



MEMORANDUM

TO: SAN LUIS & DELTA-MENDOTA WATER AUTHORITY DIRECTORS
FROM: DAN KEPPEL, EXECUTIVE DIRECTOR
SUBJECT: UPDATE REPORT
DATE: SEPTEMBER 11, 2023

This memo is intended to keep you apprised as to what is happening regarding policy issues the Family Farm Alliance (Alliance) is engaged in. In the past month, much of our efforts have focused on advancing farm bill ideas with Western Senators and committee staff, assessing Biden Administration changes to ESA and NEPA implementation, planning for our farmer lobbyist trip to D.C., public outreach, and organizational administrative matters. These issues and other matters important to our members are further discussed in this memo.

BIDEN ADMINISTRATION

1. Environmental Protection Agency (EPA): Clean Water Act “Waters of the U.S.”

EPA two weeks ago said it has revised a key rule to comply with the Supreme Court decision from earlier this year, which changed parts of the previous definition of “waters of the United States” (WOTUS) to align with the Supreme Court’s decision. EPA and the Army Corps of Engineers [published](#) the new final WOTUS rule in the Federal Register on September 8, 2023, which is the new rule’s effective date. The agencies will not accept any new public comments on the revised rule.

EPA said the amendments announced are limited and only change the parts of the previous rule that are invalid under the court’s decision. Importantly, the new rule removes the significant nexus test and revises the definition of “adjacent” to mean “having a continuous surface connection.” The definition of “significantly affect” has been deleted. Tributaries, adjacent wetlands, and additional waters no longer include the significant nexus test. Adjacent waters have also had “wetlands and streams” removed. In regard to interstate waters, “interstate wetlands” has been

removed from the text. The following definitions have not been changed – “high tide line,” “impoundments,” “ordinary watermark,” “territorial seas,” “tidal waters,” “traditional navigable waters,” and “wetlands.” Further, there are no changes to the WOTUS exclusions. EPA also notes that the agencies’ amended WOTUS definition does not affect the longstanding activity-based permitting exemptions provided to the agricultural community by the Clean Water Act.

The *Washington Post* and its green supporters are already wringing their hands, claiming that EPA’s new rule could “strip protections from more than half of U.S. wetlands”. Republicans on Capitol Hill issued statements of condemnation about the rule, reiterating prior concerns that the Biden Administration should have waited on *Sackett* before issuing its proposed rule. A number of agricultural groups have expressed significant disappointment in the latest WOTUS rule. Many note that the [new amendments](#) fall short of addressing long-term issues. We’ll continue to dig into the rule and keep you apprised of what we and others discover.

2. EPA: Proposed Pesticide and Herbicide Restrictions

Driven by lawsuits launched by some of the most litigious environmental activist organizations in the country – and cheered on by those same groups – the Biden Administration EPA is taking aggressive steps to address the impacts of pesticides and herbicides on at-risk plants and animals. Last year, EPA noted that over the past five decades, it has effectively ignored its responsibility to evaluate pesticides’ impacts on at-risk plants and animals in more than 95 percent of cases. Now, one senior level EPA regulator said “...without exaggeration . . . we have done more in two years than every other administration has done—combined—on this issue.”

EPA is now working on new, broader ways to reduce potential harms that don’t require waiting for each individual evaluation. In June, officials [proposed](#) restrictions and other practices that could be put in place to protect 27 of the most vulnerable species from exposure from groups of pesticides that might harm them. Then, in July, the agency released its first [Herbicide Strategy](#), which identifies common routes of exposure to weedkillers, like [drift](#) and [runoff](#), and proposes broad changes to how those chemicals are used.

Both new frameworks are currently in draft form and are open to [public comment](#), and they are generating plenty of criticism from the agriculture sector, including another Biden Administration Department: the U.S. Department of Agriculture (USDA). The EPA’s proposal discards weighing the risks and benefits of spraying pesticides in favor of significant restrictions for all outdoor uses, according to USDA pest management policy director Kimberly Nesci in a recent letter to EPA chief pesticide regulator Jan Matuszko.

The USDA’s warning echoes state agricultural officials in red and blue states who say the EPA’s plan to protect 27 species by banning or limiting pesticides represents a fundamental shift in U.S. pesticide policy. The Association of American Pesticide Control Officers said the “unreasonable” restrictions will foster “rampant lack of compliance” with pesticide laws. The association has concerns with EPA’s proposal to make some farmers get permission to spray three months in

advance from the U.S. Fish and Wildlife Service, which could impose new limits on pesticide applications. Of course, this would be difficult to implement since farmers can't predict when a pest problem is going to occur.

