H.R. 2 contains the following objectionable provisions:

**TITLE II - CONSERVATION**

Sec. 2801 – This section eliminates the Conservation Stewardship Program (CSP). The establishment of stewardship contracts in 2302(d) in place of CSP fails to retain the core components of the CSP, which provides comprehensive assistance for farmers and ranchers to implement conservation systems on their land. The elimination of CSP, even after the addition of stewardship contracts, would result in the elimination of nearly $5 billion in funding for voluntary working lands conservation programs.

Sec. 2603 allows “mineral exploration” (usually defined to include mining as well as oil and gas development) on lands in the Agricultural Conservation Easement Program. The program was created to preserve agricultural lands as working farms. This provision would allow mining and oil and gas companies to extract resources from lands even though conservation easements funded by taxpayers were supposed to protect the same land.

**TITLE IV - NUTRITION**

The Nutrition Title restricts nutrition assistance under the SNAP program through new work requirements, making it even harder for individuals living in poverty to escape food insecurity. This highly controversial measure targets food access for our most vulnerable citizens, elevating partisanship and ideological purity over all else.

Sec. 4204 weakens school lunch “fresh fruit and vegetable” provisions. The current school food program provides special funding to provide fresh fruits and vegetables to kids in schools in low-income communities. The bill weakens this program, providing that schools could instead buy junk food including canned foods, purees, and dried fruits, with no restrictions on added sugar, salt, or fats, defeating the entire purpose of encouraging kids to eat healthy fresh fruit and vegetables.

**TITLE VIII - FORESTRY**

Sec. 8014, the State and Private Forest Landscape Restoration Program. The Compliance with NEPA language (g) (5) and the inclusion of cross-boundary activities on Federal forest land (g) (3) (A) (ii) (I) risk inappropriate management of federal lands.

Sec. 8107, Healthy Forests Restoration Act of 2003 Amendments. Expands the insect and disease treatments area activities in (b) (1) (B) to include hazardous fuels, and the allowed project size in (c) (2) (A) for categorically is increased from 3,000 acres to 6,000 acres.

Sec. 8201, Secure Rural Schools Amendments. Sec. 204(f) of the Secure Rural Schools Act is amended to allow up to 50% of Title funds to be used for timber production, instead of meeting restoration needs on the forest.

Sec. 8202 undermines Resource Advisory Committees by restricting participation and ending the requirement for consensus based decision making. The intent appears to be to enable the RACs to begin supporting controversial logging projects versus the current variety of restoration and recreation-enhancement projects that have universal support.

Sec. 8203 would amend section 209 of the Secure Rural Schools to allow 10 RACS to recommend projects that generate receipts. This would further undermine the currently effective and noncontroversial Title II restoration program by emphasizing commercial logging.

Sec. 8303 (a) grants federal land management agencies ESA authority to determine if a project is likely to adversely affect a listed species or critical habitat. If the agency makes this determination, ESA consultation is not required. Subsection (b) places an arbitrary timeline on consultations of 90 days, and any consultations not completed in that timeframe are deemed to not violate the ESA.

Sec. 8311 creates a 6,000 acre categorical exclusion that applies to all federal forests for a wide-variety of purposes.

Sec. 8312 creates a 6,000 acre categorical exclusion for salvage logging. This ignores overwhelming scientific evidence that salvage logging can cause significant ecological harm to wildlife requiring snags such as the Black-backed Woodpecker and is not necessary to regenerate forests.

Sec. 8313 creates a 6,000 acre categorical exclusion to create early seral forests.

Sec. 8314 creates a categorical exclusion of unlimited size for hazard tree removal and salvage logging to protect public safety, water supply or public infrastructure.

Sec. 8315 creates a 6,000 acre categorical exclusion to reduce wildfire risks. Allowed activities include logging, removal of pinyon juniper forests, targeted livestock grazing, construction of livestock infrastructure, and spraying herbicides.

Sec. 8316 creates a 6,000 acre categorical exclusion for forest restoration, including logging, post-fire logging, regeneration harvest, and up to three miles of new road construction..

Sec. 8317 creates a categorical exclusion for infrastructure development including road construction up to three miles, adding a road to the forest transportation system, and pesticide applications.

