Law Office of
MICHAEL G. HEATON
926 J Street, Suite 505
Sacramento, CA 95814-2786

Telephone (916) 444-2880
FAX (916) 444-6915
E-Mail mgheaton@tomatoweb.com

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November 27, 2001

U.S. Bureau of Reclamation
Attn: Alisha Sterud - MP 400
2800 Cottage Way
Sacramento CA 95825

Re: Comments on the draft M&I Water Shortage Policy (dated 9/11/01)

Dear Ms. Sterud:

This is on behalf of Feather Water District. I have reviewed the comments which have been submitted by Attorney Mark Atlas on behalf of the Tehama-Colusa and Corning Canal contractors and wish to join in those comments.

There appear to be two significant issues or questions associated with this draft policy. First, it appears to create an unwarranted preference for M&I contractors, to the detriment of the CVP's north of Delta water service contractors. Feather Water District could support a policy which is protective of public health and safety but which also recognizes the need to maintain at least "hardship" level deliveries for agricultural contractors. Second, it would appear that the adoption of this policy is a "major federal action" which requires compliance with the National Environmental Policy Act (NEPA), particularly with respect to the need for analysis of the impact of this policy on CVP agricultural water supplies and the associated environmental/socio-economic impacts.

Thank your for your consideration of these comments.

Very truly yours,

Michael G. Heaton
Attorney for Feather Water District

cc: Francis Silva
David Guy
Mark Atlas

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