This particular topic is outside the Alliance's water-focused mission, so I recommend that you check in with those organizations who advocate for agricultural herbicides / pesticides in California.

3. CEQ NEPA Phase II Rule

The White House Council on Environmental Quality (CEQ) has released its long-awaited Phase 2 National Environmental Policy Act (NEPA) rule, called the "[*Bipartisan Permitting Reform Implementation Rule*](#)," that would codify NEPA reforms included in recent debt-ceiling legislation as well as to ensure inclusions of Biden Administration priorities on climate change and environmental justice. The proposed phase 2 rule aims to implement congressionally mandated efficiencies and address the twin Biden administration priorities of climate change and environmental justice. But, according to *InsideEPA* articles we have reviewed, the proposed new mitigation, assessment, and other mandates may drive new litigation opportunities and further delay project approvals.

Mark Limbaugh reports that, among the newly proposed provisions are measures that toughen mitigation mandates by encouraging agencies to select "environmentally preferable alternatives," strengthen consideration of projects' potential climate change and environmental justice (EJ) effects, require agencies to use new science, and more. Such measures seem to be at odds with other provisions in the rule that aim to codify statutory changes that Congress and the Biden Administration agreed to in recent debt ceiling legislation, the [*Fiscal Responsibility Act \(FRA\)*](#), including allowing project sponsors to prepare environmental impact statements (EISs), setting deadlines and page limits on reviews and allowing project sponsors to sue over missed deadlines. The debt ceiling legislation also allows agencies to create categorical exclusions (CE) from any NEPA review in planning documents rather than as a separate action and authorizes agencies to adopt each other's CEs.

NEPA experts say the new requirements mark a significant change from prior NEPA rules, particularly for mitigation. In the past, cooperating agencies were able to suggest potential mitigation measures if they objected or expressed concern about a project's effects. Instead, the phase 2 proposal "directs cooperating agencies to specify mitigation measures in all circumstances." And CEQ directs the agencies to make all mitigation enforceable "with accompanying monitoring and compliance plans, whenever agencies consider such mitigation in their analysis of the reasonably foreseeable environmental effects of an action."

The newly proposed climate and EJ assessment requirements depart from long-standing approaches that required federal agencies to assess adverse effects that have a sufficiently close causal connection to a proposed action. The new provisions also would require agencies to mitigate

such potential effects. CEQ provides very few details in the proposed rule about how their new measures that allow agencies to adopt “innovative approaches” under NEPA will work, while also eliminating Trump-era rule language that required project critics to detail concerns during the comment phase if they later sought to challenge a NEPA approval.

As for new CEs, the proposal requires a lot more documentation, including for mitigation commitments and inventories of each agency’s CEs. Further, it says mitigation -- either in a CE or in a “mitigated Finding of No Significant Impact (FONSI)” – will require follow-up and additional requirements if the mitigation effort fails. Further, NEPA experts believe the public engagement requirements in the proposed rule are key because they are a dramatic shift from “public participation” to requiring agencies “to truly engage with” affected EJ communities.

a. CEQ Public Meetings

CEQ hosted its first virtual public meeting last Saturday, August 26. Yes – that’s right. They did it on a weekend. They must have caught some flak, because now they’ve come out with some additional meeting times, including these two remaining meetings:

- Public Meeting #3: Monday, September 11, 2023, from 1 p.m. to 4 p.m. EDT [Register for Public Meeting #3](#)
- Public Meeting #4: Thursday, September 21, 2023, from 2 p.m. to 5 p.m. EDT [Register for Public Meeting #4](#)

I’ll be participating in Meeting #3 from Sea-Tac airport, enroute to the Tri Cities. As discussed on our August joint ZOOM meeting of the board and Advisory Committee, we’ll be preparing comments this month on the proposed NEPA Phase II rule. Please let me know if you’d like to be included in the Alliance workgroup that will be leading this effort.

