreement
- Pre-visit information compilation
- On-site assessment for BMP verification, opportunities & issues
- Develop draft CIP with potential new BMPs/management changes
- Use Nutrient Load Estimator (post processor for EPA WSM land-use loads) to estimate "No BMP", Existing and CIP loads
- CIP delivery, practice selection and sign-off by farmer
- Try to get at least one third of additional needed reduction in first cycle and plan to achieve target in 4-6 CIP cycles

What makes this unique/innovative?

- Independent third party accountability
- Whole farm systems approach to water quality protection
- Farmers seem more willing to have private sector "auditor"
- Farmer participates ; selects practices based on recommendations
- Incremental approach; recurring review of existing/new practices
    - Consistency with statutory requirements
- Quantitative estimate of reductions toward farm level target
- The Continuous Improvement Program

Observations

1. Substantial existing practice implementation but not at levels expected by TMDL WIPs

2. Needed reductions achievable on most farms, but
    - Need alternative uses of manure
    - Will require widespread BMP implementation

- May require some changes in cropping systems and limited, strategic land retirement (~5-10%)
- Hardest for animal agriculture but hard for all

3. Local, state and CBP, BMP definitions and expectations vary

4. Practices need to match "efficiency definitions" of efficiencies need to be adjusted

Value of Assessment, Verification & Continuous Improvement

1. Concept of private sector, third party confidential assessment resonates well with farmers

2. Provides incremental continuous improvement with defined targets and quantitative assessment of recommended practices

3. Biennial review & update of CIP allows farmers to "transition to success"

4. Third party assessment, verification and contiuous improvement can provide "reasonable assurance"

Closing Thoughts

- Beta and pilot programs well accepted by SV Farmers
- Recruiting new farmers and business for SCDs, NRCS, Ext.
- A-V-CI process/protocols can (and will) be used or adapted by other public or private organizations
- Provides a farmer based, structured approached to achieve WIP goals over time, with recurring assessment and adaptive management to meet WIP goals
- Whole farm continuous improvement approach is critical regardless of statutory nature of program

Public Comment

There was no additional public comment.

Next Steps/Next Meeting

Ms. Martin asked if the group felt they were ready to move ahead with discussion of the regulations. The group concurred.

The next meeting was set for Tuesday, January 3, 2012 at the same location. Ms. Martin noted that the next meeting of the Soil and Water Conservation Board was set for March 29, 2012.

Ms. Martin said that the group had been asked to comment regarding the draft regulations. She said that some comments had been received. She asked if there would be additional comments and if the group was ready to see the next draft based on comments received.

A member asked if comments would be shared.

Ms. Martin said that comments were being compiled and would be both shared as well as incorporated into the next draft. She said that staff needed time to put the draft together and review before the draft was reviewed again by the committee.

There was no further discussion and the meeting was adjourned.