

Monthly Briefing

A Summary of the Alliance's Recent and Upcoming Activities and Important Water News

Alliance Calls for Withdrawal Of Delta Smelt Opinion

Declaring that fifteen years of failure is enough, the Family Farm Alliance (Alliance) has filed suit to force the withdrawal of the federal government's latest order cutting back California's water supplies on behalf of the delta smelt. The order issued by the U.S. Fish and Wildlife (USFWS) does not meet the Endangered Species Act's standards for quality of data and scientific integrity according to the suit filed on July 10 with the U.S. District Court for the Eastern District of California.

The suit was filed in federal court under the Administrative Procedures Act. In the suit, the Alliance argues that the Service has not complied with the Information Quality Act (IQA) or with administrative IQA guidelines mandating the use of best available science in federal decision making.

Last December, the Alliance identified several instances in the smelt biological opinion where the Service had failed to use the best

available data, and the Alliance filed a request under the IQA asking the Service to correct numerous scientific errors. The Service refused to make the requested corrections, and the Alliance has now asked the courts to order the Service to withdraw and redo the document.

"Fortunately the Endangered Species Act (ESA) sets strict standards to protect the public and the environment from biased and unscientific abuses of its provisions," said Dan Keppen, Alliance Executive Director. "We are taking this action to protect the integrity

of ESA and to ensure that those standards are applied to correct the federal government's unmitigated record of failure in the Delta."

For the past 15 years, federal regulators have ordered more and more stringent restrictions on the water supplies pumped through the Delta to serve California's farms and cities, on the presumption that the pumps were harming delta smelt. Those restrictions have cost California billions of dollars in economic

Cont'd on Page 2

STORIES INSIDE.....	Page #
Delta Smelt Litigation Q&A	3
Alliance to Weigh in on Climate Debate	5
Alliance Speaks at Farm Foundation Forum - National Press Club	7
Alliance Editorial on Clean Water Restoration Act	8
THANK YOU to Our New and Supporting Members	9



Part of the throng of nearly 10,000 farm workers and their supporters who showed up last April at San Luis Reservoir (CALIFORNIA) to protest the federal government's curtailment of water supplies for San Joaquin Valley farmers. The curtailment is caused, in part, by an order for delta smelt that the Family Farm Alliance is challenging in court as "biased and unscientific".

Alliance Calls on Gov't to Restore Scientific Integrity *Cont'd from Pg 1*

losses and tens of thousands of jobs. But instead of showing any benefit from these measures, the population of delta smelt has continued to decline.

The Alliance is not alone in questioning the integrity of USFWS's smelt order. The California Department of Water Resources has formally asked that it be withdrawn for reconsultation and revision. DWR says there is new information on better ways to protect the smelt that was not considered in the existing order.

And the federal court recently granted a temporary injunction against USFWS' order on a complaint that the order violated the National Environmental Policy Act because the federal government failed to prepare an environmental impact statement. Instead the order was drafted in secret and put into effect without any public hearings or review.

At a recent town hall meeting in Fresno, where area congressmen, business leaders, landowners and farm workers criticized the order's scientific inadequacy, U.S. Secretary of the Interior Ken Salazar declined to defend USFWS' action, pointing out that these cutbacks in water supplies had been the work of the previous administration.

"President Obama and the leadership in Congress have declared their commitment to upholding the standards and bringing the best science to bear on governmental decision making," said Keppen. "We applaud their commitment and call on them to live up to that promise by withdrawing this flawed and fallacious order now, before it does any more harm."

Numerous scientific studies have identified multiple causes for the delta smelt's decline, including ammonia discharges from Sacramento and other industrial pollution, temperature changes, and invasive non-native species that are devouring the smelt's food as well as the smelt themselves.

"USFWS has refused to analyze these other factors and

their importance, sticking instead to their assumption that pumping must be the problem," Keppen said. "But if anything, their failure to produce any benefits for the smelt over the last fifteen years should demonstrate that the pumps are not the problem."

According to analyses prepared by the University of California, federal restrictions on pumping water through the Delta, combined with the ongoing effects of drought, cost California's Central Valley economy more than \$300 million in 2008 and nearly \$1 billion this year. The economic impacts statewide are much greater.

