

Clean Water Action * Defenders of Wildlife * Earthjustice * Environment America
Environmental Working Group * League of Conservation Voters
National Audubon Society * Natural Resources Defense Council * The Wilderness Society

Dear Member of the House Agriculture Committee:

On behalf of our millions of members, activists and supporters, we write to express our strong opposition to the Federal Agriculture Reform and Risk Management Act of 2012 (FARRM) as currently drafted. The legislation's disregard for the environment and those farmers who act as its stewards is all too evident in its deep financial cuts to core conservation programs as well as its harmful policy riders that threaten our water, health, and wildlife. We urge committee members to oppose the bill as drafted as well as all efforts to add additional unrelated and controversial provisions that would harm our air, water and wildlife.

FARRM's more than \$6 billion dollars in cuts to conservation would paralyze programs that are both enormously popular and essential to the preservation of our lands, waters, wildlife, and soils. These historically oversubscribed programs should be expanded, not reduced, to allow growers from every part of the country to continue to contribute to the stewardship of our environment. Adding insult to injury, the bill also weakens the link between federal support and conservation compliance. This basic covenant between farmers and taxpayers assures that in return for receiving federal subsidies, including crop insurance subsidies, farmers should meet some basic eligibility requirements including protecting erodible soils and not draining wetlands on their property.

In addition, FARRM has been weighed down by extraneous and dangerous provisions that undermine sound science and roll back our bedrock clean water and wildlife laws, including:

Sec. 7404 would repeal section 221 (carbon cycle research), of the Agricultural Risk Protection Act. As extreme weather and droughts sweep across the country, putting agriculture crops and communities at risk, this head-in-the sand provision once again denies the basic science of climate change and pulls the rug out from under research that could help mitigate global warming, while benefiting agricultural producers.

Sec. 8301-8304 ("National Forest Critical Area Response") requires the Forest Service to designate areas of our national forests as being at risk, and in these areas all projects—regardless of what they are—must proceed with streamlined or even no public scrutiny under NEPA and limited judicial review. This provision would allow logging, road-building, and other highly controversial projects to move forward without meaningful oversight in vast swaths of our national forests.

Sec. 10011 would deregulate the use of genetically engineered crops by removing the applicability of both the Endangered Species and National Environmental Policy Acts. USDA's review process is already recognized as woefully inadequate for genetically modified crops. Yet the proposed deadlines and diminished reviews in this section would further weaken the process by, allowing genetically modified crops to be automatically deregulated when the clock runs out. This provision would potentially lead to costly contamination episodes, like Starlink or Liberty Link Rice, which have cost farmers hundreds of millions of dollars in losses. This could also lead to significantly increased use of pesticides without adequate oversight to protect public health.

Sec. 10016 would interfere with federal agency efforts to mitigate the impacts of harmful pesticides on imperiled species, in compliance with the Endangered Species Act. This provision would further threaten West Coast salmon fisheries that are being harmed by use of worst-of-the-worst, World War II-era pesticides. This also threatens human health since the mitigation measures that have been recommended to protect imperiled species from pesticides also would benefit humans, especially young children. .

Sec. 10017, which incorporates into the Farm Bill the Reducing Regulatory Burdens Act of 2012 (H.R. 872), would overturn the Clean Water Act requirement that entities obtain permits before spraying pesticides directly into or near waters. Eliminating this common sense requirement would endanger the health of our families and communities by removing all oversight regarding what happens to pesticides once they are released into our waterways.

It is time to stop hijacking important legislative business with provisions like these and converting them into ideological assaults on our bedrock health and environmental laws. Farm and Food policy is both complex and important enough without miring it in these controversial and ultimately harmful debates.

Once again, we urge you to oppose FARRM as drafted as well as any amendments that would further undermine the nation's commitment to our health and environment.

Sincerely,

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