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JODY BRENNAN

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CENTRAL VALLEY PROJECT WATER ASSOCIATION

20 June 1996

Honorable Bruce Babbitt
 Secretary
 U.S. Department of the Interior
 1849 C Street, NW
 Washington, DC 20240

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Dear Secretary Babbitt:

We are concerned that the revised Rules and Regulations for implementing the Reclamation Reform Act of 1982 have not yet been finalized. We urge you to select the preferred alternative as identified in your Final Environmental Impact Statement of February 1996 as soon as possible.

As you are aware, the revision of the Rules and Regulations was first mandated by the District Court in litigation initiated by the Natural Resources Defense Council (NRDC) and others. The Rules and Regulations process ultimately emanated from an agreement between NRDC and the United States. The District Court Order as well as the agreement required the rulemaking process to proceed with some diligence. Indeed, as part of that process, the United States was required to adhere to a specific time-line.

It is with this background that we view the current situation. We know that NRDC was not pleased with the preferred alternative and we understand that they have largely been responsible for the current delay in finalizing the Rules and Regulations. In light of the fact that it was NRDC that filed suit to compel the new Rules and Regulations, and that it was NRDC that urged diligence and prompt action on the new Rules and Regulations, it is unconscionable that they should now create any delay in the finalization of those Rules and Regulations merely because they do not like the apparent result of the efforts they forced upon the United States. It would indeed be ironic and unfortunate if, after all of this time, the very entities within the regulated community who intervened in the litigation to support the United States' position would be forced to return to court in an attempt to compel you to do the right thing.

Our concerns derive from some very real and practical considerations. We understand the new regulations will take effect on 1 January 1997. This is good because it precedes the growing season. However, unless a final decision on the regulations is made soon, there will be insufficient time in which to undertake the important business planning that will be required in light of the new Rules and Regulations. The longer you delay a decision, the more costly compliance will be. Time is of the essence.

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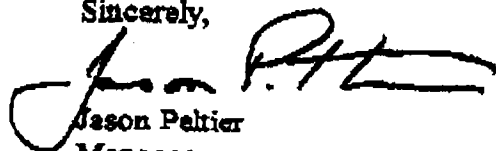
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Actions you take or do not take will have enormous consequences to agriculture; not only to farm businesses, but to farm families and employees and the many other businesses supported by farming. In short, the entire farm community West-wide will be affected. There are 20,000 farmers served by the federal Central Valley Project in California, and tens of thousands more across the Western states waiting for your decision. We urge your expedient and appropriate action to finalize the preferred alternative for the Rules and Regulations to implement the Reclamation Reform Act of 1982.

Sincerely,



Jason Paltier
Manager