

**1SUPPORTING STATEMENT A  
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**CERTIFICATION SUMMARY FORM AND  
REPORTING SUMMARY FORM FOR ACREAGE LIMITATION  
43 CFR PART 426 AND 43 CFR PART 428  
OMB Control Number 1006-0006**

**Terms of Clearance:** At the next submission, please explain in the Supporting Statement that the burden estimates are provided in the instructions for each form (and if possible upload the instructions into ROCIS, too, or include in the Supporting Statement links to the instructions online).

**Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Reclamation Act of 1902 (43 U.S.C. 371), Sections 206, 224(c), and 228 of the Reclamation Reform Act of 1982 (43 U.S.C. 390aa) (RRA), and Section 5302 of the Omnibus Budget Reconciliation Act of 1987 (Pub. L. 100-203) mandate and/or authorize the collection of information in this information collection request (ICR). Respectively, they establish a policy of Federal assistance through irrigation development, establish ownership and pricing provisions for Reclamation irrigation water deliveries, require RRA form submittal (including water district responsibility for submittal and collection thereof) as a condition for the receipt of Reclamation irrigation water, and establish audit requirements.

In response to litigation, the revised Acreage Limitation Rules and Regulations (Regulations, 43 CFR part 426) were published (effective January 1, 1997). Comments received during the rulemaking process for the revised Regulations led to the creation of 43 CFR part 428 (“Information Requirements for Certain Farm Operations in Excess of 960 Acres and the Eligibility of Certain Formerly Excess Land”), which supplements the Regulations by establishing (among other things) the RRA form submittal requirements for certain farm operators.

In accordance with the requirements of the RRA, an information collection has taken place since 1984 to administer and enforce the acreage limitation provisions of Federal reclamation law. The RRA forms included in this ICR reflect the requirements of 43 CFR 426.19(g) that became effective January 1, 1998, and 43 CFR 428.4 through 428.8 that generally became effective January 1, 2001.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Water districts that are subject to the requirements of the RRA are required to use the forms in this ICR (Forms 7-21SUMM-C and 7-21SUMM-R) to summarize landholding information submitted to the districts by individual landholders and certain farm operators (via the forms approved under OMB approval number 1006-0005). The districts annually submit to Reclamation the summary forms in this ICR. It should be noted that in general, Reclamation does not collect the forms submitted by landholders (via the forms in 1006-0005), and those that are collected are not retained permanently. Thus, the district summary forms are the only permanent record maintained by the Federal government on acreage limitation program administration.

The summary forms meet the statutory requirements included in section 228 of the RRA. If Reclamation did not require summary forms from districts showing all landholders' data, Reclamation would not know if RRA section 228 requirements were being satisfied. Summary forms indicating large amounts of unreported acreage, or significant discrepancies between the reported acreage and the congressionally authorized acreage for any particular district, will alert Reclamation to potential compliance problems in that district. Thus, the summary forms are a primary tool for prioritizing districts for Reclamation audits. Reclamation's experience to date has shown that compliance problems are frequently revealed through mathematical discrepancies in the summary forms. For example, a summary form showing 3,000 acres leased by two landholders, but showing no full-cost acreage, almost certainly indicates a compliance problem because, generally speaking, the maximum nonfull-cost acreage that could be leased by two landholders would be 1,920 acres.

The summary forms' breakdown of landholder data into various farm size categories and the summarization of owned, leased, excess, and full-cost acreage, gives Reclamation valuable information on land tenure in Reclamation projects. Reclamation frequently receives inquiries from the Congress, the public, and various other parties on land tenure, excess acreage, etc., for specific districts. This information is often critical in making legislative and policy decisions. Reclamation's inability to quickly answer such questions has, in the past, subjected Reclamation to criticism.

