



Delaware Nutrient Management



Meeting Minutes of the Technology Subcommittee October 3, 2017

The Delaware Nutrient Management Commission

In attendance:

Sub-Committee Members Present: Chairman Kenneth Blessing, Laura Hill, Wayne Hudson, Jessica Inhof, Robert Palmer, Richard Sterling, Bill Vanderwende, Scott Webb

Ex-Officios Present: Nutrient Management Administrator Chris Brosch

Commission Members Present: Kenneth Horeis, Bud O'Neill

Sub-Committee Members Absent: None

Others Present: Deputy Secretary Kenneth Bounds, Bob Coleman, Julia Moore, Brooke Walls, Clint Gill, Aaron Givens, Sally Kepfer, Jessica Collins, Harvey O. Thomas Sr., Carol Atkinson, James Atkinson, Garry Killmon, Jack Kohland, Catherine Kohland, Benjamin W. Johnson

This meeting was properly notified and posted as required by law.

Call to Order/Welcome:

Chairman Blessing called the meeting to order at 6:00 p.m., welcomed everyone in attendance, and reminded everyone to sign the sign-in sheet.

Approval of Minutes:

A motion was heard to approve the minutes of the Technology Sub-Committee Meeting of August 29, 2017. The minutes were approved by Scott Webb and seconded by Ken Horeis, resulting in final unanimous approval.

Discussion and Action Items:

Discuss Compliance Audit Standard Operating Procedure (SOP) – Administrator Brosch

- Before addressing the SOP directly, Administrator Brosch announced breaking news that required him to review the events that generated the need for the past two Technology Sub Committee meetings, so he could bring this Committee up-to-date on current standing with the Environmental Protection Agency (EPA) as well as the changed status of the outstanding Action List items (see attachment at the end of this report).
 - There had been ongoing conversation between the Chesapeake Bay Program (CBP) in review of their models, when issues came up in February regarding Soil P data that had been helping to generate some of the estimates of phosphorous pollution from agricultural fields.
 - The data collected for Delaware was from the University and Waypoint Labs, out of Richmond, Virginia, over a period of 30-35 years.

- It summarized about 3% of agricultural fields per year for Delaware, while some other states like West Virginia and New York had less than .5% sampled for this data that was feeding the model. So Delaware was twice as high as the next best state, Maryland, at about 1.5%.
 - What that showed in Sussex County (Sussex) was that levels were high initially and beginning to decrease. But when we compare the levels of Sussex to other manure dominated, highly agricultural systems counties like Lancaster County Pennsylvania or Rockingham Virginia, we found Sussex was testing as much as 50% higher, which did not seem logical.
 - With the help of DNREC, especially Bob Palmer and some of his staff, we elevated the issue at the CBP, stating we thought that was an inaccurate representation. Not necessarily that Sussex tested where it did – we had a lot of evidence to suggest that number, **225 FIV**, and that at its peak was probably a little below reality – but, being measured in our pollution goals side by side with other manure-rich counties that were testing on the order of 150, that was going to create a problem for us to meet our goals and was putting Sussex at a disadvantage.
 - It was showing all three Delaware counties trending in the right direction, but it still was not a fair representation of Delaware. Additionally, those other counties [not located in Delaware] that we expected to be higher did not show a decrease in Soil P – they were still getting worse, according to the data, and we were the unique ones among all counties in the CB Watershed who were showing some success.
 - We were not going to let the model continue to paint the picture that Sussex was worse than anywhere else. So as we had those discussions, we had basically a single item veto in the division framework, because it's a consensus-based partnership. We held that negative vote as long as we could, because we had a partner in Pennsylvania pushing the issue.
 - Then Pennsylvania negotiated before the final management decision to have a scientific study be funded by the EPA to determine and appropriate sampling of Nutrient Management (NM) compliance – that is, a number of audits per year of a total population, to determine the compliance rate.
 - For example, the EPA asks, for CAFO's, that 20% of farms be audited each year and that would determine a compliance rate. Once you do the 20%, at the end of the year you can say 80% of farms were compliant. For standard NM plans there was no guidance from EPA except that there was no reason not to be held to the standard of CAFO.
 - The 20% was not attainable for standard NM, so a 10% goal was talked about, but discussion ensued about how difficult that was going to be, especially in Sussex. DDA spoke about employing the Conservation Districts to help get Delaware to this goal.
 - After the August 29 meeting of this Committee, the news broke that Pennsylvania had made their deal that would benefit everyone.
 - We called the EPA and suggested that we would “stand aside” during their decision, if they agreed to provide us with a full-time auditor.
 - Basically, we have Brooke performing all our audits right now, and we think that her audit potential is about 3%, and it should go up after she completes her first year of auditing to perhaps 3.5 – 4%.
 - Adding one person would get us very close to the human number of 10% that the EPA tossed around. It would allow Delaware to do the type of auditing to achieve statistical significance, and every year we'll have a legitimate answer about compliance that we can report to EPA.
 - DDA and the EPA agreed that after the study is completed the real number could end up to be around 7% and data would support that.
 - So in terms of meshing all the above details, Administrator Brosch advised that many of the items on the Action List, based on this Committee's two meetings, have changed.
 - Namely, Secretary Scuse's wish to employ the Conservation Districts to work on compliance along with DDA is not something that DDA plans to pursue. It is no longer necessary and it solves their problem of protecting their non-regulatory role in the scheme of NM planning. The meeting called for in Item 1 of the Action List did occur at 11:00 am on the 3rd, as planned, and now the action is CLOSED due to these developments.
 - Item 2 answers were disclosed to the District's at the meeting noted above, though Jennifer Sing, Legal Counsel, was unable to be present. Administrator Brosch related her report, however, that generally speaking, all data generated by NM activities is exempt from FOIA requests. That is protected under Title 3, the Agricultural Title in Delaware Code. The only exception being anything related to CAFO. CAFO NM activities are 100% subject to FOIA, and that's true nationwide. This item is now CLOSED.

