

Language to Add “New Part E”

- Pros
 - More detail on potential coalition concept
 - Coalitions could be very helpful
 - Education, assistance, outreach, coordination, grants
 - Inspections, incentives, awards
 - Collaboration, leveraging
 - Coalitions may help facilitate broad scale implementation, such as:
 - Los Huertos ideas
 - Sarah Lopez-Greene, Preservation Inc., Quail Creek
 - Ross Clark, Central Coast Wetlands Group

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- Cons
 - Still a concept (though one that can be done)
 - Missing key indicators of pollution reduction and practice effectiveness
 - Not what Los Huertos presented (or Sarah Lopez-Greene)
 - Point of compliance
 - No risk based prioritization criteria
 - No milestones or targets within term of Order
 - Timeframes too long
 - Not responsive to human health threat
 - Shallow groundwater
 - No targets or indicators of nitrate loading reduction
 - No advanced requirements for higher risk
 - Language and approach does not meet legal standard
 - Must comply with water quality standards
 - Lacks reporting requirements to determine compliance with Order
 - Cannot be a shield

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Recommendation Regarding “New Part E”

- Cannot recommend adding Attachment E language in the Order.
- However, we encourage third party groups to develop alternative implementation approaches with key elements.
- Technical Advisory Committee is a good idea.