4. Proposed ESA Rule Revisions

As previously reported, the U.S. Fish and Wildlife Service (“FWS”) and National Marine Fisheries Service (collectively, “the Services”) two months ago published three proposed rules related to implementation of the Endangered Species Act (“ESA”). The three proposed rules would:

- Revise regulations regarding interagency consultation, including broadening the scope of the Services’ conditioning authority;
- Reinstate a blanket protection for threatened species managed by FWS; and
- Clarify any “misconceptions” created by the Trump administration when it removed language in 2019 referencing economic impacts within the context of the classification process.

The Biden Administration agreed to rewrite the three ESA rules in response to a lawsuit filed by Earthjustice on behalf of the Center for Biological Diversity, Defenders of Wildlife, the Sierra Club, the Natural Resources Defense Council, and other litigious environmental organizations.

a. Alliance Actions

The Alliance has consistently and strongly supported efforts to reform the ESA and its implementing regulations – like the effort initiated by the Trump Administration - to provide clearer direction to the agencies in applying and enforcing the law. The Alliance in November 2021 developed a detailed comment letter to the Services that reaffirmed the support the organization placed behind the substance and process used to finalize the 2020 ESA rules that were rescinded by the current administration. We developed another comment letter that leans heavily on three letters prepared by the National Endangered Species Act Coalition, which we transmitted to Fish and Wildlife Service and National Marine Fisheries Service earlier this month.

5. Bureau of Reclamation: \$195 M in Funding Opportunities

Reclamation earlier this month announced up to \$195 million in funding opportunities to develop a more resilient water supply, support cooperative watershed management and safeguard aquatic ecosystems. The funds come primarily from the Bipartisan Infrastructure Law's (BIL's) WaterSMART program, as well as from the Inflation Reduction Act (IRA) and annual appropriations. Through the [BIL](#), Reclamation is investing a total of \$8.3 billion over five years for water infrastructure projects, including water purification and reuse, water storage and conveyance, desalination and dam safety. The IRA is investing an additional \$4.6 billion to address the historic drought. Reclamation is implementing an overall \$1 billion investment from the BIL for WaterSMART grants to provide financial assistance to water managers to help conserve and use water more efficiently, implement renewable energy projects, investigate and develop water marketing strategies, mitigate conflict risk in areas at a high risk of future water conflict, and accomplish other benefits that contribute to sustainability in the West. Reclamation is opening three funding opportunities for drought resilience, planning and design and cooperative watershed management and extending an opportunity for aquatic ecosystem projects.

a. Drought Resilience Projects

Reclamation is making up to \$55 million available in drought resiliency funding to develop projects that can increase water management flexibility. Projects under this funding opportunity are divided into four task areas aimed at infrastructure improvements, groundwater recovery, decision support tools, modeling and measurement and domestic water supply projects for Tribes or disadvantaged communities. Applicant eligibility and the required non-federal cost-share vary by task area.

b. Planning and Design Projects

Reclamation is making up to \$35 million available for planning and design grants to support water management improvements. This includes funding for water strategy grants to conduct planning and project design activities to improve water supplies and create comprehensive drought contingency plans. Applicant eligibility and the required non-federal cost-share vary by task area.

c. Cooperative Watershed Management Projects

Reclamation is offering up to \$40 million in Bipartisan Infrastructure Law funding for collaborative watershed projects under the WaterSMART Cooperative Watershed Management Program. Through this funding opportunity, which has two application periods for funding from this fiscal year and next fiscal year, Reclamation is promoting water reliability and cooperation between stakeholders to reduce conflict, facilitate solutions to complex water issues and stretch limited water supplies. This grant will fund establishment of new watershed groups or expansion of existing watershed groups, restoration planning and project design for watershed management projects. This program provides support for local watershed groups to plan and design projects to improve watershed health, benefitting multiple water uses. For more information on the Program visit [Reclamation's Cooperative Watershed Management Projects webpage](#).

d. Aquatic Ecosystems Projects

Reclamation is making an additional \$65 million available for projects to restore and protect aquatic ecosystems through a second application period open until January 24, 2024. Funding from this opportunity is part of a total \$95 million to support the study, design and construction of ecosystem restoration projects that restore cleaner, colder and more available water to ecosystems with benefits for fisheries, wildlife and aquatic habitat and improved fish passage. Study and design projects are eligible for between \$500,000 and \$2 million, and construction projects can receive between \$3 million and \$20 million. A non-federal cost share of at least 35% is required. Applications submitted by the close of the first application period on June 1, 2023, are now under review.

