

From: Dan Spangler [REDACTED]
To: <AWLaputz@waterboards.ca.gov>, <jkarkoski@waterboards.ca.gov>
CC: <cleanwaters@netscape.com>
Date: 3/22/2011 11:44 PM
Subject: Electronic Submittals from Individual Dischargers

Gentlemen:

I am a diversified farmer growing rice, hay, grain, and other crops and a 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 adamantly opposed to the "planned electronic submittals from individual dischargers to the Board" (pageA-14, #6 of the Framework document). Being a small diversified farmer has become increasingly difficult with regulatory burdens exploding over these last few years where reporting requirements are more costly and time consuming than actual compliance!

For 7 years, our 600 ranchers and farmers have spent \$300,000 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. We have a proven program that has saved and will save California taxpayers and coalition members thousands of dollars of unnecessary regulatory expenses.

Requiring each individual farmer to electronically submit our farm information directly to you bypasses 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 costs 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. Simply put, compliance levels will likely decline, regulatory and enforcement costs will increase, and the effectiveness of the program will decline. This is NOT in any of our best interests.

Please do not require electronic submittal of individual farm information.

Thank you.

Dan Spangler, PNSSNS Member