

Hello-

As small rancher and member of the Placer-Nevada-South Sutter- North Sacramento Subwatershed Group (PNSSNS, one of ten subwatersheds under the Sacramento Valley Water Quality Coalition SVWQC), I am concerned with the *"planned electronic submittals from individual dischargers to the Board"* (pageA-14, #6 of the Framework document).

Our subwatershed has spent \$300,000 on agriculture water monitoring over the last seven years in compliance with the current ILRP. During this period, our waters have continually tested clean. For 7 years, this subwatershed has proven that we are a low threat watershed.

By asking each individual farmer to electronically submit farm information to you directly, we would be bypassing PNSSNS which was originally formed to keep costs low and to allow farmers and ranchers some control of our regulatory destiny. This proposal will undermine years of effort by this subwatershed to comply with the ILRP via the local coalition and its outreach and education to our members and local agencies. This subwatershed has done an excellent job of connecting with members and obtaining compliance. Why ratchet up regulatory creep on our low-threat complying members? In low-threat areas like PNSSNS, there is no justification for this level of increased regulatory action.

I am also concerned about electronic databases containing individual farm information and maps becoming accessible to the general public. It could open our members to potential security issues and data abuse/misuse. There is no protection against other interested stakeholders forcing the Regional Board's hand to use this as a regulatory compliance tool. And at a time when we are all concerned with the increased cost of government, this electronic data gathering system and the personal to support it would seem a costly waste and another level of beauracracy.

Finally, complying with this requirement is a huge imposition for roughly half our members. Thirty percent of our members do not have internet access and don't own a computer. Another twenty percent have inefficient internet connection or have to drive to town to a "free wi-fi" establishment.

***Please, do not require electronic submittal of individual farm information.***

Thank you.

Carol Kramer