- Item 3 is why we are here today and we are still actively pursuing a rewrite of the SOP for how to perform audits; and we are going to take on the responsibility of taking comments from both the Full Commission [once the SC gives consensus] and other interested parties. That started at this committee's last meeting, but this group may now be interested in elevating the edit to the full Commission because it's the only item remaining on this body's docket. (See discussion below, as well.)
 - Item 4, partner inspection protocol, won't be pursued due to DDA, in theory, being able to perform all the inspections [as stated above]. This item is now CLOSED.
 - Item 5, looking for additional funding sources – the responsibility has squarely fallen in the lap of the EPA, and Deputy Secretary Bounds and Administrator Brosch will have a call with the EPA on the morning of the 5th to determine the mechanism to pay for that full-time employee. This item is now CLOSED
 - Thus 4 out of the 5 actions are completed.
- Administrator Brosch then returned to item 3 of the Action List, reminding the SC that this is the main reason for this evening's meeting. It is an item he hopes to be able to bring for briefing to the full Commission later this evening. He stressed the need to get it right, and therefore this will not be the only discussion. Today is only the first one. There had been some input already received, but more would be welcomed.
 - Deputy Secretary Bounds: Happy how things played out. Regarding the SOP, doesn't want to collect one ounce more data than we need but we want to make sure we do get everything we do need and then anticipate what we might need in the future as well. We don't want to make it an onerous process, but with us doing it as a department, he thinks we can do it really well.
 - Deputy Secretary Bounds: Clarified that the study is not just for Pennsylvania, and that EPA is going to look at our numbers to see what is statistically significant for us.
 - Administrator Brosch: The idea for the SOP is to look at typical strategies for auditing NM plans. Selection method is probably the most important in determining statistical significance:
 - If you randomly sample something you're more likely to, with a smaller sample, determine what the whole population is doing.
 - If you use targeted samples, you're likely to skew results one way or the other.
 - As example, reference Item 2C of the SOP. Targeted inspections based on non-compliance with Annual Reports is likely to skew to non-compliance because they've already not done something we've asked them to do. We did this purposefully - our intent was for them to know we are noticing the non-compliance. And still this is not a bad number – our non-compliance rate is relatively low, with probably 80% compliance. Not all numbers are crunched yet (they aren't due till the end of the month), but it's what we think we have found.
 - Chairman Blessing: The 2015 Annual Report took time, and the 2016 was easier, so we should have gotten a better return rate.
 - Administrator Brosch: We had to tease out the difference between 2015 & 2016 reporting because we had a change in database system so our ability to find addresses and get envelopes printed and sent out was also increased. But add this to the ease of reporting – the improvement in Salesforce prefilling envelope documents - reporting was close to about a 50% return rate and skyrocketed to about 78% in the most recent year. That's a comfortable place to be.
 - And for this year's Annual Reports, Commissioner Inhof said if we send them out after Christmas there should be an even better return rate. The last two weeks in December are bad, because of the proximity to Christmas. Administrator Brosch took heed and has already committed to sending them out at the end of December, rather than sooner as was the norm, but we can't send them after January 1 because they need to be delivered in time for Ag Week participation (Jan 8-11, 2018).
 - Commissioner Hill asked if the email database is substantial, but Administrator Brosch conceded that it is not. The NM staff works hard to get the information, but we don't have confidence that but maybe 1 in 4 is reliable. If one is bad, it may take 6 days to bounce back if it's invalid, which is a great delay.
- Continuing on in regard to the SOP, Administrator Brosch invited Brooke Walls to interject if he misses anything as he gives a brief overview.
 - Section Items A-F, under number 2 (Selection), generally speaking are the laundry list of options that we could brainstorm:
 - We know that random selection is important and EPA wants us to do that. With targeting some inspections for particular elements of riskiness of operations or history of non-