The moderate level of detail and categorization specified in the summary forms forces districts to examine data contained in each landholder's RRA form (as currently approved under OMB approval number 1006-0005). We believe this procedure is invaluable in helping districts discover false and/or erroneous reporting. It must be remembered that district officials are not Federal employees and generally consider themselves to be representatives of the farmers' (not the Government's) interests. If we did not require districts to transfer landholder data to summary forms in reasonable detail, the majority of landholder forms would likely never be reviewed until a Reclamation review took place. Additionally, this moderate level of detail and categorization gives Reclamation some definite parameters to determine districts' attention to forms requirements. If, for example, all landholdings below 960 acres were summarized with no differentiation, as has been suggested in the past, it would be far more difficult for Reclamation to determine whether a district had, in fact, examined landholder forms at all. There are multiple statutory and regulatory acreage entitlements in the RRA program, i.e., more than just 960 acres, and the framework for the information collected on these summary forms assists both district and Reclamation staff with ensuring these entitlements are applied correctly. For these reasons, we

believe the level of detail prescribed in the enclosed summary forms is necessary and appropriate.

No changes have been made to the currently approved forms and instructions in order to obtain the draft forms and instructions proposed for approval. Burden hours are explained in the instructions for each form.

#### List of forms

Following is a list of district summary forms, their corresponding tabulation sheets, and a brief discussion of the purpose of each form. A detailed discussion of the purpose of each question on the forms is provided in Attachment 1.

**Form 7-21SUMM-C** is to be used by districts to summarize landholdings and landholders subject to discretionary provisions. Districts that are subject to discretionary provisions also summarize the landholdings of all trusts and all public entities in their districts. The summarization is derived from tabulation sheets that are explained below. Reclamation requires that districts use and submit the following tabulation sheets, except where noted, to facilitate completion of the summary forms and to aid in fulfilling specific requests for information. This has eliminated numerous requests to districts for detailed information.

**Form 7-21SUMM-R** is to be used by districts to summarize landholdings and landholders that are subject to prior law. Districts that are subject to prior law also summarize the landholdings of all trusts and all public entities in their districts. The summarization is derived from tabulation sheets that are explained below. Reclamation requires that districts use and submit the following tabulation sheets, except where noted, to facilitate completion of the summary forms and to aid in fulfilling specific requests for information. This has eliminated numerous requests to districts for detailed information.

Form 7-21SUMM-C and Form 7-21SUMM-R each have a set of applicable tabulations (seven forms, Tabulation A through Tabulation G). Separate tabulations for Form 7-21SUMM-C and Form 7-21SUMM-R are required because of the different forms submittal thresholds and acreage limitation entitlements applicable to the discretionary and prior law provisions. Tabulations are completed and attached to Form 7-21SUMM-C or Form 7-21SUMM-R as applicable based on the landholders identified on the corresponding Form 7-21SUMM-C or Form 7-21SUMM-R. Each of the seven tabulations collects the following information:

Tabulation A tabulates information from certification forms submitted by individuals and entities.

Tabulation B tabulates information from forms submitted by trusts and estates.

Tabulation C tabulates information from forms submitted by public entities.

Tabulation D tabulates information from certification forms submitted by religious or charitable organizations.

Tabulation E tabulates errors or infractions detected in the review and compilation of landholder forms (e.g., forms nonsubmittal by landholders whose westwide landholdings exceed the forms submittal threshold, erroneous or incomplete landholder information where failure to complete RRA forms properly will jeopardize the landholders' eligibility to receive Reclamation irrigation water, etc.). District reporting of errors will help Reclamation verify that districts took appropriate action in the case of infractions, and facilitate Reclamation's efforts to administer and enforce the acreage limitation provisions of Federal reclamation law.

Tabulation F is an optional form, provided only for district convenience, to detail and tabulate information concerning part owners who indirectly hold land. While indirect landholding information is not addressed on any other tabulation sheet and is consequently not transferred to Form 7-21SUMM-C or Form 7-21SUMM-R, summarized part owner information can be used by both districts and Reclamation to determine applicable acreage limitation entitlements.

