NCWA
Northern California Water Association

November 28, 2001

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Kirk Rodgers
Acting Regional Director
Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

Dear Kirk:

We have reviewed the Draft Municipal and Industrial (M & I) Water Shortage Policy for the Central Valley Project (CVP) that was published in the Federal Register on October 30, 2001. We are very concerned that the proposed policy is punitive to Northern California and will serve to unfairly impact the Bureau of Reclamation's agricultural contractors north of the Delta during shortage conditions. This is particularly evident from Table 3 in the "Urban Reliability Policy Impact Analysis" prepared for the Bureau of Reclamation by Bookman-Edmonston in June 1997. This policy could seriously impact the contractors along the Tehama-Colusa and Corning Canals, the Feather Water District, Clear Creek Community Services District and Bella Vista Water District.

As you know, Northern California water users are committed to an integrated water management program that will help you and the Bureau assure water supply reliability for all water suppliers, including municipal, industrial and agricultural contractors throughout the state. Our partnership with the Bureau is a critical element for advancing this integrated program. It now appears that the Bureau's proposed policy, rather than constructively addressing the water needs in Northern California, instead will penalize certain agricultural contractors and will lead to less reliable water supplies.

Many of the agricultural water service contractors in Northern California are submitting more detailed and specific comments on the proposed policy, which we strongly urge you to consider. We appreciate your continuing leadership and will look forward to discussing this policy with you in more detail.

Sincerely yours,

David J. Guy
Executive Director

cc: Aisha Sterud
T-C/Corning Canal Contractors
Feather Water District
Clear Creek CSD
Bella Vista Water District

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