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## MEMORANDUM

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**TO:** SAN LUIS & DELTA MENDOTAT WATER BOARD OF DIRECTORS  
**FROM:** DAN KEPPEN, EXECUTIVE DIRECTOR  
**SUBJECT:** EXECUTIVE DIRECTOR'S REPORT  
**DATE:** SEPTEMBER 13, 2021

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This memo is intended to keep you apprised as to what is happening behind the scenes on policy issues the Family Farm Alliance is engaged in. In the past month, much of our efforts have focused on engaging in Biden Administration rulemaking efforts, tracking and influencing water legislative developments in Congress, working on drought messaging and public outreach, and influencing Western water infrastructure provisions in Congress. These issues and other matters important to our members are further discussed in this memo.

### **BIDEN ADMINISTRATION DEVELOPMENTS**

#### **1. Appointments**

President Biden plans to appoint Ms. Maria-Elena Giner as the U.S. Commissioner to the agency that oversees international boundary and water treaties. Ms. Giner, an engineer with decades of experience in U.S.-Mexico water policy, would serve a body that's composed of two independent branches, one in the U.S. and one in Mexico. Each of the sections is overseen by a presidentially appointed commissioner who is also an engineer. The IBWC, based in El Paso, Texas, operates under the guidance of the U.S. Department of State, and provides binational solutions when issues arise around rivers, sanitation, water quality and flood control in the border region. In other appointment news, the Senate Energy and Natural Resources (ENR) Committee has not yet scheduled a hearing for Camille Touton's nomination to be Commissioner of the Bureau of Reclamation (Reclamation). That likely will occur sometime later this month.

#### **2. White House Council on Environmental Quality (CEQ): NEPA Regulations**

The Biden Administration has laid out a three-step plan to overhaul the Trump National

Environmental Policy Act (NEPA) regulations, with CEQ advancing the first step recently when it sent to the White House Office of Information and Regulatory Affairs (OIRA) a proposal that would make a “narrow set of changes” to the Trump rules. In a second step, CEQ has extended a deadline by two years to 2023 for agencies to comply with procedural requirements mandated by the Trump regulations. The third step would be to replace the regulations altogether. CEQ is charged with coordinating the NEPA process across dozens federal agencies. The NEPA regulations help guide agencies on environmental review for some of the nation’s biggest projects, like highways, bridges, water infrastructure, and electric transmission lines. Environmental groups are complaining the Trump regulations are still being implemented by the Biden Administration and should have been withdrawn first.

The often slow and cumbersome federal regulatory process is a major obstacle to realization of projects and actions that could enhance Western water supplies. NEPA implementation, in particular, can have a direct bearing on the success or failure of critical water supply enhancement projects. The Trump Administration adopted changes that reduced review times, cut page counts, limited public input, cut out “cumulative impacts” analyses, and expanded projects that could be excluded entirely from NEPA review. The Alliance in March 2020 prepared a detailed comment letter on those proposed regulations, and believed they would help modernize the Federal environmental review process, which would lead to improvements in Western water resource development and management. We very much appreciated the Trump CEQ’s effort to reform the regulations, which had not seen a significant update since 1978. In our view, many of the changes the Trump Administration made regarding implementation of decades-old federal environmental laws like NEPA helped bring them into the modern era.

### **3. Environmental Protection Agency (EPA) / Corps of Engineers: WOTUS Rulemaking**

#### **a. EPA and Corps Pull Trump-era Clean Water Act (CWA) Rule**

EPA and the Corps of Engineers last week halted the Trump-era CWA rule after a federal judge in Arizona ruled that the regulation was too harmful to remain in place. EPA [announced](#) the decision on its website, pointing to an order from the U.S. District Court for the District of Arizona last week that brought a swift end to the Navigable Waters Protection Rule (NWPR), which took effect last year. Judge Rosemary Márquez said in that case that the Trump rule, which replaced the Obama administration's 2015 Clean Water Rule, was too flawed to keep in place.

