

**Commentary on Project 2025, by Ryk E. Spoor**  
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**Prefatory Note:** This is a VERY rough document, mostly cobbled together from a bunch of posts I made on Facebook. These posts were written exactly when posted (not written ahead of time), so they're purely quick analysis.

**Formatting Information:**

- in the quoted sections of Project 2025, you will often see numbers in the text (example: " Executive Order 13836, encouraging agencies to renegotiate all union collective bargaining agreements to ensure consistency with the law and respect for management rights;26"). These numbers, in the original document, are footnotes. I'm not including the footnotes themselves in this document, but if one returns to the document the numbers will properly reference the footnotes.
- I am quoting sections of the Project, rather than referencing page numbers, because it has been reported that there are different format versions of the Project that make page number references unreliable; it would be far more difficult for them to re-write the whole document to make quotes unable to be found.
- My commentary is in **Boldface** to help distinguish it from the actual quoted sections.

DISCLAIMER: I am not an expert in politics or government or policy, and UNDOUBTEDLY there are points in this document that I show my ignorance and make an ass of myself. I of course hope that I mostly make sense.

**My main qualification for examining Project 2025** is that it is a \*Project Proposal\* -- a document meant to outline and then detail a set of steps to accomplish a goal in a governmental context – and this has been, in fact, my professional employment for over twenty years: the writing of proposals to various agencies to, hopefully, obtain funding for the small company I work for. I think I've been reasonably successful at it.

What that means is that I am very intimately familiar with the type of phrasing used for multiple purposes in such documents – especially the way in which one emphasizes the points you want your audience to take away, the way you DON'T say things that you know the audience knows but that you have reasons not to bother stating, the way you avoid particular subjects while appearing to address them.

Project 2025 is EXACTLY the kind of document I've read – and written – for almost a quarter century.

**One thing I have to say up-front is that this is not "just a thought experiment" or anything of the kind.** This is an extensively researched, professionally written (by people whose

time and effort would command VERY high fees) and formatted project proposal that breaks nine HUNDRED pages, and covers essentially the entirety of the U.S. Governmental structure with various plans for action. This is a PLAN. This is a deliberate, carefully thought out, and absolutely serious plan of action to change the way the United States functions. I would be astonished if this document, by itself, cost less than seven figures to produce. (Addendum: After completing my review, I'll make that eight figures. Low tens of millions)

So it is important, when reading Project 2025, to remember that no matter how extreme or ridiculous some parts sound – the authors, and the people who assembled this document, are very, DEADLY serious about it.

Originally I started just skimming, so the first few pieces are just hand-picked "wow" moments. It becomes a more systematic review as we go on.

And so let's begin!

### **Project 2025, a quote for anyone in the LGBTQ+ community to have handy:**

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GENDER POLICY COUNCIL (GPC)

The President should immediately revoke Executive Order 1402041 and every policy, including subregulatory guidance documents, produced on behalf of or related to the establishment or promotion of the Gender Policy Council and its subsidiary issues. Abolishing the Gender Policy Council would eliminate central promotion of abortion ("health services"); comprehensive sexuality education ("education"); and the new woke gender ideology, which has as a principal tenet "gender affirming care" and "sex-change" surgeries on minors. In addition to eliminating the council, developing new structures and positions will have the dual effect of demonstrating that promoting life and strengthening the family is a priority while also facilitating more seamless coordination and consistency across the U.S. government.

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### **Another tidbit from Project 2025, about how they plan to weaken government stability and break unions:**

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(Trump enacted)

Executive Order 13836, encouraging agencies to renegotiate all union collective bargaining agreements to ensure consistency with the law and respect for management rights;<sup>26</sup> Executive Order 13837, encouraging agencies to prevent union representatives from using official time preparing or pursuing grievances or from engaging in other union activity on government time;<sup>27</sup> and Executive Order 13839, encouraging agencies both to limit labor grievances on removals from service or on challenging performance appraisals and to prioritize performance over seniority when deciding who should be retained following reductions-in-force.<sup>28</sup>

All were revoked by the Biden Administration<sup>29</sup> and should be reinstated by the next Administration, to include the immediate appointment of the FLRA General Counsel and reactivation of the Impasses Panel.

Congress should also consider whether public-sector unions are appropriate in the first place. The bipartisan consensus up until the middle of the 20<sup>th</sup> century held that these unions were not compatible with constitutional government.<sup>30</sup> After more than half a century of experience with public-sector union frustrations of good government management, it is hard to avoid reaching the same conclusion.

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**Yeah, unions were fighting an uphill battle through the first half of the 20<sup>th</sup> century. They want it to be fought again.**

**Still going through Project 2025. In the DOD section. They want both sides of the bread buttered but never getting butter on their hands -- they want to increase security against Great Powers (i.e., China) but at the same time they want to get rid of not just bureaucracy but a whole bunch of the processes involved with transfer of military materiel -- basically, plan every military system with export in mind. Obviously this is a great thing if you're a military contractor.**

**Here's the bit about requiring every kid in public school (i.e., any federally funded school) to take the military entrance exam:**

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3. Improve military recruiters' access to secondary schools and require completion of the Armed Services Vocational Aptitude Battery (ASVAB)—the military entrance examination—by all students in schools that receive federal funding.

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**Why would you need to test all students unless you had plans that might encompass YOU doing the choosing of the kids?**

**Also:**

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4. Encourage Members of Congress to provide time to military recruiters during each townhall session in their congressional districts.

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**Also, here's a funny joke:**

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2. Codify language to instruct senior military officers (three and four stars) to make certain that they understand their primary duty to be ensuring the readiness of the armed forces, not pursuing a social engineering agenda. This direction should be reinforced during the Senate confirmation process. Orders and direction motivated by purely partisan motives should be identified as threats to readiness.

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**This ENTIRE DOCUMENT, Project 2025, is direction motivated by purely partisan motives.**

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**More Project 2025:  
Remember that bit about partisan? Here's some more:**

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3. Reinstate servicemembers to active duty who were discharged for not receiving the COVID vaccine, restore their appropriate rank, and provide back pay.  
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**Yes, servicemen who were ignoring directives to help protect the public by not spreading or catching a literal plague should be reinstated. Not.**

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4. Eliminate Marxist indoctrination and divisive critical race theory programs and abolish newly established diversity, equity, and inclusion offices and staff.  
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**"Marxist"? These people wouldn't know actual Marxists if they ran up to them and started beating them to death with the Communist Manifesto. Some of this document reads like they took someone frozen during the McCarthy era and thawed him out to write policy.**

**No, let's not back up and ignore any progress made in the last thirty years.**

**The next three continue the trend:**

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5. Restrict the use of social media solely for purposes of recruitment and discipline any armed services personnel who use an official command channel to engage with civilian critics on social media.  
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**Yep, ordering people to shut up and say nothing not approved is absolutely the hallmark of a functioning democracy.**

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6. Audit the course offerings at military academies to remove Marxist indoctrination, eliminate tenure for academic professionals, and apply the same rules to instructors that are applied to other DOD contracting personnel.  
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**"Marxist" again. General Ripper's having a grand old time here -- wonder if they'll want to stop fluoridation of the water to prevent contamination of our precious bodily fluids.**

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7. Reverse policies that allow transgender individuals to serve in the military. Gender dysphoria is incompatible with the demands of military service, and the use of public monies for transgender surgeries or to facilitate abortion for servicemembers should be ended.  
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**And here, for the LBGTQ+ people, another step towards removing you as people. That's it for now, I'm going to do something more relaxing like running a wirebrush over my face.**

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4. Audit all curricula and health policies in DOD schools for military families, remove all inappropriate materials, and reverse inappropriate policies.  
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**Translation: God forbid they learn anything about lifestyles that aren't the ones we want.**

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Reduce the number of generals. Rank creep is pervasive. The number of O-6 to O-9 officers is at an all-time high across the armed services (above World War II levels), and the actual battlefield experience of this officer corps is at an all-time low. The next President should limit the continued advancement of many of the existing cadre, many of whom have been advanced by prior Administrations for reasons other than their warfighting prowess.  
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**At first glance this looks not entirely unreasonable. Except that if you have leaders ALL chosen for warfighting prowess, then warfighting is most of what they're good for. A military like the USA's is for peacekeeping, political maneuvering, and other things that are NOT just fighting big or small battles. The greatest general is one that doesn't HAVE to fight a war because they won without firing a shot.**

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2. Align collection and analysis with vital national interests (countering China and Russia).  
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**This is repeated in various ways in multiple places -- implying that our ONLY important national interests are in countering these other countries. Not home safety and stability, not world stability in other areas, just these two bugaboos. It's basically the Cold War attitude fossilized and revived. That era is OVER.**

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"The U.S. Army is at an inflection point that is marked by more than a decade of steadily eroding budgets and diluted buying power, an appreciable degradation in readiness and training capacity, a near crisis in the recruiting and retention of critical personnel, and a bevy of

aging weapons systems that no longer provide a qualitative edge over peer and near-peer competitors but will not be replaced in the near term."

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**There is a certain amount of truth in this, but the budget isn't the problem. A lot of it is a lack of focus of a more modern mission in a world without a direct adversarial setup -- a situation we should be working to maintain rather than upset. Some is people being less interested in being part of the military itself. A lot of it is the way the military-industrial complex has continued to operate on Cold War assumptions, and how vulture capitalism has been undermining what should have been relatively quick and efficient advances (Boeing being a current poster child for this, but they are neither the first nor the only major DOD contractor that's basically been cannibalizing its own reputation and resources only to serve up less and less useful end-products).**

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4. Increase the Army force structure by 50,000 to handle two major regional contingencies simultaneously.

5. Reform recruiting efforts. The Army missed its 2022 recruitment goal by 25 percent, or 15,000 soldiers.

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***"Only an idiot fights a war on two fronts. Only the heir to the throne of the Kingdom of Idiots would fight a war on twelve fronts." -- Londo Mollari, Babylon 5***

**Here it's made clear that one intention of this overhaul is to literally be ready to fight two-front (though one hopes not twelve-front) wars. That's at the least worrisome and at worst terrifying, especially with other elements indicating they want to have the next generations all categorized properly under military categories of interest with the ASVAB.**

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3. Reestablish the experiential base for the planning, execution, and leadership of Army formations in large-scale operations. Currently, there are no general or field-grade officers who served as planners or commanders against a near-peer adversary in combat.

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**Of course there aren't, you witless buffoons, because we haven't fought a war against a near-peer adversary since 1945. Even if you count Korea and Vietnam, nothing for the last fifty years. A firebreathing mustang general who was in his thirties at the end of Vietnam is seventy or more now.**

**AND WE DON'T WANT ANY MORE, THANK YOU. Any sane general doesn't ever WANT to get into a battle with anyone, let alone a peer.**

**(there's also a lot about not making the Army a "test bed for social evolution", which is a laugh in multiple ways. A lot of the problems of the military come directly from Republican policies.)**

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7. Revamp Army school curricula to concentrate on preparation for large- scale land operations that focus on defeating a peer threat.

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**See above. Firstly, we're STILL the most powerful military on Earth, and that by a LARGE margin. Second, we really do not want to plan on fighting anyone nearly our size because that's not gonna end well for anyone, including us.**

**Most of the issues repeat through the Air Force and other service discussions, but this one may be worth adding:**

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1. Define irregular warfare as “a means by which the United States uses all elements of national power to project influence abroad to counter state adversaries, defeat hostile nonstate actors, deter wider conflict, and maintain peace in great-power competition.”

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**This comes in my mind perilously close to saying "The US will use terrorist approaches to serve our national agenda". When followed by the intent to establish what amounts to a school for learning how to apply "irregular warfare", that's pretty worrisome.**

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China is pursuing a strategic breakout of its nuclear forces, significantly shifting the nuclear balance and forcing the U.S. to learn how to deter two nuclear peer competitors (China and Russia) simultaneously for the first time in its history.

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**First... Seriously, Russia? Russia's ENTIRE GDP is a little over 2 trillion. If our nuclear infrastructure is aging, theirs is senile. They are not nuclear peers and haven't been for years and years. They can't beat UKRAINE, for god's sake. The US Government's budget alone is three times Russia's GDP.**

**Second, there's a LOT of saber-rattling implied in the whole section on nuclear weaponry. I'm all for nuclear energy, but not nuclear weapons. Yes, for deterrence I'm afraid we DO need a fair number, but we don't need to increase the number, just modernize the systems and make sure they're functional. And hope to God they're never needed.**

**That's the end of this section.**

**Project 2025, heading into the DHS section...**

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Our primary recommendation is that the President pursue legislation to dismantle the Department of Homeland Security (DHS). After 20 years, it has not gelled into "One DHS."

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**Well, will wonders never cease: I absolutely agree with this. The DHS was a terrible idea from the start, it should never have been created, and it needs to go.**

**Why do I suspect the details of this one will not be the way I envision it...?**

**Oh, *that's* why. Because the first thing they want to do is make some of the PIECES into one gigantic Cabinet-level entity:**

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U.S. Customs and Border Protection (CBP) be combined with Immigration and Customs Enforcement (ICE); U.S. Citizenship and Immigration Services (USCIS); the Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR); and the Department of Justice (DOJ) Executive Office for Immigration Review (EOIR) and Office of Immigration Litigation (OIL) into a standalone border and immigration agency at the Cabinet level (more than 100,000 employees, making it the third largest department measured by manpower).

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**Given the common rhetoric surrounding immigration, borders, and so on, there seems to be some warning bells going off when you make one huge agency that combines health, immigration, and border protection.**

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The Transportation Security Administration (TSA) be privatized.

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**Privatizing government services is one of the favorite things for businesses and one of the worst ideas for actual government services. If a government service is needed or desired, it's something for the government to do. It is a SERVICE, not a BUSINESS, and any privatization will focus on the business first and the service second.**

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"DHS has also suffered from the Left's wokeness and weaponization against Americans "

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**We'll see this phrasing more than once, which of course translates to "they're not letting us do stuff we used to get away with when we were young".**

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"...privatizing TSA screening and the Federal Emergency Management Agency (FEMA) National Flood Insurance Program..."

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**Ooh, nice one to sneak in there. Privatize a federal program used to protect from flood. I can't imagine how that could possibly go wrong.**



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"Expansion of Dedicated Political Personnel. The Secretary of Homeland Security is a presidentially appointed and Senate-confirmed political appointee, but for budgetary reasons, he or she has historically been unable to fund a dedicated team of political appointees. A key first step for the Secretary to improve front-office functions is to have his or her own dedicated team of political appointees selected and vetted by the Office of Presidential Personnel, which is not reliant on detailees from other parts of the department, to help ensure the completion of the next President's agenda."

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**Translated: Not only do we want to appoint the secretary, we want to make sure they have all the yes-men they need around them.**

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"While Senate confirmation is a constitutionally necessary requirement for appointing agency leadership, the next Administration may need to take a novel approach to the confirmations process to ensure an adequate and rapid transition. For example, the next Administration arguably should place its nominees for key positions into similar positions as "actings" (for example, putting in a person to serve as the Senior Official Performing the Duties of the Commissioner of CBP while that person is going through the confirmation process to direct ICE or become the Secretary). This approach would both guarantee implementation of the Day One agenda and equip the department for potential emergency situations while still honoring the confirmation requirement. "

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**I don't think I *NEED* to spell this out, but what this is saying is "deliberately evade the spirit of the law by inserting our choices into the position with a convenient title of "acting", so that they'll be doing the job whether the Senate likes it or not."**

**So, still with DHS: Plenty of stuff about how to mold it into the "agenda", then there's this little nugget:**

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All personnel with law enforcement capacity should be removed immediately from office billets and deployed to field billets to maximize law enforcement capacity.

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**What? So no one with actual LEO experience will be in administration? Just hand every technically-qualified desk jockey a gun and badge and kick 'em out the door into the field? What is even the PURPOSE for this?**

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"Non-Use of Discretionary Guest Worker Visa Authorities. To stop facilitating the availability of cheap foreign labor in order to support American workers (particularly poor and middle-class American workers) "

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**Translation here is "We'll shoot ourselves in the foot by taking away the one source of cheap labor our food production depends on. But probably we'll fix it later in this document by finding a way to make poor people even poorer while they work." I'll see if that prediction comes true later on.**

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Congress should mandate and fund additional bed space for alien detainees. ICE should be funded for a significant increase in detention space, raising the daily available number of beds to 100,000.

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**A hundred thousand detainees AS A GOAL. This kinda boggles my mind, but it fits with the language of parts preceding it which basically assume that there's tons and tons of criminal foreigners running rampant on US soil that the Woke Left has let in for... reasons.**

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USCIS (US Customs and Immigration Service) should be classified as a national security-sensitive agency, and all of its employees should be classified as holding national security-sensitive positions. Leaks must be investigated and punished as they would be in a national security agency, and the union should be decertified.

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**I don't think I need comment much on this, aside from noting that we see here another union-busting plan.**

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"... In addition, Congress should change the cost-share arrangement so that the federal government covers 25 per- cent of the costs for small disasters with the cost share reaching a maximum of 75 percent for truly catastrophic disasters..."

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**This is part of a discussion on FEMA which boils down to "Make the states pay more during disasters, and don't spend our money on anything that's not an immediate disaster, including grants for improving various types of readiness. That's the states' problem."**

**More on Project 2025, now in the Coast Guard...**

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USCG is facing recruitment challenges similar to those faced by the military services. The Administration should stop the messaging on wokeness and diversity and focus instead on attracting the best talent for USCG. Simultaneously, consistent with the Department of Defense, USCG should also make a serious effort to re-vet any promotions and hiring that occurred on the Biden Administration's watch while also re-onboarding any USCG personnel who were dismissed from service for refusing to take the COVID -19 "vaccine," ...

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**Translated: Anyone who isn't a Republican Approved person should be kicked out of the Coast Guard, while we'll re-hire people who couldn't be bothered to protect others from a pandemic because the Republican party spread uncounted amounts of bullshit about it.**

**Now here's a real funny one, as we enter the Secret Service section:**

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The U.S. Secret Service must be the world's best protective agency. Currently, the agency is distracted by its dual mission of protection and financial investigations. The result has been a long series of high-profile embarrassments and security failures, perhaps most notably its allowing of then-Vice President-elect Kamala Harris to be inside the Democratic National Committee office on January 6, 2021, while a pipe bomb was outside. Despite the great size and scope of the January 6 investigation, this high-profile incident of danger to a protectee remains unresolved.

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**Huh, January 6th, 2021. I thought nothing happened then, Repubs? Just ordinary tourists visiting, nothing to worry the Secret Service? Oh, wait, it's serious when we want to set up our critique. But not if, you know, anyone who committed crimes during it is on trial.**

**Here's another funny:**

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USSS should keep visitor logs for all facilities where the President works or resides. The Biden Administration has evaded such transparency with President Biden spending a historic amount of time for a President at his Delaware residence. This has left the American people in the dark as to who is influencing the highest levels of their own government.

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**And Trump made hundreds of trips to his own properties during his tenure, and I'm pretty sure didn't tell everyone who visited him there every day. "Transparency for thee but not for me" is what they mean.**

**On to the TSA:**

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The TSA model is costly and unwisely makes TSA both the regulator and the regulated organization responsible for screening operations. As part of an effort to shrink federal bureaucracies and bring private-sector know-how to government programs, TSA is ripe for reform. The U.S. should look to the Canadian and European private models of providing aviation screening manpower to lower TSA costs while maintaining security. Until it is privatized, TSA should be treated as a national security provider, and its workforce should be deunionized immediately.

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**While there are a lot of problems with the TSA (like, is it even needed?), privatizing government services is a formula for turning them to profit farms. And once again we see the intention to break unions, because god forbid the little people have any say in their lives.**

**I don't know enough about the management directorate to discuss the handwavy babble that I see here. I'm sure there's buzzwords and dog-whistles in there, but I don't know what they are.**

**"Before the summer 2020 civil unrest," seems to be a repeated theme. I'm not sure exactly what they're referring to. People daring to protest? The document wants to use it to excuse moving one office from under MGMT because of some need for law enforcement response.**

**They want to eliminate the Office of Intelligence and Analysis as both "not added value and because it has been weaponized for domestic political purposes."**

**Office of the General Counsel:**

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**OGC should advise principals as to how DHS can execute its missions within the law instead of advising principals as to why they cannot execute regulations, policies, and programs.**

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**Translated: "When we want to do something, tell us how to justify it, don't ask us to stay within the law".**

**This is reinforced by a discussion where they want the counsel for each component of the relevant government agencies to report primarily to the component and only secondarily to the General Counsel, rather than the current setup which makes all counsels responsible to the law as interpreted by the OGC.**

**Multiple mentions of making sure political appointees are put in place to ensure the President's agenda is executed.**

**Continuing onward in Project 2025, now we're at the Office for Civil Rights and Civil Liberties (CRCL) and Privacy Office (PRIV)**

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**Although the CRCL Officer and the Freedom of Information Act (FOIA) Officer/Privacy Officer are statutory, their offices are not mandatory. CRCL and PRIV Officers and employees should report to a Deputy General Counsel, who would be a political appointee.**

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**They don't like that these became offices, and want to get rid of them. Note that the officers required would then be put under a political appointee. What a surprise that they want to cut down on anything focused on civil liberties and privacy.**

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A consistent, clear, and singular message is necessary for DHS's mission. Therefore, all communications and/or meetings with any federal, state, local, or nongovernment groups should be limited to the Deputy General Counsel.  
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**Translated: "Our political lapdog will filter all communications to these unwanted officers".**

**They also want to get rid of all outside advisory and working groups the two offices participate in, and keep them from issuing bulletins or periodicals. "Shut up about your damn civil liberties!" in short.**

**They continue to dismantle oversight and support for detainees or foreign citizens in the next couple of sections.**

**Then, in the "Agency Relationships" section:**

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Department of Defense: Assist in aggressively building the border wall system on America's southern border.  
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**This is one of the biggest boondoggles they want to push. You can't build an effective barrier across our southern border, and if you did, it would be ludicrously expensive to both build and maintain. The Berlin Wall didn't even manage to be 100% effective, and it only covered one CITY.**

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Department of Justice: Agree to move the Executive Office for Immigration Review and the Office of Immigration Litigation to DHS and/or, alternatively, to treat the administrative law judges (immigration judges and Board of Immigration Appeals) as national security personnel, decertify their union, and move to increase hiring significantly to enable the processing of more immigration cases.  
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**Boy, they really hate unions, and really like making organizations into national security arms, presumably because that allows them to be secretive and controlled better.**

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Department of State: Allow DHS to lead international engagement in the Western Hemisphere on issues of security and migration. Additionally, quickly and aggressively address recalcitrant countries' failure to accept deportees by imposing stiff sanctions until deportees are in fact accepted for return (not just promised to be taken).  
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**Wow. If you don't take the people we send you, we'll sanction your country! This will surely not cause any kind of negative reaction from other nations.**

**Of course, a lot of the people trying to come here want to GET AWAY from their prior country, so maybe they're counting on getting good will by helping other oppressive countries capture their troublemakers.**

**The panic/hatred for the pretty much nonexistent invasion of our country by "illegals" is a big theme through the rest of this section .**

**Now, on to the Department of State.**

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There are scores of fine diplomats who serve the President's agenda, often helping to shape and interpret that agenda. At the same time, however, in all Administrations, there is a tug-of-war between Presidents and bureaucracies— and that resistance is much starker under conservative Presidents, due largely to the fact that large swaths of the State Department's workforce are left-wing and predisposed to disagree with a conservative President's policy agenda and vision.

It should not and cannot be this way: The American people need and deserve a diplomatic machine fully focused on the national interest as defined through the election of a President who sets the domestic and international agenda for the nation.