"These are critical issues for the members of our alliance," Keppen pointed out. "More than 300,000 acres of productive farmlands have been fallowed because of these

cutbacks. Rationing is being imposed in many California cities. Our membership includes farmers but we also represent irrigation districts, commodity associations, private water companies, and suppliers of a wide range of farm-related services and equipment. We are all being hurt by these federal cutbacks in water deliveries."

The Alliance brought its concerns with the adequacy of the data used for this order to the attention of USFWS as soon as the order was released in December, 2008. But USFWS has so far refused to address these problems or correct the order. The Alliance has now exhausted all of the opportunities for administrative relief.

"This is the first time that the Alliance has engaged in litigation, and it's not a step we take

lightly," said Alliance President Patrick O'Toole. "But in this case, we had no other choice. "Preserving the scientific basis for these decisions and ensuring the fairness and transparency of all the proceedings under ESA is a vitally important issue for all of our members throughout the western states."

SOMETHING ABOUT THIS BO STINKS.....

Among the many defects in USFWS's December order, the Alliance pointed out that:

- **Instead of conducting the independent peer review that the law requires, USFWS brought in the authors of the papers on which the agency's order was based. In effect, they were being asked to review the adequacy of their own work. None would qualify under the standards set by ESA, the Information Quality Act or the federal Office of Management and Budget guidelines.**
- **Although ESA requires USFWS to use the best available scientific and commercial data, the agency instead based its findings in part on an analysis which had not been published or peer reviewed and, supposedly, data, which USFWS refused even to disclose. Moreover, it turns out the agency did not actually possess some of the data that it claimed it used to order the cutbacks in water supplies.**
- **Rather than relying on scientific evidence to form its conclusions as the law requires, USFWS only cited the bits and pieces of information that supported its own assumptions and ignored the rest.**

The Alliance's Delta Smelt Litigation

Answers to Frequently Asked Questions

What action has the Family Farm Alliance taken?

We have filed a lawsuit asking the U.S. District Court for the Eastern District of California to take action on the biological opinion (BO) on smelt that the US Fish and Wildlife Service (USFWS) issued in December, 2008. We want the court to order USFWS to revise that document to comply with the standards for the use of data that the Endangered Species Act (ESA) and the Information Quality Act (IQA) have set to protect the public and the environment from arbitrary, biased and unscientific abuses of federal authority.

What is the problem?

In brief, USFWS failed to comply with the most fundamental requirements of IQA and ESA regarding the quality, objectivity, utility, and integrity of scientific decision-making by federal agencies. The BO on smelt was based upon assumptions, not data, the methods relied upon were not transparent, the analysis was not reproducible, and the peer review employed was not competent and credible due to its lack of independence and expertise.

What is the outcome you seek?

Federal law requires USFWS to base a biological opinion of this kind on the best available scientific and commercial data – not on supposition, speculation or assumptions about the outcome that the regulators want to impose. The existing biological opinion does not meet that standard. We want to ensure that ESA and IQA are enforced fairly for the protection of all.

Aren't you worried that once the regulators go back and review the data more carefully, they will still order the same cutbacks in California's water supply?

The cutbacks that USFWS has ordered are all based on the premise that pumping water through the Delta is the reason for the smelt's decline. But fifteen years of failure should be enough to demonstrate that the pumps are not the problem. For the past 15 years, federal regulators have ordered more and more stringent restrictions on the water supplies pumped through the Delta to serve California's farms and cities. Those restrictions have cost California billions of dollars in economic losses and tens of thousands of jobs.

"Preserving the scientific basis for these decisions and ensuring the fairness and transparency of all the proceedings under ESA is a vitally important issue for all of our members throughout the western states."

**Patrick O'Toole, President
Family Farm Alliance**

But instead of showing any benefit from these measures, the population of delta smelt has continued to decline. We are taking this action because the data does not support the findings of the current biological opinion.

Isn't this an attempt to undermine the effectiveness of ESA?

No, our intent is to ensure that ESA is enforced and to make certain

that USFWS complies with the high standards of scientific integrity that the act requires.

Why file your lawsuit now, when the federal court has already indicated that the smelt BO may be sent back for a complete environmental impact assessment?

We applaud the court's action. The complaint in that case was based on USFWS' violation of the requirements of the National Environmental Policy Act; our suit addresses the agency's violations of ESA and IQA. If USFWS is required to assess the impact of its biological opinion on other endangered species, communities and the environment, which is what the court indicated they should have done in the first place, that will help to mitigate the harm that the BO might do. But our suit challenges the premise on which the BO is based, not just its possible effects. Both suits, however, address fundamental flaws in what USFWS has done in violation of environmental statutes.

