

**From:** Richard Shelby [REDACTED]  
**To:** <AWLaputz@waterboards.ca.gov>  
**Date:** 3/25/2011 7:52 PM  
**Subject:** ELECTRONIC SUBMITTAL OF SOLO FARM INFORMATION

What follows is a form letter of complaint. However I would like to add to it. This whole idea of making everyone conform to the practice of electronic submission of required information had to have come from somebody near the top of the employment food chain. On paper it all sounds picture perfect and no doubt gives a cost reduction. However it should be reviewed by someone with real hands on experience.

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

I am a farmer 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).

For 7 years, our 600 ranchers and farmers have spent close to \$500,000 on agriculture water monitoring to comply with the current ILRP. For 7 years, our waters have tested clean. For 7 years, we have proven that we are a low threat watershed.

Now you are asking each individual farmer to electronically submit our farm information directly to you, bypassing PNSSNS which was originally formed to keep costs low and to allow farmers and ranchers some control of our regulatory destiny. This absurd proposal will undermine our years of effort to comply with the ILRP via the local coalition and its outreach and education to our members and local agencies. Your proposal will alienate the PNSSNS coalition leadership from our membership. Certainly, this requirement will 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.

Public accessed electronic databases containing individual farm information and maps will subject us 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. Without a doubt, the Regional Board will spend far more on an electronic data gathering system than it is worth.

Finally, complying with this requirement is an impossibility for roughly half our members. 30% of our members do not have internet access and don't own a computer. Another 20% are using dial-up or some other inconvenient means to access the internet such as driving their laptop to town to a "free wi-fi" establishment.

Please do not require electronic submittal of individual farm information.

Thank you.

Richard Shelby