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**Here, it's absolutely wrong. It can and should be this way, because it is NOT the job of the President to lead the whole country according to his (or her) singular vision. It's their job to direct the ship of state, SUBJECT TO the input of multiple others. Experienced diplomats and their offices have to be there to moderate a President's mistakes, to preserve the USA's image and reputation even when the leader may fumble the ball on occasion.**

**Ideally the President and the diplomatic corps would be in tune, because the President would understand that they do NOT understand the complexities of all the diplomats' jobs and need their input. But if not, the diplomatic corps exists to try to prevent turning the ship of state directly onto a reef.**

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Exert Leverage During the Confirmation Process. Notwithstanding the challenges and slowness of the modern U.S. Senate confirmation process, the next President can exert leverage on the Senate if he or she is willing to place State Department appointees directly into those roles, pending confirmation.

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**Once again, we see the explicit intent to avoid the intent and spirit of the law by doing an end-run around it. "If you won't give me what I want, I'll just put it in anyway." Very Trumpian.**

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Assert Leadership in the Appointment Process. The next Administration should assert leadership over, and guidance to, the State Department by placing political appointees in positions that do not require Senate confirmation, including senior advisors, Principal Deputy Assistant Secretaries, and Deputy Assistant Secretaries. Given the department's size, the next Administration should also increase the number of political appointees to manage it.

To the extent possible, all non-confirmed senior appointees should be selected by the President-elect's transition team or the new President's Office of Presidential Personnel (depending on the timing of selection) and be in place the first day of the Administration. No one in a leadership position on the morning of January 20 should hold that position at the end of the day.

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**I like that last line especially. Only Republican Yes-Men must be present in any position of power.**

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Reboot Ambassadors Worldwide. All ambassadors are required to submit letters of resignation at the start of a new Administration. Previous Republican Administrations have accepted the resignations of only the political ambassadors and allowed the foreign service ambassadors to retain their posts, sometimes for months or years into a new Administration.<sup>5</sup> The next Administration must go further: It should both accept the resignations of all political ambassadors and quickly review and reassess all career ambassadors. This review should commence well before the new Administration's first day.

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**They're not screwing around here. All the people involved at the high levels of interaction with foreign governments will be yanked from their positions and replaced (unless they turn out to pass the loyalty tests, presumably). The disruption this could cause to our international relations is... considerable. I mean, really, that's a LOT of ambassadorial posts that are going to be suddenly vacant until reviews are completed, and a lot of established relationships suddenly severed.**

**Yeah, that's gonna end well.**

**They're similarly hardass as this section goes on -- want to literally shut down all agreements and unratified treaties wholesale, retroactively review them, and refuse to release funding for unknown amounts of time: "The quality of this review is more important than speed."**

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This may lead to, for example, the President authorizing the State Department to engage with Members of Congress and relevant committees on certain issues (including statutorily designated congressional consultations), but to remain "radio silent" on volatile or designated issues on which the White House wants to be the primary or only voice. All such authorized department engagements with Congress must be driven and handled by political appointees in conjunction with career officials who have the relevant expertise and are willing to work in concert with the President's political appointees on particularly sensitive matters.

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**Translation: The State Department will have no opinions that the President doesn't give them. This is why we need political appointees to run it.**

**There's an entire section titled simply "Respond Vigorously to the Chinese Threat" which is just Cold War Paranoia remixed, including the flat out statement that they've been "at war" with us for thirty years.**

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Rightsizing refugee admissions. The Biden Administration has engineered what is nothing short of a collapse of U.S. border security and interior immigration enforcement. This Administration's humanitarian crisis—which is arguably the greatest humanitarian crisis in the modern era, one which has harmed Americans and foreign nationals alike—will take many years and billions of dollars to fully address. One casualty of the Biden Administration's behavior will be the current form of the U.S. Refugee Admission Program (USRAP).  
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**And here they head straight into delusions. I think I'd have heard of something that huge, given the other humanitarian crises that I've heard about in my lifetime. Oh, wait, they mean "showing any kind of humanitarian consideration for others is a crisis."**

**Continuing 2025, still on the Department of State...**

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The federal government's obligation to shift national security-essential screening and vetting resources to the forged border crisis  
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**Whoa. Are they admitting this crisis is nothing of the sort, a forged crisis?**

**Okay, on to the international stage where we want to discuss our Big Problems.**

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The five countries on which the next Administration should focus its attention and energy are China, Iran, Venezuela, Russia, and North Korea.  
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**Like... wow. Okay, I'll give you China, though the discussion ON China is batshit insane, but the others? All put together, Iran, Venezuela, and North Korea don't match RUSSIA in GDP. North Korea's run by a lunatic who has managed to make a couple nukes. Iran and Venezuela can't even do that. Russia's getting its ass handed to it by the Ukraine.**

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The United States must have a cost-imposing strategic response to make Beijing's aggression unaffordable, even as the American economy and U.S. power grow. This stance will require real, sustained, near-unprecedented U.S. growth; stronger partnerships; synchronized



economic and security policies; and American energy independence—but above all, it will require a very honest perspective about the nature and designs of the PRC as more of a threat than a competitor.

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**So we have to make ourselves even bigger and take an aggressive stance against the only other really large country on the planet, setting up for a new Cold War.**

**The section goes on to basically echo prior statements, right down to Communists being the problem (as though they even know what Communism is). "The PRC's aggressive behavior can only be curbed through external pressure."**

**In discussion on Mexico:**

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A fentanyl-free frontier. The same cartels that parasitically run Mexico are also working with the PRC to fuel the largest drug crisis in the history

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**The largest drug crisis in history is the fact that we've made all these drugs illegal. That CREATES an industry of criminal manufacture, import, and competition. This is, of course, great if what you want is lots of excuses for increased LEO activity, RICO work, and so on, not so great if what you actually want is to reduce crime and assist people who are addicts. THAT would be to legalize all drugs and provide actual assistance.**

**In the discussion of the Middle East -- people peeved at Biden for his administration's approach to Israel and Palestine will not find their desired administration any better, and likely worse; "The Palestinian Authority should be defunded" is just the start.**

**The overall discussion reads like a real return to the Cold War, with the US building "allies" by pushing into overseas regimes with our military power and money.**

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The humiliating withdrawal of U.S. troops from Afghanistan after a 20-year military campaign

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**This tidbit is repeated more than once in this document. Apparently the idea that we finally got out of a war we shouldn't have been in really bothers them, and they want to find a real VICTORIOUS war.**

**Also, the disastrous elements of the withdrawal ALL can be traced to Trump.**

-----

When such institutions act against U.S. interests, the United States must be prepared to take appropriate steps in response, up to and including withdrawal. The manifest failure and corruption of the World Health Organization (WHO) during the COVID-19 pandemic is an example of the danger that international organizations pose to U.S. citizens and interests.

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**Here they really get up on the hobbyhorses and start riding. The fact that the world tried to fight a pandemic and they tried to fight the world is a repeated theme, and they embrace the idea that the entire response to COVID was a mistake and/or a deliberate act against America. Thus them even putting "vaccine" in quotes, implying that it wasn't a vaccine -- really lunatic fringe stuff now enshrined in a serious policy document. They go on to say...**

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"The Trump Administration's "tough love" approach to international organizations served American interests. For example, the Trump Administration withdrew from, or terminated funding for, the United Nations Human Rights Council, the United Nations Educational, Scientific and Cultural Organization, the United Nations Relief and Works Agency, and the WHO."  
-----

**Yep, Trump withdrew us from organizations working for health, human rights, and science. This is certainly not a crazy idea, no sir.**

**Project 2025, let's start today off with a real gut-bustingly funny quote in the Intelligence Community (IC) section:**

-----  
The IC must be perceived as a depoliticized protector of America's civil rights and security. The American people are understandably frustrated by the fact that those who abuse power are rarely held to account for their actions. This must change, beginning with leadership that is both committed to ensuring that these agencies faithfully execute the laws of the land under the Constitution and resolved to punish and remove any officials who have abused the public trust.  
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**Like the Felon-In-Chief and all his supporters? Like the people who attempted to subvert an election and stormed the Capitol?**

**Oh, silly me, of course not THEM.**

-----  
To help further the legislative intent behind IRTPA, DNI Ratcliffe advised during the transition of incoming Biden DNI Avril Haines that the DNI should be the only Cabinet-level intelligence official.<sup>10</sup> While his recommendation was adopted and has corrected the previously allowed imbalance by making the DNI the only Cabinet official and head of the IC at the table, the ODN's effectiveness and direction leave much to be desired.  
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**They want to make DNI the sole boss of the entire intelligence community. This was a bad idea when it was suggested and it remains a bad idea today. Yes, some of the infighting between groups really is counterproductive, but honestly, we don't want any**

**single authority over all intelligence apparatus; this is how you get a pervasive secret police force.**

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Finally, future IC leadership must address the widely promoted “woke” culture that has spread throughout the federal government with identity politics and “social justice” advocacy replacing such traditional American values as patriotism, colorblindness, and even workplace competence.  
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**Here's that terrifying word "woke" again (they mention/discuss the horrors of Wokeness on at least 27 pages), along with a somewhat clearer statement of what they actually mean: "colorblindness" is a classic buzzword that means almost the exact opposite of what its proponents think (and having BEEN such a proponent, I can say this with confidence). And of course that means that if you're paying attention to social challenges faced by people of color (or LGBTQ+, etc.) you are obviously ignoring competence.**

**Here comes some more amusing have-it-both-ways:**

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As with every agency in government, the President's election sets a new agenda for the country. Public servants must be mindful that they are required to help the President implement that agenda while remaining apolitical, upholding the Constitution and laws of the United States, and earning the public trust.  
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**You can't "help the President implement (their) agenda" and "remain(ing) apolitical". The President's agenda will be, by its nature, a political one. The job of public servants is to serve the PUBLIC interest, which may or may not involve supporting a current President's (or Congressional) agenda.**

-----  
The problem, unfortunately, is that certain elements in the State Department, IC, and DOD trade on risk aversion or political bureaucracy to delay execution of the President's foreign policy goals. A future conservative President should therefore identify individuals on the transition team who are familiar with the implementation of covert action with a view to placing them in key NSC, CIA, ODNI, and DOD positions. These knowledgeable teams can assist in any review of current covert actions and, potentially, planning for new actions.  
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**Translation: we have to remove people from these positions who might question our plans to do covert actions and replace them with people willing to do anything we want.**

-----  
In particular, the IC must restore confidence in its political neutrality to rectify the damage done by the actions of former IC leaders and personnel regarding the claims of Trump–Russia

collusion following the 2016 election and the suppression of the Hunter Biden laptop investigation and media revelations of its existence during the 2020 election.

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**There was, obviously, Russian influence in 2016, 2020, and ongoing right now, the laptop was a nothingburger, and what they're saying here is of course "we don't want intelligence to be biased except FOR us". Neutrality is not what they intend nor want.**

**There is of course an entire section on "CHINA", which I am now hearing in the Street Fighter 2 announcer's voice. I'm not quoting from that one because it's not really saying anything new.**

**This, though is worth quoting...**

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The Senate Select Committee on Intelligence (SSCI) has taken a keen interest in possibly updating the codified language underpinning much of the nation's counterintelligence apparatus. "Spy vs. spy" threats continue to exist, but the rise of China and (to an extent) Russia's machinations move beyond the governmental sphere to technological, economic, supply chain, cyber, academic, state, and local espionage threats at a level our country has never seen. The asymmetric threat includes cyber, nontraditional collection, and issues involving legitimate businesses serving as collection platforms.

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**Fear fear fear and more fear is the order of the day here. Fear is the mind-killer, and they definitely don't want any functioning minds questioning them.**

**Still in the intelligence section.**

**In discussing how international intelligence information exchanged is performed (and how the challenges of secrecy, cover, etc., are managed), we get to this:**

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An incoming conservative President should reset Europe's expectations. Brussels has always arbitrated the difference between being a military ally against, for example, Russia and conducting a full-blown trade conflict with the United States. Restrictions on data exports have been part of the trade conflict, but now they could seriously harm our military and intelligence capabilities. Moreover, restrictions on U.S. intelligence collection hurt the Europeans themselves, especially as the United States shares unprecedented amounts of intelligence on Russia's invasion of Ukraine with Europeans...

The United States has never seriously pushed back against the EU; now is the time. An incoming President should ask for an immediate study of the implementation of Executive Order 14086 and suspend any provisions that unduly burden intelligence collection. At the same time, in negotiations with the Europeans, the United States should make clear that the continued sharing of intelligence with EU member states depends on successful resolution of this issue within the first two years of a President's term. It is time for a real solution, not the 30 years of stopgaps imposed by Brussels.

-----  
**Short version, it's time that Europe conform to USA's interests and the US should play hardball on that, demanding a resolution of our intelligence community conflicts in two years.**

**I don't doubt that there are, indeed, issues in this area -- intelligence-gathering was relatively static in its craft, then slowly changing, then all of a sudden the Internet and computer age changed everything. Playing catch-up in a game that gets people killed is no fun. But I'm not sure that playing the tough guy is the way to convince a dozen other countries to play nice with you.**

**Now, on to the Media Offices...**

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...Even content that went well beyond fair and accurate reporting on U.S. domestic and political problems could not be reined in by front office leadership under the Firewall Regulation. Soon, VOA's White House correspondent was posting content highly critical of, and personally insulting to, the U.S. President—in contradiction of VOA's own journalistic standards, policies, and procedures.  
-----

**I suspect what they mean is "VOA was telling the truth about the Trump White House", since there's very little that would be actually personally insulting to Trump in a legal sense; truth is an absolute defense against libel or slander charges.**

**A lot of this section is like this -- basically, our Voice of America and related media areas have been infiltrated by "anti-American propaganda" and so on, and this needs to be fixed.**

-----  
Current and former USAGM/VOA leadership who wanted to maintain virtually zero accountability and oversight waged a campaign of interference, resistance, and disinformation to stifle change at the agency. Perhaps not coincidentally, various media outlets with relationships to former and future USAGM leadership published near-daily criticisms of Trump Administration appointees and also of grantee organization leaders who were appointed by CEO Pack to implement long-overdue reforms.  
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**As we see here, in fact. Yes, indeed, there was near-daily criticism of Trump Administration appointees, when Trump was (for instance) appointing people with a history of hating various government agencies to RUN those agencies. This is called "reporting".**

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...These shortfalls are either oriented toward, or directly contribute to, the agency's media organizations joining the mainstream media's anti-U.S. chorus and denigrating the American story—all in the name of so-called journalistic independence...

Ensuring that taxpayer-funded TV, radio, and messaging tells America's story is imperative and should be coordinated with the existing foreign- language social media platforms at the State Department. Currently, VOA's foreign-language TV programming is unreliable in telling America's story, given its amorphous interpretation of its independence firewall and its waning adherence to certain provisions of the Smith–Mundt Act depending on which political party is in office.

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**"America's story"? This is never actually defined anywhere, just used as though it's obvious what they mean by "America's Story". I'd really like a clear definition of what they mean by that.**

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If the de facto aim of the agency simply remains to compete in foreign markets using anti-U.S. talking points that parrot America's adversaries' propaganda, then this represents an unacceptable burden to the U.S. taxpayer and a negative return on investment. In that case, the USAGM should be defunded and disestablished. If, however, the agency can be reformed to become an effective tool, it would be one of the greatest tools in America's arsenal to tell America's story and promote freedom and democracy around the world.

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**Well, here it's a bit clearer. It means "whatever propaganda the President wants pushed overseas" rather than reporting and information.**

**Now let's see what they see about PBS...**

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Every Republican President since Richard Nixon has tried to strip the Corporation for Public Broadcasting (CPB) of taxpayer funding. That is significant not just because it means that for half a century, Republican Presidents have failed to accomplish what they set out to do, but also because Nixon was the first President in office when National Public Radio (NPR) and the Public Broadcasting Service (PBS), which the CPB funds, went on air.

In other words, all Republican Presidents have recognized that public funding of domestic broadcasts is a mistake.

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**"There should only be private commercially-viable broadcasting and directly controlled exterior propaganda" appears to be the slant here. Publicly funded domestic broadcasts apparently allow too many facts, unburdened with commercial motives, to be transmitted.**

**Along that line, they continue:**

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All of which means that the next conservative President must finally get this done and do it despite opposition from congressional members of his own party if necessary. To stop public

funding is good policy and good politics. The reason is simple: President Lyndon Johnson may have pledged in 1967 that public broadcasting would become “a vital public resource to enrich our homes, educate our families and to provide assistance to our classrooms,” but public broadcasting immediately became a liberal forum for public affairs and journalism.

Not only is the federal government trillions of dollars in debt and unable to afford the more than half a billion dollars squandered on leftist opinion each year, but the government should not be compelling the conservative half of the country to pay for the suppression of its own views. As Thomas Jefferson put it, “To compel a man to furnish contributions of money for the propagations of opinions which he disbelieves and abhors, is sinful and tyrannical.”

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**It's really funny they use that quote here in all seriousness, but forget it when it's THEIR opinions being propagated that the "liberal" half of the country find abhorrent. Yea, sorry, not sorry.**

**Going on...**

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The Biden Administration has deformed the agency (USAID) by treating it as a global platform to pursue overseas a divisive political and cultural agenda that promotes abortion, climate extremism, gender radicalism, and interventions against perceived systemic racism.

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**Yeah, well, the problem is that their hobbyhorse of abortion isn't that big a deal anywhere else, climate change is real, and so is prejudice and systematic racism. But I understand, this is a threat when you don't want to actually face the world as it is.**

**They continue these rants for a while, and then we get to this gem:**

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Refocusing Gender Equality on Women, Children, and Families. Instead of protecting women’s and children’s unalienable human rights and propelling their ability to thrive in society, past Democrat Administrations have nearly erased what females are and what femininity is through “gender” policies and practices. For instance, these Administrations have diluted USAID’s focus on assisting vulnerable women, children, and families around the globe by adding protections for and ideological advocacy on behalf of progressive special-interest groups. USAID now aggressively promotes abortion on demand under the guise of “sexual and reproductive health and reproductive rights,” “gender equality,” and “women’s empowerment” and advocates for those who claim minority status or vulnerability.

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**The idea of "erasing what 'females' are" is a preposterous statement on the face of it, and the rest of it is just the same old "There's only two genders" business with an additional serving of anti-reproductive rights.**

**Anti-abortion is a MAJOR focus here, along with erasing anything other than Man and Woman (and traditional Man-Woman-Child Family). There's considerable material**

**devoted to eradicating any of the advances of the last fifty years from any and all agencies.**

**Oh, and "religious freedom" is repeated multiple times -- in a fashion that makes it clear what they mean is "Our Particular Christian Nationalist approaches must be free to run everything".**

**Continuing with Project 2025, still in USAID section:**

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Focusing on Holistic Health Care and Support for Women, Children, and Families. The continued high rate of maternal and infant mortality is a persistent global tragedy. Contrary to current publicity, this problem is not solved by abortion. Families genuinely cherish children.

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**This is a mishmash of propaganda and deliberate or unconscious misunderstanding. Few, if any, groups push abortion as a solution to maternal or infant mortality. The problem of both is served by easily available healthcare. Abortion availability is also part of that, and of a woman's ability to control her own body -- which is the real issue, not "the children", because even in this document it's not really addressed how you're going to care for the extra millions of children per year that you would get if you actually outlawed abortion.**

**Abortion and birth control are embraced as they become available, which is why overall birth rates plummet in every country that reaches certain points.**

**As James Nicoll put it many years ago, "When women are given the choice to choose the answer to the question 'would you like to push as many objects the size of a watermelon out of your body as it takes to kill you?' most women answer 'no, thank you'."**

**The focus on "families" is of course continued throughout, with that meaning "Man, Woman, Kids, preferably man working and woman staying home" (even when their other policies make that virtually impossible).**

**The rest of this section is more of the same, with repeated mentions of their favorite hobbyhorse: "Biden Administration's radical priorities in foreign assistance, including gender, climate change, and the promotion of identity-based politics."**

**What this means, of course, along with their insistence on making use of "faith-based" groups, is "promote our radical "Christian" agenda against the advances made in the last decades'.**

**(They also want to turn a lot of the stuff over to "private industry", which means of course "our donors")**

**Now into the section titled "The General Welfare", and at least they're honest up front:**

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HHS is home to Medicare and Medicaid, the principal drivers of our \$31 trillion national debt. When Congress passed and President Lyndon B. Johnson signed into law these programs, they were set on autopilot with no plan for how to pay for them. The first year that Medicare spending was visible on the books was 1967. From that point on through 2020—according to the American Main Street Initiative’s analysis of official federal tallies—Medicare and Medicaid combined cost \$17.8 trillion, while our combined federal deficits over that same span were \$17.9 trillion. In essence, our deficit problem is a Medicare and Medicaid problem.

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**This is like me noting that the largest proportion of my budget is going to rent and groceries and blaming rent and groceries for my credit card debt. If that's the case, the problem isn't rent and groceries, it's that I'm low on money all the time.**

**Hobbyhorse time:**

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"for the irrational, destructive, un-American mask and vaccine mandates that were imposed upon an ostensibly free people during the COVID-19 pandemic. "  
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**Mask mandates were in place in goddamn 1918. They made sense then, they made sense now. And vaccines save more lives than anything else, so going against those makes you sound like an idiot. Vaccines have been mandated for decades.**

**The above is just the start of a long conspiracy-theory diatribe against the actual scientific community's response to COVID and a summary of all the half-baked right-wing lunacies they worked to promote. I haven't come across a mention of drinking bleach or sticking UV lights up your butt, but I wouldn't be entirely surprised.**

**From there, it goes on to attack the DOJ (how dare they actually call Trump and his people to account for anything?), the Department of Education :**

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...a convenient one-stop shop for the woke education cartel, which—as the COVID era showed—is not particularly concerned with children’s education. Schools should be responsive to parents, rather than to leftist advocates intent on indoctrination—and the more the federal government is involved in education, the less responsive to parents the public schools will be. This department is an example of federal intrusion into a traditionally state and local realm. For the sake of American children, Congress should shutter it and return control of education to the states.  
-----

**There it is in black and white: get rid of the Department of Education. They're really afraid of people being able to learn anything that they don't directly control.**

**RE the Department of Energy:**

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"...end the Biden Administration's unprovoked war on fossil fuels, restore America's energy independence, oppose eyesore windmills built at taxpayer expense, and respect the right of Americans to buy and drive cars of their own choosing, rather than trying to force them into electric vehicles and eventually out of the driver's seat altogether in favor of self-driving robots."

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**You know, the self-driving robots are being promoted by billionaires like Musk. No one's forcing anyone to drive electric cars. This is just a wish list for fossil-fuel companies, near as I can tell, who of course invested in this.**

### **In Housing and Urban Development:**

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help "restore the family-supporting job as the centerpiece of the American economy," in lieu of the current Administration's "left-wing social-engineering agenda"—"the most assertive" in history—which empowers race, gender, and climate-change activists at the expense of American workers.

-----

**You complete twits, the reason the family-supporting jobs are gone is because you guys have promoted the current brand of capitalism that literally sucks all the money up into the company itself. When I was young, jobs had steady raises for EVERYONE, and extra for those doing well. The standard today is if you don't switch jobs every few years, you'll end up losing. Which is directly contrary to supporting a stable family.**

### **Now into the actual section on Department of Agriculture:**

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The current mission statement as stated by the Biden Administration highlights the broad scope of the USDA:

"To serve all Americans by providing effective, innovative, science-based public policy leadership in agriculture, food and nutrition, natural resource protection and management, rural development, and related issues with a commitment to delivering equitable and climate smart opportunities that inspire and help America thrive."

The first part of the mission statement regarding the issues covered is not new to the Biden Administration; it reflects the overly broad nature of the USDA's work. However, the language bringing in equity and climate change is new to the Biden Administration and part of the USDA's express effort to transform agricultural production.