How does this lawsuit relate to the Department of Water Resources' request for reconsultation on the BO.

The Department of Water Resources (DWR) has formally requested that USFWS reopen the biological opinion and consider revising it in the process of reconsultation. This is necessary because DWR rightly says there is new information that USFWS did not consider that could lead to better protection for the smelt and less harm to California's water supplies. Reconsultation would not necessarily cover all of the same issues as the Alliance has raised in our lawsuit. But both efforts are aimed

Cont'd on Page 4

Delta Smelt Litigation Q&A Cont'd from Page 3

at compelling USFWS to do a better job of consulting all of the data on the smelt, impartially and completely.

Why has there been so much attention focused on the smelt BO?

Both California's Department of Water Resources and the federal court are already taking steps to correct some of the serious defects in the smelt BO. In addition, a wide range of public water agencies serving more than two-thirds of the state's residents have filed lawsuits of their own seeking corrections for the numerous problems they have identified in USFWS' work on the smelt. All of these actions are helping to shed a little sunlight into a process that ESA and IQA say should be transparent. This one opinion has cut California's water supplies by one third. It has cost the state's economy billions of dollars. Hundreds of thousands of acres of productive farmlands have been shut down and tens of thousands of people have lost their jobs. All because of an opinion that was adopted without any public review or a single public hearing.

How does this lawsuit relate to calls for the government to convene the God Squad?

Invocations of the so-called God Squad are aimed at suspending some aspects of the enforcement of ESA. On the contrary, the Alliance's lawsuit seeks to ensure compliance with ESA's high standards for scientific integrity.

You say USFWS didn't meet the federal requirements for information quality. Is there some source of additional information that USFWS should have used?

The issues raised in our suit involve both the sources of the information the USFWS relied on as well as the ways in which the data was used, selectively and with bias in order to validate the agency's predetermined assumptions.

The smelt BO violates the IQA because it is: (a) **Inaccurate** in that it fails to meet the data standards required by the ESA and IQA for decision-making and for highly influential scientific assessments; (b) **Biased** in that it assumes a cause, and performs a post hoc rationalization, ignoring data that demonstrate no important effects on delta smelt due to operation of the pumps; (c) **Incomplete** in that it fails to include mate-



Brenda Davis, whose law firm represents the Family Farm Alliance in the delta smelt litigation, talks about the Information Quality Act at the Alliance's March 2009 annual convention in Las Vegas (NEVADA)

rial data and analysis that rebuts the assumptions which support the biological opinion; (d) **Unclear** in that it fails to acknowledge that the data does not support an assumption that the decline in delta smelt is correlated to the operations of the water project pumps and fails to acknowledge that basic biology of the delta smelt is poorly understood; and (e) **Unclear and incomplete** in that it fails to acknowledge the required data standard of the ESA and instead relies on speculation, assumption, and surmise.

Since the Family Farm Alliance has never been involved in litigation before now, why did you resort to a lawsuit in this case?

The Alliance has an extensive history of involvement with ESA issues, including most recently the controversy over water use on the Klamath River. As soon as the smelt BO was issued in December, 2008, the Alliance brought its concerns with the adequacy of the data to the attention of USFWS. But USFWS has so far refused to address these problems or correct the order. The Alliance has now exhausted all of the opportunities for administrative relief.

Why would this issue in California be of concern to your members in Wyoming or some other state?

Water use is a critical issue throughout the western states. All of our members in farming are vulnerable to arbitrary or capricious actions by federal regulators. It is inherent in the basic nature of the Alliance that we work together to ensure that fairness and scientific integrity are observed in regulatory decisions that could wind up affecting us all.

If you would like to participate in this important endeavor, please contact Dan Keppen at 541-892-6244 or by email: dankeppen@charter.net.

Contributions can also be mailed directly to: Family Farm Alliance Legal Fund, 22895 S. Dickenson Avenue, Riverdale, CA 93656.

Alliance To Weigh in on Climate Change Debate

As the U.S. Senate prepares to craft its version of a comprehensive climate change bill, agricultural groups are gearing up to find ways to ensure that a cap-and-trade program does not impose enormous costs on family farmers and ranchers. The Family Farm Alliance has begun efforts to develop constructive measures which the organization will advocate for this fall as Congress attempts to pass sweeping climate change legislation.

