

**From:** "Rowe. Greg" [REDACTED]  
**To:** <AWLaputz@waterboards.ca.gov>, <jkarkoski@waterboards.ca.gov>  
**CC:** "Rowe. Greg" [REDACTED]  
**Date:** 3/25/2011 3:40 PM  
**Subject:** Submission of individual property data to public-accessed databases

Dear Mr. LaPutz and Mr. Karkoski: The following comments are respectfully submitted on behalf of the Sacramento County Airport System (County Airport System). The County of Sacramento owns approximately 6,000 acres comprising Sacramento International Airport (Airport), including a number of parcels in Sutter County. The Airport acreage is almost equally divided between the Airport itself, and surrounding operational compatibility "buffer" property. The "buffer" property is shown on the FAA-approved Airport Layout Plan (ALP) as "Airport Management Area," meaning it was acquired and is maintained exclusively for the protection of aircraft approach, departure and circling airspace.

All of the Airport land is within the jurisdiction of the Placer-Nevada-South Sutter- North Sacramento Subwatershed Group (PNSSNS), one of ten subwatersheds under the Sacramento Valley Water Quality Coalition (SVWQC). Because agriculture is one of the primary attractants for wildlife hazardous to aircraft operations, crop cultivation does not occur on Airport buffer land. However, in compliance with regulatory requirements invoked a number of years ago by the United States Fish and Wildlife Service, the Airport established two aquatic habitat mitigation preserves for the giant garter snake (GGS). These two preserves are located about 1-1/2 miles and almost 5 miles, respectively, from the Airport itself. The 43-acre preserve is irrigated by well water, however, so we only pay a fee to the PNSSNS for the 217-acre preserve in Sutter County.

The County Airport System has been a member of the PNSSNS since 2006. (At that time the Airport did in fact lease some of the buffer property to tenant farmers, so the fee payments to the PNSSNS were higher.) Through our membership, we have contributed to the funds spent in monitoring water quality to comply with the current ILRP. During our membership tenure, the waters have tested clean, indicative of a low threat watershed. We have found since 2006 that our compliance efforts have been greatly facilitated by submitting reports to locally organized and administered group such as the PNSSNS. We are therefore concerned about the proposed requirement for electronic submittals by individual dischargers to the Board (pageA-14, #6 of the Framework document).

We believe that requiring submittal of annual records directly to the Regional Board would be contradictory to the effectiveness and efficiency that has been the hallmark of subregional watershed groups such as the PNSSNS. The proposal to bypass our membership group and submit electronic data directly to the Regional Board, bypassing the PNSSNS, could make landowners less comfortable with disclosing information about their operations. It could actually reverse the excellent track record of compliance with the ILRP via the local coalition and its outreach and education to members and local agencies. Although the County Airport System has been unable to be as active in the PNSSNS as we might have wished, it would seem that the proposed electronic submittal of data could have the effect of making some coalition members less interested in and committed to the ILRP program. It would appear that in low-threat areas like PNSSNS, there is little justification for this level of increased regulatory action.

Public accessed electronic databases containing individual landowner information and maps could subject landowners 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. From our perspective, we would prefer that there not be widespread public knowledge about our professionally managed habitat preserves, because past experience has shown that such isolated preserves are sometimes subject to vandalism and other disturbance. The easier it is for someone to obtain information about such preserves, the easier it could be for those with bad intent to

engage in disruptive behavior. (It is for this reason that the Natomas Basin Conservancy some years ago discontinued publishing its annual Swainson's hawk nesting tree census on its website. Poachers reportedly downloaded the report and used it to locate and shot hawks.)

Finally, while the County Airport System of course has a great deal of "high tech" capability, the slim operating margins and geographic isolation of many farmers could make it difficult to comply with an electronic reporting requirement.

Thank you for your kind consideration in this matter.

Greg Rowe  
Senior Environmental Analyst  
Planning and Environment  
Sacramento County Airport System (SCAS)



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