EPA and the Corps of Engineers said they will revert to pre-2015 regulations, including implementing a 1986 rule as interpreted by the George W. Bush administration to determine what qualifies for federal protection as “waters of the United States” (WOTUS) under the CWA. The agencies said they will continue to review the order and consider next steps, including “working expeditiously to move forward with the rulemakings” announced on June 9 “in order to better protect our nation’s vital water resources that support public health, environmental protection, agricultural activity, and economic growth.” EPA and the Army Corps in recent weeks have

conducted several webinars / “listening sessions” to inform their efforts to revise the Trump Administration’s definition of WOTUS to “better ensure clean and safe water for all”.

b. Alliance Actions

The Alliance has made engagement on WOTUS – which now spans three presidential administrations- a top priority. During the Trump Administration era, working with a team of Western attorneys and water managers, the Alliance developed detailed comment letters to EPA and the Corps, urging them to repeal the 2015 rule, and providing guidance as to how the new rule should look. We thought the Trump rule repeal and replacement was actually a good thing for the West, despite what many media outlets reported. On September 3, we transmitted a formal letter to EPA and the Corps that reiterates this message, and outlines the concerns we will address in the upcoming rulemaking process.

The Alliance letter advocates for guidance that sustains, recognizes, and implements the CWA provisions in Sec. 404(f) that exempt the construction, operation, maintenance, repair, and rehabilitation of man-made ditches and canals and maintenance of drains from CWA Section 404 jurisdiction. Earlier this week, Alliance representatives met with Radhika Fox, the head of EPA’s Office of Water, to directly appeal to her and her staff on this matter. Our WOTUS letter also insists that the new rule ensures that Congressionally-approved permitting exemptions for point source regulation of agricultural stormwater discharges and irrigation return flows are acknowledged and protected. We will continue to advocate for clearly written exclusions of dry washes, arroyos, and other ephemeral features, as well as the other ten non-jurisdictional features that the NWPR excluded from the definition of WOTUS.

4. EPA

a. Clean Water Act Section 401 Certification

In other Clean Water Act news, EPA and the Corps last month issued a memo that lays out circumstances under which states or tribes can take more than a year to approve permit applications under the CWA Sec. 401 certification process, circumventing the Trump Administration’s 2020 “Clean Water Act Section 401 Certification Rule” that allows only one year for states or tribes to approve or deny CWA permits for utilities and oil and gas pipelines. The EPA earlier this year announced it was redoing the Trump rule, criticizing the regulation for eroding state and tribal authority. The EPA itself has been criticized by the environmental community and certain states and tribes for not removing the rule, or for that matter repealing the Trump NWPR. However, EPA cannot simply take rules like WOTUS or the CWA Section 401 rule off the books. The agencies must go through a formal rulemaking process, including taking public comment.

## DEVELOPMENTS IN CONGRESS

### 5. Senate Passes Bipartisan Infrastructure Bill

As previously reported, the Senate last month passed the 2,702-page, five-year *Infrastructure Investment and Jobs Act*, which includes a full surface transportation reauthorization bill, in addition to funding for the electric grid, broadband, water infrastructure, resiliency and western water storage, environmental remediation, and more. The long-awaited vote took place after months of bipartisan negotiations, headlined by talks led by a group of 10 senators spearheaded by Sens. Rob Portman (R-Ohio) and Kyrsten Sinema (D-ARIZONA). The legislation totals around \$1.2 trillion, with roughly \$550 billion constituting new federal spending and the rest coming from existing, planned investments in roads, highways and bridges. Western Senators introduced dozens of amendments and pushed for votes on a number of them. Despite western amendments not faring well on the floor, members were able to secure many provision in the bill including on western water projects, forest management, and more.

#### a. Western Water Infrastructure Provisions

The Western Water Title in the infrastructure bill passed by the Senate includes \$8.3 billion for Reclamation, including \$3.2 billion for aging infrastructure, \$1.15 billion for new storage and conveyance, \$100 million for small scale storage projects, \$250 million for ecosystem restoration, \$100 million for multi-benefit watershed projects and \$400 million for WaterSMART, including \$100 million for natural infrastructure projects. Importantly, the *Infrastructure Investment and Jobs Act* aligns with the solutions advanced by a Western water coalition that collectively represents thousands of Western farmers, ranchers, water providers, businesses and communities who help provide \$120 billion of agricultural production on millions of acres of productive land. The coalition is led by a steering committee comprised of the Alliance, Association of California Water Agencies (ACWA), California Farm Bureau, National Water Resources Association (NWRA) and Western Growers.