compliance, that would help drive our sampling rate down; and we know that we are skewing more towards finding the non-compliant folks in our inspections to a higher degree. We'll be taking all the options to the contractor that will do the statistical analyses, to say "Whatever your report determines, we need to make sure it addresses the options that we have on the table here".

- That said, the SOP does not need to decide which particular route we take – that's something we will get into later on down the line.
- Commissioner Hill: Are you saying the selection process could involve A through F, or are you trying to narrow it down?
- Administrator Brosch: It could involve A through F, it could involve A through Z. There are other strategies that we could employ that we just haven't come up with yet. And expect that by the time the EPA's contractor gets though, the report itself will have a couple ideas that we haven't considered.
- Commissioner Blessing: If this were to be the selection process, you would think that after the first year the Annual Reporting would be a lot higher than 70%.
- Commissioner Hill: It's understood about targeting certain problem farms and having them skew the results, but at the same time it may help them to get on board.
- Commissioner Webb: Are you going to include [C and D] in the calculations, because they almost have to be done. Should they be calculated as your % compliant or as anomalies, since they are targeted?
- Administrator Brosch: Tetra Tech is the contractor. The way they have done other statistical analyses is to assign a confidence interval (the technical statistical term they use) for the type of selection. So your confidence interval of nailing the compliance rate of the population is higher the more random you get. Basically they can put a coefficient on each of these, and a higher coefficient will go to the most random selection. [Therefore] it doesn't harm you as much when you skew a population toward a non-compliance side.
- Commissioner Webb: Is Brooke's audit different for CAFO versus non-CAFO?
- Administrator Brosch: The inspector is different for CAFO. Brooke doesn't do them. DDA already has EPA money to do those inspections Aaron and Jessica at DNREC is also able to do them. Generally, the audit is the same, but we have squarely not been focused on audits of CAFO because getting general coverage has been a higher priority. But we have done 2 CAFO inspections and generally speaking the audit itself is the same, with the big difference being that we can only perform audits on CAFO's that are covered and right now that's only non-land-applying farms. So it's a pretty brief record review and a walk-around the farm for good housekeeping.
- Brooke Walls: It's basically the same form, it just includes a couple extra questions that are required for the CAFO program.
- Commissioner Webb: Did anyone ever decide what the protocol was for separating operations into different business names – grains vs. animal? Would they get 2 audits?
- Commissioner Hill: They have to each be a separate entity legally.
- Administrator Brosch: We got a tip from the MDE about legally separated farms, to protect their grain from legal liability they may have on their animal side. Region 3 told MDE, if it's the same operator it's the same farm, no matter what the legal documents say. Delaware is not asking Region 3 what they think. If a farmer seeks coverage under a general permit, the one they think suits their needs, we will address that with each individual case, as we do any other person seeking CAFO coverage.
- Commissioner Hill: Would like a legal opinion on what Region 3 is telling Maryland. Going back several years when we had the EPA Working Group with the Commissioners, that came up and it was an EPA person who said if they are separate operations, with 2 different ID numbers (1 a SSN and 1 a Federal ID, or 2 Federal ID's), they are 2 legal entities.
- Administrator Brosch: The way that our draft State Technical Standards are written, if you compare them to the Technical Standards for the itemization in the CAFO regulations, the only difference is the number of years of records that need to be kept – 5 years for CAFO, 3 years for everyone else.
- Deputy Secretary Bounds: What's that do for FOIA in terms of making your grain operation FOIA'able if it's all under 1 [entity].
- Administrator Brosch: The grain side would be protected, the CAFO not. Anything that's covered with the CAFO permit would be FOIA'able. So if the grain side were separated from

