

**Alabama Rivers Alliance * Alaska Wilderness League * American Bird Conservancy
Center for Biological Diversity * Clean Water Action * Conservation Northwest
Defenders of Wildlife * Earthjustice * Endangered Habitats League
Endangered Species Coalition * Environment America * Environmental Law & Policy
Center * Environmental Working Group * Friends of the Earth * Gulf Restoration
Network * Illinois Council of Trout Unlimited * Klamath-Siskiyou Wildlands Center
League of Conservation Voters * National Parks Conservation Association
National Sustainable Agriculture Coalition * Natural Resources Defense Council
Oregon Environmental Council * Public Citizen * Rural Coalition
Sierra Club * Southern Environmental Law Center * U.S. PIRG
Union of Concerned Scientists * Western Environmental Law Center
The Wilderness Society * Xerces Society**

May 14, 2018

Dear Representative,

On behalf of our millions of members and supporters, our groups urge you to oppose H.R. 2 as reported by the House Committee on Agriculture due to the inclusion of myriad anti-environmental provisions and attacks on conservation*. Many of these controversial measures have already been rejected in their own right and should not find refuge in any vehicle, including the Farm Bill. Further, we reject the changes made to the Supplemental Nutrition Assistance Program which hurt those most in need and make it harder for low-income households to put food on the table.

Our nation needs a bipartisan Farm Bill that fosters food security and rural development without harm to clean water, wildlife, lands and public health. This is not that bill. H.R. 2 as reported by the House Committee on Agriculture is unacceptable and unlikely to be improved due to the inclusion of a host of highly damaging provisions. These provisions, listed by focus area and section number in the attached document, collectively undermine fundamental areas of concern for our groups, including:

Clean Water – This bill would gut Clean Water Act safeguards that keep our communities safe from pesticides sprayed directly into our water supplies. Pesticide contamination has contributed to nearly 2,000 instances of water impairment across the US, yet this “Poison Our Waters” provision would take away any meaningful oversight of pesticides being sprayed directly into our waterways by slashing the commonsense Clean Water Act General Pesticide Permit Program and instead relying only on the federal pesticide registration law (the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)), which does not require the tracking of pesticide applications.

Conservation – The Conservation Title takes an overall cut of around \$800 million in this bill. Among many other concerns with the title, the bill proposes to eliminate the Conservation Stewardship Program (CSP), the nation's largest conservation program by acreage. CSP is the only Farm Bill program focused on advanced conservation systems to

Because of the breadth of these attacks, not all signed organizations work on all aspects noted here or included in the attached list, but there remains overarching consensus that the Farm Bill should be free of attacks on our natural resources and the laws that protect them.

comprehensively protect natural resources, including soil health, water quality, and wildlife habitat. Even while adding some components of CSP as "stewardship contracts" within the Environmental Quality Incentives Program (EQIP), the contracts would lose CSP's unique whole farm approach to conservation, emphasis on environmental benefits, and eligibility requirement for a good environmental stewardship level. The elimination of CSP would cut nearly \$5 billion in funding for voluntary working lands conservation programs, and to make matters even worse, the bill would reduce the conservation baseline for the next farm bill after this one by \$1.5 billion, putting conservation and environmental stewardship even further in the hole.

Endangered Species – This bill would severely undermine vital Endangered Species Act protections. Among the anti-wildlife provisions in this legislation is one of the most sweeping attacks ever on the Endangered Species Act: a "Poisoned Pollinator Provision" that seeks to eliminate liability when pesticides harm and kill threatened and endangered species under the new procedures advanced by this bill. This provision would also cut the expert federal wildlife agencies out of the Endangered Species Act consultation process, severely curtailing the government's ability to assess the effects of toxic pesticides on imperiled species, including pollinators, salmon, California condors, and whooping cranes. Yet another provision would undermine important Endangered Species Act consultations for forest management projects.

Forests/Public Lands – The bill is replete with provisions that undermine bedrock environmental laws, including the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and Roadless Area Conservation Rule (Roadless Rule). This bill consistently prioritizes the logging industry over all other national forest stakeholders. It would cause irreparable harm to our public lands; the millions of Americans who depend on them for clean drinking water, subsistence, recreation, and economic benefit; and the wildlife that call them home.

Public Input & Environmental Review – The bill completely eliminates public input and environmental review under NEPA for over 45 activities on public lands. The bill allows logging, grazing, and many other activities on up to 6,000 acres - almost 10 square miles for each single project - without any NEPA review or disclosure of potential harms. By eliminating the requirement for the Forest Service to consider cumulative effects and "extraordinary circumstances" such as wilderness areas and endangered species, the bill essentially establishes a statutory exemption from NEPA for an astonishingly broad range of activities.

Pesticides – Section 9119 of the Farm Bill would facilitate the registration of harmful pesticides (via PRIA reauthorization) without any safeguards for the protection of farmworkers, pesticide applicators, and rural communities from pesticide exposure. Additionally, Section 9101 of the Farm Bill would preempt cities, counties and communities from taking action to restrict certain uses of pesticides to protect the health of children, workers, consumers or the environment.

States' Authority – With the inclusion of Representative King's HR 4879 legislation, the Farm Bill would prohibit state and local governments from protecting their citizens from agricultural products imported from other states by restricting their ability to regulate or legislate protections against such products. It would also strip the public of state law protections for

agricultural products, and the accompanying right to enforce those protections through access to state courts. This attack on the public's substantive protections under state law and associated judicial rights is even more egregious because the bill language also expands judicial rights for industry in alarming ways.

In sum, H.R. 2 is plagued by ideological and special interest giveaways and provisions that harm public health and the environment and we urge you to vote it down. It is a far cry from what is needed -- a Farm Bill that fosters food security and environmental sustainability. The nation expects and deserves both.

Sincerely,

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