Tabulation G tabulates information from forms submitted by farm operators who provide services to more than 960 acres westwide held in trusts or by legal entities.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

Reclamation has made all of the RRA forms in this ICR and the associated instructions available on the Internet for either printing and manual completion, **or** electronic completion and either manual or electronic submission. This effort was fully accomplished in early 2020. These forms can be found at [https://www.usbr.gov/rra/RRA\\_district\\_forms.html](https://www.usbr.gov/rra/RRA_district_forms.html). In 1997 Reclamation developed standards for computerized RRA forms which several districts and companies have used, and continue to use, to develop substitute forms in word processing, database, and spreadsheet files, with the goal of facilitating the transfer of applicable information between the summary forms and the local databases and software in which districts are maintaining this information. Reclamation's standards require Reclamation's inspection and approval of such electronic, substitute RRA forms prior to their use. While the districts use the substitute forms they have developed to complete their summary forms, two private companies have developed a software package of substitute RRA forms (including district summary forms) that they have marketed to the public.

The acreage limitation provisions of Federal reclamation law provide statutory and regulatory authority for Reclamation to require landholders' submission of RRA forms that gather information pertinent to the lawful delivery of Reclamation irrigation water, and the retention requirements associated with such forms. There is, however, no statutory or regulatory acreage limitation provision that allows Reclamation to mandate electronic submittal. At this time and for the foreseeable future, electronic submittal is voluntary for the districts that submit the

summary forms in this ICR. Districts subject to the acreage limitation provisions vary widely in their staffing levels and technological capabilities. In many cases, RRA administration is a collateral duty for water district staff, and is a low priority for a district's financial resources. Therefore, while some districts may have the staff and equipment to utilize the electronic submittal option, other districts are not capable of electronic submittal at this time. Although Reclamation has, to the best of its ability, made the electronic submittal option available for use, it will be difficult to estimate year to year the number of districts that will choose to submit electronically. For the 2023 water year, approximately half of the 120 respondents for this ICR submitted their summary forms electronically.

The information collected on the RRA forms is used internally within Reclamation's RRA program and is not disseminated to the public on the internet or in hard copy. The voluntary nature of districts using electronic submittal does not affect Reclamation RRA staff's ability to use the information collected by the summary forms, as longstanding practice entails mailing hard copy summary forms to specific RRA staff by the districts that don't choose to utilize the electronic submittal option.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The acreage limitation provisions of Federal reclamation law apply only to certain Reclamation projects that provide Reclamation irrigation water for agricultural purposes; consequently, similar data are neither collected nor available through any other Federal agency, State or local government, or private organization. An attachment to a letter from Mr. Scott J. Cameron, then Deputy Assistant Secretary for Performance and Management (Department of the Interior), to then U.S. Representative Doug Ose regarding an April 11, 2002, hearing on Paperwork Reduction Act issues (specifically, pages two and three of the attachment to Mr. Cameron's letter) detail the following general findings:

- a. Not all of Reclamation's customers participate in USDA programs, and most of USDA's customers do not receive Reclamation irrigation water.
- b. Reclamation and USDA do not use the same categories of program respondents due to statutory and regulatory program requirements.
- c. The level and nature of detail in USDA and Reclamation ICRs differ in such ways that it is clear USDA data would not be sufficient to allow Reclamation to properly administer and enforce the acreage limitation provisions of Federal reclamation law.
- d. RRA forms are filed at the local (district) level; USDA forms are filed at county offices with little centralization of that data.

For the foregoing reasons, it has been determined that there is no duplication with regard to this particular data collection.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Water user organizations are the respondents to this ICR. Reclamation has carefully analyzed this requirement to ensure the information requested of these organizations is the minimum necessary to implement and enforce the acreage limitation provisions of Federal reclamation law.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Section 228 of the RRA and section 426.19(g) of the Regulations specify that districts must report to Reclamation on an annual basis. This eliminates the possibility of not conducting the ICR or conducting it less frequently. Furthermore, if information was collected and verified on a less frequent basis, enforcement of the law would be weakened, and landholders and districts would become less aware of the continuing requirement for compliance with the acreage limitation provisions of Federal reclamation law.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- \* **requiring respondents to report information to the agency more often than quarterly;**
- \* **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- \* **requiring respondents to submit more than an original and two copies of any document;**
- \* **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- \* **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- \* **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- \* **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- \* **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Reclamation rarely requests district summary forms more frequently than once per year. The reason Reclamation may issue such a request typically pertains to correction of errors (e.g., submittal of a corrected form if Reclamation finds errors during a regularly scheduled water district review). There are reasons a district may choose to submit more than one district summary form per year, such as the addition of data for landholdings of a new landholder in the district if the addition takes place after RRA summary forms have been submitted to Reclamation for the year. In such a case, the district's submittal of a new summary form would be of the district's choosing and not at Reclamation's request.

