

**From:** Heather Kingdon [REDACTED]  
**To:** <AWLaputz@waterboards.ca.gov>, <jkarkoski@waterboards.ca.gov>  
**Date:** 3/23/2011 5:58 PM  
**Subject:** ILRP framework

Re: Adoption of ILRP Framework:  
Submission of individual farm information to public-accessed  
databases

I am a beef producer, hay grower and member of the Upper Feather River Watershed Group (UFRWG), a subwatershed under the Sacramento Valley Water Quality Coalition SVWQC. I am concerned with the "planned electronic submittals from individual dischargers to the Board" (page A-14, #6 of the Framework document).

Public accessed electronic databases containing individual farm information and maps will subject 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. We acknowledge the RB need for some level of documentation of water quality practices and coalition submittals of summary information by waterway and/or commodity will provide adequate information in low-threat areas.

For 6 years, our 105 ranchers and farmers have spent nearly \$300,000 on agriculture water monitoring to comply with the current ILRP. For 6 years, our waters have tested clean, with exception of the occasional low-threat "unknown" parameters of DO, pH and E.coli back in 2006-2008. Working with our UC Cooperative Extension and UC Davis Researchers, UFRWG and its members have been engaged in identifying sources for these background parameters for the ILRP. As members of our active coalition, we undertook special studies on our private lands, attend and host annual ranch BMP tours, receive educational Newsletters, attend Ag Workshops, implemented water saving and BMP's funded by myself and attended membership meetings to follow the mandates of this engaged program. Management Plans under the current program are nearly complete. For 6 years we have proven that we are a low threat watershed.

Our reward for this effort? You now propose each individual farmer electronically submit their farm information directly to the Regional Board, bypassing the local coalitions which were originally formed to keep costs low and to allow farmers and ranchers some control of their regulatory destiny. Adopting this proposal within the Framework will undermine our years of effort to develop valuable partnerships through outreach and education among our members and local agencies. The short term and long term effect will be to alienate coalition leadership from our membership. This requirement will ratchet up regulatory creep on our low-threat complying members. In low threat areas like UFRWG, there is no justification for this level of increased regulatory action. On my ranches this will not happen.

We, the active members of UFRWG, strongly urge the Water Board to allow Coalitions to continue to maintain and manage their own member data and to provide the Water Board with the information needed to assess and manage water quality.

Thank you,  
Brian Kingdon  
UFRWG director