e. Upcoming Listening Sessions

You can learn more about these funding opportunities at [Reclamation's WaterSMART webpage](#). Reclamation is also hosting a one-hour information update session on funding opportunities and implementation of the BIL and IRA on Thursday, September 7, 2 p.m. Eastern Daylight Saving Time. Join by phone: 1-202-640-1187 passcode, 906535652#, or via [Teams Link](#). A moderated question-and-answer format will be enabled. If you have a question, please submit it to USBR.BIL@usbr.gov. Meeting links for this upcoming session, as well as prior sessions back to December 2021, can also be found at www.usbr.gov/bil and www.usbr.gov/inflation-reduction-act. These sessions will be recorded and available at the same sites.

6. Bureau of Reclamation: 2021 Reinitiation of Consultation on the Long-Term Operation of the CVP and SWP

Reclamation will hold a quarterly public meeting on Sept. 12, 2023, between 1:00 p.m. and 3:00 pm to provide an update on the development of the Biological Assessment and Environmental Impact Statement for the 2021 Reinitiation of Consultation on the Long-Term Operation of the Central Valley Project (CVP) and State Water Project (SWP). The meeting is pursuant to the Water Infrastructure Improvements for the Nation Act. Development of the biological assessment is required by the federal Endangered Species Act as part of the Reinitiation of Consultation on the Long-Term Operation of the CVP and SWP. The assessment evaluates potential effects of operating the CVP and SWP on federally listed species and proposed species, as well as designated and proposed critical habitat.

The meeting will be held virtually on Microsoft Teams. For meeting materials, including the link to the meeting, please see www.usbr.gov/mp/bdo. Please contact Jo Anna Beck for further information (jbeck@usbr.gov).

7. FWS: Foothill Yellow-Legged Frog Received ESA Protection

FWS earlier this month announced that it will provide ESA protections to four of the six geographically and genetically distinct population segments (DPS) of the foothill yellow-legged frog. After reviewing the best scientific and commercial information available, FWS determined endangered status for the South Sierra DPS and South Coast DPS and threatened status for the North Feather DPS and Central Coast DPS of the foothill yellow-legged frog. FWS is including a 4(d) rule for the North Feather DPS and Central Coast DPS that exempts take incidental to habitat restoration projects and forest fuels management activities that reduce the risk of catastrophic wildfire. The Service will designate critical habitat for the frog at a later date. The Alliance last year joined dozens of California counties, California Farm Bureau (CFB) and water agencies to FWS on this matter. We supported the exclusion of the North Coast and North Sierra DPSs in the proposal, and also requested that FWS consider further expanding the proposed 4(d) Rule.

The 4(d) provisions in the final rule maintain the activities we expressed support for. However, the additional recommendations we recommended in our comments were not included. The rule does not include critical habitat designation at this time but they have a year to do and they essentially say its coming but need the economic assessment first. Unfortunately, with the next step of critical habitat designation ahead , I think this is something we'll all need to continue to monitor given the potential impacts to routine farming practices and water management.

DEVELOPMENTS IN CONGRESS

Congress returns this month from their August recess (Senate in session last week – House returns this week) to deal with several important issues, including keeping the government open after September 30. The FY 2024 appropriations process is far from complete, with vast differences

between House and Senate versions of their respective spending bills. The Senate is rushing a three-bill package of FY 2024 appropriations bills that could include Energy and Water Development (Corps/Reclamation/Energy)/Military Construction-VA, and Agriculture spending bills for a floor vote next week, but a final decision has not been made. This is the first such package of FY 2024 spending measures to begin to move in the upper chamber.

Congress is racing to pass all 12 spending bills before government funding runs out September 30, but we believe a temporary continuing resolution (CR) will be needed to prevent a government shutdown on October 1. House and Senate leaders have expressed support for a CR extending FY 2023 funding through the first part of December, but conservatives in the House GOP are demanding policy provisions be included in the CR that will not pass in the Senate, which could slow progress and even cause a government shutdown. Meanwhile the Biden Administration has requested an additional \$16 billion for the now-depleted Federal Emergency Management Agency (FEMA) disaster relief fund and \$24 billion in Ukraine aid in a supplemental funding request in addition to their FY 2024 budget request. This request has been embraced by several key Senators on both sides of the aisle but will face an uncertain future in the GOP-led House.