#### b. Water Trade Groups Pan 'Made in America' Provision

A coalition of water infrastructure trade groups are urging congressional leaders to abandon the “Buy American” mandates in the Senate bipartisan infrastructure package that would apply to a range of structures and facilities like public roads, water infrastructure, ports, and broadband. Currently, certain specialty parts, like butterfly valves for water systems, are built overseas. The trade associations charge that the new requirements could harm efforts to protect water supplies and fight climate change. The groups are specifically worried about the Senate bill's provisions that would expand “Buy American” requirements for two EPA programs – the state revolving funds and the Water Infrastructure Finance and Innovation Act (WIFIA). Under the legislation, water projects funded under these EPA water financing programs would be required to have all “manufactured products” made in America. Current rules only require the project’s iron and steel

products to be made in the United States. The trade groups' concerns are that industry in the U.S. doesn't have the capacity to take up manufacturing of these critical components on a timeline that would allow for construction on many vital water projects to begin anytime soon, potentially creating long delays in project delivery.

## **6. Senate Passes \$3.5 T Budget Resolution**

With passage of the bipartisan infrastructure package behind them, the Senate quickly proceeded to pass a \$3.5 trillion budget resolution on a party line vote, sending instructions to Senate committees to hammer out details of a budget reconciliation package by mid-September that would direct spending to various programs over ten years. The \$3.5 trillion package would include funding for President Biden's *Build Back Better* plan to provide for expanded climate and environmental programs, expanded child tax credits, community college, universal pre-kindergarten and an expansion of Medicare to include dental and vision coverage. The package would also raise taxes on corporations and wealthy Americans to help pay for a portion of the increased spending. Several concerns are being raised regarding a "transfer tax." Former Chairman of the House Agriculture Committee Collin Peterson points out that there is a provision in the plan that would enact a transfer tax when an asset changes hands.

Western members offered some amendments on the floor. Senator Barrasso (R-WYOMING) started it off with an amendment to prohibit the enactment of the Green New Deal which remarkably passed unanimously. Senator Thune (R-SOUTH DAKOTA) went down to protect farmers and ranchers with an amendment to preserve and extend tax relief for small agriculture businesses, which also passed unanimously. Senator Ernst (R-IOWA) got her anti-"Cow Tax" amendment included with a great bipartisan vote. It is unlikely that the final partisan bill will include these sensible provisions.

## **7. House Adopts Senate Resolution, Commits to Consider Senate Bipartisan Package**

The House on August 23 returned to Capitol Hill from their August recess and passed, by a party-line vote, a resolution which includes the adoption of the Senate-passed FY 2022 budget resolution, and commitment to consider the \$1.2 trillion Senate-passed *Infrastructure Investment and Jobs Act* no later than September 27. Adoption of the FY22 budget resolution by both the House and Senate officially kickstarts the budget reconciliation process. This will allow congressional Democrats to pass an expansive \$3.5 trillion social spending and tax package to "enact the Build Back Better agenda," including large swaths of President Joe Biden's proposed American Jobs and Families Plans unveiled earlier this year.

The FY22 budget resolution directs 13 House committees to write and markup their parts of the reconciliation package by Wednesday, September 15. The multiple bills marked up and passed by the committees will then be bundled together by the House Budget Committee as a single, mammoth bill prior to a vote by the House, which is likely to occur during the week of September 20. This would then be followed by a vote in the Senate, where only a simple majority will be

required for passage. While 12 Senate committees are also tasked by the FY22 budget resolution with writing their parts of the reconciliation package by September 15, Senate Democrats are already working with their House Democratic counterparts behind-the-scenes to come to agreement on various policy and spending items, allowing only the House committees to formally markup parts of the package. Importantly, the House must now consider the \$1.2 trillion Senate-passed *Infrastructure Investment and Jobs Act* no later than September 27.

House Speaker Nancy Pelosi (D-CALIFORNIA) reached a deal that included this commitment with 10 moderate House Democrats, led by Rep. Josh Gottheimer (D-NJ), who had initially threatened not to vote in favor of the FY22 budget resolution until the House voted on the Senate-passed infrastructure bill first. Two of those Democrats want Speaker Pelosi to make further assurances regarding Democrats' massive social spending bill, saying they are necessary "to obtain our support." Reps. Stephanie Murphy (D-Fla.) and Henry Cuellar (D-Texas) lay out "overarching principles" that the reconciliation bill and its drafting process must meet in order for them to support the legislation.

Speaker Pelosi has pledged for months that the House would wait to vote on the bipartisan Senate-passed infrastructure bill until the \$3.5 trillion reconciliation package was also passed by the Senate because of previous threats from progressives that they would oppose the infrastructure bill until their priorities were addressed in the reconciliation package. Progressives warned in a statement that they would vote against the infrastructure bill if the reconciliation bill does not pass first. Republicans slammed Democrats for not addressing the crisis in Afghanistan and for pushing the budget resolution, which they say will hurt businesses and expand the deficit.