- the animal side and as long as the regulations are not in challenge with regard to what is connected and what is not, the grain side would be protected from FOIA.
- Deputy Secretary Bounds: If you are sharing equipment, they are the same. I had this conversation with the EPA quite a while back, and the EPA has been of the opinion if you are sharing managements, or you're sharing equipment, then they are the same operation.
 - Commissioner Hill: What if I can prove on paper the equipment is specific to the specific farm entity? I have documents that prove my equipment was purchased by the poultry side and the grain has its own things purchased.
 - Deputy Secretary Bounds: If they truly are separate, with dedicated tractors, equipment, etc., and even down to employees – the more you are on that continuum, then you have a better case. But that could still become an issue.
 - Commissioner Hill: Those with separate entities need to understand that.
- Any other comments?
- Deputy Secretary Bounds: Did we discuss the field vs. the farm?
 - Commissioner Inhof: Question about Farm Gate – Section II (Audit Details) #2C – Land Only. It states “the auditor must be able to complete a Farm Gate approach with records”.
 - Administrator Brosch: That is the comment we heard from the Tech SC in the first meeting about this so that is how we wrote it up in the draft. That was written at the same time we were sending the EPA a schedule for how we would roll out these different deliverables. I know Kenny [Bounds] got a few comments back (albeit unofficial for now), that the EPA is very much interested in us adopting the Field Scale approach and not concentrating at the Farm Gate for the balance. One technical issue that was raised when we were just chatting with the MDA is that a Farm Gate approach at a large operator scale would inherently add more flexibility if you compare that large operator to a smaller farm operation because the diversity of crops and the number of acres that can have psnt's driving that flexibility is going to be an issue.
 - Deputy Secretary Bounds: The reverse is also true, when you get down to picking 1 field out of 30 as non-compliant. Does that make the entire operation non-compliant?
 - Commissioner Hill: So when you are talking about Farm Gate are you talking about the operation as a whole?
 - Administrator Brosch: Yes. Identifying the crop need for every acre in that farm then matching that with the fertilizer and manure receipts for the same year.
 - Commissioner Palmer: Kenny is right, does the EPA offer guidance on how that would be assessed?
 - Administrator Brosch: They have guidance in their CAFO handbook but the extent to which it's useful is minimal.
 - Commissioner Palmer: So we have to propose something?
 - Administrator Brosch: If we had a way to categorize farms by size, and justify the tweaking of the Farm Gate approach for smaller operations, it would definitely fly. For larger operations, that increased flexibility is going to be something that the EPA presses us on. But the same conversation we had with the MDA when they went to Field Scale was “let's talk early and often” – they are happy to help us through this process.
 - Commissioner Palmer: Which way did they go?
 - Administrator Brosch: They have a Field Scale approach and based on the size of the farm that determines how many fields they evaluate. So for a small farm they may do 1, medium farm they do 2, and large farms 3.
 - Commissioner Palmer: That doesn't sound bad.
 - Commissioner Inhof: It's always 3 fields. I have never been in an audit with less. Their sheet has 3 on it and the first thing they do is choose which ones.
 - Commissioner Palmer: So they define small as 5 fields or less?
 - Administrator Brosch: They must have a definition but they didn't get into that much detail.
 - Commissioner Palmer: Scale makes sense philosophically.
 - Administrator Brosch: It certainly helps avoid inappropriately signing non-compliance for larger operations.
 - Chairman Blessing: You'd think it would be on acreage tilled rather than fields. Soil sampling is supposed to be on no more than 20 acres. If you've got a large farm and many fields, the farm size matters, rather than the number of fields.
 - Administrator Brosch: Sometimes the academics in NM talk about management units that can be several fields combined if they are all receiving the same nutrient application rates and are

treated the same. Obviously they'll still be sampled differently, but we encourage that. So that could be another angle.