The USDA's new vision statement illuminates the focus of this effort:

"An equitable and climate smart food and agriculture economy that protects and improves the health, nutrition and quality of life of all Americans, yields healthy land, forests and clean water, helps rural America thrive, and feeds the world."

This effort is one of a federal central plan to put climate change and environmental issues ahead of the most important requirements of agriculture—to efficiently produce safe food.

-----

**Here, they keep their blinders on about climate change, and that's where this whole thing runs headlong into problems: "to efficiently produce safe food" you need to account for changing climate and weather patterns. Denying it's happening isn't gonna help your agriculture. The fact that Exxon itself knew the change would happen and even made a pretty damn close prediction of how much would change way back in the early 70s is something they love to forget. And it'll kill us if they succeed in running policy based on plugging their ears and screaming LA LA LA I CAN'T HEAR YOU.**

**Continuing the USDA section of 2025...**

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The Biden Administration's USDA strongly supported the recent United Nations (U.N.) Food Systems Summit. According to the USDA:

"The stated goal of the Food Systems Summit was to transform the way the world produces, consumes and thinks about foods within the context of the 2030 Agenda for Sustainable Development and to meet the challenges of poverty, food security, malnutrition, population growth, climate change, and natural resource degradation."

Not unlike those who oppose reliable and affordable energy production, there is a disdain, especially by some on the Left, for American agriculture and the food system. The Biden Administration's vision of a federal government developing a plan that "fixes" agriculture and focuses on issues secondary to food production is very disturbing.

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**Poverty, food security, malnutrition, population growth, climate change, and natural resource degradation are issues very much relevant to food production -- what's produced, where it's produced, how it's produced, and for whom it's produced and how it's brought to those it's produced for.**

**American agriculture has done great things. It's also done some pretty terrible things, sometimes both at once because the "terrible" wasn't obvious until quite some time after the "great" started. It's important to constantly re-evaluate such vital industries, especially now in the light of changing climate and availability of land, impact of fertilizers, and so on. The ancient world destroyed more than one breadbasket area by failing to properly understand what made it work; we should recognize that we're capable of the same mistakes.**

-----

Proactively Defend Agriculture. From the outset, the next Administration should: Denounce efforts to place ancillary issues like climate change ahead of food productivity and affordability when it comes to agriculture.

\* Remove the U.S. from any association with U.N. and other efforts to push sustainable-development schemes connected to food production.

\* Defend American agriculture and advance the critical importance of efficient and innovative food production, especially to advance safe and affordable food.

\* Stress that ideal policy should remove obstacles imposed on American farmers and individuals across the food supply chain so that they can meet the food needs of Americans.

\* Clarify the critical importance of efficiency to food affordability, and why a failure to recognize this fact especially hurts low-income households who spend a disproportionate share of after-tax income on food compared to higher-income households.

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**I particularly like that they talk about championing agriculture, but dismiss sustainable development. This is something of a tell-tale element, as many of the problems of industrial agriculture are ones of long-term sustainability. What gives you tons of food today is great, but you want it to keep DOING that effectively forever, especially as your population increases.**

**Things that rely on fertilizers, pesticides, and so on may not BE sustainable, for numerous reasons. We've reduced the amount of land used for agriculture drastically. Possibly it would be better to increase that proportion and use somewhat different techniques.**

**Their comment about efficiency translating to affordability is of course naive at best, deliberately misleading at worst. Current commercial industry practice is to make sure the gains of efficiency in production go to the company and its stockholders, not into dropping the price of goods and services. Legally this has even been upheld -- the responsibility of a corporation is to the stockholders, in effect, so their actual production of anything is secondary to that.**

**I'm no expert in farming so I'm not going into detail of the next bits. It does strike me that the kind of changes they want to make in federal subsidy and insurance programs are the sort I'd expect to impact individual small farmers far more than large ones, which may be borne out by their constant reference to how small the acreage affected is, rather than how many farms would be impacted.**

**Now, they do wanna go after food stamps, as we knew from prior notes:**

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**Re-implement work requirements. The statutory language covering food stamps allows states to waive work requirements that otherwise apply to work-capable individuals**

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**"Means-tested" stuff is usually quite inefficient and expensive. Adding in work requirements or other qualifications just makes it more inefficient, as someone has to**

**keep checking all of these things. Make it sufficiently a pain in the ass, people can't use it. That may save you money on THAT side, but it's not helping anyone.**

-----  
Reform broad-based categorical eligibility. Federal law permits states to enroll individuals in food stamps if they receive a benefit from another program, such as the Temporary Assistance for Needy Families (TANF) program. However, under an administrative option in TANF called broad-based categorical eligibility (BBCE), "benefit" is defined so broadly that it includes simply receiving distributed pamphlets and 1-800 numbers...Adopting the BBCE option has even allowed millionaires to enroll in the food stamp program.

-----  
**The Welfare Millionaire rears its head again, and it's as much bullcrap now as it was when we first heard of it. The money wasted by the bureaucracy to DENY people access well exceeds the money saved, and pretty much always has. But the Republican horror at the idea of someone getting something without proving they deserve it -- even food, shelter, or other things needed for that inalienable right "life" -- means that they want to make it harder and harder for anyone to qualify.**

-----  
Return to the Original Purpose of School Meals. Federal meal programs for K-12 students were created to provide food to children from low-income families while at school.<sup>81</sup> Today, however, federal school meals increasingly resemble entitlement programs that have strayed far from their original objective and represent an example of the ever-expanding federal footprint in local school operations.

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**God forbid that kids get to eat without their parents taking out time from their lives to prove they deserve to. Aren't the Republicans the ones who want to demand something for their taxes? Parents pay taxes for their schools, let the schools provide food, since the kids are REQUIRED to be there.**

-----  
Promulgate a rule properly interpreting CEP. The USDA should issue a rule that clarifies that only an individual school or a school district as a whole, not a subset of schools within a district, must meet the 40-percent criteria to be eligible for CEP. Education officials should be prohibited from grouping schools together.

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**Yep. If your school district has a third of its kids eligible, screw them. They're not eligible unless more of 'em are poor.**

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Work with lawmakers to eliminate CEP. The NSLP and SBP should be directed to serve children in need, not become an entitlement for students from middle- and upper-income homes. Congress should eliminate CEP. Further, the USDA should not provide meals to students during the summer unless students are taking summer-school classes. Currently, students can get

meals from schools even if they are not in summer school, which has, in effect, turned school meals into a federal catering program.<sup>93</sup>

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**Indeed, make sure the kids who may get their only decent meals at lunch can't get anything for three months. That's definitely taking care of your lower income kids.**

**A number of other provisions I'm not sure of the impact of, as they have to do with farmers and markets and inspection of food. I am suspicious that the desire to turn inspection of food over to states has a (food) poison pill in it, though.**

**But then we get to:**

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Wildfires have become a primary vegetation management regime for national forests and grasslands.<sup>118</sup> Recognizing the need for vegetation management, the Forest Service has adopted "pyro-silviculture" using "unplanned" fire,<sup>119</sup> such as unplanned human-caused fires, to otherwise accomplish vegetation management.

The Forest Service should instead be focusing on addressing the precipitous annual amassing of biomass in the national forests that drive the behavior of wildfires. By thinning trees, removing live fuels and deadwood, and taking other preventive steps, the Forest Service can help to minimize the consequences of wildfires.

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**So the Forest Service should be basically going through the entire national forest system raking leaves, picking up deadwood, and so on? What drugs are these people ON? They haven't the faintest idea of what kind of a task they're recommending here.**

***ADDENDUM* to my original post: I have been informed that the language up there – thinning trees, removing live-fuels and deadwood, etc. – is timber company language for clear-cutting. So what they're saying is the Forest Service should be helping out the logging companies.**

**Fires ARE part of maintenance in forested areas. There's plants that literally won't GERMINATE seeds until a fire's passed through. One of the reasons the Pine Bush, here in NY, has been slowly fading away, along with its signature Karner Blue butterfly, is that we don't allow it to burn every few years, thus killing off the encroaching hardwoods and letting the pines keep the land, the lupin grow in the flame-cleared area, and so on. My dad studied some of this.**

**Department of Education:**

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Federal education policy should be limited and, ultimately, the federal Department of Education should be eliminated. When power is exercised, it should empower students and families, not government. In our pluralistic society, families and students should be free to choose from a diverse set of school options and learning environments that best fit their needs.

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**And having the regular people able to get education's a terrible thing indeed.**

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Although student loans and grants should ultimately be restored to the private sector (or, at the very least, the federal government should revisit its role as a guarantor, rather than direct lender)  
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**I'm not entirely sure about this one. Whenever I see "restored to the private sector" I immediately think "used for the benefit of the banks", but it's true that student loans are a mess right now. I SUSPECT that that's because there's actually been more business interference in them than actual government action, but I don't know.**

**The real problem -- and it goes across our entire society, both legally and through social/business assumptions -- is that nearly all businesses (there are a very few exceptions) operate, openly or unspokenly, under the "if we can get more money, of course we will" principle, rather than "we're doing quite well, we have no reason to push things" principle. A lot of people in their private lives operate on the latter, but it's much, much rarer in business. Thus, trying to improve a situation by making more resources available to the people who need something often runs into the problem that the businesses then think "hey, that means we can squeeze more money out of everyone!".**

**Not sure if there's a good solution for this, but if not -- it's one of the reasons our society is headed for collapse. We weren't doing this up through the late 70s - early 80s, but it's become the norm since.**

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That has not, however, been the track record of federal higher education policy or of the many institutions of higher education that are hostile to free expression, open academic inquiry, and American exceptionalism.  
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**Here's a real funny one. The idea of "American Exeptionalism" is, pretty much, hogwash. There's some really cool ideas in the USA's founding, and on occasion we've done something with them, but we've also got about as much terrible bullcrap in our history as anyone else (given our relatively short history). Yes, teaching American Exceptionalism may make people more patriotic, but that patriotism is based on a lie at that point.**

**I am absolutely a fan of the USA -- but as its IDEAL, not as its terribly flawed incarnations. Captain America and Superman, when written well, represent the ideal of liberty and justice for all. Our actual history is an unfortunate, though far more realistic, scattering of bright points through a lot of gray and sometimes dead black.**

**What's funny is the "hostile to free expression and open academic inquiry" juxtaposed with "American Exceptionalism", since if you take the latter as a given you've definitely shut off the first two.**

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**Not sure how to reproduce the graphs they use to prove how badly our kids are doing in testing (leaving aside whether testing means much), but if you're experienced in reading graphs what you see is "it's not changed much in the last several years, though COVID caused a drop".**

**A large chunk of this one I can't directly comment on because I agree with some aspects (there's definitely an awful lot of bureaucratic bloat in this and other agency areas) but am suspicious of the proposed solutions including shoving various responsibilities into other agencies and privatizing other elements, and of course the constant refrain of getting rid of "woke" stuff, including "critical race theory" and so on.**

**The overall idea that the Federal government shouldn't have any hand in education is ridiculous. An educated, competent population would be an asset to everyone, and clearly contributes to the general welfare -- especially if you're helping the otherwise disadvantaged get access to proper education.**

**Personally, my kids all benefited from having programs specifically designed to aid those on the autism-ADHD spectrum, and those are supported by both state and federal dollars.**

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**Student Assistance General Provisions, Federal Perkins Loan Program, and William D. Ford Federal Direct Loan Program Final Regulations**

Effective July 1, 2023, the department promulgated final regulations addressing loan forgiveness under the HEA's provisions for borrower defense to repayment ("BDR"), closed school loan discharge ("CSLD"), and public service loan forgiveness ("PSLF"). The regulations also included prohibitions against pre-dispute arbitration agreements and class action waivers for students enrolling in institutions participating in Title IV student loan programs. Acting outside of statutory authority, the current Administration has drastically expanded BDR, CSLD, and PSLF loan forgiveness without clear congressional authorization at a tremendous cost to the taxpayers, with estimates ranging from \$85.1 to \$120 billion.

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**Actually, student loan forgiveness costs taxpayers nothing most of the time; the loans were already paid back, and the "forgiveness" is just erasing excessive interest.**

**This is clearly predatory lenders annoyed that they won't be allowed to predate.**

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**Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance (Title IX)**



With its Notice of Proposed Rulemaking published on July 12, 2022, the Biden Education Department seeks to gut the hard-earned rights of women with its changes to the department's regulations implementing Title IX, which prohibits discrimination on the basis of sex in educational programs and activities. Instead, the Biden Administration has sought to trample women's and girls' athletic opportunities and due process on campus, threaten free speech and religious liberty, and erode parental rights in elementary and secondary education regarding sensitive issues of sex. The new Administration should take the following steps:

\*Work with Congress to use the earliest available legislative vehicle to prohibit the department from using any appropriations or from otherwise enforcing any final regulations under Title IX promulgated by the department during the prior Administration.

\*Commence a new agency rulemaking process to rescind the current Administration's Title IX regulations; restore the Title IX regulations promulgated by then-Secretary Betsy DeVos on May 19, 2020; and define "sex" under Title IX to mean only biological sex recognized at birth.

\*Work with Congress to amend Title IX to include due process requirements; define "sex" under Title IX to mean only biological sex recognized at birth; and strengthen protections for faith-based educational institutions, programs, and activities.

The Trump Administration's 2020 Title IX regulation protected the foundational right to due process for those who are accused of sexual misconduct. The Biden Administration's proposed change to the interpretation of Title IX disposes of these rights.

The next Administration should move quickly to restore the rights of women and girls and restore due process protections for accused individuals.

At the same time, there is no scientific or legal basis for redefining "sex" to "sexual orientation and gender identity" in Title IX. Such a change misrepresents the U.S. Supreme Court's opinion in *Bostock*, threatens the American system of federalism, removes important due process protections for students in higher education, and puts girls and women in danger of physical harm. Facilitating social gender transition without parental consent increases the likelihood that children will seek hormone treatments, such as puberty blockers, which are experimental medical interventions. Research has not demonstrated positive effects and long-term outcomes of these treatments, and the unintended side effects are still not fully understood.

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**Short version: go away, trans and genderfluid people (and take the gays with you). There's only Men and Women and you're an unfortunate aberration of the evil Democrat Liberal Regime. Especially go away, any legal protection for you people.**

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#### Phase Out Existing Income-Driven Repayment Plans

While income-driven repayment (IDR) of student loans is a superior approach relative to fixed payment plans, the number of IDR plans has proliferated beyond reason. And recent IDR plans are so generous that they require no or only token repayment from many students.

\*The Secretary should phase out all existing IDR plans by making new loans (including consolidation loans) ineligible and should implement a new IDR plan. The new plan should have an income exemption equal to the poverty line and require payments of 10 percent of income above the exemption. If new legislation is possible, there should be no loan forgiveness, but if not, existing law would require forgiving any remaining balance after 25 years.

President Biden has proposed a new income-driven repayment program that would be extremely generous to borrowers, requiring only nominal payments from most students. It would turn every policy lever to the most generous setting on record (e.g., lowering the percentage of income owed from 10 percent to 25 percent under existing plans to 5 percent, lowering the number of years of payment required from 20 or 25 years to 10 years, and increasing income exemption from 150 percent to 225 percent of the poverty line)

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**Translation: "My bank and their stockholders, Bob! Who's helping them out?"**

**We really should just have free education like a lot of other countries, but if that can't happen, we shouldn't make getting a degree a tool to pauperize people, which it currently is.**

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When the nation's largest teacher association, the National Education Association (NEA), cites its federal charter, it lends the NEA a level of significance and suggests an effectiveness that is not supported by evidence. In fact, the NEA and the nation's other large teacher union, the American Federation of Teachers (AFT), use litigation and other efforts to block school choice and advocate for additional taxpayer spending in education. They also lobbied to keep schools closed during the pandemic.

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**Ah, what a surprise, more union-busting on the schedule. How dare unions try to keep our teachers and students from spreading a pandemic and killing more people.**

*"Members should conduct hearings to determine how much federal taxpayer money the NEA has used for radical causes favoring a single political party."*

**Ah. "Are you now, or were you ever, a member of the Democratic Party?" Only for teachers instead of Hollywood.**

**Department of Education still...**

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Parental Rights in Education and Safeguarding Students

Federal officials should protect educators and students in jurisdictions under federal control from racial discrimination by reinforcing the Civil Rights Act of 1964 and prohibiting compelled speech. Specifically, no teacher or student in Washington, D.C., public schools, Bureau of Indian Education schools, or Department of Defense schools should be compelled to believe, profess, or adhere to any idea, but especially ideas that violate state and federal civil rights laws.

By its very design, critical race theory has an “applied” dimension, as its founders state in their essays that define the theory. Those who subscribe to the theory believe that racism (in this case, treating individuals differently based on race) is appropriate—necessary, even—making the theory more than merely an analytical tool to describe race in public and private life.

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**Another bugaboo that has nothing to do with reality they're inventing here, so that they can Newspeak it into being the enemy. To be clear, they go on to say: "...the false idea that America is systemically racist, the theory is actively disrupting the values that hold communities together such as equality under the law and colorblindness..."**

**America \*IS\* systemically racist and sexist. We've been trying to fix it off and on for decades, but denying it or pretending it's not really there obviously isn't going to fix it. Denying it IS great if you happen to benefit from the omnipresent prejudices, but that's not the ideal we have.**

**Here, of course, they WANT to redefine reality so that they can take tools being used to combat systematic prejudice and eliminate them -- protecting the status quo and the fantasy of an America that never existed.**

**Note, as mentioned before, I have the IDEAL of America as part of my defining soul. I understand what they WANT to see. But I know that what I believe in is an IDEAL, not truth, and that most of our history doesn't even come close to that ideal.**

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For K–12 systems under their jurisdiction, federal lawmakers should adopt proposals that say no individual should receive punishment or benefits based on the color of their skin.

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**Now this sounds perfectly reasonable, even laudable. But if you put it in context, what they MEAN is "there should be no programs that help out disadvantaged groups".**

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Advancing Legal Protections for Parental Rights in Education

While the U.S. Supreme Court and other federal courts have consistently recognized that parents have the right and duty to direct the care and upbringing of their children, they have not always treated parental rights as co-equal to other fundamental rights—like free speech or the free exercise of religion. As a result, some courts treat parental rights as a “second-tier” right and do not properly safeguard these rights against government infringement. The courts vary greatly over which species of constitutional review (rational basis, intermediate scrutiny, and strict scrutiny) to apply to parental rights cases.

This uncertainty has emboldened federal agencies to promote rules and policies that infringe parental rights. For example, under the Biden Administration’s proposed Title IX regulations, schools could be required to assist a child with a social or medical gender transition without parental consent or to withhold information from parents about a child’s social transition (e.g., changing their names or pronouns). The federal government could demand that schools

include curriculum or lessons regarding critical race or gender theory in a way that violates parental rights, especially if it requires minors to disclose information about their religious beliefs, or beliefs about race or gender in violation of the Protection of Pupil Rights Amendment (20 USC Sec. 1232h).

To remedy the lack of clear and robust protection for parental rights, the next Administration should:

\*Work to pass a federal Parents' Bill of Rights that restores parental rights to a "top-tier" right. Such legislation would give families a fair hearing in court when the federal government enforces any policy against parents in a way that undermines their right and responsibility to raise, educate, and care for their children. The law would require the government to satisfy "strict scrutiny"—the highest standard of judicial review—when the government infringes parental rights.

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**Parental rights are not, in fact, "top-tier"; they are conditional rights based on how the parents conduct themselves. The specific issues cited above are in fact meant to protect young people who are deciding on crucial elements of their lives from possible dangerous consequences.**

**For these people, of course, they WANT those dangerous consequences because the idea of kids being trans is just not to be borne. Thus, they want "parental rights" to be absolute as possible, so that the schools CANNOT protect kids. It's already hard enough for them to do so.**

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School officials in some states are requiring teachers and other school employees to accept a minor child's decision to assume a different "gender" while at school—without notifying parents. In California, New Jersey, and certain districts in Kansas and elsewhere, educators are prohibited from informing parents about children's confusion over their sex if the children do not want their parents to know. Such policies allow schools to drive a wedge between parents and children. The next Administration should work with Congress to provide an example to state lawmakers by requiring K–12 districts under federal jurisdiction, including Washington, D.C., public schools, Bureau of Indian Education schools, and Department of Defense schools, with legislation stating that:

\*No public education employee or contractor shall use a name to address a student other than the name listed on a student's birth certificate, without the written permission of a student's parents or guardians.

\*No public education employee or contractor shall use a pronoun in addressing a student that is different from that student's biological sex without the written permission of a student's parents or guardians.

\*No public institution may require an education employee or contractor to use a pronoun that does not match a person's biological sex if contrary to the employee's or contractor's religious or moral convictions.

State lawmakers should use this model and adopt similar provisions for public schools within their borders. Federal lawmakers should not allow public school employees to keep secrets about a child from that child's parents.

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**There you have it in black and white: trans kids better shove themselves into the closet, and good, until they graduate, because even if their parents are violently against any such behavior, the school's to be required to tell them.**

**There are some less-deadly and more amusing implications of these laws (like nicknames are now outlawed), but the important points here are making sure trans (and gay, etc.) kids can't find support outside of the home.**

**The next sections cheerfully advocate "school choice" (vouchers and special education "accounts" which amount to take your money to whatever school you want); the issues with that have been discussed by others in far more detail than I could even attempt, so I'm moving past that.**

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Over a 10-year period, the federal spending should be phased out and states should assume decision-making control over how to provide a quality education to children from low-income families.

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**There's the real key: they're doing the same thing to education that they used for abortion, use "state's rights" to get rid of something they don't like.**

**Funny, "state's rights" seems to be used a lot by these people. Seems to me I remember another group being really interested in that little thing, back around this "Civil War" we had...**

**They continue on with this stuff, including reiterating the need to make sure student loans can never be forgiven and make new ones privatized entirely. Then there's this little gem:**

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Congress should cap the indirect cost rate paid to universities so that it does not exceed the lowest rate a university accepts from a private organization to fund research efforts. This market-based reform would help reduce federal taxpayer subsidization of leftist agendas.

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**How they get from indirect rates to "subsidize leftist agendas" is an amazing bit of mental acrobatics, but what this really does is make it so that research universities can't use their actual indirect rates, making research far more expensive.**

**(if you don't know what indirect versus direct rates are, it's not surprising, I didn't know until I started having to do R&D budgets, but believe me, telling an organization you**

**won't pay their indirect rates is a good way to get them to stop doing stuff for you, ever, before they go broke)**

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In the meantime, the next Administration should promulgate a new regulation to require the Secretary of Education to allocate at least 40 percent of funding to international business programs that teach about free markets and economics and require institutions, faculty, and fellowship recipients to certify that they intend to further the stated statutory goals of serving American interests.

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**Wow. 40 percent of the funding is to go to literal capitalism propaganda.**

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Eliminate the "list of shame." Educational institutions can claim a religious exemption with the Office for Civil Rights at the Department of Education from the strictures of Title IX. In 2016, the Obama Administration published on the Department of Education's website a list of colleges that had applied for the exemption. This "list of shame" of faith-based colleges, as it came to be known, has since been archived on ED's website, still publicly available. The President should issue an executive order removing the archived list and preventing such a list from being published in the future.

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**What, shouldn't we know if a college is complying with important regulations? Oh, wait, "faith-based". What "faith" would they be concerned with, I wonder? Buddhism? Shinto? Sikhism? ...**

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**Pursue Antitrust Against Accreditors**

The President should issue an executive order pursuing antitrust against college accreditors, especially the American Bar Association (ABA).

