

4-17-07

Bureau of Reclamation

Re: Comments on Shortage Guideline Matters

1. I request that your use of the term "extraordinary conservation" be changed to **extraordinary measures** which includes:
  - a. **Extraordinary conservation** based on doing something using less water and thereby generating **conserved wet water**.
  - b. **Fallowing and crop rotation** based on "not farming for a period of a year or more" or "not farming for a period which is less than a year" and generating **saved wet water**.

Making this distinction is important for:

- (1) **Conservation** has a positive socioeconomic impact
- (2) **Not farming** has a negative socioeconomic impact

2. I support Reclamation directly managing the ICS program based on:
  - a. The Lower Basin States submitting their ideas
  - b. Reclamation proposing and establishing policies and procedures
  - c. Reclamation managing the ICS program in accordance with its policies and procedures

Because the Seven Basin State and lower Basin State meetings and the Technical Committee meetings are closed to the public, I request that Reclamation will be available to discuss the management of the ICS program further upon request.

  
Cliff Hurley

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