Thomas-
Thank you for facilitating our participation. My (abbreviated) comments today were:

**Adrienne Nemura** [Geosyntec Consultants, Ann Arbor, MI; representing Ohio Corn & Wheat Growers Association and Ohio Soybean Council]. Professional engineer with 31 years of experience with water quality – including modeling microcystin bloom in 1983 on Potomac Estuary and working on Chesapeake Bay issues, including participating in the ChesBay modeling subcommittee. Supporting the two associations on understanding and providing input on water quality issues. They have invested significant funding in research on BMP effectiveness and improved tools for their members to help reduce phosphorus loads to Lake Erie and other waterways across the state.

1. Concerned about the short notice for this teleconference and would request additional time to provide input to the panel.
2. Confused about the use of "adaptive management". We are used to this in the context of a more holistic approach that goes beyond lake water quality models – and considers the need for flexible approaches to implementing nutrient controls, including research on BMPs and recognition of available funding. Successful adaptive management goes beyond modeling and monitoring and technical experts and requires successful engagement of the stakeholders that can fund and implement the necessary controls.
3. Believe there is a critical need to link watershed models to the lake models. Need to understand the fate and transport of various forms of phosphorus within the tributaries and resultant delivery of phosphorus to the lake. Need to consider soil erosion, surface runoff and tile drainage of total and dissolved P. BMPs targeted at one source at the expense of others will be short-sighted.
4. Agree with the importance of understanding the impact of legacy P in the lake and would add to legacy P within the watershed and the lag times associated with implementation of controls and water quality responses.
5. Concerned about the SAB's recommendation that agricultural BMPs to reduce N be used in the basin. This is a fundamental shift for Ohio agriculture and the implementation issues are not well understood and could be significant.

Thank you very much for this opportunity.

Adrienne

**Adrienne Nemura, P.E.**
Senior Principal
Geosyntec Consultants
3520 Green Court, Suite 275
Ann Arbor, Michigan 48105
Phone: [redacted] Mobile: [redacted]

[redacted] MMI ENGINEERING | SIREM | SAVRON | GREEN HARBOR ENERGY

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**Cc:** Adrienne Nemura <ANemura@Geosyntec.com>
**Subject:** RE: SAB teleconference on Review of Lake Erie Nutrient Load Reduction Models and Targets.

Are you on the call?
Call in 1 866 299 3188
Code 202 343 9995#

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**From:** Elizabeth Toot-Levy [mailto:etoot-levy@Geosyntec.com]
**Sent:** Monday, March 27, 2017 3:58 PM
**To:** Carpenter, Thomas <Carpenter.Thomas@epa.gov>
**Cc:** Adrienne Nemura <ANemura@Geosyntec.com>
**Subject:** RE: SAB teleconference on Review of Lake Erie Nutrient Load Reduction Models and Targets.

Thomas,
Thanks for your response. I am not available at the time of the call; however, Adrienne Nemura, also from Geosyntec Consultants, will provide comments. We are representing the Ohio Corn and Wheat Growers and the Ohio Soybean Council.
Thanks,
Beth

**Elizabeth Toot-Levy**
**440-227-9181**

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**From:** Carpenter, Thomas [mailto:Carpenter.Thomas@epa.gov]
**Sent:** Friday, March 24, 2017 3:57 PM
**To:** Elizabeth Toot-Levy <etoot-levy@Geosyntec.com>
**Cc:** Adrienne Nemura <ANemura@Geosyntec.com>
**Subject:** RE: SAB teleconference on Review of Lake Erie Nutrient Load Reduction Models and Targets.

Ms. Toot-Levy could you also confirm the organization you are representing.

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**From:** Carpenter, Thomas
**Sent:** Friday, March 24, 2017 3:23 PM
**To:** 'Elizabeth Toot-Levy' <etoot-levy@Geosyntec.com>
**Cc:** 'Adrienne Nemura' <ANemura@Geosyntec.com>
**Subject:** RE: SAB teleconference on Review of Lake Erie Nutrient Load Reduction Models and Targets.

Ms. Toot-Levy,

I have registered you to address the Science Advisory Board on the teleconference. The *Federal Register*

*Notice* explains the procedures for providing comments and the agenda identifies the time slot. Both are available on the SAB webpage at:
https://yosemite.epa.gov/sab/sabproduct.nsf//MeetingCalBOARD/C117D94BE044BA63852580BC005A201F?OpenDocument

Please confirm you will be the registered speaker for the call on Thursday March 30, 2017.

Regards,

Thomas Carpenter
Designated Federal Officer / Sr. Biologist
US EPA Science Advisory Board, MC 1400R
1200 Pennsylvania Avenue, NW
Washington DC 20460
ph 202 564 4885 Fax 202 565 2098

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**From:** Elizabeth Toot-Levy [mailto:etoot-levy@Geosyntec.com]
**Sent:** Friday, March 24, 2017 2:18 PM
**To:** Carpenter, Thomas <Carpenter.Thomas@epa.gov>
**Cc:** Adrienne Nemura <ANemura@Geosyntec.com>
**Subject:** SAB teleconference on Review of Lake Erie Nutrient Load Reduction Models and Targets.

Thomas,
What is the appropriate procedure to become a registered speaker for the public comment portion of the above referenced teleconference? We would like the opportunity to speak on behalf of part of the Ohio Agricultural Community.
Respectfully,
Beth

**Elizabeth Toot-Levy**
**440-227-9181**

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