

**CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD  
DISCLOSURE FORM  
EX PARTE COMMUNICATIONS REGARDING PENDING GENERAL ORDERS**

*Note: This form is intended to assist the public in providing the disclosure required by law. It is designed to document meetings and phone calls. Written communications may be disclosed by providing a complete copy of the written document, with attachments. Unless the board member(s) provide you with a different contact person, please your materials to: [stacy.denney@waterboards.ca.gov](mailto:stacy.denney@waterboards.ca.gov)  
Use of this form is not mandatory.*

1. Pending General Order that the communication concerned: ILRP 4.0
2. Name, title and contact information of person completing this form: Abby Taylor-Silva, Vice President, GSA, [abby@growershipper.com](mailto:abby@growershipper.com), 831-422-8844
3. Date of meeting, phone call or other communication: 10/14/20  
Time: 5:00 p.m.  
Location: E-mail Communication
4. Type of communication (written, oral or both): Written
5. Names of all participants in the communication, including all board members who participated: Abby Taylor-Silva, Jane Gray, Tammie Olson
6. Name of person(s) who initiated the communication: Abby Taylor-Silva, Vice President, Grower-Shipper Association of Central California
7. Describe the communication and the content of the communication: Please see attached.
8. Attach a copy of handouts, PowerPoint presentations and other materials any person used or distributed at the meeting. If you have electronic copies, please email them to facilitate web posting.

Dear Jane,

Attached please find additional draft order language for Central Coast Water Board member and staff consideration. This language is being submitted in response to questions from Central Coast Water Board members that were presented during the course of the September 2020 workshops. During the September 2020 workshops, Central Coast Water Board members expressed an interest in having more detail regarding the Agricultural Association Partners Third Party Alternative for Irrigation and Nutrient Management. We committed to providing that detail, and do so in the attached Part 2, Section C.1A.

The attached Part 2, Section C.1.A, would be a new section of the Order, and would set forward an alternative compliance pathway for growers that are willing to go the extra mile to participate in a third party and be subject to intensive education and outreach efforts. In summary, growers would either select the current Part 2, Section C.1 approach as proposed by staff, or this alternative approach. (Notably, some adjustments to Part 2, C.1. and the MRP will also need to occur to accommodate this alternative in the event that the Central Coast Water Board decides to include this approach. These additional adjustments will be provided in the near future.)

In summary, we provide this additional draft order language following the considerable dialogue at the September Board meetings. This language provides further detail with respect to the inclusion of a Groundwater Protection Program that includes Groundwater Formulas, Values, and Targets, and how the process would work in conjunction with other elements of Draft Ag Order 4.0. You'll notice that with this proposed approach, we recommend that instead of using an outlier concept, we look to use nitrogen discharge targets founded on A-R for the first five years (i.e., short-term targets), and then transition Groundwater Protection Targets for the long-term program. The draft language also articulates the additional intensive education and outreach that the third party would undertake in administering this approach.

We have also attached a Power Point presentation that synthesizes the information. It would be our pleasure to discuss this further with you prior to your meeting on October 22-23. Please let me know if you'd like to schedule a zoom call.

Sincerely,  
Abby



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