



United States Department of the Interior



BUREAU OF RECLAMATION
PO Box 25007
Denver, Colorado 80225-0007

IN REPLY REFER TO:

84-53000
LND-9.00

JUL 27 2009

Subject: Clarifications on Reporting Landholding Changes on Reclamation Reform Act of 1982 (RRA) Forms

Dear Ladies and Gentlemen:

The purpose of this letter is to (1) clarify reporting landholding changes that occur **before** the Bureau of Reclamation water deliveries commence and (2) reiterate reporting landholding changes that occur **during** the irrigation season.

1. If landholding changes occur **before the start of the irrigation season** and a new RRA standard form¹ has already been submitted for that water year:
 - Standard RRA forms submitted for a specific water year can be **altered up to the time** Reclamation irrigation water deliveries for that year commence to that landholder. Therefore, if Reclamation irrigation water **has not yet been delivered**, the landholder can report all landholding changes on the original **standard** RRA form submitted for that water year. Each specific change must be noted on the RRA standard form, dated, and initialed by the **landholder**. Note: The landholder will not be eligible to submit "Verification of Landholdings" (Form 7-21VERIFY) for the next water year since the standard RRA form included landholding changes.

Example: Farmer Z submits a "Certification of Individual's Landholdings" (Form 7-2180) for the 2009 water year in February on the same day Farmer A submits a Form 7-21VERIFY that verifies the Form 7-2180 submitted in 2008. In early March 2009, both farmers lease additional acres, but water deliveries do not start until April.

- In this case, Farmer Z would be able to simply adjust his Form 7-2180 and date/initial each change. Farmer Z will then need to submit a new standard form before receiving Reclamation irrigation water the next water year (e.g., 2010).
- Farmer A will need to submit a new Form 7-2180 before receiving Reclamation irrigation water for the 2009 water year because he previously submitted Form 7-21VERIFY for the 2009 water year instead of a new standard form. Farmer A would be eligible to submit a Form 7-21VERIFY the next water year (e.g., 2010) if there are no other changes.

¹ See the October 10, 1997, letter, Attachment 1, in the "RRA Reference Sources" notebook for a list of standard RRA forms.

This is a change to previously issued examples on this topic in the letter to the districts dated August 25, 2004. The examples in the August 25, 2004, letter will be updated and sent to the districts in their next update to the “RRA Reference Sources” notebook. As a reminder, correction fluid is not to be used on RRA forms. Rather, acceptable changes to the forms are to be crossed out, dated, and initialed.

2. Reiteration on reporting landholding changes that occur **during** the irrigation season:

- Landholding changes must be reported on RRA forms within 60-calendar days of the change. However, new standard RRA forms do not have to be submitted every time there is a landholding change. If there are **multiple landholding changes** within the same 60-calendar day period, they can all be reported on one new standard RRA form. The date that the new RRA form is received in the district must be within 60-calendar days of the **first** landholding change that occurs.

Example: March 1 – Rancher Bob files Form 7-2180 declaring 300 acres owned
 March 15 – Bob receives Reclamation irrigation water
 April 2 – Bob purchases 100 acres
 April 30 – Bob purchases 200 acres
 May 30 – Bob files Form 7-2180 declaring all 600 acres (form filed within 60-calendar days of April 2)
 June 20 – Bob sells 50 acres
 October 15 – Bob receives his last Reclamation irrigation water delivery for the irrigation season.
 November 1 – Landholding change problem discovered

Although Bob had already filed two forms for the same irrigation season, he encountered another landholding change (selling 50 acres) after his most recent Form 7-2180, which was submitted May 30. Since Bob did not file a new RRA form within 60-calendar days of June 20, he will be required to file a new standard form before receiving Reclamation irrigation water deliveries in the future, and Reclamation will issue an administrative fee bill for the forms submittal (landholding change) violation.

- If the irrigation season is going to end before the 60-calendar days pass, no new RRA standard forms are required to report landholding changes for that water year. However, new standard RRA forms are required for the following water year. Form 7-21VERIFY’s are not permitted in such cases.

The above reiteration supplements the April 28, 2003, letter to the districts.

If you have any questions regarding the information provided in this letter, please contact the appropriate Reclamation office.

Sincerely,

A handwritten signature in black ink that reads "Richard W. Rizzi". The signature is written in a cursive style with a large initial 'R'.

Richard W. Rizzi
Manager, Land Resources Office