A written response in fewer than 30 days, and submittal of more than an original and two copies, would never be required. Retention of records provisions are not applicable to district summary forms. Forms 7-21SUMM-C and 7-21SUMM-R are submitted by the districts to Reclamation, and the Department of the Interior's records retention schedule (in association with the National Archives and Records Administration) identifies these forms as permanent records.

The forms in this ICR are not used in connection with a statistical survey or statistical classification, nor do they involve a pledge of confidentiality. Confidential information on these forms is addressed by protection under the Privacy Act of 1974, system of records notice INTERIOR/WBR-31, Acreage Limitation.

**8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Notice was given in the Federal Register on July 10, 2023 (88 FR 43632). No public comments were received in response to this notice or in response to the PRA statement associated with the collection over the past three years.

This ICR contains forms that are completed by districts (using information taken from the RRA forms submitted by landholders under OMB approval number 1006-0005) and submitted annually to Reclamation as documentation of acreage limitation administration for landholders in a particular district that received Reclamation irrigation water. The burden hour estimate associated with the forms in this ICR is an average figure because no single district is representative of all districts. The number of landholders in the districts subject to the acreage limitation provisions varies from fewer than 10 respondents in some districts to more than 500 respondents in others. Furthermore, the information a particular district submits on the forms in this ICR can (and frequently does) change from year to year. For example, landholders that lease land in a district during one irrigation season may no longer have such leases during the next season for a variety of reasons. Or, an entity that holds land in a particular district during one irrigation season may sell all of its land before the start of the next season. In either case, the affected landholders would no longer be required to submit RRA forms (under OMB approval

number 1006-0005), and consequently there would be a decrease in the amount of information the district would submit to Reclamation on the summary forms in this ICR. In any given water year, a district can also see an increase in the landholders identified on the forms in this ICR (e.g., new landholders, parties to new annual leases, etc.). As such, the burden hour estimate associated with the summary forms is an average figure that is more accurately calculated from a Reclamation-wide estimation of the types of RRA landholders submitting forms in all of the districts subject to the RRA, not the feedback of individual districts.

Throughout each year, Reclamation conducts regularly scheduled water district reviews at district offices that are subject to the acreage limitation provisions. Discussions between Reclamation RRA staff and district staff are held at those reviews during which burden hour feedback from both districts and landholders is addressed. In other words, Reclamation continually assesses burden hour estimates for the RRA forms through regular discussions with district staff that are in direct contact with the respondents of the forms in this ICR, and has done so since these forms were first drafted in 1983. In the context of these water district reviews, Reclamation has access to a compilation of district feedback that comes from far more than a random sampling of 10 or fewer districts, and we adjust the accuracy of our burden estimates according to any feedback received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

We will not provide payments or gifts to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). The Privacy Act system of records notice associated with this ICR is INTERIOR/WBR-31, Acreage Limitation.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

We do not ask questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- \* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential**



respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- \* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

The total estimated annual burden hours for this ICR are 6,000 hours (rounded). The estimated burden hours are included in the PRA statement in the instructions for each form.