7. 2023 Farm Bill

Government spending isn't the only deadline awaiting Congress this month. Action to extend the current Farm Bill to avoid some programs reverting to Depression-era policies that are expensive and unworkable. In addition, action to authorize the FAA must also be taken, whether an extension or full-scale reauthorization, before the end of September to avoid potential disruptions to U.S. air travel. Once these deadlines are addressed, Congress will need to quickly begin to advance their full year FY 2024 appropriations bills, which the Appropriations Committees cleared before leaving Washington for the August recess.

As you know, the farm bill is an omnibus, multiyear law that is typically renewed about every five years. All signs point to a short-term extension for several Farm Bill-related provisions from the 2018 Farm Bill covering numerous food and nutrition policies and programs. Like government funding, the Farm Bill expires on September 30, 2023, creating a critical time crunch for lawmakers, who have yet to release draft text of the legislation. Given the delays from the debt ceiling and appropriations negotiations, lawmakers have yet to release the draft text of the Farm Bill legislation in both chambers. Leaders in the House and Senate, Rep. G.T. Thompson (R-Penn.) and Sen. Debbie Stabenow (D-Mich.) have mentioned their desire to share draft legislation soon. Key topics of debate between Democrats and Republicans include SNAP (food stamp assistance) and funding levels for climate change and rural energy programs.

a. WACC Farm Bill Briefing

The Family Farm Alliance has focused on the conservation title for the last three farm bills, working extensively through our involvement with the Western Agriculture and Conservation Coalition (WACC). Along with Trout Unlimited, we co-founded the WACC as the 2014 Farm

Bill was being negotiated. In its monthly ZOOM meeting held in August. WACC members compared notes on where the farm bill is, and what may end up being included in the legislation.

b. PL-566 update

As previously reported, we've been working with the office of Senator Michael Bennet (D-COLORADO) on legislation intended to streamline the NRCS Watershed and Flood Prevention Operations program (also known as "PL-566"). Last month, Senator Bennet, along with Senators Deb Fischer (R-NEBRASKA) and Jeff Merkley (D-OREGON) issued a press release announcing the introduction of [S.2636, the Healthy Watersheds and Healthy Communities Act](#). We were quoted in Senator Bennet's press release, and our support for the bill was noted in *Greenwire*.

8. Reintroduction of Barrasso/Manchin Forestry Bill

Senator Barrasso (R-WYOMING) will re-introduce forest management legislation – the Promoting Effective Forest Management Act- that he co-authored with Senator Manchin (D-WV) in the last Congress. The Barrasso shop wants to include a support quote from Alliance President Pat O'Toole in their press release, as well. The bill is virtually identical to the version introduced in the last Congress, which Pat testified in support of before the Senate Energy and Natural Resources Committee.

9. California Agricultural Relief Act

California Members of Congress have introduced the [California Agricultural Relief Act](#) to create permanent disaster relief for U.S. farmers who lose crop revenue due to unprecedented climate events, including severe drought, massive wildfires and flooding. The Agricultural Emergency Relief Act was recently announced by U.S. Sens. Alex Padilla and Dianne Feinstein and Democratic Rep. Mike Thompson of Napa and Republican Rep. Doug LaMalfa of Richvale. The Act would fortify emergency relief programs and enable Congress to appropriate supplemental disaster funds.

10. Water Infrastructure Finance and Innovation Act Amendments

We have been contacted by the offices of Rep. Garamendi (D-CALIFORNIA) and Schrier (D-WASHINGTON), who are working to reintroduce their bipartisan Water Infrastructure Finance and Innovation Act (WIFIA) Amendments, which is similar to legislation we supported in the last Congress (Rep. Costa's "Restoring WIFIA Eligibility Act"). As you may recall, this bill incorporates several key provisions for Western water projects including guaranteeing eligibility for transferred works and State-led storage projects under the 2016 WIIN Act. Rep. Schrier has made some minor changes to the bill for this Congress to incorporate feedback from EPA.

We have been asked to support the new bill, which will be introduced as soon as they land a GOP original cosponsor. Once reintroduced early this fall, the bill sponsors are hoping to get a markup

in the House Transportation and Infrastructure Committee, and then make a play for the 2024 Water Resources Development Act, or any forthcoming Western water package. We supported this legislation in the prior Congress because it allows for federal transferred work operators to use WIFIA. However, with the aging infrastructure account out there now, the interest in WIFIA has subsided a bit. We're currently reviewing the bill to see exactly what EPA was wanting to include.

