

From: [Patricia Schifferle](#)
To: ["Mosley, Michael"](#)
Cc: ["David Van rijn"](#); ["Jonas Minton"](#); ["Barbara Barrigan-Parrilla"](#); ["Barbara Vlamis"](#); ["Bill Jennings"](#); ["Ron Stork"](#); ["Eric Wesselman"](#); ["Frank Egger"](#); ["Larry Collins"](#); ["Conner Everts"](#); ["lloyd carter at comcast"](#); ["john mcmanus at golden state salmon"](#); ["Carolee Krieger"](#); ["kathryn.phillips@sierraclub.org"](#); ["John Buse"](#); ["Stephen Green"](#); ["Kier Associates"](#); ["Guy Phillips"](#)
Bcc: ["Steve Volker"](#); ["Thomas H. Keeling \(tkeeling@freemanfirm.com\)"](#); ["Osha Meserve \(osha@semllawyers.com\)"](#); ["nrobertson@earthjustice.org"](#)
Subject: RE: Meeting Availability for Cost Allocation Study Listening Sessions, August 2019
Date: Monday, August 12, 2019 9:56:00 AM
Attachments: [PCL et. al. Cmts Re Draft CVP Cost Allocation Study April 2019.highlights.pdf](#)
[image001.png](#)

Dear Mr. Mosely,

Thank you for including me in your correspondence, but be aware that the comments I transmitted were prepared by and endorsed by 16 different nonprofit organizations (cc'd), representing thousands of members, and these groups need to be separately invited.

From my point of view, the process you are proposing for addressing comments will not be successful until you first answer and address the numerous questions and comments already raised months ago in the comment letter. Frankly, the Draft Cost Allocation Study is almost unintelligible, with key source materials that are not fully disclosed and selection of time periods and data that appear arbitrary or designed to benefit select users rather than pay back the taxpayer as required by law.

Without answers to these fundamental questions, Reclamation asks for the organizations to attend a listening session to only address *'specific comments that your organization considers to be your highest priority during the meeting.'* Once again, the rationale for further reducing or selecting specific comments before addressing comments already made is not given. This is an arbitrary process that will likely not achieve the stated purpose to *'improve the study before implementation'*. Much time and effort went into providing the comments. All of the information is important and critical to making sure Reclamation does in fact reach its stated goal to *'adopt reasonable Cost Allocation Study results that are consistent with our legal Authority and Reclamation Policy'*.

I have attached the original comments submitted by the 16 organizations, which they have each approved, and highlighted the primary comments and questions for your convenience. It would be extremely helpful if you could address these in writing prior to the listening session. Reclamation has had these comments for over 3 months with no response and now seeks to limit the response to select issues during a brief listening session with two-weeks notice. Without USBR responses to all of the questions and comments, followed by sufficient time to evaluate the responses, the most critical issues cannot realistically be sorted out and addressed in a 2-hour session with multiple commenters.

Thank you again for the opportunity to comment and the invitation to the "listening" session. As mentioned the time selected by Reclamation will not work for me due to the death of a family member and commitments with my son's wedding.

Regards,

Patricia Schifferle

Patricia Schifferle
530 550 0219 v



Pacific Advocates

From: Mosley, Michael [mailto:mmosley@usbr.gov]
Sent: Wednesday, August 07, 2019 2:48 PM
To: Patricia Schifferle
Cc: David Van rij
Subject: Meeting Availability for Cost Allocation Study Listening Sessions, August 2019

Dear Ms. Schifferle,

Reclamation has received the comments that your organization provided during the public comment period and wish to better understand your concerns, with a goal of identifying the most important comments among those submitted. The purpose of the listening session is not to create an adversarial atmosphere, but instead to listen and gather the most important information from our stakeholders that can then be utilized to improve the study before implementation.

Reclamation can address the specific comments that your organization considers to be your highest priority during the meeting. Reclamation still intends to release official comment responses after the conclusion of the listening sessions. It is our desire to have reasonable Cost Allocation Study results that are consistent with our legal Authority and Reclamation Policy.

I will send you an invitation to our Friday 8/23/19 listening session. I sincerely hope that you or a representative can attend.

Thank you

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Michael Mosley
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