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**What they have against the American Bar Association I'm not sure; SOMEONE's lawyer got them in trouble, I guess.**

**They list out things to save money, like ending grants and making sure people can't wiggle out of their student loans. All helpful, these people are.**

**Now into the Department of Energy.**

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The new energy crisis is caused not by a lack of resources, but by extreme "green" policies. Under the rubrics of "combating climate change" and "ESG" (environmental, social, and governance), the Biden Administration, Congress, and various states, as well as Wall Street

investors, international corporations, and progressive special-interest groups, are changing America's energy landscape.

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**Since one of the key tenets of their entire posture is that anthropogenic climate change isn't real (or if real, is not a problem) this drives their entire focus through this section. Obviously, if most scientists are lying or misleading them they have to change everything so that the scientists aren't listened to.**

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Yet the current Administration's first concern is plowing taxpayer dollars into intermittent wind and solar projects and ending the use of reliable fossil fuels.

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**"Reliable fossil fuels"? Look, if you were saying "reliable nuclear power" I'd buy it, but fossil fuel plants are at least as vulnerable to disruption as solar and wind -- they have to have their fuel delivered CONSTANTLY, while a nuke plant just sits there sealed up and generating energy for decade-scale periods, and both wind and solar have the energy delivered to them by nature.**

**Storage of energy is, indeed, the major limit on solar and wind, but we're making strides in those areas.**

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\*Affirm an "all of the above" energy policy through which the best attributes of every resource can be harnessed for the benefit of the American people.

\*Support repeal of massive spending bills like the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA), which established new programs and are providing hundreds of billions of dollars in subsidies to renewable energy developers, their investors, and special interests, and support the rescinding of all funds not already spent by these programs.

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**Here they have a "yes, but no", where they want to affirm use of any and all sources, but immediately kill off any major work in the use of renewables.**

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Ensure that the Nuclear Regulatory Commission facilitates rather than hampers private-sector nuclear energy innovation and deployment.

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**One area I wholeheartedly agree on. Nuclear power is our best alternative for high-energy-density, green power generation. And as China just demonstrated, you can build reactors that can't melt down, due to their physical design.**

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The DOE Office of Clean Energy Demonstrations (OCED); Office of State and Community Energy Programs; ARPA-E; Office of Grid Deployment (OGD); and DOE Loan Program should be

eliminated or reformed. If they continue to exist, FECM, NE, OE, and EERE should focus on fundamental science and technology issues, particularly in relation to cyber and physical threats to energy security, rather than subsidizing and commercializing energy resources.

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**Translated: "Holy jebus, stop the Greens!"**

**They want to change the DOE to "Department of Energy Security and Advanced Science" (DESAS), with a big emphasis on the Security bit and of course no emphasis at all on conservation, emissions reduction, or any of that renewable energy stuff. Only exception is nuclear power, which I favor but I don't trust the group of people they'd have running this shitshow.**

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The next Administration should work with Congress to eliminate all DOE applied energy programs including OE (except perhaps those related to basic science for new energy technology).

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**This, and other statements in this (and other) section(s), are focused once more on removing any government support in the development of new technologies (rather than basic science). This makes me suspect that, among other things, they want to kill off all the practical development government funding, including my bread-and-butter SBIR program, instead replacing the small business support with large multinational R&D firms.**

**Obviously, they want to eliminate the Office of Energy Efficiency and Renewable Energy (EERE) and get rid of its functions (such as ensuring the efficiency of appliances and such). They also want to get the Feds out of grid planning (adding new grid capacity and transfer capability), leaving it all to the states and commercial concerns. This is directly contradictory to their goal of making the grid more robust and secure; it needs to be expanded, decentralized and reinforced, which is something that should be done over multi-state areas at least if not country-wide.**

**The remainder of this section is pretty much more of the same: eliminate anything that has to do with practical solutions, destroy any renewable energy support, deny anything to do with climate change.**

**Oh, and build more nuclear weapons. Lots more new, modern nuclear weapons.**

**Going on in Project 2025, let's see what's up for the EPA!**

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Not surprisingly, the EPA under the Biden Administration has returned to the same top-down, coercive approach that defined the Obama Administration. There has been a reinstitution of unachievable standards designed to aid in the "transition" away from politically disfavored industries and technologies and toward the Biden Administration's preferred alternatives. This approach is most obvious in the Biden Administration's assault on the energy sector as the



Administration uses its regulatory might to make coal, oil, and natural gas operations very expensive and increasingly inaccessible while forcing the economy to build out and rely on unreliable renewables.<sup>1</sup> This approach has also been applied to pesticides and chemicals as the Biden Administration pushes the “greening” of agriculture and manufacturing among other industrial activities.

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**Translation: The Biden Administration tried to start enforcing actual environmental standards and the industries are annoyed that they might have to spend money to meet those standards rather than paying dividends or doing stock buybacks.**

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Many EPA actions in liberal Administrations have simply ignored the will of Congress, aligning instead with the goals and wants of politically connected activists.

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**Translated: They didn't follow what the right-wing people in Congress wanted.**

**Now here's a killer:**

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Pursuit of this globally focused agenda has distracted the agency from fulfilling its core mission, thereby creating a backlog of missed statutory deadlines,<sup>3</sup> and at times has even led to preventable environmental disasters. During the Obama Administration, for example, the U.S. experienced two of the worst environmental disasters in decades, including the Flint, Michigan, water crisis in 2014<sup>4</sup> and the Gold King Mine spill in 2015<sup>5</sup>.

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**Certainly, let's blame the EPA rather than the multiple failures of people to actually enforce basic standards, to a great extent because it would be cheaper to ignore them. Flint, in particular, was caused by a \*Republican\* appointee changing the source of water to a polluted one that – without proper pre-treatment – vastly increased the leaching of lead from the pipes into the water supply.**

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EPA was established on December 2, 1970, following a call by President Richard Nixon to “rationally and systematically” organize existing piecemeal efforts to clean up and protect the environment.<sup>9</sup> Under Reorganization Plan No. 3, the EPA was to initiate a “coordinated attack on the pollutants which debase the air we breathe, the water we drink, and the land that grows our food.”<sup>10</sup> Numerous authorities were consolidated and given to the EPA including research, monitoring, standard-setting, and enforcement activities.

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**They go on to trumpet other fine achievements like the Clean Air Act, but conveniently ignore how the Republicans, especially during the Trump administration, were working hard to dismantle or weaken all of them.**

**Going through a lot more of this, it's more of the same. Shove the actual responsibilities onto the states (where the Red states can immediately say "screw the regulations" if they like), reduce any goals towards further improvement of the environment in exchange for "considering the economic impact" (i.e, don't make the companies have to actually pay to clean up their act), and so on and so forth. Utterly predictable, and no point in my going over this inch by inch.**

**Obviously, repeal anything Biden ever did, kick out anyone he appointed, and so on. Looks like they really want to go back to using Freon again, too.**

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**\*A WOTUS rule that makes clear what is and is not a "navigable water" and respects private property rights. Coordinate with Congress to develop legislation, if necessary, to codify the definition in Rapanos v. United States that "waters of the United States" can refer only to "relatively permanent, standing or continuously flowing bodies of water...as opposed to ordinarily dry channels through which water occasionally or intermittently flows."**  
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**This (WOTUS is Waters of the United States) sounds reasonable, except that there are numerous key waterways that are, in fact, intermittent, especially in drier areas of the country, and are still extremely important waterways that require protection. The regulations surrounding these things are, of course, inconvenient to certain industries.**

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**\*Pause for review all contracts above \$100,000 with a heavy focus on major external peer reviews and regulatory models.**  
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**This bit, in the R&D section, is echoed in other sections of this document, and reinforces what I suspected: this is going to hit the small businesses very hard. \$100k is even for small businesses a TINY contract, and in fact at this point most SBIR Phase I contracts now exceed this value. Phase IIs are ALL well over that limit.**

**So in any of the affected agencies, every single SBIR contract will be paused and "reviewed". Given that for many small businesses, SBIR contracts represent a significant portion of their cash flow, this could literally KILL many, many businesses outright.**

**Naturally, it won't harm LARGE businesses as much, as they have reserves and other resources to survive a bad few months.**

**All right, Project 2025 is now entering HHS -- Health and Human Services, and you know THIS will be a bit of a ride. Strap in.**

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**Under President Trump, HHS was dedicated to serving "all Americans from conception to natural death, including those individuals and families who face...economic and social well-being challenges."1 Under President Biden, the mission has shifted to "promoting equity in**

everything we do” for the sake of “populations sharing a particular characteristic” including race, sexuality, gender identification, ethnicity, and a host of other categories.

As a result of HHS’s having lost its way, U.S. life expectancy, instead of returning to normal after the COVID-19 pandemic, continued to drop precipitously to levels not seen since 1996 with white populations alone losing 7 percent of their expected life span in just one year. Nothing less than America’s long-term survival is at stake. Accordingly, HHS must return to serving the health and well-being of all Americans at all stages of life instead of using social engineering that leaves us sicker, poorer, and more divided.

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**Yes, indeed, the decreasing American lifespan must have to do with an attempt to make things more equitable than, say, the hideous state of American so-called healthcare, which was dealt a body-blow during COVID from which it hasn’t recovered.**

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**\*Goal #1: Protecting Life, Conscience, and Bodily Integrity. The Secretary should pursue a robust agenda to protect the fundamental right to life, protect conscience rights, and uphold bodily integrity rooted in biological realities, not ideology.**

**From the moment of conception, every human being possesses inherent dignity and worth, and our humanity does not depend on our age, stage of development, race, or abilities. The Secretary must ensure that all HHS programs and activities are rooted in a deep respect for innocent human life from day one until natural death: Abortion and euthanasia are not health care.**

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**Okay, we’re not gonna be subtle here. The translation, if even needed, is "The Evangelical Christian movement’s views must be enshrined in law, no matter how many people don’t agree." AKA "Some of you may die... but this is a sacrifice we are willing to make."**

**The bit with "biological realities" is of course code-speak for "There’s only Man and Woman, screw your uncomfortably complicated actual biology. I learned this in fourth grade, clearly there’s no nuances beyond that."**

**This kicks the door wide open to allow direct opposition to LGBTQ+ folk.**

**The bit about disallowing BOTH abortion and euthanasia is particularly nasty, as it assumes by assertion that there’s no acceptable reason for either -- not the potential death of the mother nor the suffering of the old and dying, and both of these rooted in a particular "religious" point of view that is not relevant to most of the inhabitants of the USA (25-35% identify themselves that way, and the number of really embrace the more radical parts of that movement is considerable lower -- though far louder).**

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**Goal #2: Empowering Patient Choices and Provider Autonomy. Basic economics holds that costs tend to decrease and quality and options tend to increase when there is robust and free**

competition in the provision of goods and services. Health care is no exception. Health care reform should be patient-centered and market-based and should empower individuals to control their health care-related dollars and decisions.

Of course, providers who deliver health care also need the freedom to address the unique needs of their patients. States should be the primary regulators of the medical profession, and the federal government should not restrict providers' ability to discharge their responsibilities or limit their ability to innovate through government pricing controls or irrational Medicare and Medicaid reimbursement schemes.

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**Hooooo, a lot to unpack in those two paragraphs. "Patient centered" is in healthcare almost diametrically opposed to "market-based", for one reason: a lot of patients can't afford the market price, even if the market prices were a lot lower than they are.**

**The costs of having a sick populace are huge, but diffuse, and it's easy to ignore them, or put the blame for the costs on those who are ill, rather than on the difficulty and expense of obtaining medical care, and in adhering to medical advice. (For example, a doctor may recommend a week of minimal activity and bed rest, but your employer may fire you if you do that).**

**This means that the bit about how the market should "empower individuals to control their health care-related dollars and decisions." is nothing but a smokescreen for "privatize healthcare even more, and if you can't afford to pay for it, too bad for you. Have you considered NOT being poor?"**

**The second paragraph just builds on this. " States should be the primary regulators of the medical profession, and the federal government should not restrict providers' ability to discharge their responsibilities or limit their ability to innovate through government pricing controls or irrational Medicare and Medicaid reimbursement schemes."**

**This means that if your state is Red and controlled by evangelical-focused politicians, you can kiss goodbye any rights of care for anyone who's not also evangelical. Especially if you happen to be LBGTQ+, not-rich, and likely not-white.**

**Also means that there shouldn't be any leverage even on prescription drug prices due to Federal support, like using Medicaid/Medicare to reduce the price of insulin so it wasn't hundreds of dollars per month.**

**Now HERE is a real funny:**

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**Finally, America's broken insurance system, run largely through confusing provider networks and third-party payers (employers), induces overconsumption of health care, limits consumer shopping, and hides true costs from patients.**

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**"Overconsumption of health care"? What the HELL are they smoking? The problem is that people often can't GET health care of any quality, for reasons of cost, accessibility, and practical factors like "I can't take a day off to go to the doctor".**

**Oh, wait. They mean "people who aren't rich may sometimes get actual treatment". Certainly we should put a stop to THAT.**

**Let's move on to the next jawdropper:**

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Goal #3: Promoting Stable and Flourishing Married Families. Families comprised of a married mother, father, and their children are the foundation of a well-ordered nation and healthy society. Unfortunately, family policies and programs under President Biden's HHS are fraught with agenda items focusing on "LGBTQ+ equity," subsidizing single-motherhood, disincentivizing work, and penalizing marriage. These policies should be repealed and replaced by policies that support the formation of stable, married, nuclear families.

Working fathers are essential to the well-being and development of their children, but the United States is experiencing a crisis of fatherlessness that is ruining our children's futures. In the overwhelming number of cases, fathers insulate children from physical and sexual abuse, financial difficulty or poverty, incarceration, teen pregnancy, poor educational outcomes, high school failure, and a host of behavioral and psychological problems.

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**In black and white, there it is. If you're not the classic 1950s Working Dad, Mom, and Kids, you're just not American, and any attempt to support your DEVIANT LIFESTYLES needs to be stopped this instant.**

**I love the little bit about "disincentivizing work", as that's a fancy way of saying that you deviants are also lazy and given a chance will just suck the money away from decent folk. There's not a shred of EVIDENCE for this position -- our social services are virtually impossible to get, and once obtained, they sure ain't no bed of roses. SSI, for instance, goes away the very instant you have assets exceeding \$2,000, which is in today's economy practically a pittance.**

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Goal #4: Preparing for the Next Health Emergency. The COVID-19 pandemic demonstrated how catastrophic a micromanaging, misinformed, centralized, and politicized federal government can be. Basic human rights, medical choice, and the doctor-patient relationship were trampled without scientific justification and for extended periods of time. Excess deaths, not due to COVID-19, skyrocketed because of forced lockdowns, isolation, vaccine-related mass firings, and colossal disruptions of the economy and daily rhythms of life.

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**No, massive deaths were caused by COVID, you cretinous liars. The lockdown slowed the spread, wherever people were actually allowed to DO so, and among other things practically stomped out the flu at the same time. Your Manchurian Cantaloupe's rantings**

**are directly and indirectly responsible for hundreds of thousands of deaths due to COVID, and you really should stop lying about it.**

**A lot of the rest of this little section, if you read between the lines, is really saying, "Corporate profits were way down during COVID, we can't let that happen again."**

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All National Institutes of Health, Centers for Disease Control and Prevention, and Food and Drug Administration regulators should be entirely free from private biopharmaceutical funding. In this realm, "public-private partnerships" is a euphemism for agency capture, a thin veneer for corporatism. Funding for agencies and individual government researchers must come directly from the government with robust congressional oversight.

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**Wow. In the other sectors we wanna push everything into the private sector, now we want to divorce them entirely. I wonder what might be the motive for this about-face in this section.**

**Given that they've literally hit the Opposite Day button here, my guess is that what they really mean is that the working partnership here has a terrible effect of enforcing some form of reality onto the private industries involved.**

**That doesn't mean that some of their suggestions aren't without merit; certainly we don't want, as they mention later, people deeply involved in pharmaceutical companies jumping over to run regulatory agencies that interact with those exact companies.**

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COVID and Structural Reform. COVID-19 exposed the Centers for Disease Control and Prevention (CDC) as perhaps the most incompetent and arrogant agency in the federal government. CDC continually misjudged COVID-19, from its lethality, transmissibility, and origins to treatments. We were told masks were not needed; then they were made mandatory. CDC botched the development of COVID tests when they were needed most. When it was too late, we were told to put our lives on hold for "two weeks to flatten the curve;" that turned into two years of interference and restrictions on the smallest details of our lives. Congress should ensure that CDC's legal authorities are clearly defined and limited to prevent a recurrence of any such arbitrary and vacillating exercise of power.

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**These twittering buffoons still want to put the blame on the CDC when the reason it was such a long-drawn out process is that for a while, the Trump federal government was FIGHTING against doing anything, and when anything was done, it was undermined both legally and by deliberate ignoring of the rules. When millions of people are convinced that a mask mandate violates "muh freedom", they continue to be vectors spreading disease.**

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For example, how much risk mitigation is worth the price of shutting down churches on the holiest day of the Christian calendar and far beyond as happened in 2020? What is the proper balance of lives saved versus souls saved?

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### **WHAT THE LIVING HELL.**

**This is the most blatant and direct attempt to legitimize the interference of religion with government, an absolute statement that religious beliefs could literally be used to subordinate saving lives.**

**If we didn't see it before, this is an absolute wake-up call for anyone who tries to pretend that this isn't the product of an evangelical Christian -- extreme evangelical Christian -- group trying to co-opt power in the Federal government, quite consciously and deliberately ignoring separation of church and state, a direct path to making the USA a religion-controlled nation.**

**More of this below:**

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Respect for Life and Conscience. The CDC should eliminate programs and projects that do not respect human life and conscience rights and that undermine family formation. It should ensure that it is not promoting abortion as health care. It should fund studies into the risks and complications of abortion and ensure that it corrects and does not promote misinformation regarding the comparative health and psychological benefits of childbirth versus the health and psychological risks of intentionally taking a human life through abortion.

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**Once more, "conscience" "respect for life", and "family" are all being defined here in a narrow "Christian" perspective. I suppose I should be glad that they're not hiding their faces very well here.**

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CDC should update its public messaging about the unsurpassed effectiveness of modern fertility awareness-based methods (FABMs) of family planning and stop publishing communications that conflate such methods with the long-eclipsed "rhythm" or "calendar" methods. CDC should fund studies exploring the evidence-based methods used in cutting-edge fertility awareness.

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**Doctors have a name for women who rely on those methods. "Mothers".**

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The CDC should immediately end its collection of data on gender identity, which legitimizes the unscientific notion that men can become women (and vice versa) and encourages the phenomenon of ever-multiplying subjective identities.

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**Yep, LGBTQ+, yet another shot at you.**

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Abortion Pills. Abortion pills pose the single greatest threat to unborn children in a post-Roe world. The rate of chemical abortion in the U.S. has increased by more than 150 percent in the past decade; more than half of annual abortions in the U.S. are chemical rather than surgical. The abortion pill regimen is typically a two-part process. The first pill, mifepristone, causes the death of the unborn child by cutting off the hormone progesterone, which is required to sustain a pregnancy. The second pill, misoprostol, causes contractions to induce a delivery of the dead child and uterine contents, usually into a toilet at home.

-----  
**Yeah, they're really stuck on this hobbyhorse. The idea that a woman can have a right to their body that's equal to that of a man just pisses them off no end. They want to remove any FDA approval on it, obviously leaning on the Supreme Court's breaking of Roe v. Wade.**

-----  
The National Institutes of Health (NIH) is the world's largest biomedical research agency and is made up of 27 different components called Institutes and Centers. Despite its popular image as a benign science agency, NIH was responsible for paying for research in aborted baby body parts, human animal chimera experiments, and gain-of-function viral research that may have been responsible for COVID-19.

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**Basically this is lies, lies, and more lies. The amount of truth behind the lies is paper thin and not even worth addressing in detail. The important part is that they want to apply more of their "conscience" to directing how medical research is conducted.**

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...Most problematically, in the years when they received payments, Collins, Fauci, and Lane were NIH administrators, not researchers, with no plausible claim to be scientific co-discoverers...

-----  
**This simply shows an abysmal lack of understanding of what "royalty" means (deliberate or through ignorance). The inventor gets royalties once the invention is out and being used. YEARS may elapse between the time they're researchers inventing something and the time they get anything for the invention. If they ever do -- most patents never result in anything monetary.**

-----  
Woke Policies. Under Francis Collins, NIH became so focused on the [#MeToo](#) movement that it refused to sponsor scientific conferences unless there were a certain number of women panelists, which violates federal civil rights law against sex discrimination.



**I think what they mean here is that "it violates my mistaken view that promoting womens' participation is therefore discriminating against men".**

**Okay, still in HHS, and now we're to the Medicaid/Medicare section of Project 2025...**

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**\*Increase Medicare beneficiaries' control of their health care. Patients are best positioned to determine the value of health care services, working with their health care providers. They also benefit from increased choice of doctors, hospitals, and insurance plans. Access to reliable information with respect to physicians, hospitals, and insurers is therefore essential.**

**\*Reduce regulatory burdens on doctors. Doctors must be free to focus on treating patients first, not entering codes on computers, and should not be tempted to change their medical judgment based on arbitrary or illogical reimbursement incentives.**

**\*Ensure sustainability and value for beneficiaries and taxpayers. Prices are best for patients when determined by economic value rather than political power and when they are known in advance of the receipt of services. Government's use of non-market-based methods to determine reimbursement leads to overspending on low-value services and products and underpayment for high-value services and products, stifles beneficial innovation, and because of Medicare's size distorts payments throughout the health care system. Intermediate entities that can manage financial risk and ensure quality of care are important in transitioning to value-based care within the Medicare program.**

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**Well, a fair amount to unpack even in these bullet points. I partly addressed the whole smoke-and-mirrors BS of the "increase beneficiaries' control" when they were talking about education, but there's more here. First, "control" requires money and time to take advantage of, things that many beneficiaries are short of. It requires that you have the time and mental capacity to analyze your choices and make informed decisions about them. This is fine if you have that luxury, but many people on Medicaid and Medicare don't.**

***"They also benefit from increased choice of doctors, hospitals, and insurance plans"***

**It's the last two words that really matter here. As social safety and support nets, Medicaid/Medicare are not supposed to be "insurance plans" nor really should they have any connection to such. If you want to add "choice of insurance plans", you're saying that the insurance agencies really want a bigger cut.**

**The "regulatory burden on doctors" sounds sensible, but it's noticeably short on any form of actual detail as to what the PROBLEM is that they're addressing. I have my suspicions, and maybe it will become more clear as we go on.**

***"Ensure sustainability and value for beneficiaries and taxpayers. Prices are best for patients when determined by economic value..."***

**Ooo, this one's fun. Stripped of the obfuscation, what they mean is "Is it really economical to do this? If not, we shouldn't do it."**

**Which sounds nice until you realize that it's NEVER economical to treat a lot of diseases and conditions, especially as people get older and have more of them, and they take longer to recover. The idea of a social safety net is to enable the "life, liberty, and pursuit of happiness" for everyone, not to make a profit and loss balance of how reasonable it is to give that 80 year old man a hip operation.**

-----  
\*Reduce waste, fraud, and abuse, including through the use of artificial intelligence for their detection.  
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**Dear god, I don't trust current AI to get the right number of fingers on a person, why would I even THINK of using this for any serious purpose?**

-----  
Additionally, regulations should advance site neutrality by eliminating the inpatient-only list and expanding the ambulatory surgical center covered procedures list. Medicare generally pays more for inpatient hospital procedures and less for the same procedures performed in an outpatient setting. Whether a medical service is delivered in a physician's office, a clinic, or a hospital setting, the Medicare payment for that service should be the same.  
-----

**Weren't we talking about letting the doctors make choices for their patients unburdened by government interference just a few paragraphs ago?**

**Here they're saying "if it's at all possible to do this outpatient, it should be done that way, and even if you do it as an inpatient, don't pay any more".**

**This is something to help out the industrialized hospital industry, that hates hates *hates* maintaining beds in inpatient settings; they're expensive. They want 100% usage and that means everything needs to be scheduled out long-term. They don't want a doctor saying "Well, yes, this could be done outpatient, but Mrs. Jones is fragile and I think it should be inpatient for a few day's stay".**

**Combined with our prior bit about "economical", this means they will pay the cheapest possible amount for the procedure in ALL settings, meaning that there is a very powerful, NON-healthcare motivation to avoid doing any procedure in a hospital, even if it would be better for the patient and doctor.**

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Finally, HHS needs to restore and enhance conscience protection regulations that allow medical practitioners to participate in federal health care programs without being compelled to provide sex changes or similar services.  
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**Translation: "Let doctors refuse to perform medical procedures based on their (Evangelical Christian) personal beliefs".**

**This is... FLAT OUT NO. Doctors are there to treat patients. They are not there to judge them. Whether they're murderers or saints or whatever, you do what current best practice says you should do. This is one of their other ways of eliminating any form of women's healthcare that is in any way controversial.**

\*\*\*\*\*

**Note that this is not theoretical for me; they kept my wife under sedation in an OR for something like five hours because the religious leadership of the hospital suddenly decided they didn't want to allow the doctor to implant an IUD (even though it wasn't for birth control but other issues). That's just a minor taste of the bullshit this is meant to allow.**

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**\*Encourage more direct competition between Medicare Advantage and private plans.**

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**How about we just have Medicare for All and get rid of private healthcare coverage in the vast majority of cases?**

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Medicaid. Over the past 45 years, Medicaid and the health safety net have evolved into a cumbersome, complicated, and unaffordable burden on nearly every state. The program is failing some of the most vulnerable patients; is a prime target for waste, fraud, and abuse; and is consuming more of state and federal budgets. The dramatic increase in Medicaid expenditures is due in large part to the ACA (Obamacare), which mandates that states must expand their Medicaid eligibility standards to include all individuals at or below 138 percent of the federal poverty level (FPL), and the public health emergency, which has prohibited states from performing basic eligibility reviews.