- Chairman Blessing: The big concern, especially with the Farm Gate format, is if they must have 3 years of records, the auditor needs to take into account a trend that field is doing – there has to be room for extenuating circumstances.
- Commissioner Inhof: If there are any cropping changes, etc., then according to page 3C (Management Changes & Plan Modifications during Implementation), I'll have to rewrite the plan every year!
- Administrator Brosch: That's in the State Technical Standards.
- Deputy Secretary Bounds: So it's an addendum – an abbreviated notification [that's required].
- Administrator Brosch: It's a handwritten note, if it needs to be.
- Deputy Secretary Bounds: So it's not a rewrite of the plan
- Commissioner Hill: A collection of hand-written notes will never pass you if you get the call that you're going to be audited, because I can guarantee you that's not realistic.
- Chairman Blessing: Hadn't this already been addressed? Like with vegetables – if you can't get orders for them, you divert to grain.
- Commissioner Inhof: What about psnt's? So even if a psnt comes back the plan has to be changed if they use more nitrogen?
- Administrator Brosch: psnt is an enhanced practice – utilizing it incorrectly would not result in non-compliance of an NM plan. That isn't to say if they ran the psnt, ignored it, then applied whatever amount of fertilizer they wanted to apply regardless – that could still get them into some hot water if it didn't match the plan.
- Deputy Secretary Bounds: But we've definitely got to make sure that process is done correctly. Everybody's got to put their thinking caps on. We don't want to create non-compliance, extra work. Is that form friendly, is it going to be filled out? What is Maryland doing with a management change such as growing all beans due to rainy weather?
- Administrator Brosch: We would expect in this state that the plan be updated as soon as possible. It can be updated after the fact. If the plan can be written, then you have still followed the plan, even if it is in short-term retrospect. The concern is going out and seeing on paper that you were going to plant corn then finding a bunch of beanstalks in the field. Somebody has to write it down or there's no point in the plan at all.
- Commissioner Palmer: The only date indicated there is the expiration date, so as long as it's done by then it would be acceptable.
- Administrator Brosch: Mid-season changes happen and you have pretty much a month before and after planting and harvest to get something down and contact your consultant for the change.
- Deputy Secretary Bounds: So do you define what a significant change is versus an insignificant change?
- Commissioners Hill and Palmer: It doesn't specify – it says any property changes.
- Commissioner Hill: I think an NM plan needs to be written with flexibility and that would alleviate this problem.
- Sally Kepfer: Some consultants do write in a lot flexibility, then you can't figure out what you are supposed to do!
- Commissioner Palmer: The only devil's advocate conversation would be, though, if the EPA came down and did the same audit it would be beneficial that you have it in there. You want to be able to justify putting on that extra nutrient or explain why the yield was off.
- Administrator Brosch: As long as we know we are talking about 2 different things.
 - The field changes/crop changes has to be written down as soon as possible. This is management changes in regard to cropping.
 - In terms of management changes for unforeseen circumstances like weather related to nutrients, it needs to be documented. And if in the audit we find that the p application was unjustified – if the farmer wrote down “we added more p because of weather”, that's insufficient because that's a non-sequitur – it doesn't follow the science. If they added more n because they had a wet spring, denitrification combined with leaching resulted in less available n, we can defend that.
- Chairman Blessing: It sounds like if you are the plan writer you put in contingencies, just in case.