“We have assessed Western climate change studies and we have developed common-sense recommendations that can help mitigate for climate change impacts to Western water resources,” said Patrick O’Toole, President of the Alliance. “The cap and trade bill recently passed by the House of Representatives could definitely be improved. We intend to provide guidance to Sen-

ate leaders towards that end.”

Debate to Resume After Recess

Senate leaders predict the floor debate will not occur until after the August recess on health care legislation. But that shift in schedule does not affect a September 28 deadline for Senate committees to complete various components of the climate bill. Senate Environment and Public Works (EPW) Chairwoman Barbara Boxer, who is heading up the effort, says the measure the House passed last month, H.R. 2454, will serve as the initial basis for a Senate bill.

Implications for Western Agriculture

The House-passed climate change legislation contains several ‘adaptation’

sections that Alliance representatives question.

“Our initial review of the bill suggests that the ‘adaptation’ sections put more emphasis on providing mitigation measures for fish and wildlife than for farmers,” said Alliance executive director Dan Keppen. “In fact, it appears that more attention is made in the adaptation section of the bill to help agriculture and farmers in third world countries than in our own country.”

Alliance Initiative

Rather than developing a long list of criticisms regarding the bill, the Alliance leadership is now in the process of developing a written document that provides alternative, constructive and meaningful recommendations for the Senate to consider as they craft climate change legislation.

“This latest effort is simply a continuation of the constructive approach we have tried to take on this issue for the past two years,” said O’Toole.

The Alliance in September 2007 released its climate change report, entitled “Water Supply in a Changing Climate: The Perspective of Family Farmers and Ranchers in the Irrigated West”. Since that time, the Alliance has been invited to testify three times before Congressional committees on climate change and water.

Of note, Senator Bingaman (NEW MEXICO) in October 2007 introduced a comprehensive bill to address a range of water resource issues. The bill included water science initiatives; water efficiency programs; and an attempt to better understand and adapt to the water-related impacts of global climate change. The bill – entitled the “SECURE Water Act” – contains some provisions that are very close to recommendations provided by the Alliance in its 2007 testimony before Chairman

[Cont’d on Page 6](#)



The Family Farm Alliance’s executive director Dan Keppen (third from right) testified before the Senate Select Committee on Energy Independence and Global Warming in 2008 about climate change impacts to Western farmers and ranchers. Committee Chairman Ed Markey (MASSACHUSETTS—far right) and Committee Member Senator John Hall (CONNECTICUT—third from left) joined Keppen and other witnesses after the hearing for a group photo. Source: U.S. Senate Select Committee on Energy Independence and Global Warming.

Alliance Prepares to Engage in Climate Change Debate

Climate Change Bill Has Implications for Western Ag Cont'd from Pg 5

Bingaman's committee. The SECURE Water provisions were ultimately included in the omnibus land and water package signed into law by President Barack Obama in March.

The climate change recommendations that the Alliance is currently developing will likely endorse actions similar to those contained in the SECURE water provisions.

"We will also look to our 2007 climate change report and 2008 water policy report and propose reasonable concepts that at least partially try to address those recommendations," said Keppen.

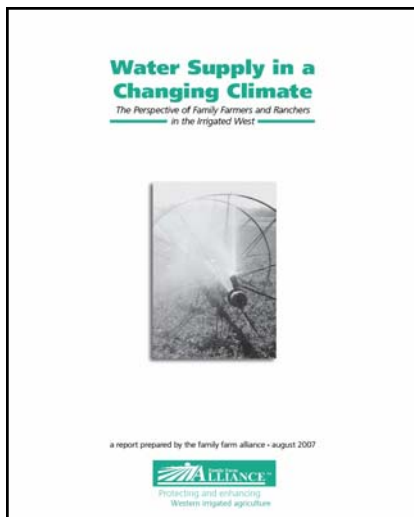
Climate Change Hydrologic Impacts

Irrigators and agricultural consultants have identified hydrologic impacts in the form of the "triple threat": 1) increased evaporation of snow pack and surface water; 2) increased crop evapotranspiration and consumptive use; and 3) decreased groundwater recharge and surface runoff – which will mean less water to work with and higher water needs. For example, as the West warms, a drier Colorado River system could see as much as a one-in-two chance of fully depleting all of its reservoir storage by mid-century, according to a new University of Colorado study. The climate change legislation that is being developed by Congress presents an opportunity to address these types of looming threats.