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**Translation: We gotta get rid of Obamacare. Where the states weren't fighting it tooth and nail, the ACA generally improved the state of health coverage -- though the private insurance companies and their people have worked very, very hard to take back anything they lost here.**

**"The stockholders, Bob; who's helping \*them\* out?" is their real refrain here.**

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Recipients are often faced with a "welfare cliff" of benefit losses as they earn above a certain amount, which is contrary to the fundamental purpose of empowering individuals to achieve economic independence.

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**It's funny to find this, a completely true and accurate statement of one of the problems of current social services, in a document which really favors SETTING UP this kind of thing, if it can't just abolish services entirely. (The Republicans are the ones constantly concerned about "do they actually deserve any help" and have worked to put means-testing in)**

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Add work requirements and match Medicaid benefits to beneficiary needs. Because Medicaid serves a broad and diverse group of individuals, it should be flexible enough to accommodate different designs for different groups. For example, CMS should launch a robust "personal option" to allow families to use Medicaid dollars to secure coverage outside of the Medicaid program. CMS should also:

1. Clarify that states have the ability to adopt work incentives for able-bodied individuals (similar to what is required in other welfare programs) and the ability to broaden the application of targeted premiums and cost sharing to higher-income enrollees.
2. Add targeted time limits or lifetime caps on benefits to disincentivize permanent dependence.

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**"Able-bodied" is a lovely term that they can probably define to make "anyone who can get out of bed on their own". End result, if you're not working to their satisfaction, you don't get any help.**

**Corporate America really, REALLY hates people wasting their time actually enjoying life when they could be producing something more for the company.**

**And lifetime caps, ahh yes. If you have a permanent disability, at some point you're no longer worth keeping around. Bye!**

**I'm done for tonight; a lot of the rest is more of the same -- put more power to the states, and more burden on the patients.**

**Onward with Project 2025 and still in HHS, let's see what more goodies they have in store for us:**

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\*Facilitate the development of shared savings and reference pricing plan options. Under traditional insurance, patients who choose lower-cost care do not benefit financially from that choice. Barriers to rewarding patients for cost-saving decisions should be removed. CMS should ensure that shared savings and reference pricing models that reward consumers are permitted.

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**Translation: pressure patients through their insurance companies to pick cheaper options. We'll charge less for those -- though don't think they'll be CHEAP in any circumstance.**

-----  
Separate the subsidized ACA exchange market from the non- subsidized insurance market. The Affordable Care Act has made insurance more expensive and less competitive, and the ACA subsidy scheme simply masks these impacts.  
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**This is mostly a lie, and any truth to it comes from the Republican opposition to actually enacting an effective healthcare plan for America. They undermined the ACA in every state they could, and first convinced Obama to dilute it in the name of "bipartisanship" -- which they then rejected anyway. Obama SHOULD have just gone ahead and forced through Medicaid for All. Maybe if Kamala wins.**

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Section titled:

LIFE, CONSCIENCE, AND BODILY INTEGRITY

\*Prohibit abortion travel funding. Providing funding for abortions increases the number of abortions and violates the conscience and religious freedom rights of Americans who object to subsidizing the taking of life.  
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**"You must adhere to our Evangelical Christian views or we don't have any freedom!"**

**No, see, religious freedom means YOU are free to NOT have an abortion. It doesn't mean you are free to prevent OTHER people from making that choice. FOAD.**

-----  
\*Prohibit Planned Parenthood from receiving Medicaid funds. During the 2020–2021 reporting period, Planned Parenthood performed more than 383,000 abortions.... Planned Parenthood affiliates face accusations of waste, abuse and potential fraud with taxpayer dollars, failure to report the sexual abuse of minor girls, and allegations of profiting from the sale of organs from aborted babies...  
-----

**"face accusations", yes. When loons invent the evidence (especially the bit about "sale of organs"), you can accuse anyone of anything. Being actually GUILTY of anything (more than any other organization probably is, anyway) is a different matter.**

**Planned Parenthood does a lot more stuff than abortion and related work. They assist in natal care and advice and perform lots of needed testing and other medical support, often for women who have a hard time getting anywhere.**

**This is just one more attempt to enforce their immoral morality on everyone else.**

-----  
\*Withdraw Medicaid funds for states that require abortion insurance or that discriminate in violation of the Weldon Amendment. The Weldon Amendment<sup>51</sup> declares that no HHS funding may go to a state or local government that discriminates against pro-life health entities or insurers.

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**"If your state supports abortion, it gets no Medicaid". I don't know the Weldon Amendment directly (and at this point I'm not going to read it), but obviously if that's the way it's worded, it needs to go, and go fast.**

**I'm going to skip over the constant repetition of new rules and ways to stop abortion. It's all the same theme, it's all just as bad, and there's no need to keep repeating it for you.**

**Now here:**

-----  
\*Reissue a stronger transgender national coverage determination. CMS should repromulgate its 2016 decision that CMS could not issue a National Coverage Determination (NCD) regarding "gender reassignment surgery" for Medicare beneficiaries. In doing so, CMS should acknowledge the growing body of evidence that such interventions are dangerous and acknowledge that there is insufficient scientific evidence to support such coverage in state plans.  
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**"Growing body of evidence" says otherwise. Oh, wait, you mean the evidence you WANT to believe. Sorry.**

**So yeah, if you're transgender, they definitely want you to pay for everything out of pocket, assuming you're allowed to get your treatment at all.**

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Radical Redefinition of Sex. On August 4, 2022, HHS published a proposed rule entitled "Nondiscrimination in Health Programs and Activities."<sup>58</sup> This rule addresses nondiscrimination provisions of the Affordable Care Act, known as Section 1557, which is enforced by the Office for Civil Rights and the Centers for Medicare and Medicaid Services. Section 1557 prohibits discrimination on the basis of race, color, national origin, age, disability, and sex in covered health programs or activities.

Under the proposed rule, sex is redefined: "Discrimination on the basis of sex includes, but is not limited to, discrimination on the basis of sex stereotypes; sex characteristics, including intersex traits; pregnancy or related conditions; sexual orientation; and gender identity."<sup>59</sup> In other words, the department proposes to interpret Section 1557 as if it created special privileges for new classes of people, defined in ways that are highly ideological and unscientific.  
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**"In other words" is bullshit. What it does is say that YOU can't keep discriminating AGAINST those classes of people.**

**(well, I understand, Rethuglicans; the idea that anyone could possibly given the same privileges as YOU, when they AREN'T you, is inconceivable).**

**So yeah, any definition of "sex" that's not "Man and Woman" is gonna be done away with.**

-----

**TANF. The Temporary Assistance for Needy Families (TANF) program is a federal block grant that gives states significant flexibility to fund a broad array of programs aimed at helping low-income families break the cycle of poverty and achieve economic self-sufficiency.**

**Generally, states apply their work requirement only to beneficiaries receiving basic assistance, who account for 22.3 percent of TANF outlays. The Trump Administration proposed a Supplemental Nutrition Assistance Program (SNAP) rule to “increase program integrity and reduce fraud, waste, and abuse” that would have prevented an individual from qualifying for SNAP simply because he or she received a pamphlet from the TANF program.<sup>60</sup> This rule defined non-cash benefits as those that are worth at least \$50 a month and received for at least six months. The tenets of this rule should be applied to the TANF program as well. This definitional change would apply the TANF work requirements to any noncash benefit worth \$50 a month and received for six consecutive months.**

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**Gods forbid people get fifty bucks a month without working. They're obviously lying around living it up on this incredible largesse.**

**This section is really strong on making sure you get nothing that they don't think you "deserve".**

**Then they also get into this with the Evangelical Christian agenda:**

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**Additionally, TANF priorities are not implemented in an equally weighted way. Marriage, healthy family formation, and delaying sex to prevent pregnancy are virtually ignored in terms of priorities, yet these goals can reverse the cycle of poverty in meaningful ways. CMS should require explicit measurement of these goals.**

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**Yeah, no, CMS is not here to enforce your puritanical and hypocritical ideas of "morality".**

-----

**Teen Pregnancy Prevention (TPP) and Personal Responsibility Education Program (PREP). TPP is operated by the Office of Population Affairs in the Office of the Assistant Secretary for Health; PREP is operated by the ACF Office of Planning, Research, and Evaluation. Both programs should ensure that there is better reporting of subgrantees and referral lists so that they do not promote abortion or high-risk sexual behavior among adolescents. ... Any lists with “approved curriculum” or so-called evidence-based lists should be abolished.**

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**"Teach 'em abstinence and to hell with evidence as to what actually works to reduce teen pregnancies".**

-----

Office of Child Support Enforcement (OCSE) Congress established Aid to Families with Dependent Children in 1935 to assist single-parent families who were suffering financially from the loss of a bread-winning husband and father. Within two decades, however, the majority of families receiving aid were dependent because of paternal abandonment rather than death. Today, nearly a third of America's children live without a father present in the home, and a fourth of them are enrolled to receive child support.

The glaring issue in child support enforcement today is a non-resident father's ability to provide full or consistent child support payments. The literature reflects this divide as fathers have been categorized as "deadbeat" dads, then as "deadbroke" dads, and now as "disconnected" dads who do not commit to the mother and child. Child support in the United States should strengthen marriage as the norm, restore broken homes, and encourage unmarried couples to commit to marriage.

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**There's not a word in here about WHY the family may be broken up, or why it could be a good idea for that separation to remain. Instead, they basically want to pressure people to stay married, and -- as this is discussed PURELY in the context of "dads" -- a marriage where the man is the primary, or only, source of income and the wife stays at home with the kids.**

-----

Child Support Tax Credit. National or state guidelines and tax law should be updated to ensure that nonresident parents with child support orders can receive a nondependent, child support tax credit. Single filers of up to \$41,756 and married or joint filers of up to \$47,646 would be eligible for a child support tax credit similar to the current earned income tax credit. Filers could receive a maximum of \$538 in annual returns for one child and a maximum of \$3,584 in annual returns for two or more children (based on a credit rate of 34 percent). A child support tax credit would use the low-income, nonresident parents' own earned income and history of employment to assist them further in the task of caring for their children.

The key to this policy is that it empowers fathers with their own resources and money rather than creating another government assistance program (or a fully refundable credit) devoid of the father's own monetary efforts. This way, the non-resident father's role as financial provider and relational figure is affirmed, and much-needed financial resources are given to the children.

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**"We'll throw a little money at the parent paying support, if they're not making much."**

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Visitation. Visitation is key to revitalizing child support and increasing payment frequency. The most effective way to lower a nonresident parent's monthly child support order is to spend more court-accounted-for time with the child. For example, Texas combined its child support court with its visitation court to ensure that resident and nonresident parents received state-mandated financial support orders and enforceable visitation orders.

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**There's a lot of reasons visitation might not be desirable. If one of the parents was abusing the other, they should have no visitation rights but still be paying child support. Yes, visitation rights probably DO encourage payment, but they also force contact where none may be desired.**

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Child Support Payment and Interactive Smartphone Application. Each state should be induced to implement a high-tech, easy-to-use application to centralize child support payments. As with Venmo or Cash App, nonresident parents would link their bank accounts and provide one-click monthly payments (or contribute incrementally throughout the month while tracking how much is due). Additionally, the nonresident parents could track "informal" gifts from money, groceries, clothes, sports gear, and more through the app.

-----

**As I'm not involved with this stuff directly, I can't be sure, but this looks to me like a way for an absent parent to control what and how their child support money is spent on, regardless of the actual needs or desires of either the child or the other parent. I can give the kid expensive cool gifts to make them more favorable to me, and give their other parent nothing to, say, buy more food with, making them look bad.**

-----

Protect faith-based grant recipients from religious liberty violations and maintain a biblically based, social science-reinforced definition of marriage and family.

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**Your "Biblically-based" crap doesn't belong in a governmental policy. Faith-based is a private choice. We shouldn't tell YOU how to get married, and you shouldn't have a say in how other people do. Accept differences.**

**There's a LOT of this kind of stuff in this section.**

**They also want to do away with the Head Start program; not sure if that's as bad as it sounds, as I haven't studied that particular program.**

-----

Support palliative care. Physician-assisted suicide (PAS) is legal in 10 states and the District of Columbia. Legalizing PAS is a grave mistake that endangers the weak and vulnerable, corrupts the practice of medicine and the doctor-patient relationship, compromises the family and intergenerational commitments, and betrays human dignity and equality before the law. Instead of embracing PAS, policymakers should focus on the benefits of palliative care, which works to improve a patient's quality of life by alleviating pain and other distressing symptoms of a serious illness.

-----

**This is a funny, funny bit, as they're all so concerned about preventing people from taking the same exit we allow every family pet, but say you should give them care to make them comfortable. I guarantee this clashes, very directly, with their planned laws**

**about drugs, since getting painkillers even if you have a chronic or terminal illness is an exercise in frustration for many \*SPECIFICALLY\* because of the anti-drug laws.**

-----  
Restore Trump religious and moral exemptions to the contraceptive mandate (also a CMS rule). HHS should rescind, if finalized, the regulation titled “Coverage of Certain Preventive Services Under the Affordable Care Act,” proposed jointly by HHS, Treasury, and Labor.<sup>70</sup> This rule proposes to amend Trump-era final rules regarding religious and moral exemptions  
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**Translation, if needed: If your doctor or pharmacist doesn't like your choices of healthcare, they can tell you to screw off. If you live in NYC, maybe that's not so much a problem, there's another pharmacy around the corner. But if you live in a small town, might not be so easy.**

**They also want to define telehealth care in such a manner that it will allow states to regulate and control everything, so even your telehealth appointment may be subject to a Red state saying "you can't talk to that doctor".**

-----  
Require HRSA to use rulemaking to update the women’s preventive services mandate. The contraceptive mandate issued under Obamacare has been the source of years of egregious attacks on many Americans’ religious and moral beliefs.  
-----

**No, actually, it hasn't. Not once has that law required any of you Evangelicals to go out and get an abortion. It's just told you that it's none of your business if someone else does.**

-----  
Withdraw Ryan White guidance allowing funds to pay for cross-sex transition support. HRSA should withdraw all guidance encouraging Ryan White HIV/AIDS Program service providers to provide controversial gender transition” procedures or “gender-affirming care,” which cause irreversible physical and mental harm to those who receive them.  
-----

**There they go again, claiming irreversible harm based on... what, their personal objections?**

**In sections preceding this they also continue their campaign to eliminate contraception as well as abortion. Also excluding condoms from the supported list of prevention methods.**

-----  
Ensure that training for medical professionals (doctors, nurses, etc.) and doulas is not being used for abortion training. HHS should ensure that training programs for medical professionals—including doctors, nurses, and doulas—are in full compliance with restrictions on abortion funding and conscience-protection laws.  
-----

**Now here's another nasty prong on their assault on abortion rights: they want all medical professionals to NOT BE EDUCATED on how to do them. So that there are no competent doctors and nurses available to PERFORM abortions, even if a woman finds one WILLING to do so.**

**Back to the back-alley coathangers is what they want.**

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**One surprise is that there's heavy support for Doulas in this, something previously deprecated. I wonder if that's simply because doulas will be less likely to be professionally trained in anything having to do with abortion, only birthing.**

**They also, in this section, strongly reject child care services and want to focus on making people care for children only in their homes. Which if they'd really fund it might work for some, but won't work for a lot of people. There's reasons there's so much demand for daycare.**

-----

**Under the Office of the Secretary section:**

**\*Restrict HHS's ability to declare indefinite public health emergencies (PHEs). Currently, HHS is merely required to notify Congress of such a declaration within 48 hours. Congress should establish a set time frame for any PHE, placing on the Secretary the burden of proof as to why an extension of the PHE is necessary.**

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**That would be reasonable if one believed that Congress would understand how to set such durations practically. I don't.**

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**\*Investigate, expose, and remediate any instances in which HHS violated people's rights by:**

- 1. Colluding with Big Tech to censor dissenting opinions during COVID.**
- 2. Colluding with abortion advocates and LGBT advocates to violate conscience-protection laws and the Hyde Amendment.**

-----

**This is just "you embarrassed us by showing us we were idiots and we want revenge" for the first, and "Respect mah Evangelical Authorotai!" for the second.**

**So, Project 2025 continues in the HHS section, because that's a big, big part of the document...**

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**The Life Agenda. The Office of the Secretary should eliminate the HHS Reproductive Healthcare Access Task Force and install a pro-life task force to ensure that all of the department's divisions seek to use their authority to promote the life and health of women and their unborn children. Additionally, HHS should return to being known as the Department of Life by**

explicitly rejecting the notion that abortion is health care and by restoring its mission statement under the Strategic Plan and elsewhere to include furthering the health and well-being of all Americans “from conception to natural death.”

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**More evidence, if we needed any, that they don't actually give a damn about abortion \*per se\*. It's well-established that the best way to reduce abortions is to provide useful, reliable, easily-available contraception, preventing pregnancies from starting unless intended. But they want to basically abolish any such from availability or support, and return to, I guess, women either avoiding sex entirely or cranking out kid after kid until they die.**

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The Family Agenda. The Secretary’s antidiscrimination policy statements should never conflate sex with gender identity or sexual orientation. Rather, the Secretary should proudly state that men and women are biological realities that are crucial to the advancement of life sciences and medical care and that married men and women are the ideal, natural family structure because all children have a right to be raised by the men and women who conceived them.

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**Yep. LGBTQ+ can all go hang, and also all forms of family structure that we didn't see on Leave It To Beaver, even if they're common in other places around the world. Also, conceiving a child automatically qualifies you to be the best parent no matter what you're like.**

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Promoting Life and Family. In dealing with sexually transmitted diseases and unwanted pregnancies, the OASH should focus on root-cause analysis with a focus on strengthening marriage and sexual risk avoidance. Strong leadership is needed in the Office of Science and Medicine to drive investigative review of literature for a variety of issues including the effect of abortion on prematurity and breast cancer; lack of evidence for so-called gender-affirming care; and physical and emotional damage following cross-sex treatments, especially on children. The OASH should withdraw all recommendations of and support for cross-sex medical interventions and “gender-affirming care.”

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**Once more, you'll have sex only the way we believe it should be, and we'll make damn sure the science supports it. Or else.**

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#### OFFICE OF GENERAL COUNSEL (OGC)

The Office of General Counsel is essential to ensuring that HHS is operating within the bounds of its numerous governing statutes. However, legal caution can outweigh practical necessity and often slows processes and decisions when time is of the essence. Such problems were evident both before and during the COVID -19 pandemic. Internal processes should be reformed to streamline necessary legal determinations during crises, and general processes should be reviewed for efficiency. OGC should also:

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**Here they beat one of their other hobbyhorses into the ground -- their whining about how the first real pandemic in a century caused them inconvenience and, more importantly, made companies lose money and -- possibly worse -- showed employees that they really didn't have to come into the office to do an awful lot of jobs. They want to make sure HHS and the OGC can't do terrible things like address pandemics again.**

**Plus of course they want it to reverse any decisions that might allow people to have, or escape penalties for having, abortions.**

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OFFICE FOR CIVIL RIGHTS (OCR)

Conscience Enforcement. Existing statutes that protect rights of conscience (such as the Church, Coats-Snowe, and Weldon amendments) do not explicitly provide a private right of action that would allow victims to seek legal redress in court. At the same time, when it continues to fund governmental and private entities that violate these laws, HHS is spending taxpayer funds unlawfully. Under liberal Administrations, OCR has amassed a poor record of devoting resources to conscience and religious freedom enforcement and is often complicit in approving or looking the other way at the Administration's own attacks on religious liberty.

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**"attacks on religious liberty" here really means "not allowing Evangelical Christian Republican rules to dominate", and they continue hammering this home as they go.**

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HHS should reestablish waivers for state and child welfare agencies for religious exemptions, especially for faith-based adoption and foster care agencies. It should also rescind subjective case-by-case evaluations for religious and faith-based organizations that request religious exemptions. These case-by-case determinations are currently coordinated with ACF and OCR. The recommended waivers should be granted to all states and agencies that request them, and OCR memos finding that RFRA would be violated if the waivers are not granted should be restored.

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**I believe this translates to "let religious (i.e., Evangelical Christian Republican) organizations be free from oversight or enforcement of proper treatment and support of children. Spare the rod and spoil the child."**

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HHS should restore OCR authority to review requests for and render opinions on the application of RFRA to requests for religious accommodation of people, families, and doctors who cannot in good conscience take or administer vaccines, including those made or tested with aborted fetal cell lines.

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**Doctors who cannot take or administer vaccines should be disqualified from being doctors, immediately. This is one of the foundations of modern medicine and the single specific advance in medicine that has saved more lives than all others put together.**

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OCR should return its enforcement of sex discrimination to the statutory framework of Section 1557 and Title IX. Specifically, it should:

1. Remove all guidance issued under the Biden Administration concerning sexual orientation and gender identity under Section 1557, particularly the May 2021 announcement of enforcement<sup>82</sup> and March 2022 statement threatening states that protect minors from genital mutilation.<sup>83</sup>
2. Issue a general statement of policy specifying that it will not enforce any prohibition on sexual orientation and gender identity discrimination in the Section 1557 regulation and that it will prioritize compliance with the First Amendment, RFRA, and federal conscience laws in any case implicating those claims. DOJ should commit to defending these actions aggressively against inevitable court challenges, including under cases such as *Heckler v. Chaney*.<sup>84</sup>

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**"Trans people and nonbinary people can get stuffed, there's only Men and Women and we'll make sure to remove any protections in law that we can."**

**There's a lot more in this, including their Opposite World approach in which recognizing discrimination exists is, itself, discrimination. Thus, all the laws and regulations set up to protect LGBTQ+ people are by their reasoning against the First Amendment and inherently discriminatory.**

**It would be funny if it wasn't so frickin' dangerous.**

With one last set of shots against abortion ever being allowed, they finally close out this section. **Next up: Housing and Urban Development (HUD), which I anticipate will also be filled with darkly entertaining bullcrap.**

**Project 2025's plan to turn the USA into a religious-based third-world nuclear nation continues, now focused on Housing and Urban Development (HUD).**

**They don't wait before revealing just how far they want to go, as shown here:**

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Reverse HUD's mission creep over nearly a century of program implementation dating from the Department's New Deal forebears. HUD's new political leadership team will need to reexamine the federal government's role in housing markets across the nation and consider whether it is time for a "reform, reinvention, and renewal"<sup>1</sup> that transfers Department functions to separate federal agencies, states, and localities.