Sec. 8318 creates a categorical exclusion for developed recreation sites including construction of new facilities, roads, trails and boat landings, rerouting of existing roads and trails, and decommissioning trails. Given the lack of an acreage limitation, a large scale development with significant environmental impacts and potential conflicts with existing recreational uses should be addressed through an Environmental Analysis.

Sec. 8319 creates a categorical exclusion for administrative sites. Again, a blanket exclusion for all sites may fail to consider significant impacts from a large-scale construction project, particularly if it includes road construction in a sensitive habitat area.

Sec. 8320 creates a categorical exclusion for Special Use Authorizations including renewal of existing special uses for up to five years, authorization of existing unauthorized uses or occupancy, and vegetation management of electric rights of way. In some cases, additional environmental analysis may be needed to address the impacts of these activities.

Sec. 8333 would lift export restrictions on federal timber in California for ten years. This has potential to incentivize unsustainable logging on federal lands, and create a competitive disadvantage for private timber holdings.

Sec. 8503 Revises Extraordinary Circumstances Regulations to develop a new regulation that precludes the consideration of Wilderness Areas, sensitive species, cumulative impacts, endangered species, biological opinions. Also states that revisions of Wilderness Area boundaries does not require an environmental impact statement.

Section 9111: Removes the requirement under Section 7 of the Endangered Species Act for the Environmental Protection Agency (EPA) to consult with expert federal wildlife agencies on the impact of potentially dangerous pesticides on threatened and endangered species before allowing those pesticides to be used. In place of the Endangered Species Act’s strong, look-before-you-leap measures to protect endangered species, this provision merely requires EPA to conduct a cursory review of the impacts to endangered species from pesticides, years after approving their use. (Most reviews would not be required before the 2030s.) This provision would cut the expert federal wildlife agencies out of the consultation process, severely curtailing the government’s ability to assess the effects of toxic pesticides on threatened and endangered species, including endangered salmon, California condors, and whooping cranes. This section also seeks to limit the ability of citizens to go to court to protect imperiled species from pesticides.

Section 9114: Waives Endangered Species Act Section 9 take liability for all pesticides that have been registered according to the procedures of this bill. In other words, if EPA has allowed a pesticide to be marketed and used, then neither EPA nor presumably the registrant or end user can be held liable for any harm or death of endangered species resulting from the label-approved use of the product. Congress has never waived Section 9 liability for any class of actions; this is one of the most sweeping attacks on the Endangered Species Act in its nearly 45-year history, eliminating the possibility of enforcement when pesticides harm and kill.

Sec. 9117 & 9118: Together, these two sections would gut Clean Water Act safeguards to keep our communities safe from pesticides that are sprayed directly into waterways. These provisions would allow pesticides to be sprayed into water bodies without any meaningful oversight since the federal pesticide registration law (the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)) does not require tracking of such pesticide spraying. Americans rely on the Clean Water Act to protect our rivers, lakes, and streams from pesticides because FIFRA’s mere registration requirements have not and will not protect our waters from these toxic chemicals.

Sec. 9121: Weakens restrictions on methyl bromide. Methyl bromide which Cornell University reports is “extremely toxic vapor.... About 1,000 human poisoning incidents caused by methyl bromide exposure have been documented, with effects ranging from skin and eye irritation to death.” It also is a powerful ozone depleter, threatening the earth’s ozone layer that was originally supposed to be phased out by 2000. The bill allows up to 20 metric tons of methyl bromide to be used for any “emergency” event. The incredibly broad definition of emergency opens it up to widespread abuse.

**TITLE XI - MISCELLANEOUS**

Sec. 11701 & 11702 (King Amendment): Includes HR 4879 which would strip the public of state law protections for agricultural products, and the accompanying right to enforce those protections through access to state courts. The language also expands judicial rights for special interests by (1) allowing industry to try to sue in federal court to block state protections (2) allowing industry to recover economic damages against state governments for regulating agricultural products in a way that is more restrictive than the federal government (3) interfering with federal courts’ discretionary powers to issue injunctions by rewriting the standard to favor industry plaintiffs; (4) providing a statute of limitations for industry to bring challenges of 10 years (by comparison NEPA provides only 5 years, and transportation projects under recently passed legislation provides only 150 days)