"While there will likely be short-term benefits that can arise from funding opportunities associated with adaptation, legislation provides the opportunity to implement good policy with long-term benefits for our members," said Keppen.

Western Watershed Health

Alliance leadership believes that the cap and trade legislation may also provide a vehicle to advance ideas that could pro-



The Alliance's 2007 Climate Change Report can be downloaded at www.familyfarmalliance.org

vide incentives for climate projects that provide benefits to water, energy and timber in rural communities. As the climate warms in the coming decades, atmospheric scientists at Harvard's School of Engineering and Applied Sciences predict that the frequency of wildfires will increase in many regions. The greatest increases in area burned would occur in the forests of the Pacific Northwest and the Rocky Mountains, which often cover large portions of watersheds that support millions of acres of irrigated land. Irrigators in those areas want to find ways to improve forest health that will ensure clean water, bolster timber and energy economies, and improve the environment.

"We will advocate for a streamlined restoration approach that comes from the ground up, rather than being directed from distant agencies in Washington," said O'Toole.

Ag Interests Will Wield Clout

As Senate leadership aims to advance climate change legislation this fall, agricultural interests will wield some clout. Groups like the American Farm Bureau Federation and the National Cattlemen's Beef Association oppose the House bill. The president of Farm Bureau told a Senate Committee in early July that farmers in some regions of the country – including the West – will not be able to participate in programs that will benefit other growers.

But top Obama administration officials earlier this month downplayed the costs that cap-and-trade legislation would have for the farming sector. U.S. Secretary of Agriculture Tom Vilsack testified at the July 22 Senate committee hearing on the role that rural America can play in addressing climate change. In his testimony, Vilsack said a new USDA economic analysis shows that the economic benefits to agriculture from the cap and trade legislation will likely outweigh the costs in the short term, and that the economic benefits from offsets markets will easily outpace increased input costs over the long term.

"The agriculture sector will benefit directly from allowance revenues allocated to finance incentives for renewable energy and agricultural emissions reductions during the first five years of the HR 2454 cap and trade program," Vilsack testified. "HR 2454's creation of an offset market will create opportunities for the agricultural sector."

Top Senate Democrats insist that their plans for moving a climate change bill this autumn will not be derailed by delays on President Obama's health care reform package.

Alliance Joins Water Competition Debate at National Press Club

On July 14, the Family Farm Alliance participated at a forum sponsored by the Farm Foundation to address the topic of "Competition for Water Resources". The Forum took place at the National Press Club in Washington, D.C.

Alliance executive director Dan Keppen explained the mission of the Alliance to the audience and then outlined the key water and water related issues facing irrigated agriculture in the West.

Keppen was joined by Karl Wirkus (Deputy Commissioner, Bureau of Reclamation), Noel Gollehon of the U.S. Department of Agriculture's Natural Resources Conservation Service, and Aaron Salzberg, special coordinator for water resources for the U.S. State Department.

Each of the panelists spoke for between 10-15 minutes, and then former Congressman Charlie Stenholm (TEXAS) offered up some topics for additional discussion and debate.

"I focused my discussion on messages now familiar to many of Western farmers and ranchers: the population of the American West is growing, environmental and

ecological water demands are expanding, and water required to develop new sources of energy pose a new, and potentially massive, draw on existing water resources," said Keppen.

Keppen also noted that climate change is expected to further complicate a scenario where development of new storage projects has essentially halted in the past 30 years.

"By default, agriculture is becoming the 'reservoir' to meet these new growing demands," he told the audience, which consisted of Capitol Hill staffers and commodity group representatives, embassy attaches, reporters, NGO representatives, government staff and academics.

Other speakers agreed.

Water supply issues are already changing America's farm landscape, said Noel Gollehon of the U.S. Agriculture Department's Natural Resources Conservation Service. Gollehon pointed to California, where Gov. Arnold Schwarzenegger in March issued an emergency declaration order-

ing water users to cut consumption by 20 percent and implement other measures to conserve the state's water supply. It's a symptom of ongoing water problems that Gollehon said is taking land out of production. In fact, Gollehon noted that Nebraska now leads the country in irrigated field acres, edging out California for the first time.