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**Ninety years, that's how far back they want to turn this clock. The intention is to reset it as far back as possible and have a "cadre of political appointees" (read: proper Evangelical Christian Republicans) break it into pieces that can be allowed to dissolve like sugar in water as they dilute it across federal, state, and local governments.**

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## FIRST-DAY AND FIRST-YEAR ADMINISTRATIVE REFORMS<sup>23</sup>

A new conservative Administration can and should implement the following reforms that focus on both people<sup>24</sup> and process.<sup>25</sup> Implementation of these reforms simply requires courageous political leadership across all of HUD's key appointed positions.

\*HUD political leadership should immediately assign all delegated powers to politically appointed PDAS, DAS, and other office leadership positions; change any current career leadership positions into political and non-career appointment positions; and use Senior Executive Service (SES) transfers to install motivated and aligned leadership.

\*The President should issue an executive order making the HUD Secretary a member of the Committee on Foreign Investment in the U.S., which will gain broader oversight authorities to address foreign threats, particularly from China with oversight of foreign ownership of real estate in both rental and ownership markets of single-family and multifamily housing,<sup>26</sup> with trillions worth of real estate secured across HUD's portfolio.

\*The Secretary should initiate a HUD task force consisting of politically appointed personnel to identify and reverse all actions taken by the Biden Administration to advance progressive ideology.<sup>27</sup>

\*The Office of the Secretary or the leadership in the Office of General Counsel should conduct a thorough review of all subregulatory guidance that has been instituted outside of the Administrative Procedure Act (APA). Additionally, departmental leadership should:

1. Immediately end the Biden Administration's Property Appraisal and Valuation Equity (PAVE) policies and reverse any Biden Administration actions that threaten to undermine the integrity of real estate appraisals.<sup>28</sup>

2. Repeal climate change initiatives and spending in the department's budget request.<sup>29</sup> Repeal the Affirmatively Furthering Fair Housing (AFFH) regulation reinstituted under the Biden Administration<sup>30</sup> and any other uses of special-purpose credit authorities to further equity.<sup>31</sup>

4. Eliminate the new Housing Supply Fund.<sup>32</sup>

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**Translation: Starting day one, rip out all the people you can, replace them with political appointees (not qualified in other ways), and start reversing all policies not approved by the fanatic right wing.**

**The bit about "integrity of real-estate appraisals" almost certainly translates to "don't prevent us from making money on real estate just to help people".**

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The Office of the Secretary should recommence proposed regulation put forward under the Trump Administration that would prohibit noncitizens, including all mixed-status families, from living in all federally assisted housing.<sup>33</sup>

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**"Mixed Status" means if you're a citizen but not all your family is, you can go get bent, if I read this correctly.**

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Longer-term reforms of HUD rental assistance programs should encourage choice and competition for renters, encourage participation by landlords where appropriate,<sup>44</sup> and encourage all non-elderly, able-bodied adults to move toward self-sufficiency. This can be pursued through regulations and legislative reforms that seek to strengthen work requirements, limit the period during which households are eligible for housing benefits, and add flexibility to rent payment terms to facilitate the movement of households toward self-sufficiency.

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**There's a lot of this sort of stuff which really means "we think there's a lot of lazy lowerclass people and we've got to make sure any help is strictly limited".**

**To move forward more, I'll skip over things that simply keep repeating the same anti-abortion, pro-evangelical Christian, anti-Biden/Left, anti-poor people stuff. I've provided more than enough examples of that.**

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In the same manner, Congress should prioritize any and all legislative support for the single-family home. Homeownership forms the backbone of the American Dream. The purchase of a home is the largest investment most Americans will make in their lifetimes, and homeownership remains the most accessible way to build generational wealth for millions of Americans. For these reasons, American homeowners and citizens know best what is in the interest of their neighborhoods and communities.

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**Reading between the lines, what this is saying is that we need to make sure that the neighborhoods can keep out the wrong sorts; they know "what's in their best interest" for "generational wealth".**

**Moving on in Project 2025, we've reached the section for the Department of the Interior!**

**Naturally, the DOI was just fine until it became "environmental", and this little bit pretty much encapsulates the problem:**

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President Joe Biden's DOI, as is well documented, abandoned all pretense of complying with federal law regarding federally owned oil and gas resources. Not since the Administration of President Harry S. Truman—prior to creation of the OCS oil and gas program—have fewer federal leases been issued.<sup>10</sup>



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**Translated: "We believe Federal Law obligates you to lease everything we ask for".**

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Unfortunately, Biden's DOI is at war with the department's mission, not only when it comes to DOI's obligation to develop the vast oil and gas and coal resources for which it is responsible, but also as to its statutory mandate, for example, to manage much of federal land overseen by the BLM pursuant to "multiple use" and "sustained yield" principles.<sup>11</sup> Instead, Biden's DOI believes most BLM land should be placed off-limits to all economic and most recreational uses.

Worse yet, Biden's DOI not only refuses to adhere to the statutes enacted by Congress as to how the lands under its jurisdiction are managed, but it also insists on implementing a vast regulatory regime (for which Congress has not granted authority) and overturning, by unilateral regulatory action, congressional acts that set forth the productive economic uses permitted on DOI-managed federal land.

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**What I think this means is that Trump was letting people do whatever the hell they wanted with Federal lands, and Biden tried to return a sense of careful stewardship -- along with an awareness of actual current ecological issues.**

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**RESTORING AMERICAN ENERGY DOMINANCE**

Given the dire adverse national impact of Biden's war on fossil fuels, no other initiative is as important for the DOI under a conservative President than the restoration of the department's historic role managing the nation's vast store-house of hydrocarbons, much of which is yet to be discovered.

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**"Drill, baby, drill!"**

**They're conveniently ignoring that oil and gas industry has BOOMED even under Biden -- hitting record production levels at least at one point. Biden and the Democrats would LIKE to transition us to more sustainable energy (though there is a constant problem with not using nuclear energy), but that ain't happening overnight, or even over a single president's terms.**

**But if that's the case, what's the problem? Well, that the DOI is being cautious about letting them just keep drilling everywhere.**

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To this end, DOI unilaterally overhauled resource management plans, lease sales, fees, rents, royalty rates, bonding requirements, and permitting processes to prevent new production of coal, oil, and natural gas on federal lands and waters; to dramatically increase production of solar and wind energy; and to accomplish its "30 by 30," "America the Beautiful" agenda to remove federal lands from "multiple"—that is, productive—use.

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**The last line there is important. As is true of many business-oriented people, what they mean is if it's not making money for someone, it's not productive, and that's a sin.**

**A lot of this includes an implicit assumption that things are just fine now, and there's nothing to worry about, so going back to the "Good Old Days" will just bring us back to a fuzzily-remembered Real America. Leaving aside that even that era was only halcyon for a few specific groups of people, that era also had major environmental, health, and technological issues that it has taken us this long to resolve.**

**They weren't OBVIOUS issues to the people on the top, in general -- because they didn't have to live with them -- but many of these problems will return if we pretend they were never an issue. The people promoting 2025, of course, are not the ones who will suffer from it; they can always get in a jet and go to Bermuda or Monaco or whatever's the happy place these days.**

-----  
**Biden's DOI is hoarding supplies of energy and keeping them from Americans whose lives could be improved with cheaper and more abundant energy while making the economy stronger and providing job opportunities for Americans. DOI is a bad manager of the public trust and has operated lawlessly in defiance of congressional statute and federal court orders.**  
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**I have a vision of Biden crouched over the oil and gas reserves like Gollum, "My Preciousssss!" .**

**We're literally having no problem getting all the oil and gas we want right now. The prices aren't because it's scarce. It's because the people providing it jack up the prices whenever they think they can get away with it, well over that needed for inflation.**

**That's not going to suddenly change if we give them more access to drill; you need a major change in either the way companies operate, or in the way we get and distribute energy, to actually make energy more cheap and available.**

**I'm not going to quote huge sections of this, but basically it says "roll back everything Biden did, restore everything Trump did, and that includes opening up most of the Petroleum Reserve in Alaska for development, and revamping environmental rules like the Endangered Species Act. "**

**Not just Drill Baby Drill, but Kill, Baby, Kill. What's a few million salmon in the rivers compared to an oil gusher?**

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**Personnel Changes. The new Administration should be able to draw on the enormous expertise of state agency personnel throughout the country who are capable and knowledgeable about land management and prove it daily. States are better resource managers than the federal government because they must live with the results. President Trump's Schedule F proposal<sup>44</sup> regarding accountability in hiring must be reinstituted to bring success to these reforms.**

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***"Schedule F", if I haven't commented on it before, is a redefinition of a large (many, many thousands) number of Federal employees as political appointees rather than standard Federal employees, meaning that under these rulings Trump (or any following President) can remove immense swathes of people and replace them with people vetted for political usefulness, rather than their institutional knowledge and competence at the jobs.***

**The process to make lists of these huge numbers of political appointees IS ALREADY UNDER WAY. (this is one way we know that Project 2025 is not just an exercise in theory). This is also relevant to MOST OF THE PRECEDING SECTIONS, as it means that when they talk about putting in political appointees, they mean it to a FAR greater depth and extent than any previous administration.**

**Currently, the majority of Federal civilian employees make their careers doing what they do. This maintains institutional knowledge and stability, and prevents huge disruptions from happening every four years (in most agencies; some suffer this anyway for political and budgetary reasons, like NASA).**

***Schedule F will make agencies much more an arm of the Executive branch and much less a stable foundation on which the government runs.***

**While talking about relocating headquarters of various departments to various western areas, they wind up saying:**

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**There is no way these and other ADs can professionally manage issues thousands of miles and multiple time zones away.**  
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**Huh. Isn't that exactly what all those multinational corporations do? Have headquarters sometimes literally around the world from major operational areas? So you're saying your billionaire supporters literally cannot professionally manage their businesses?**

**Still in the Department of the Interior section.**

**After a section on wild horses and burros, which I'm unclear on why it's such a big issue (not saying it's not, but I'm not educated in this area), they get into Alaska.**

**The initial discussion is about how, basically, Alaska was supposed to give lots more land than it has to the use of the public and (as a sort of afterthought) the Native American inhabitants. But after talking piously about how the promised land was not turned over, it's obvious WHY they're annoyed about it:**

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**Alaska has untapped potential for increased oil production, which is important not just to the revitalization of the nation's energy sector but is vital to the Alaskan economy. One-quarter of**

Alaska's jobs are in the oil industry, and half of its overall economy depends on that industry. Without oil production, the Alaskan economy would be half its size.

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**It's true that oil's a big part of Alaska's economy, but that statement isn't by itself a justification to either increase that activity, or even to say it's a good thing by itself. Especially when there's reason to believe that various mining and drilling activities certain companies have been pushing for could seriously impact the environment of the region.**

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Minerals. Alaska is not just blessed with an abundance of oil, it has vast untapped mineral potential. Therefore, the new Administration must immediately approve the Ambler Road Project<sup>60</sup> across BLM-managed lands, pursuant to the Secretary's authority under the ANILCA and based on the Final Environmental Impact Statement on the project.<sup>61</sup> This will permit construction of a new 211-mile roadway on the south side of the Brooks Range, west from the Dalton Highway to the south bank of the Ambler River, and open the area only to mining-related industrial uses, providing high-paying jobs in an area known for unemployment.

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**This project is opposed, or at least viewed with very grave suspicion, by the Tanana Chiefs Conference which oversees the entire area involved. There's good reason to be concerned that just construction of the road would be severely damaging to the ecology of rivers, streams, and other elements of the wilderness. Mining, of course, has its own impacts.**

**The Alaska section continues with a list of other actions to be taken -- for one, turning over a lot of authority over the lands and waters to the state, thereby forcing BLM to have to negotiate with the state for most of its actions. While some of these may be arguably good ideas, others are clearly driven by the fact that the current situation impedes industries such as logging.**

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National Monument Designations. As has every Democratic President before him beginning with Jimmy Carter, Joe Biden has abused his authority under the Antiquities Act of 1906. Like the outrageous, unilateral withdrawals from public use of multiple use federal land under the Carter, Clinton, and Obama Administrations, Biden's first national monument was one in Colorado—adopted over the objections of scores of local groups and at least one American Indian tribe.<sup>71</sup> In the days before the 2024 election, Biden will likely designate more western monuments.

Although President Trump courageously ordered a review of national monument designations, the result of that review was insufficient in that only two national monuments in one state (Utah) were adjusted.<sup>72</sup> Monuments in Maine and Oregon, for example, should have been adjusted downward given the finding of Secretary Ryan Zinke's review that they were improperly designated. The new Administration's review will permit a fresh look at past monument decrees and new ones by President Biden.

Furthermore, the new Administration must vigorously defend the downward adjustments it makes to permit a ruling on a President's authority to reduce the size of national monuments by the U.S. Supreme Court.

Finally, the new Administration must seek repeal of the Antiquities Act of 1906, which permitted emergency action by a President long before the statutory authority existed for the protection of special federal lands...

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**Short version: they want to get rid of the law that is used to declare National Monuments, and to re-evaluate all the existing monuments. The major reasoning, again, looks to be gaining access to currently off-limits land resources.**

**Also the very amusing statement implying Trump's got anything resembling courage.**

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Oregon and California Lands Act. One national monument worthy of downward adjustment is in Oregon, where its designation and subsequent expansion interfere with the federal obligation to residents to harvest timber on its BLM lands. A federal district court ruled in 2019 that land subject to the Oregon and California (O&C) Grant Lands Act of 1937<sup>73</sup> was set aside by Congress to be harvested for the benefit of the people of Oregon. Specifically, those federal lands are to be "managed...for permanent forest production" and its timber "sold, cut, and removed in conformity with the principle of sustained yield."

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**One of my readers let me know that this, plus a lot of verbiage in the wildfire control areas, is actually timber-industry speak for "clear-cut", which is kinda against the principle of permanent forest production (though it COULD be "sustained yield", as you could keep replanting and harvesting -- but there's a HUGE difference between a wild forest and a managed stand of timber).**

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The Endangered Species Act. The Endangered Species Act was intended to bring endangered and threatened species back from the brink of extinction and, when appropriate, to restore real habitat critical to the survival of the species. The act's success rate, however, is dismal. Its greatest deficiency, according to one renowned expert, is "conflict of interest."<sup>82</sup> Specifically, the work of the Fish and Wildlife Service is the product of "species cartels" afflicted with groupthink, confirmation bias, and a common desire to preserve the prestige, power, and appropriations of the agency that pays or employs them. For example, in one highly influential sage-grouse monograph, 41 percent of the authors were federal workers. The editor, a federal bureaucrat, had authored one-third of the paper.

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**Yes, federal workers trained in environmental sciences. Which are rather EXPECTED to write papers on their work.**

**"Stop protecting animals when we could be hunting them, and also using their lands!"**

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Under the Office of Surface Mining:

\*Relocate the OSM Reclamation and Enforcement headquarters to Pittsburgh, Pennsylvania, to recognize that the agency is field-driven and should be headquartered in the coal field.

\*Reduce the number of field coal-reclamation inspectors to recognize the industry is smaller.

\*Reissue Trump's Schedule F executive order to permit discharge of nonperforming employees.<sup>91</sup>

\*Permit coal company employees to benefit from the OSM Training Program, which is currently restricted to state and federal employees.

\*Revise the Applicant Violator System, the nationwide database for the federal and state programs, to permit federal and state regulators to consider extenuating circumstances.

\*Preserve Directive INE-26, which relates to approximate original contour, a critical factor in permitting efficient and environmentally sound surface mining, especially in Appalachia.<sup>92</sup>

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**So, drop the number of inspectors so they can't catch violations as easily.**

**Schedule F rears its head again, ensuring that political appointees can fill the entire bureau.**

**Give coal company employees free training?**

**Of course make it so that violators can excuse their behavior and get away from penalties.**

**And while I haven't looked directly into this, I'm rather suspicious that "approximate contour" is a rule that basically lets you mine as long as you can put the land into a shape (not, however, condition) approximating its prior one.**

**I'm not familiar enough with the Byzantine elements of western water rights and management, so I won't comment on that section.**

**They then talk about how the Biden Administration (and presumably other Democrats) have violated their responsibilities to the Native American nations in this area:**

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The new Administration must take the following actions to fulfill the nation's trust responsibilities to American Indians and Indian nations:

\*End the war on fossil fuels and domestically available minerals and facilitate their development on lands owned by Indians and Indian nations.

\*End federal mandates and subsidies of electric vehicles.

\*Restore the right of tribal governments to enforce environmental regulation on their lands.

\*Secure the nation's border to protect the sovereignty and safety of tribal lands.

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**(yes, they use "Indian" as a term pretty much throughout this document. That MAY have to do with legacy use in government regulations, but I'm suspicious)**

**There's a lot of TALK about the Native Americans in this section, but it strikes me that an awful lot of the actual ACTIONS are more about their usual hobbyhorses.**

**Now starting the Department of Justice...**

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Unfortunately, the department has lost its way in recent years and has forfeited the trust of large segments of the American people. Large swaths of the department have been captured by an unaccountable bureaucratic managerial class and radical Left ideologues who have embedded themselves throughout its offices and components.

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**Translation: They haven't been keeping the freaks and weirdos down, and instead are letting them actually have rights.**

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The Federal Bureau of Investigation, knowing that claims of collusion with Russia were false,<sup>5</sup>

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**You mean, "knowing Russia was influencing the elections and having good reason to believe Trump's people were colluding in this". Apparently the only way they \*technically\* avoided flat-out collusion was through sheer incompetence on Trump's side.**

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Personnel within the FBI engaged in a campaign to convince social media companies and the media generally that the story about the contents of Hunter Biden's laptop was the result of a Russian misinformation campaign—while the FBI had possession of the laptop the entire time and could have clarified the authenticity of the source.<sup>7</sup>

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**The authenticity of the source is nonexistent, and y'all know that. There's no chain of custody and never was, and nothing on it, even admitting it as real, would have been relevant.**

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The department has devoted unprecedented resources to prosecuting American citizens for misdemeanor trespassing offenses or violations of the FACE Act<sup>12</sup> while dismissing prosecutions against radical agents of the Left like Antifa.

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**I think this is talking about prosecuting American citizens for a goddamn attempted insurrection, invasion of the Capitol, and assault that resulted in multiple deaths and a lot of injuries at the Capitol during the January 6th events incited by former President Donald Trump.**

**As Antifa has never done anything that even starts to come within leagues of this, I think the FBI devoting more resources to the right-wing loons makes sense.**

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The department has failed to do its part to stop the flood of fentanyl and other deadly drugs that are flowing across our borders and decimating families and communities across the United States.

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**Hypocrisy is again the order of the day here; the entire War On Drugs is a stupid, stupid mostly right-wing driven set of activities that are useful for them because they create crime out of nothing and justify constantly increasing militarization of the police force.**

**Legalize all drugs and just regulate them like beer and cigarettes and most of those issues disappear.**

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These actions stand in stark contrast to Attorney General Merrick Garland's assertion before taking office that "there [must] not be one rule for Democrats and another for Republicans, one rule for friends and another for foes."<sup>18</sup>

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**No, what's bothering you is that Garland and others actually tried to hold the Trumpists accountable to those same rules. How dare he try to apply the law to Trump followers?**

**The entire intro is this, a complete enumeration of every gripe the Trump-dominated GOP has had with the DoJ, most of them boiling down to "they actually tried to hold us accountable to the law, rather than just letting us get away with everything".**

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Successful reform will require more than minor peripheral adjustments. It will require a holistic, energetic, leadership-driven effort to remedy the damage that has been done and advance the national interest. Additionally, some needed reforms will not be possible without legislative changes from Congress. While it is true that certain offices and components—like the FBI or the Civil Rights Division—will require more attention than others, committed direction from the department's political leadership can restore the department's focus on its two core functions: protecting public safety and defending the rule of law.

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**This is one of the most comprehensive statements of intent to destroy that they make. They intend to completely re-make the DOJ in their image.**

**Here's some more Mirror-Universe ranting:**

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The evidence shows that the Biden Administration's Department of Justice has failed to protect law-abiding citizens and has ignored its most basic obligations. It has become at once utterly unserious and dangerously politicized. Prosecution and charging decisions are infused with racial and partisan political double standards.<sup>20</sup> Immigration laws are ignored.<sup>21</sup> The FBI harasses protesting parents (branded "domestic terrorists" by some partisans) while working diligently to shut down politically disfavored speech on the pretext of its being "misinformation" or "disinformation."<sup>22</sup>

A department that prosecutes FACE Act cases while ignoring dozens of violent attacks on pregnancy care centers and/or the coordinated violation of laws that prohibit attempts to intimidate Supreme Court Justices by parading out- side of their homes<sup>23</sup> has clearly lost its way. A department that has twice engaged in covert domestic election interference and propaganda operations—the Russian collusion hoax in 2016 and the Hunter Biden laptop suppression in 2020—is a threat to the Republic.<sup>24</sup>

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**One more excursion into Opposite-World, where prosecuting actual insurrectionists is wrong and investigating foreign influence on our elections is a threat to the Republic.**

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Conduct an immediate, comprehensive review of all major active FBI investigations and activities and terminate any that are unlawful or contrary to the national interest.<sup>30</sup> This is an enormous task, but it is necessary to re-earn the American people's trust in the FBI and its work. To conduct this review, the department should detail attorney appointees with criminal, national security, or homeland security backgrounds to catalogue any questionable activities and elevate them to appropriate DOJ leadership consistent with the new chain of command (discussed below)

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**Among other things, this almost certainly means "kill off all investigations into Trump, January 6, and so on that the DOJ is involved with".**

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"The next conservative Administration should direct the Attorney General to remove the FBI from the Deputy Attorney General's direct supervision within the department's organizational chart and instead place it under the general supervision of the Assistant Attorney General for the Criminal Division and the supervision of the Assistant Attorney General for the National Security Division, as applicable. ... Such a structure would also place the FBI under a politically accountable leader ..."