## **8. Next Steps**

Key moderate Sen. Joe Manchin (D-WV) earlier this month told Democrats that they should "hit the pause button" on a \$3.5 trillion budget reconciliation package funding and implementing most of President Biden's social and economic agenda, raising the bar for the tax-and-spending plan currently under development to make it through the evenly divided Senate in the coming weeks. Senator Manchin cited "runaway inflation" along with national security uncertainties after the troubled U.S. withdrawal from Afghanistan as major reasons for a go-slow approach in adopting the plan through the budget reconciliation process, which only requires a majority Senate vote to pass and bypasses the normally 60-vote threshold to break a filibuster. Losing support from the West Virginia Democrat would make passing the reconciliation bill impossible in the evenly divided Senate, as no Republicans will likely support the measure and the bill would at least need a tie vote (50-50) for Vice President Harris to cast the deciding tie-breaking vote.

Sen. Manchin's comments come as Democratic leaders and committee chairs in the Senate and House are busily working out the specifics of the reconciliation package by September 15, with a goal of moving it through Congress prior to the end of month. The \$3.5 trillion package also faces an uphill battle in the House, where a deal was cut with 9 moderate Dems for the House to vote on the Senate-passed bipartisan infrastructure bill by September 27. That deadline could create a

potential obstacle to the passage of either bill this month if budget reconciliation stalls and House progressives vote against the infrastructure bill. House Democrats' slim majority can only afford to lose three votes against a united Republican bloc to pass either measure.

All panels have been given a Sept. 15 deadline to report their portions to the House Budget Committee. The House Natural Resources Committee started marking up its piece of the reconciliation bill, which will spend \$25.6 billion, last week. This allocation was negotiated by the White House, Senator Schumer, and Speaker Pelosi, but largely omitted funding for the Department of the Interior (DOI) programs. Of interest to Western water users, the Committee's reconciliation package will include:

- \$650 million through Reclamation for emergency drought relief and \$250 million for aquatic ecosystem restoration;
- \$9.5 billion through National Marine Fisheries Service for shovel ready restoration projects;
- \$150 million through Fish and Wildlife Service (FWS) for recovery plans and \$50 million for habitat conservation plans; and
- \$3.620 billion for the civilian climate corps (\$3 billion through Interior).

These funds will be available over the next ten years, without the need for additional action by the committees on appropriations. This is mandatory spending. Committee Ranking Member Bruce Westerman (R-Ark.) in a public statement said the Committee Democrats' plans for budget reconciliation are “at best a package of unprecedented, partisan government overreach”, and at worst, “a means to hamstringing the economy, cripple domestic energy production, and make the U.S. dependent on foreign adversaries.” Republicans claim that Committee Democrats refused to accept [Republican amendments](#). The committee's markup continues today (September 9).

In order for the House to realistically pass the Senate-passed *Infrastructure Investment and Jobs Act* by September 27, both the House and Senate will need to have made significant progress on the budget reconciliation package prior to that date. There is some skepticism at this point that those dates will be fully met.

## **9. Family Farm Alliance Actions**

All of this drama casts doubt on the eventual attainment of our priorities. We do not yet know what will be in the reconciliation package, but we are working to determine what that will be in terms of Western water. We understand that many of you are interested in other provisions that might be addressed in the reconciliation package. Regardless of what is in reconciliation, we do NOT want the drama around this process to impact the bipartisan package that we worked so hard for. We don't want Democratic leveraging and fighting to jeopardize the package and we don't want Republican opposition to reconciliation to spill over and hurt well-crafted, meaningful bipartisan infrastructure legislation the Senate passed that includes our water provisions.

Our Western Water Infrastructure Steering Committee is now working with the Senate and House agriculture committees to use the reconciliation process to fill in the gaps behind our \$30 billion forest health and \$4 billion PL-566 asks. We've been working with a small group of national conservation groups, striving to reach agreement on a subset of these two broader issues. We've also updated our broader coalition and encouraged them to contact their House Members to express support for the water provisions of the Senate bipartisan infrastructure bill. Our steering committee has also had numerous calls with key Western House Member staffers. Efforts are also underway to encourage a Western bipartisan letter in the House, urging Members to hold the line on the water infrastructure provisions included in the Senate package.