IN THE COURTS

11. Yurok Tribe v. Klamath Water Users Association

On our August ZOOM call, the board authorized the Alliance to join an amicus brief in *Yurok Tribe, et al. v. Klamath Water User Association, et al.*, Case No. 23-15499 in support of the Klamath Water Users Association. The case is currently on appeal to the 9th Circuit Court of Appeals. The Board's authorization would be contingent on (1) us having an opportunity to participate in drafting and review of such a brief, and (2) our participation would be at no cost to the Alliance. This case is the latest in a continuing effort by the Klamath farmers to have their water rights recognized in the continuing tension over Reclamation's release of water for ESA compliance for its operations of the Klamath Project. Multiple parties are preparing amicus briefs and we will have an opportunity to join. The KWUA's opening brief is due September 14, 2023, so amicus briefs will be due September 21, 2023.

ALLIANCE INITIATIVES

12. Washington State Tour

Alliance directors Charlie Lyall and Mark Hansen are organizing a tour of the Columbia and Yakima Basins and a fundraising dinner that will take place this week in Washington State. They have planned a community dinner for the evening of September 13, intended to increase awareness of the Alliance in Central Washington, and to generate new membership. President O'Toole, Mark Limbaugh and I will all speak at the dinner and participate in the tour, which will feature visits to local potato processors, irrigation districts, dairies, orchards, fruit packing plants and hops processing facilities. Meetings will be scheduled with Yakima Basin Plan leaders, hay exporters, and forest managers.

13. 2023 Farmer Lobbyist Trip

As previously reported, we plan to schedule the 2023 Alliance farmer lobbyist trip for **the week of September 25**. That means September 25 (Monday) will be a travel day, we'll have two solid days of meetings on Tuesday and Wednesday, some more meetings on Thursday morning, with Thursday p.m. and Friday a.m. set aside as times to travel back West. So far, we have nearly 30 farmer lobbyists (including William Bourdeau and Scott Peterson) from seven states heading back to D.C. for the week. We have 27 meetings planned with Congressional and agency offices.

WESTERN WATER “HOT SPOTS”

14. El Nino Winter?

A strong El Nino has a two out of three chance of forming by this winter, the National Weather Service said Aug. 10, creating conditions that could lead to a smaller snowpack in the Northwest. The southern third to half of the United States is likely to be wetter this winter. (Exactly where that dividing line falls varies from year to year.) Sea-surface temperature in July went from warm enough to trigger a "weak" El Nino to warm enough to ignite a "moderate" El Nino. El Ninos typically get stronger in the fall and peak in the winter.

In the Southwest, monsoon precipitation has been well below normal across much of the region with areas of southern Arizona and New Mexico reporting rainfall deficits ranging from 3 to 6 inches since the beginning of July (U.S. Drought Monitor). In the Pacific Northwest, areas of drought expanded in Oregon, Washington, and Montana in response to a combination of above-normal temperatures over the past 90-day period, precipitation shortfalls, and poor surface water conditions. An area of Extreme Drought exists in the North Cascades where precipitation has been below normal both in the short and long term. More than half of Oregon is experiencing moderate to severe drought, according to a state report released last month. About 52% of the state was in drought that month, up from 49% in June. The report shows a stark turn from this year's spring, when snowmelt and heavier-than-usual rain helped alleviate drought in much of the state, particularly western Oregon. Gov. Tina Kotek has declared drought emergencies for nine Oregon counties so far this year.

ADMINISTRATIVE & MISCELLANEOUS

- New Mexico Governor Michelle Lujan Grisham has named Tanya Trujillo, former Assistant Secretary of the U.S. Department of the Interior for Water and Science, as a Policy Advisor and Deputy State Engineer, a newly created position. We look forward to continuing to work with Tanya in her new position.
- Over the last century, temperatures across much of the United States have risen by two degrees Fahrenheit — in Alaska they're up three — yet the Midwest has managed to skate by with just a 1.5-degree increase. Some Midwestern counties haven't experienced any temperature rise at all. Research has shown that large-scale irrigation has been mitigating the effects of climate change in many parts of the United States. The National Center for Atmospheric Research's Climate and Global Dynamics Laboratory has published multiple studies on the topic.