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**Make the primary domestic security and investigation agency accountable to a political appointee, is what that reads.**

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The United States government and, by extension, the FBI have absolutely no business policing speech, whether in the public square, in print, or online. The First Amendment prohibits it. The United States is the world's last best hope for self-government,<sup>33</sup> and its survival relies on the ability of our people to have healthy debate free from government intervention and censorship.  
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**The words are true, the intent is not.**

**What they MEAN is that they don't want their particular brand of delusions to be challenged in public as the misinformation that they actually are. The First Amendment doesn't actually give you a license to say ANYTHING -- or at best, it says "yeah, you can yell 'fire' in a crowded theater, but you also are then responsible for the consequences". They want to be able to yell FIRE without the consequences.**

-----  
The next conservative Administration should eliminate any offices within the FBI that it has the power to eliminate without any action from Congress.<sup>34</sup> For example, few Americans know that the FBI maintains a core of approximately 300 attorneys within its Office of General Counsel, an office that has been involved in some of the FBI's most damaging recent scandals.<sup>35</sup>  
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**The major domestic law enforcement agency... has no business having attorneys on staff?**

**The first sentences are the real moneymakers here, though. ANYTHING they can get away with is to be removed.**

**This section is long, because they really, really wanna remake the whole DoJ.**

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Juxtaposed against this increase in violent crime are things like Attorney General Merrick Garland's October 4, 2021, memorandum directing the commitment of significant resources and energies to combating imaginary, politically convenient threats of violence toward members of school boards and their staffs during the heat of the Virginia gubernatorial race.<sup>38</sup>  
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**Where they get this stuff I don't even know. Garland released a pretty straightforward memo, why it got them in a twist I don't know. (well, okay, I know; the people doing the threatening were on their side)**

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\*Use applicable federal laws to bring federal charges against criminals when local jurisdictions wrongfully allow them to evade responsibility for their conduct.<sup>41</sup> The department should also

increase the federal law enforcement presence in such jurisdictions and explore innovative solutions to bring meaningful charges against criminals and criminal organizations in such jurisdictions.

\*Where warranted and proper under federal law, initiate legal action against local officials—including District Attorneys—who deny American citizens the “equal protection of the laws” by refusing to prosecute criminal offenses in their jurisdictions. This holds true particularly for jurisdictions that refuse to enforce the law against criminals based on the Left’s favored defining characteristics of the would-be offender (race, so-called gender identity, sexual orientation, etc.) or other political considerations (e.g., immigration status).

\*Pursue policies and legislation that encourage prosecution of violent crimes as well as appropriate sentences for such offenses. The Biden Administration has adopted policies that do not prevent armed career criminals, who actually commit violent crimes, from committing those crimes. A recent U.S. Sentencing Commission report shows that armed career criminals are consistently sentenced below their minimum sentencing guidelines range.<sup>42</sup>

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**So, the idea here seems to be that while they want the states to take over lots of stuff, the states have to do it the way they WANT it done, or else. In this case, if they don't agree with how you're prosecuting or punishing crime, the Feds should come in and FIX it -- regardless of all those state's rights they talk about elsewhere.**

**There's also fairly revealing wording in this section about "punishment". Punishment shouldn't be the purpose of law. We're not spanking badly behaved kids. We have two possible directions: 1) rehabilitation, which requires a lot less punishment and a lot more support of the person, or 2) protection of society by keeping the criminals out of it, which doesn't require punishment at all as you're not planning on letting them back into society.**

**"Punishment" is an emotion-driven motivation that is promoted by Old Testament-type "eye for an eye" feelings, and really has almost no real-world effect on criminal – or often even non-criminal – choices and behaviors.**

-----

Enforce the death penalty where appropriate and applicable. Capital punishment is a sensitive matter, as it should be, but the current crime wave makes deterrence vital at the federal, state, and local levels.

-----

**This is utter ballocks. We don't have a "crime wave" worthy of the name, and the death penalty is simply not a good idea. It doesn't actually provide "deterrence". Criminals never expect to be caught. They either aren't THINKING at the time of the crime (so deterrence won't apply as they're just acting in fury or fear), or they think they've figured out how to get away with it (which means the punishment won't apply and can't deter them).**

**Moreover, the death penalty is historically terribly misapplied in MULTIPLE ways, and quite simply I don't trust the justice system to have that power. You can't apologize to a corpse. And I'd rather have a hundred murderers go free than execute one innocent person.**

**Then they talk about going after organized crime, and make these statements:**

-----

1. Rigorously prosecute as much interstate drug activity as possible, including simple possession of distributable quantities.<sup>46</sup> Recent efforts to create the impression that drug possession crimes are not serious offenses has contributed to the explosion of criminal organization activities in the United States.

2. Aggressively deploy the Racketeer Influenced and Corrupt Organizations Act (RICO),<sup>47</sup> which Congress expressly created to empower the Department of Justice to treat patterns of intrastate- level crimes, such as robbery, extortion, and murder, as federal criminal conduct for criminal organizations and networks. The next Administration can use existing tools while it works with Congress to develop new tools.

-----

**Drug possession ISN'T a hideous violent crime, and if you just made the damn things legal you'd wipe out 90% of the violence associated with it... because suddenly there's no need for criminal activity to acquire the stuff. We've learned nothing from Prohibition.**

**RICO has been heavily abused in the past and I see no reason to believe it won't be abused in the future. The concept was understandable, but the way in which it has been historically applied has been more damaging than useful.**

-----

Secure the border,<sup>48</sup> which is the key entry point for many criminal organizations and their supplies, products, and employees. Mexico— which is arguably functioning as a failed state run by drug cartels—is the main point of transit for illegal drugs produced in Central and South America, fentanyl precursors from the Chinese Communist Party-led People's Republic of China,<sup>49</sup> weapons, human smuggling and trafficking, and other contraband. Mexican drug cartels, including the dominant Sinaloa Cartel and the Jalisco New Generation Cartel (CJNG), are the main drivers of fentanyl production and distribution in the United States.

-----

**Again, this is just an excuse for more law enforcement upgunning. The War On Some Drugs is an invented problem that could be solved by just... not having them be illegal and treating them like beer and cigarettes. Cigs kill more people than just about anything -- even today, with drastically reduced smoking, about 480,000 people a year according to the CDC. If we'll let that and the equally devastating effects of alcohol slide, surely we can deal with the other drugs.**

**They then repeat their CHINA CHINA CHINA alarm-bells, and also reiterate their well-worn assertions that the Biden administration "politicized" the office and so on and so**

**forth; they also repeat the need to re-evaluate \*every\* ongoing and recent action by the DOJ.**

-----  
Pursuing Equal Protection for All Americans by Vigorously Enforcing Applicable Federal Civil Rights Laws in Government, Education, and the Private Sector. Entities across the private and public sectors in the United States have been besieged in recent years by an unholy alliance of special interests, radicals in government, and the far Left. This unholy alliance speaks in platitudes about advancing the interests of certain segments of American society, but that advancement comes at the expense of other Americans and in nearly all cases violates long-standing federal law.

Even though numerous federal laws prohibit discrimination based on notable immutable characteristics such as race and sex,<sup>73</sup> the Biden Administration—through the DOJ’s Civil Rights Division and other federal entities—has enshrined affirmative discrimination in all aspects of its operations under the guise of “equity.”

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**I particularly like the "Unholy Alliance" bit.**

**In case this isn't clear, once more we're entering the Opposite World zone. Their "point" here is that the efforts to legislate and promote equity against inherently racially biased social constructs is "discrimination". As with a number of other similar sections of this document, the authors view as "discrimination" any effort to enforce a level, rather than tilted, playing field.**

**So this -- and following sections -- trumpet "enforce nondiscrimination", when what they mean is "remove any efforts to improve the overall socioeconomic position of non-white groups". In other words, they're leaning all the way into the "this is reverse discrimination against white cis men" but using language that sounds less objectionable.**

-----  
Announcing a Campaign to Enforce the Criminal Prohibitions in 18 U.S. Code §§ 1461 and 1462 Against Providers and Distributors of Abortion Pills That Use the Mail. Federal law prohibits mailing “[e]very article, instrument, substance, drug, medicine, or thing which is advertised or described in a manner calculated to lead another to use or apply it for producing abortion.”<sup>75</sup> Following the Supreme Court’s decision in Dobbs, there is now no federal prohibition on the enforcement of this statute.

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**They return to their familiar refrain, here with a very specific description of intent-to-action and the methodology thereof. If you want any form of freedom of choice, you'd damn well better be in one of the states NOT yet controlled by the Evangelical Right.**

-----  
Reassigning Responsibility for Prosecuting Election-Related Offenses from the Civil Rights Division to the Criminal Division. The Attorney General in the next conservative Administration should reassign responsibility for prosecuting violations of 18 U.S. Code § 24176 from the Civil

Rights Division to the Criminal Division where it belongs. Otherwise, voter registration fraud and unlawful ballot correction will remain federal election offenses that are never appropriately investigated and prosecuted.<sup>77</sup>

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**This is another one of those situations in which the Republicans are projecting. There's almost no evidence of voter registration fraud or unlawful ballot correction, or indeed almost any kind of personal voting fraud -- and what few examples exist are almost all Republican. There is not, and never has been in the modern era, sufficient ballot fraud to make more than a tiny fraction of a percentage difference.**

**What they MEAN here is "since we'll control the courts we can see to it that we jail our opponents on charges of ballot fraud while we fake up all the ballots we like".**

**They also go into some detail about how they REALLY hate provisional ballots and all the ways they should be prevented from being used.**

-----

Rejecting Third-Party Requests for Politically Motivated Investigations or Prosecutions. The DOJ should reject demands from third-party groups that ask it to threaten politically motivated investigation or prosecution of those engaging in lawful and, in many cases, constitutionally protected activity.

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Well, that sounds perfectly reasonable. What kind of things are they talking about?

-----

A recent example illustrates the risks posed by such activity. On October 4, 2021, Attorney General Merrick Garland issued a memorandum to the Director of the FBI, the Executive Office for U.S. Attorneys, and the Assistant Attorney General, Criminal Division, calling on the FBI to work with each U.S. Attorney to “convene meetings with federal, state, local, Tribal, and territorial leaders” to discuss strategies for addressing “threats against school administrators, board members, teachers, and staff.” ...

...prompted by a September 29, 2021, letter sent by the National School Boards Association (NSBA) to President Biden demanding a federal law enforcement response to perceived threats to school board members and public-school employees.

The NSBA letter made outlandish demands in response to protests that were then occurring at school board meetings in response to COVID policies and revelations about the use of critical race theory-infused curricula in classrooms.

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**So, um, yeah, what they mean is that school boards and such were being threatened by right-wing nutbars who felt that trying to stop a pandemic was a violation of their rights, and got belligerent about it.**

**So the purpose of this little bit is to add more "some for me and none for thee" in the area of political persecution. Given how, just a bit above, they're clearly planning to prosecute people for acting like Democrats, it's obvious that they don't actually want to prevent political witch hunts. Just ones that might catch right-wingers.**

-----

Ensuring Proper Distribution of DOJ Grant Funds. DOJ grants are an underutilized asset in most conservative Administrations. When used properly, they can be highly effective in implementing the President's priorities. The Office of Justice Programs (OJP) is comprised of six components and is responsible for most DOJ grants to local law enforcement, juvenile justice, and victims of crime as well as for criminal justice research and statistics. The opportunity to support a President's agenda may be greater through OJP grant funding than it is through any of the federal government's other grant-making components.

-----

**That statement may be one of the few true ones here, and it's kinda scary, because what they detail in the following paragraphs is a plan to use billions of dollars in state-targeted block grants to enforce their particular social vision (anti-Left in every particular, of course) by attaching conditions to the grants that make them available only to states or localities that toe the line. One specific target is, and was, "sanctuary cities".**

**We return to the issue of illegal immigrants with a bang;**

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Issue guidance to all U.S. Attorneys emphasizing the importance of prosecuting immigration offenses,<sup>95</sup> and immigration-related offenses. The brunt of these offenses is born by districts along the southwestern border with Mexico, but the simple fact remains that immigration and immigration-related offenses are present in every district across the country. Successfully pursuing the priorities outlined in this chapter will require creative use of the various immigration and immigration-related authorities ....

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**"... will require creative use..." means "by hook or by crook, interpret the regulations however needed to accomplish the goal".**

**This section goes on for quite a bit, including a paragraph about possibly mass-undoing everything Garland did under the Biden administration. They really REALLY hate the idea of illegal immigrants, or maybe they just really, REALLY like the idea of how much power and equipment can be distributed to the border trying to stop the "tidal wave".**

**They're not subtle about the need to control at all levels, either:**

-----

**Ensure the assignment of sufficient political appointees throughout the department. Ensuring adequate accountability throughout the DOJ requires the intentional devotion of sufficient resources by the Administration—not simply replicating what was done under prior Administrations and reflected in the Plum Book...**

**... It is not enough for political appointees to serve in obvious offices like the Office of the Attorney General or the Office of the Deputy Attorney General. The next conservative Administration must make every effort to obtain the resources to support a vast expansion of the number of appointees in every office and component across the department—especially in the Civil Rights Division, the FBI, and the EOIR.**

-----

**This goes hand-in-hand with their similar statements across this document. The idea is to eliminate ALL the prior institutional structure and replace it with people specifically chosen for political loyalty to the party.**

**There is a VERY good reason that this was NOT allowed previously -- because all it takes is one party pushing this agenda to its full extent to convert the government to a single-party entity.**

-----

**Protecting the Integrity of the Bureau of Justice Statistics and the National Institute of Justice. The DOJ's statistical and research arms should serve the American people and not special interests. The Director of the Bureau of Justice Statistics should focus the BJS on producing the statistics of greatest interest to everyday Americans, and hence of policymakers, rather than those of particular interest to criminal-justice academics. The Director should insist that such statistics be as accurate as possible and presented as clearly as possible. The intellectually engaged, everyday American citizen should be able to read and understand the BJS's published statistics and reports rather than having to trust "experts" because the statistics are not clear.**

-----

**Let me translate: "Make sure we only publish simple statistics, and make sure they say what we want them to say. Don't let the average American realize that things are actually more complicated than a couple of numbers and a soundbite."**

**That's it for the DOJ. Next up -- Department of Labor.**

**We start right out with no pretense whatsoever that there will be any such thing as separation of Church and State if they get their way:**

-----

**At the heart of The Conservative Promise is the resolve to reclaim the role of each American worker as the protagonist in his or her own life and to restore the family as the centerpiece of American life. The role that labor policy plays in that promise is twofold: Give workers the support they need for rewarding, well-paying, and self-driven careers, and restore the family-supporting job as the centerpiece of the American economy. The Judeo-Christian tradition, stretching back to Genesis, has always recognized fruitful work as integral to human dignity, as service to God, neighbor, and family.**

-----

**There you go. There's no need to mention any other religion, as no others need apply.**



**It's useful to quote one other summary here -- which is purely factual -- so we can keep track of all the government entities in play, of which DoL is only one:**

**"The labor agencies covered in this chapter include the Department of Labor (DOL), the Equal Employment Opportunity Commission (EEOC), the National Labor Relations Board (NLRB), the National Mediation Board (NMB), the Federal Mediation and Conciliation Service (FMCS), and the Pension Benefit Guaranty Corporation (PBGC). "**

-----

**\*Reverse the DEI Revolution in Labor Policy.** Under the Obama and Biden Administrations, labor policy was yet another target of the Diversity, Equity, and Inclusion (DEI) revolution. Under this managerialist left-wing race and gender ideology, every aspect of labor policy became a vehicle with which to advance race, sex, and other classifications and discriminate against conservative and religious viewpoints on these subjects and others, including pro-life views.

**\*Eliminate Racial Classifications and Critical Race Theory Trainings.** The Biden Administration has pushed "racial equity" in every area of our national life, including in employment, and has condoned the use of racial classifications and racial preferences under the guise of DEI and critical race theory, which categorizes individuals as oppressors and victims based on race.

-----

**Once more we enter the Mirrorworld, which has over seventeen mirrors. Wait, wrong Mirrorworld. This one is the one in which "recognizing the systematic difficulties encountered by those not of the dominant groups" is considered just as bad as "promoting the dominance of the ascendant group".**

**This is part of the typical right-wing incel complaining, in which when they say "level playing field" they mean "the slanted one we grew up with".**

**It's no SURPRISE that they want to take out any such programs, but it's definitely one more problem.**

-----

**\*(the President should) Issue an executive order banning, and Congress should pass a law prohibiting the federal government from using taxpayer dollars to fund, all critical race theory training (CRT).**

-----

**As they actually can't (or won't) define what they MEAN by CRT, what this order would be -- as we've seen already in some states -- is "remove any materials that might show the systematic mistreatment of minorities". Looky there, state's rights, nothing to do with slavery back in that nasty little Civil War.**

-----

**Eliminate EEO-1 data collection.** The Equal Employment Opportunity Commission collects EEO-1 data on employment statistics based on race/ ethnicity, which data can then be used to

support a charge of discrimination under a disparate impact theory. This could lead to racial quotas to remedy alleged race discrimination. (The Office of Federal Contract Compliance Programs (OFCCP) also has a right to the data EEOC collects.) Crudely categorizing employees by race or ethnicity fails to recognize the diversity of the American workforce and forces individuals into categories that do not fully reflect their racial and ethnic heritage.

-----

**The latter part may even have a point; the gathering of such data has to walk a difficult line between obtaining useful statistics, and digging too deeply into personal information.**

**Their objection, of course, has nothing to do with that and everything to do with the fact that such statistics provide actual evidence for charges of discrimination.**

-----

\*Eliminate disparate impact liability. With interracial marriages in America increasing, many Americans do not fit neatly into crude racial categories.<sup>1</sup> Under disparate impact theory, moreover, discriminatory motive or intent is irrelevant; the outcome is what matters. But all workplaces have disparities.

-----

**Well, yeah, but the fact that one of you is white and one isn't doesn't change the fact that, well, one of you isn't.**

**The bit "all workplaces have disparities" is also a distractor, something along the lines of someone saying "ambulance paramedics get paid \$15 per hour, you want to give that to someone flipping burgers?" It ignores the idea that maybe BOTH things are a problem (that is, workplaces should always strive NOT to have disparities in treatment, and ambulance workers should be paid more than \$15 per hour).**

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\*Eliminate OFCCP. The Office of Federal Contract Compliance Programs (OFCCP) exists to enforce Executive Order (EO) 11246.<sup>2</sup> That order was originally signed in 1965 to require federal contractors (and subcontractors) to commit to nondiscrimination. It gave enforcement authority to the Department of Labor, up to and including debarment from federal contracting. The Equal Employment Opportunity Commission has since grown, often making OFCCP's authority redundant and imposing a second regulatory agency under whose rules businesses must operate. In addition, under EO 11246, the President and DOL can force a huge swath of American employers to comply with rules and regulations based on novel anti-discrimination theories (such as sexual orientation and gender identity theories) that Congress had never imposed by statute.

-----

**Translation: the more of these "equality" promoting organizations we can get rid of, the more we can return to the halcyon days of (1950... 1930... 1830...)"**

-----

(Bostock v. Clayton County. Bostock held that “an employer who fires someone simply for being homosexual or transgender” violates Title VII’s prohibition against sex discrimination.)

\*Restrict the application of Bostock. The new Administration should restrict Bostock’s application of sex discrimination protections to sexual orientation and transgender status in the context of hiring and firing.

\*Withdraw unlawful “notices” and “guidances.” The President should direct agencies to withdraw unlawful “notices” and “guidances” purporting to apply Bostock’s reasoning broadly outside hiring and firing.

\*Rescind regulations prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, and sex characteristics. The President should direct agencies to rescind regulations interpreting sex discrimination provisions as prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, sex characteristics, etc.

\*Direct agencies to refocus enforcement of sex discrimination laws. The President should direct agencies to focus their enforcement of sex discrimination laws on the biological binary meaning of “sex.”

-----

**As if we needed more evidence, here's more explicit detail of how they intend to walk back protections for anyone who's in the LGBTQ+ circle.**

**Here's three more anti-abortion entries, one after another.**

-----

\*Promote pro-life workplace accommodations for mothers. Federal law should protect life and promote pro-family policies. Current law, the Pregnancy Discrimination Act,<sup>3</sup> provides nondiscrimination protections in the workplace for pregnancy, childbirth, or related medical conditions. The Pregnant Workers Fairness Act (PWFA)<sup>4</sup> requires employers to make reasonable accommodations for women “to the known limitations related to the pregnancy, childbirth, or related medical conditions,” unless “the accommodation would impose an undue hardship on the operation of the [employer’s] business.” The Americans with Disabilities Act (ADA) also provides nondiscrimination and accommodation protections in the workplace for certain pregnancy-related disability.<sup>5</sup> None of these laws requires an employer provide health insurance benefits for elective abortion.

\*Pass a law requiring equal (or greater) benefits for pro-life support for mothers and clarifying abortion exclusions. Congress should pass a law requiring that to the extent an employer provides employee benefits for abortion, it must provide equal or greater benefits for pregnancy, childbirth, maternity, and adoption. That law should also clarify that no employer is required to provide any accommodations or benefits for abortion.

\*Keep anti-life “benefits” out of benefit plans. Some benefits attorneys and pro-choice advocates have argued since the Supreme Court’s *Dobbs v. Jackson Women’s Health Organization* decision<sup>6</sup> that the longstanding doctrine of Employee Retirement Income Security Act of 1974 (ERISA)<sup>7</sup> preemption should block individual states’ efforts to prohibit

employers from helping employees procure abortions via offering various kinds of coverage under employee-sponsored benefit plans. ERISA should not be allowed to trump states' ability to protect innocent human life in the womb.

-----

**So nice they want to help human life in the womb, but don't really plan to protect it once it's actually, you know, BORN.**

**I also love the "Anti-Life" phrase. Really, we're not Darkseid.**

-----

\*Provide robust protections for religious employers. America's religious diversity means that workplaces include people of many faiths and that many employers are faith-based. Nevertheless, the Biden Administration has been hostile to people of faith, especially those with traditional beliefs about marriage, gender, and sexuality.

-----

**That's such a load of manure that people must be smelling it in China. Saying "no, you can't impose your religion on other people" is in no way being hostile to your religion. Unless, of course, your religion requires you to impose it on others, in which case... sorry, jack, religious tolerance ends at the point of my nose.**

-----

\*Issue an executive order protecting religious employers and employees. The President should make clear via executive order that religious employers are free to run their businesses according to their religious beliefs, general nondiscrimination laws notwithstanding, and support participation of religious employees and employers as federal contractors and in federal activities and programs.

-----

**Ummm... I'm going with NO. At least not as a blanket declaration. You're welcome to make your meat store Halal or Kosher, or follow other personal religious requirements that won't impact other people. But in a lot of cases this isn't the issue. One area that the Evangelical Right really means this is medicine (as we saw previously) with respect to abortion. And no, as a doctor or as a pharmacist, you may NOT practice your religion to the detriment of your patients. You can disagree with their choices, but your job requires you to serve all comers.**

-----

\*General EEOC Reforms. The Equal Employment Opportunity Commission (EEOC) does not have rulemaking authority under Title VII and other laws it enforces, yet it issues "guidance," "technical assistance," and other documents, including some that push new policy positions. EEOC should disclaim its regulatory pretensions and abide by the guidance reforms discussed below.

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**In short, pull the teeth of the EEOC and have it only involved in what amounts to reinforcing their policies.**

-----

\*Refocusing Labor Regulation on the Good of the Family. The DEI revolution in labor affected not only the administrative state, but it has also targeted much of the private sector. ... We must replace “woke” nonsense with a healthy vision of the role of labor policy in our society, starting with the American family.

\*Allow workers to accumulate paid time off. Lower- and middle-income workers are more likely be in jobs that are subject to overtime laws that require employers to pay time-and-a-half for working more than 40 hours a week.

\*Congress should enact the Working Families Flexibility Act. The Working Families Flexibility Act would allow employees in the private sector the ability to choose between receiving time-and-a-half pay or accumulating time-and-a-half paid time off (a choice that many public sector workers already have).

-----

**Well, the FIRST entry under the starting suspicious paragraph seemed reasonable. But the second one? That's not "accumulating Paid Time Off", that's "shoving the payment for overtime down the road". This is saying "if you want time off, work more hours", which is pretty much the opposite of what most of us mean when we say PTO.**

-----

\*Congress should incentivize on-site childcare. Across the spectrum of professionalized childcare options, on-site care puts the least stress on the parent-child bond.

\*Congress should amend the Fair Labor Standards Act (FLSA) to clarify that an employer's expenses in providing on-site childcare are not part of an employee's regular rate of pay.