- As a result of routine oversight activities, we determined that approximately 120 districts are currently required to submit summary forms.
- The estimated number of responses per respondent is 1.25 annually, or 150 total annual responses (120 respondents multiplied by 1.25 responses per respondent).
- The average annual burden per response for all forms listed in the table below is 40 minutes (0.67 hours).
- We estimate that each district will require an average of 40 person-hours of labor per response annually to collect, file, and summarize the landholders’ forms. These 40 hours consist of about 5 hours for reporting or disclosure burden and about 35 hours of recordkeeping burden.
- The estimated annual burden hours per form are listed in the table below.

The average annual cost per response is estimated to be \$1,102.

- Based on the median wage rate of \$19.67 \* per hour for the office and administrative support wage rate, multiplied by a benefits multiplier of 1.4\*\*, multiplied by 40 hours per response.

\* [Occupational Employment and Wages, May 2022](#) (Office and administrative support occupations)

\*\*Bureau of Labor Statistics new release [USDLE-23-0488, March 17, 2023](#) ; specifically, private industry workers, natural resources, construction, and maintenance by occupational group (office and administrative support), December 2022, Table 4.

- The total annual cost is estimated to be \$165,300 (150 total annual responses multiplied by \$1,102 per response). This represents a net decrease of \$58,352 from the most recent OMB approval of this ICR.

Form No.	Estimated No. of Respondents	Frequency of Response	Total Annual Responses	Burden Hours Per Response	Total Burden Hours
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7-21 SUMM-C and tabulation sheets	113	1.25	141	40	5,640
7-21 SUMM-R and tabulation sheets	7	1.25	9	40	360
<b>TOTAL</b>	<b>120</b>	<b>1.25</b>	<b>150</b>		<b>6,000</b>

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation, maintenance, and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the Government, or (4) as part of customary and usual business or private practices.

We have not identified any non-hour cost burden associated with this collection.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

We estimate the total annual cost to the Federal Government to administer this information collection is \$24,358, as itemized in the table below.

To determine average annual salary costs, we used the [Office of Personnel Management Salary Table \(2023\)](#) to determine the annual base salary costs for staff involved in reviewing and

processing the information collected as shown below. The benefits rate was calculated from Bureau of Labor Statistics News Release [USDL-23-0488](#), March 17, 2023, Employer Costs for Employee Compensation—December 2022. We multiplied the annual salaries by 1.57 to account for benefits, in accordance with USDL-16-2255.

Item	Costs
Printing of hard copy RRA forms for districts that request them instead of online forms	\$1,000
Personnel (salary and benefits)*	\$ 22,733 (375 person-hours X \$60.62 per hour)
Miscellaneous administrative costs (e.g., equipment for Reclamation RRA staff's maintenance of digital RRA records)	\$ 625
<b>TOTAL</b>	<b>\$24,358</b>

\* Wage rate figure is based on the following:

- The average grade level of staff included in this cost estimate is GS-12 step 5
- The 2023 hourly base wage for a GS-12 step 5 Federal employee is \$38.61
- The total hourly wage with benefits is \$60.62 (\$38.61 base wage x 1.57 benefits multiplier)
- This represents a decrease of \$802 since this ICR was approved in 2020, due to decreased printing costs.

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

We are not reporting through this document any program changes or adjustments in burden hours. Minor changes in cost burden are the result of average occupational wage changes since the most recent approval of this ICR.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There are no plans for publication of the results of these information collections.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Reclamation is requesting an exemption to not display the expiration date of OMB approval of the form. The RRA and its corresponding Regulations require the submittal of an appropriate RRA form every year as a condition for the receipt of Reclamation irrigation water. Districts' contractual irrigation seasons and geographic growing seasons vary widely across the 17 Reclamation states. Reclamation irrigation water deliveries may be in progress when a given OMB expiration date arrives, particularly in districts with year-round irrigation. To make visible on the RRA forms an OMB expiration date that occurs in the middle of an irrigation season will

cause undue confusion for districts and landholders. For example, they may be led to erroneously believe a new RRA form must be submitted in order to continue to receive Reclamation irrigation water for the remainder of the irrigation season. This would be a duplication of public burden generated by miscommunication of semantics, not by statutory or regulatory requirements.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions to the certification statement.