Media attention on this matter continues to grow. New coverage in outlets like the Associated Press, *USA Today*, Fox News, ABC News, *POLITICO* and *Agri-Pulse* reported on the Western ag/urban coalition's efforts, and Western water and ag interests have been steadily feeding the op/ed pages of Western newspapers with guest columns. California Ag Today also recently ran three segments on our coalition's efforts on the infrastructure front. For some reason, I could only locate the last two of the three, [here](#). They are each about 90 seconds in length.

#### **10. DRAFT Watershed Protection and Flood Prevention Act**

Last month, we were asked by Senator Bennet's office to review the draft "Watershed Protection and Flood Prevention Act" bill that his staff has been working on. The original Watershed Protection and Flood Prevention Act (PL-566) authorizes the USDA Natural Resources Conservation Service to help local organizations and units of government plan and implement watershed projects. Projects can include flood prevention and damage reduction, development of rural water supply sources, erosion and sediment control, fish and wildlife habitat enhancement, wetland creation and restoration, and increased recreational opportunities. Generally, it appears that the goal of this draft legislation is to elevate drought and Western water needs in the PL-566 program while supporting good projects that benefit fish and wildlife habitat.

We shared the draft legislation with our board and Advisory Committee and prepared a response for Senator Bennet. Most of our members feel that the current program works well, and they believe we should try to stick with the original intent of the program, wherever possible. PL-566 is a flexible program that is oversubscribed and underfunded. However, it's a complicated program to administer, and it already takes too long to get decent projects completed. We do not need to complicate it further. If anything, we need this program to move faster. That is the message we conveyed in our response to Senator Bennet, while identifying specific concerns with the draft legislation, which related to emphasis on "natural infrastructure", new complicating evaluation criteria, and water rights implications. We'll keep you apprised on how this draft bill evolves.

### **THE 2021 WESTERN DROUGHT**

Historic drought conditions continue to rapidly worsen and expand with over 80% of the West now in drought. Widespread impacts are being felt, particularly by Western farmers and ranchers.



Mother Nature was somewhat cooperative in the past month, bringing cooler temperatures and additional precipitation to certain parts of the parched West. However, legal and policy directives in California and the Colorado River Basin could lead to reduced water supplies – both in the short-term, and in future years – for some farmers and ranchers.

## **11. Drought Hydrology**

Drought continues to plague much of the West, according to the U.S. Drought Monitor. However, due to recent monsoonal rainfall, drought conditions improved in New Mexico, southern Utah, adjacent parts of southern Nevada and southeast California. August storms help push Tucson (ARIZONA) toward a record-breaking monsoon rainfall of 12.08 inches. Parts of the Midwest, High Plains, and West regions received beneficial rainfall near the end of August, which led to improvement in drought conditions in some locales. Rain fell over wide areas of Nebraska, South Dakota, North Dakota, Wyoming, and western Colorado, leading to some improvements in drought conditions.

Unfortunately, southwest Nebraska missed out on the rain, and agricultural drought impacts and precipitation deficits continue to mount. Ongoing drought has also impacted the bee population in North Dakota. One third of U.S. cattle are in drought areas, according to the U.S. Drought Monitor, and producers are making the painful decision to send animals to slaughter early. Liquidations of breeding stock are expected to limit cattle production in the coming years, tightening North America's beef supply and driving up consumer prices, according to two dozen ranchers and cattle experts. And, the drought is leading to policy decisions in California and the Colorado River Basin that could have both short-term and delayed impacts to many Western water users.

As the historic Colorado River drought continues, low runoff conditions in the Colorado River Basin have prompted Reclamation to reduce downstream releases from Glen Canyon Dam and Hoover Dam in 2022 due to declining reservoir levels. In the Lower Basin the reductions represent the first-ever “shortage” declaration—demonstrating the severity of the drought and low reservoir conditions. The declaration means that in January 2022 the agency will reduce water deliveries to the Lower Colorado River Basin states of Arizona and Nevada and to Mexico.

## **12. California cracks down on diversions**

As you know, California regulators are cracking down on water use, ordering 4,500 farmers, water districts and other landowners, including the city of San Francisco, to stop drawing water in the basins — or face penalties of up to \$10,000 a day. Some irrigation districts don't expect an impact this year from the emergency drought regulation that could stop other farmers from diverting water from the state's major rivers. However, they are concerned about precedent and how this year's actions could impact farmers in 2022.