Karl Wirkus, deputy commissioner of the Bureau of Reclamation presented a more optimistic view, and noted the water consumed by agriculture in the United States has not changed over the past several decades. According to USDA, an irrigated farm acre today takes 25 percent less water to farm than it did in 1969. Wirkus pointed to a new federal focus on water conservation and efficiency efforts as a reason that, have contributed to this success.

Keppen also addressed concerns irrigators have with Endangered Species Act implementation, the possibility that additional regulations may be imposed on irrigators (e.g. CWRA – see story on page 8), and the challenges associated with addressing aging water infrastruc-



Dan Keppen, executive director of the Family Farm Alliance (second from right), addresses a forum organized by the Farm Foundation at the National Press Club on July 14. From left to right, former Congressman Charlie Stenholm (TEXAS), Noel Gollehon (USDA), Aaron Salzberg (U.S. State Department) and Karl Wirkus (Bureau of Reclamation) look on. Photo Courtesy of Sheldon Jones, Farm Foundation

Clean Water Bill Should Clarify the Law, Not Muddle It

An Editorial on the CWRA by the Family Farm Alliance

Clean water is something everyone can get behind, especially those who depend on water for their livelihoods – our farmers and ranchers here in the West. We in agriculture agree that the federal Clean Water Act has worked to make America’s waters clean, fishable, and swimmable for the past 30-years. What we do not agree with is the assumption that protection of clean water requires federal regulation of every mud puddle, low-lying swale, or dry desert depression that could possibly hold rainwater.

The extent of federal power under the Clean Water Act has been a contentious issue for decades. Many believe that the original Act clearly limited federal control over our precious waters to water bodies that were tributary to the “navigable” streams and rivers that protected interstate commerce. Others, including most environmental organizations, believe the Act imposed virtually no limitation on federal authority to regulate any water anywhere and any activity affecting water. The U.S. Supreme Court considered this question twice,

and ruled both times that the Act does indeed limit the reach of federal regulators. However, the rulings did not clarify exactly where that limitation lay, resulting in some confusion about enforcement of the Act. Environmental organizations have seized on that confusion as a reason for Congress to “clarify” and “restore” the Act to match their interpretation of the law. That is what *The Clean Water Restoration Act* (S. 787) would do by removing the term “navigable” from the original law.

If passed by the Congress and enacted into law, S. 787 would infinitely broaden the Clean Water Act, and the associated federal regulations and bureaucratic control over any waters in the U.S., whether in a mountain meadow or your backyard. Proponents of this bill insist the language would only follow the interpretation used by the U.S. Army Corps of Engineers and the Environmental Protection Agency prior to the controversial Supreme Court rulings. We do not agree. Congress originally put the word “navigable” into the Clean Wa-

ter Act to differentiate between those water bodies that would be regulated by the federal law and those that would not be. Removing that term does more than clarify the Act; it rewrites it completely by erasing any reasonable limit on Washington’s regulatory authority. In light of this fundamental change to the Act, the “compromise” amendment recently approved by a Senate Committee is nothing more than window dressing that provides no solid assurances for agriculture.

The Supreme Court cases that triggered this current debate focused on the question of whether small, isolated wetlands should be regulated like rivers and streams. Congress can easily clarify the law on that point without rewriting the Clean Water Act. But the organizations that are pushing the CWRA want more than clarification. They want to further expand federal authority over local land-use decisions and the operations of irrigation districts and family farms. We believe that Congress should firmly reject that approach and focus instead on finding a more reasonable, workable solution.

Tell your story!

The “Water Review” focuses on Alliance members and the issues and actions they are involved with.

If you would like to have a local project or issue featured, send a request to: dankeppen@charter.net



In next month’s issue of the Water Review.....

A New Mexico irrigation district uses energy from its canal delivery system to generate clean, green power.

Thank You to Our New and Supporting Members!

July 2009

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Your contributions matter. Whether you support the Alliance's advocacy, outreach or education efforts, you can rest assured that your investment will promote the protection of Western irrigated agriculture and the strong rural communities that it supports.

Make your tax-deductible gift to the Alliance today! Grassroots membership is vital to our organization. Thank you in advance for your loyal support. If you would like further info, please contact Dan Keppen at his NEW e-mail address: dankeppen@charter.net, or visit our website:

www.familyfarmalliance.org.



Contributions can also be mailed directly to:
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