- Administrator Brosch: We could add some narrative samples or illustrations of justification logic that would be acceptable so that there would be a better understanding for the people that are reviewing this SOP – what we are ok with and what’s going to get “the finger wag”.
- Commissioner Palmer: You should probably put out the most common example of what those changes would be in each situation (weather related, etc.).
- Administrator Brosch: There is always going to be some subjectivity, but we’re certainly trying to eliminate it as much as we can. That’s why we have this document.
- Deputy Commissioner Bounds: But do you / will you have some latitude for minor changes?
- Administrator Brosch: Every inspector I know uses quite a bit of latitude for minor changes. You have to walk a line about how much you spell out and how much you employ. The EPA is only going to see the black and white stuff.
- Chairman Blessing: It gets back to the argument we’ve had for years. If Brooke is representing the EPA for this, I know she knows what she’s looking at. But if someone else from the EPA Region 3 comes in like they did, they may or may not have common sense to visualize what they are looking at here. That’s always I the back of my mind. There has to be some kind of insurance that those people know just what production agriculture is and what all these headings truly mean in order to do the audit. I don’t know what kind of assurances there can be but we can stress that the auditors have that knowledge.
- Deputy Secretary Bounds: We’ve talked about that and Secretary Scuse has actually spoken with Cecil Rodriguez (the Administrator in Philadelphia) about that and found that he and his staff were receptive. Chris and I agree with this assessment.
- Bob Coleman: You have an assurance right now, and that is me. I was at every EPA audit to be sure they understood the practicalities of production agriculture. The message was received loud and clear. I speak their lingo.
- Administrator Brosch: The inspector that Bob had to chaperone has been replaced and now our Philadelphia person is NM certified in Delaware.
- Deputy Secretary Bounds: We had another issue crop up with the EPA inspectors that reared a very ugly head this year and that was worker protection. And we’ve had a strong conversation with the EPA and the fact that we have an MOU between us and if they are going out on our farms we too are going to be along. We stated that we would have someone local at each EPA audit.
- Bob Coleman: Just a reminder that we must give 48 hours’ notice before we do any formal inspection, and the EPA by extension must also do that.
- Administrator Brosch recommended that we take this draft to the Full NM Commission today [at the 7 p.m. meeting following this one] and have these discussions continue after this briefing.
 - All Commissioners received the document electronically and it is suggested that we pursue it that way.
 - This is the main item on our to-do list for the foreseeable future.
 - Not that CAFO is on autopilot by any means, but certainly transitioned to update mode.
- Chairman Blessing asked for a consensus that we send this up to the full commission and address it at that level and take it out of the Tech SC.
 - Commissioner O’Neill: Wouldn’t it be wise to take it to the Commission, but keep it at the Tech SC level for future changes, technical discussions, and rewrites?
 - Chairman Blessing: Stands corrected, the consensus is to take the SOP to the full Commission and the Tech SC will keep a watchful eye and reconvene when necessary to address issues.
 - Administrator Brosch: When there are new drafts they will go to the Tech SC first and ask if anyone want an individual meeting of the SC. Otherwise we’ll consider it at the full Commission level.

Next Meeting: Will be scheduled when needed.

Adjournment: Chairman Blessing adjourned the meeting at 6:55 p.m.

Approved,

F. K. Blessing, Technology Sub-Committee Chairman
Delaware Nutrient Management Commission
jlm

Attachment: Follow-up Actions, updated as of 9/22

Follow-up Actions from Technology Subcommittee Meeting (DNMC)
August 29, 2017

1. Secretary Scuse suggested that district specific working meetings should be scheduled
 - a. HOST: DDA
 - b. ATTENDEES: Districts and DDA, Marcia Fox, NRCS
 - c. PURPOSE: increase comfort levels of Districts and discuss what they would be comfortable doing to help NM meet EPA requirements for DE; also see #4
 - d. WHEN: within next 2-3 weeks
 - e. WHERE: TBD
 - f. **STATUS AS OF 9/22:** Meeting scheduled at DDA for October 3 at 11:00
2. Follow up with Jennifer Singh, Legal Counsel
 - a. WHO: NM
 - b. PURPOSE: NM has FOIA exemption under law, but Districts do not have that exemption. Consider options, in order to shield their producers
 - c. WHEN: ASAP
 - d. **STATUS AS OF 9/22:** Chris will bring update to the meetings on October 3
3. Review the draft NM Standard Operating Procedure
 - a. WHO: Committee and Partners
 - b. PURPOSE:
 - i. to modernize NM audit protocol and improve water quality
 - ii. to provide guideline for partners to use when preparing their own protocols
 - c. WHEN:
 - i. provide comments to NM Administrator Chris Brosch as they are determined within the next few weeks
 - ii. goal is to have them compiled and document firmed up in 4 weeks
 - d. **STATUS AS OF 9/22:** Nothing has been received to date, and your input is important. Please submit to Chris prior to October 3, when it will be a topic on the meeting Agenda's.
4. Additional Partner Inspection Protocol document
 - a. WHO: Districts will be the authors
 - b. PURPOSE:
 - i. to add continuity for Districts when performing their plan rewrites
 - ii. not meant to be as strict or lengthy as NM SOP
 - c. WHEN: complete by end of calendar year 2017
 - d. **STATUS AS OF 9/22:** Meeting scheduled at DDA for October 3 at 11:00
5. Look for additional funding sources
 - a. WHO: DDA leadership
 - b. PURPOSE:
 - i. temporary manpower to perform NM audits so DE gets numbers to meet EPA requirements
 - ii. would not immediately exclude the need for the Districts' immediate assistance
 - c. WHEN: by end of calendar year 2017
 - d. **STATUS AS OF 9/22:** Update will be brought to the meetings on October 3