### **13. USGS Study Shows Drought Impacting California Water Quality**

While previous studies have focused on the risk of wells being overdrawn and run dry during drought, a recent study from the United States Geological Survey and the California State Water Resources Control Board is the first to directly link drought to deteriorating water quality on a regional scale. The study looked at 30 years of data from the Central Valley. Based on their analysis, researchers found higher levels of nitrate at public drinking water wells in the Central Valley in areas where groundwater levels dropped rapidly during drought. The results highlight clean drinking water supply vulnerabilities in California and other Western states currently experiencing record drought conditions.

### **14. Alliance Drought Messaging Actions**

The media coverage of the Western drought has been extensive, and for the most part, accurate. I've previously reported on our interactions with the media this summer on drought matters. Some of our Arizona members, including Paul Orme (Alliance board member) and I recently did lengthy interviews with Joanna Allhands, the digital opinions editor for *AZCentral*, which is part of the USA Today network, as she worked on this opinion piece which was published last month [HERE](#).

### **15. Western Wildfires**

As wildfires in Northern California and Oregon have literally destroyed communities and displaced tens of thousands of residents, another debate is raging in the West over the causes of those fires and what can be done to reduce future wildfire risk and protect at-risk communities. More than 75 million acres across America have burned in the last decade. Over 3 million acres have already burned this year. Much of the recent media coverage on the fires raging in Northern California has featured commentary from politicians, environmental activists and academics who point to climate change as the driving factor behind a dozen wildfires that have forced more than 42,000 Californians to flee their homes. Many of the fire scientists quoted in recent media reports say that the solution involves implementing more controlled burns.

Climate change concerns may certainly be shared by some rural Westerners who live in once-thriving timber dependent communities. However, there is also a growing frustration that forest management – or rather, the perceived lack of management by federal agencies, driven in part by environmental litigation – fails to get the attention it deserves in many media accounts of the current Western wildfire infernos. Some rural Westerners who have watched the condition of federal forests deteriorate in recent decades have a different perspective. They have witnessed how federal forest management actions have been hampered in recent decades, in part due to environmental litigation actions initiated by activist groups like the Sierra Club. In fact, a Facebook public group called “The Sierra Club is destroying our forests” has now grown to include nearly 15,000 members. A dry ecosystem with low fuel loads can tolerate fire. However, inactive management on federal lands - coupled with 100 years of fire suppression - is a different story.

The only two registered foresters in Congress have come together to propose science-based solutions to prevent these catastrophic fires from happening in the first place. Senator Jim Risch (R-IDAHO) and Congressman Bruce Westerman (R-Ark.) recently co-authored an opinion piece for *Fox News* that claims more than 80 million acres of national forests are overgrown and in dire need of active management. There are several bills that have been introduced in Congress, intended to facilitate responsible forest management by simplifying and expediting environmental analyses, cutting bureaucratic red tape and frivolous litigation, giving land managers essential management resources, and accelerating reviews for reforestation activities. One of those is the *Resilient Federal Forests Act* (H.R. 4641), re-introduced from the past Congress by Rep. Westerman. This bill – supported by 85 organizations, including the Family Farm Alliance - would address the environmental and economic threats of catastrophic wildfires.

Why is the Alliance engaging in forest management issues? We do so because improving the condition of our nation's forested lands is of primary importance to water providers. National Forest lands are overwhelmingly the largest, single source of water in the U.S. and, in most regions of the West, contribute nearly all of the water that supplies our farms and cities. In addition, our already fragile water infrastructure can be severely damaged or rendered useless by fire and post-fire flooding and debris flows. The unhealthy state of our national forests, which were initially reserved specifically to protect water resources, has led to catastrophic wildfires that threaten the reliability, volume, and quality of water for tens of millions of Americans, along with the wildlife, recreational, and multi-purpose values of these lands.

The Family Farm Alliance believes a responsible level of continuous fuels reduction includes a combination of robust mechanical thinning and prescribed fire. This can be employed to significantly reduce evapotranspiration, tree stress, disease, and pest infestation, preserve health forest conditions, and protect species and habitats. Failure to employ this approach will continue the downward, accelerating spiral of fuel accumulation, drought, disease, and invasive insects. This will lead, inevitably, to additional high-intensity fire events in the future.

## **ADMINISTRATIVE AND MISCELLANEOUS**

- I'll be speaking in Pismo Beach this week at the California Agricultural Irrigation Association summer meeting.

*This is a quick summary of just a few of the issues the Alliance has been engaged in. Please do not hesitate to contact me at [dan@familyfarmalliance.org](mailto:dan@familyfarmalliance.org) if you would like further information about what the Alliance is doing to protect water for Western irrigated agriculture.*