

From: [WHEELER Sarah](#)
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Subject: Div 12 - alternate penalties
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Attachments: [Div 12 Alternate penalties red-lined.docx](#)

Les asked me to look at this section, and I've attached what I recommend (and some questions). I emailed Jeff about the CAFO provision, but he's been out, so I'll get back to you on that when I can.

Let me know if you have any questions. Thanks,
Sarah

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