-----

**I'm all for supporting childcare, but an awful lot of companies don't have space, or settings, for on-site care. Moreover, that second paragraph? I can interpret that a couple ways -- one of them being that if it's not part of their regular rate of pay, that they'll have to pay for it, just like I have to pay for dental insurance out of pocket.**

-----

\*DOL should commit to honest study of the challenges for women in the world of professional work. The Women's Bureau at DOL tends towards a politicized research and engagement agenda that puts predetermined conclusions ahead of empirical study.

-----

**Uh-huh. If you don't have any predetermined conclusions, how can you say that the existing research is putting their own ahead of study? I have a suspicion that there's particular conclusions they'd like to see (i.e., that women don't belong in professional work most of the time).**

-----

To equalize access to tax-free retirement savings for married couples, the limit for married couples on 401(k) and similar work- based retirement savings accounts should be double the limit for individuals, regardless of the allocation of work between the couple.

-----

**That's... kinda nice, I guess, but an awful lot of workers don't even GET such opportunities -- and even if their employer offers them, they can't afford to double their contributions. I know \*I\* can't.**

-----

Sabbath Rest. God ordained the Sabbath as a day of rest, and until very recently the Judeo-Christian tradition sought to honor that mandate by moral and legal regulation of work on that day.

\*Congress should encourage communal rest by amending the Fair Labor Standards Act (FLSA)<sup>9</sup> to require that workers be paid time and a half for hours worked on the Sabbath. That day would default to Sunday, except for employers with a sincere religious observance of a Sabbath at a different time (e.g., Friday sundown to Saturday sundown)

-----

**Well, there goes their lip service to "faith" in general. There's only one faith really being paid attention to here.**

-----

Congress should clarify that overtime for telework applies only if the employee exceeds 10 hours of work in a specific day (and the total hours for the week exceed 40).

-----

**Whoa nelly! They REALLY hate telework. Working in an office, the threshold's 8 hours or more. And a lot of places have 37.5 hour weeks. But now they can make you work 9.5 hours every day for a total of 47.5 hours and pay you ZERO, ZIP, NADA overtime (note the "and" clause above). Alternatively, they can have you work 14 hours in a day as long as the whole week doesn't break 40.**

-----

DOL should clarify that a home office is not subject to OSHA regulations and that time to set up a home office is not compensable time or eligible for overtime calculations. DOL should likewise clarify that reimbursement for home office expenses is not part of an employee's regular rate, even if those reimbursements are repetitive (such as for internet or cell phone service).

-----

**So there's no requirement that your home workplace be safe and secure for work, and any ongoing expenses for working from home are your problem, a freebie giveaway to your employer. Nice.**

**Okay, we're now into a section that's discussing:**

-----  
Making Family-Sustaining Work Accessible. Our national work ethic is an American hallmark. As Benjamin Franklin once said, “America is the land of labor.” Much of American life is mediated by Americans coming together to take responsibility for solving problems and helping their communities.

Protect flexible work options and worker independence (independent contractors). Roughly 60 million Americans across all income groups, ages, education levels, races, and household types participate in independent work, including full-time, part-time, or as a “side hustle.”

\*NLRB and DOL should return to their 2019 and 2021 independent contractor rules that provided much-needed clarity for workers and employers.

\*Congress should establish a bright-line test—based on the level of control an individual exercises over his or her work—to determine whether a payee is an employee or an independent contractor, across all relevant laws. This would prevent continued uncertainty as well as provide continuity across federal laws.

\*Congress should provide a safe harbor from employer-employee status for companies that offer independent workers access to earned benefits. Doing so would increase access among independent contractors to traditional pooled workplace benefits such as health care and retirement savings accounts.

-----  
**This section, I admit I don't know much of anything about. I have my suspicions that things like "safe harbor" means that the companies would have no responsibility towards or for the contractors and thus be able to treat them in ways that you cannot treat regular employees, but I'm not informed enough on the ins and outs of contractor-employer law to say.**

-----  
Protect Small Businesses and Entrepreneurship (Joint Employer). Millions of businesses across America engage in mutually beneficial affiliation arrangements with other businesses. These arrangements include janitorial services, staffing firms, construction contractors and subcontractors, technology support services, and many other vendor and contracting services. They also include the nearly 775,000 independently owned franchise businesses, which employ 8.2 million workers across the United States.

\*DOL and NLRB should return to the long-standing approach to defining joint employers based on direct and immediate control.

\*Congress should enact the Save Local Business Act, which would codify the long-standing definition that has existed outside the Obama-era and Biden-proposed rules.

-----  
**Based on some discussion in the section above, I am suspicious that part of the reasoning here is that the companies in charge of franchise businesses -- like McDonald's, etc. -- will have directives for franchises to follow that the franchise can, in theory, ignore or**

**change, but for which the franchise owner will be punished, thus the main company still has "control" over the business even though they have no LEGAL control. They of course don't want to be held responsible for the costs or problems this creates for the franchise owner or his employees.**

**Again, I can't say for sure, but this is my initial suspicion on this bit.**

-----

Overtime Pay Threshold. Overtime pay is one of the most challenging aspects of the Fair Labor Standards Act rules. "Nonexempt workers" (e.g., workers whose job duties fall within the law's power or whose total pay is low enough) must be paid overtime (150 percent of the "regular rate") for every hour over 40 in a work- week. Overtime requirements may discourage employers from offering certain fringe benefits such as reimbursement for education, childcare, or even free meals because the benefits' value may be included in the "regular rate" that must be paid at 150 percent for all overtime hours.

-----

**Translation: How can we claim overtime pay is 150% but not actually pay 150%, thereby allowing cheap employers to claim they pay overtime?**

-----

\*DOL should maintain an overtime threshold that does not punish businesses in lower-cost regions (e.g., the southeast United States). The Trump-era threshold is high enough to capture most line workers in lower-cost regions.

-----

**"We'd really like to pay as little overtime as possible, so put thresholds for pay requiring overtime based on the lowest-paying states rather than higher ones."**

-----

\*Congress should clarify that the "regular rate" for overtime pay is based on the salary paid rather than all benefits provided. This would enable employers to offer additional benefits to employees without fear that those benefits would dramatically increase overtime pay.

-----

**As above, "how can we pay overtime without actually including the full pay rate in overtime?"**

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\*Congress should provide flexibility to employers and employees to calculate the overtime period over a longer number of weeks. Specifically, employers and employees should be able to set a two- or four- week period over which to calculate overtime. This would give workers greater flexibility to work more hours in one week and fewer hours in the next and would not require the employer to pay them more for that same total number of hours of work during the entire period.

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**Translated: "By spreading it out over more weeks, we can really put you in the grind for two weeks and then give you no hours in the next two, yet pay you no more! More uncertainty and less money for you, more money for us!"**

**If you really wanted to help workers, make comp time a requirement, lock it to a no-longer-than-8-hour-day, and lock it to a 37.5 hour week (40 hours minus half-hour mandated breaks).**

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Clear and Restrictive Rules on Guidance Documents. Federal agencies not only issue regulations to fill in gaps left by legislation, but also supplement those regulations with "guidance" documents that occupy a unique and often confusing area between law and "helpful advice." Unfortunately, wielded by overzealous enforcement agents, such guidance, some of it even hidden from public view, morphs into binding law used against unsuspecting employers.

\*DOL should reinstitute the PRO Good Guidance rule via notice and comment.

\*Congress should amend the Administrative Procedure Act<sup>11</sup> to explicitly limit the use of guidance documents.

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**My suspicion here, based on other elements discussed, is that this is "Those darn agencies try to make us do things for safety and employees that cost us money. Make them stop doing it."**

**I really like the "unsuspecting employers" bit.**

-----

Exemptions from Regulations for Small Business. Burdensome regulations have anti-competitive effects. In general, larger, higher-margin businesses are better able to absorb the costs of regulatory compliance than are small businesses, and under the Biden Administration, big-business lobbies have affirmatively embraced certain regulations (such as the COVID vaccine mandate for private employers) to reduce competition from smaller businesses. Research suggests that labor regulations may pose the highest aggregate regulatory cost for small businesses.

\*The labor agencies should exercise their available discretion and duties under the Regulatory Flexibility Act<sup>12</sup> to exempt small entities from regulations where possible.

\*Congress should enact legislation increasing the revenue thresholds at which the National Labor Relations Board asserts jurisdiction over employers to match changes in inflation that have occurred since 1935 and better reflect the definition of "small business" used by the federal government.

\*Congress (and DOL, in its enforcement discretion) should exempt small business, first-time, non-willful violators from fines issued by the Occupational Health and Safety Administration.

-----

**This is a somewhat sticky one, as they DO have a point that the more regulations a small business has to follow, the larger the marginal cost to the business. This is true in many areas, including accounting, security, and safety, all of which can be addressed much more easily by larger businesses.**

**However, exempting them from the REGULATIONS, rather than either providing support to COMPLY with regulations, has the strong potential to make small businesses "dumping grounds", both figuratively and literally, who can get away with avoiding expensive compliance while performing various operations for larger corporations; this allows the larger corporation to avoid all such costs and puts the onus for any consequences on the smaller business.**

-----

#### EDUCATION AND VOCATIONAL TRAINING

Apprenticeships. The next Administration should return to prior policy and implement an industry-recognized apprenticeship program separate from the Registered Apprenticeship Program (RAP) and explore how best to modernize, streamline, and eliminate duplication in the RAP. For roughly 80 years, the RAP— which requires conforming to government standards and includes federal funding, tax credits, and other federal resources—has dominated apprenticeship programs in the U.S. Congress should expand apprenticeship programs outside of the RAP model, re-creating the IRAP system by statute and allowing approved entities such as trade associations and educational institutions to recognize and oversee apprenticeship programs.

-----

**Yes, and there's a reason that Biden repealed the IRAP. The government regulations they often complain about exist mostly to protect apprentices -- history has a LOT of examples of how apprentices were mistreated in the past. Apprenticeships should be subject to the same protections as any other worker group, in pay, in working conditions, etc. (this should also be true for other similar groups, such as interns, graduate student workers, and so on)**

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\*Encourage and enable religious organizations to participate in apprenticeship programs, etc. Both DOL and NLRB should facilitate religious organizations helping to strengthen working families via apprenticeship programs, worker organizations, vocational training, benefits networks, etc.

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**This, and a paragraph or two preceding it, show that they'd like to add religious "guidance" to working organizations. I trust I don't have to go into detail on how that could be a terrible idea.**

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\*DOL should amend its hazard-order regulations to permit teenage workers access to work in regulated jobs with proper training and parental consent.

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**While the reasoning behind this claims to be founded on the right of people to choose, and to support family-owned businesses that involve dangerous operations, the real point of this is that teenagers can be more easily pressured (by monetary, societal, etc., means) into accepting risks that older people will not, and are also less able to combat ill-usage. This makes them monetarily ideal for dangerous processing and manufacturing areas because they will be paid less, risk more, and be less likely to understand when lines are being crossed that really should not be.**

-----

Congress should create an employer grant worth up to \$10,000 per year or pro-rated portion thereof for each worker engaged in on-the-job training, defined as some share of paid time spent in a formal training program.

-----

**I'm unclear why the \*employer\* should be rewarded with a grant rather than the worker.**

**Skipping areas I really can't even begin to comment on, including what appears to be a lot of complaining about the Unemployment Insurance possibly having fraud in it -- which they're way more worried about than that it's actually paying people who are unemployed.**

**This is, alas, typical -- their attitude seems to be they'd rather 5 families go broke than one family get money it doesn't deserve, while I'd rather 5 families get paid money they don't really need as long as none of the people who DO need it still get it.**

-----

#### **WORKER VOICE AND COLLECTIVE BARGAINING**

Non-Union Worker Voice and Representation. American workers lack a meaningful voice in today's workplace. Between 50 percent and 60 percent of workers have less influence than they want on critical workplaces issues beyond pay and benefits. Even managers are twice as likely to say their employees have too little influence rather than too much. But America's one-size-fits-all approach undermines worker representation. Federal labor law offers no alternatives to labor unions whose politicking and adversarial approach appeals to few, whereas most workers report that they prefer a more cooperative model run jointly with management that focuses solely on workplace issues. The next Administration should make new options available to workers and push Congress to pass labor reforms that create non-union "employee involvement organizations" as well as a mechanism for worker representation on corporate boards.

-----

**Some interesting "assuming the conclusion" here, or at least interesting choices of phrasing. It's true that few people LIKE adversarial approaches, but historically this has been the way such negotiations GO. While they talk about "cooperative" approaches, there's precious little evidence that this is an effective way to really address worker**

**needs when the workers don't have the threat of organized strikes or similar actions available to them, through an official or unofficial union.**

**A LOT of work has been expended by corporate America over the last several decades to make unions look either bad or incompetent, and there's a reason they'd spend that much effort on it: because unions can cost them money.**

-----

Duty of Fair Representation. Unions have a duty of fair representation to their members, yet they too often abuse that duty to use their members' resources on left-wing culture-war issues that are unrelated, and in fact often harmful, to union members' own interests.

\*The NLRB should take enforcement or amicus action advancing the position that political conflicts of interest by union leadership can support claims for breach of the duty of fair representation in a manner analogous to financial conflicts of interest and analogous to breaches of the fiduciary duty of loyalty in other areas of law.

-----

**I'd feel there was a more benevolent motive behind this if it wasn't that "left" is singled out. As it is, I suspect the idea is that giving a union left-wing leadership is something they want to stamp out, especially as the left wing would be much more likely to push things for the common worker rather than the company.**

-----

Interpreting "Protected Concerted Activity." In an effort to prevent employers from retaliating against workers who express a desire to unionize, certain activities are deemed "protected concerted activity" (under §7 of the NLRA). The NLRB has issued extreme interpretations of these activities, such as determining that a business's requiring its employees to be courteous to customers and one another is an unlawful infringement on the free speech rights implicit in the protected concerted activity protections in the NLRA.

\*Reverse unreasonable interpretations of "protected concerted activity." The NLRB should return to the 2019 Alstate Maintenance interpretation of what does and does not constitute protected concerted activity, including listing eight instances of lawful actions by employers.

-----

**They mention "listing eight instances of lawful actions" and the only example they give in the prior paragraph is a general claim that it was ruled that asking employees to be courteous was a violation.**

**Now, I don't know exactly what the heck they're referring to, but my guess is that there's a lot more to it than an employee refusing to say "have a good day" or something like that. My internal cynic is thinking it might be more along the lines of "C'mon, honey, be nice to the man, he's spending a lot of money here".**

**In any event, this sounds like an attempt to weaken protected activity that's part of unionizing and collective bargaining. You can ASK me to be polite but I have a right to**

**decide when customers, or employees, step over a line and are no longer deserving my politeness.**

-----

**Dues-Funded Worker Centers.** Under current law, both labor unions and unionized employers must file financial disclosures with DOL on an annual basis to ward off potential fraud and corruption of the sort that has been seen recently within the United Automobile, Aerospace and Agricultural Implement Workers of America (UAW). However, worker centers, which have grown in number and influence enormously over the past decade, are not required to file these disclosures.

**\*Investigate worker centers and require financial disclosures.** DOL should investigate worker centers that look and act like unions and bring enforcement actions to require them to file the same financial disclosures.

-----

**Yes, I can see why they don't like this; the worker centers are community-grown support networks that provide a more distributed, and not-limited-to-individual-employer, support that is in some ways analogous to unionizing, and is especially for the lower-rung workers, immigrant and otherwise.**

**Imposing such disclosure regulations on such groups is a great way to stomp them out of existence while piously claiming to be watching out for fiscal responsibility.**

-----

Office of Labor-Management Standards Initiative. Currently, the Office of Labor-Management Standards (OLMS) may investigate potential employer malfeasance with regard to union funds in the absence of any complaint by a worker or union but may not do the same with regard to potential union malfeasance. If OLMS has evidence that a union may be violating the law based on information available to the agency (such as annual financial disclosure reports, information developed during an audit of a union's books and records, or information obtained from other government agencies) it should be permitted to open an investigation. It should have the same enforcement tools available for both employers and unions.

**\*Revise investigation standards.** The Office of Labor-Management Standards should revise its investigation standards to authorize investigations without receiving a formal complaint.

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**Seriously, this isn't even a subtle move. Authorizing investigations without a formal complaint into worker's representation organizations is a really great way to help break unions.**

-----

Unionizing the Workplace: Card Check vs. Secret Ballot. Under the NLRA, instead of having a secret ballot election about the decision to unionize a workplace, a union may instead collect signed pro-union cards from a majority of the employees it wishes to represent and then ask the employer and National Labor Relations Board for voluntary union recognition. That request gives the employer the option to hold a secret-ballot election or to recognize the union without

any such election. This “card check” procedure is likely to induce employees to provide their signed cards in ways that do not accurately reflect their true preferences—ranging from a desire not to offend the signature requestor to a wish to avoid intimidation and coercion to signing based on false information provided by union organizers. In short, the card check procedure sidesteps many aspects of democratic decision-making that free and fair elections conducted by secret ballot are supposed to accomplish.

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**Hmm. An interesting argument, but I'm not persuaded that what amounts to an official public survey of your employees is any more likely to support a union than to oppose it. After all, signing a card for a union also puts you on record favoring the union, where the employer will see it. Seems to me that the employer can bring at least as much pressure to bear as the union organizers could.**

-----

Contract Bar Rule. Although current labor law allows a union to establish itself at a workplace at more or less any time, the calendar for any attempt to decertify a union is considerably more constrained. If a union is recognized as a collective bargaining agent, then employees may not decertify it or substitute another union for it for at least one year under federal law (the “certification bar”). Similarly, when a union reaches a collective bargaining agreement with an employer, it is immune from a decertification election for up to three years (the “contract bar”). A typical consequence of these rules is that employees must often wait four years before they are allowed a chance at decertification. Employees then have only a 45-day window to file a decertification petition; if the employer and union sign a successor contract, then the contract bar comes into play once again—meaning employees with an interest in decertification must wait another three years.

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**Yeah, there's a REASON for those barriers, and it's because an anti-union employer can ensure that there's a challenge to decertify CONSTANTLY if there's no limits. This weakens any union and forces them to be wasting energy fighting this battle rather than fighting management for the employees it represents.**

-----

Tailoring National Employment Rules. National employment laws like the Fair Labor Standards Act (FLSA)<sup>21</sup> and the Occupational Safety and Health (OSH) Act<sup>22</sup> set out one-size-fits-all “floors” regulating the employment relationship. These substantive worker protections often do not mesh well with the procedural worker protections offered through the NLRA’s collective bargaining process. Unions could play a powerful role in tailoring national employment rules to the needs of a particular workplace if, in unionized workplaces, national rules were treated as negotiable defaults rather than non-negotiable floors.

\*Congress should amend the NLRA to authorize collective bargaining to treat national employment laws and regulations as negotiable defaults. For example, this reform would allow a union to bless a relaxed overtime trigger (e.g., 45 hours a week, or 80 hours over two weeks) in exchange for firm employer commitments on predictable scheduling.

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**There's a goddamn reason that employment laws and safety regulations are not negotiable, and -- especially in the OSHA rules -- those regulations are written in blood. The unions are part of the REASON they exist, and making them negotiable means that employers have another lever to push against in negotiations. Screw that.**

**Boy, they want to do a number on the DoL and related agencies.**

-----

#### THE STATES

Worker-led Benefits Experimentation. Workers depend on unemployment benefits to navigate inevitable market frictions and seek new employment opportunities. But existing unemployment insurance (UI) is bureaucratic, ineffective, and unaccountable. The outdated system's myriad failures during the COVID-19 pandemic highlighted the need for innovations that respond to recipients' needs.

The most promising avenue for innovation is to involve workers and private-sector organizations more directly, freed from unnecessary bureaucratic strictures.

\*Approve non-public worker organizations as UI administrators. DOL should approve, pursuant to § 303(a)(2) of the Social Security Act, non- public worker organizations as administrators.

\*Offer waivers for suitable alternatives. DOL should offer waivers from the standard requirements imposed on unemployment compensation by § 303(a) and § 303(d) of the Social Security Act to states that propose suitable alternatives.

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**Maybe I'm just imagining things, but is "non-public worker organization" a roundabout way of saying "Private commercial concerns" -- that is, privatization of unemployment benefits?**

**There's no way this could possibly go horribly wrong. Look at private prisons. No, wait, don't look at those!**

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Labor Law. The federal laws governing labor-management relations have barely changed in generations, and reforms on the federal level have been almost impossible to get through Congress. To modernize labor law, the Congress should:

\* Pass legislation allowing waivers for states and local governments.

To encourage experimentation and reform efforts at the state and local levels, Congress should pass legislation allowing waivers from federal labor laws like the NLRA and FLSA under certain conditions. State and local governments seeking waivers would be required to demonstrate that their reforms would accomplish the purpose of the underlying law, and not take away any current rights held by workers or employers. In addition, waivers would be limited to a five-year period, after which time they could be modified, canceled, or renewed.

-----

**Forget the handwaving later on, focus on the basic proposition, that they want state and local governments to be able to be exempt from labor laws and regulations.**

**"demonstrate that their reforms would accomplish the purpose of the underlying law" is an interesting phrase, as it encompasses a broad amount of interpretation -- what, exactly, IS the "purpose" of the "underlying law"? You'll get very different results if the courts believe the purpose of unemployment and labor law is to "help people get good, stable, well paying jobs" versus "punish the slackers who are trying to be parasites".**

-----

Excessive Occupational Regulation. Excessive occupational regulation— most typically encountered as occupational licensing—creates underemployment and wasted resources, and artificially increases consumer prices. It is a significant problem that is difficult to address at the federal level.

\*Congress should ensure that interstate compacts for occupational license recognition that are federally funded do not require new or additional qualifications (that is, qualifications that do not originate from state governments themselves) for licensed professionals to participate.

\*Congress should ensure that well-qualified licensees are not locked out of the job market by restrictive government programs funded by the federal government. (For instance, medical doctors must complete residency training to practice, and because Medicare provides funding for significantly fewer residencies than there are doctors, sizable numbers of MDs are locked out of the job market every year.)

-----

**There are some worthwhile points here, but any time they start talking about relaxing regulations, it needs a cold, hard squint at what they might actually mean to accomplish with it.**

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Wagner-Peyser Staffing Flexibility. State agencies that administer unemployment benefits and workforce development programs should be able to hire the best people to do the job and should not be required to use state employees if a contractor can do the job better. Further, the federal government should not force a state to use non-union labor or union labor for these positions.

-----

**Again, this is a lever to privatize a social program. While there are undoubtedly government tasks that may be done well by private organizations, ones intended as support for the society, and which are thus services, are not and never were meant to produce any profit -- and thus are unsuitable candidates for privatization if the point is to provide the services rather than shunt the service money to private industry.**

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WORKER RETIREMENT SAVINGS, ESG,  
AND PENSION REFORMS



\*Remove ESG considerations from ERISA. Environmental, Social, Governance (ESG) investing is a relatively recent strategy promoted by large asset managers that focuses not only on a company's bottom line, but also on the company's compliance with liberal political views on climate change, racial quotas, abortion, and other issues. The ESG movement has focused especially on reducing greenhouse gas emissions. For example, ESG proponents advocate for divestment from oil and gas companies or the exercise of investor influence to reduce oil and gas production.

ESG considerations unrelated to investor risks and returns necessarily sacrifice trust law's traditional sole focus on investment returns for collateral interests.

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**Not only is this yet one more example of how the authors have a major focus on destroying any attempt to address the climate issue and a particular dislike of anything that might smack of renewable energy, but also here we get a direct look at one of the -- I might even say, a major -- cause of the problems we have with modern companies.**

**That is contained in the phrase: "trust law's traditional sole focus on investment returns". This also applies to a lot of general corporate law, and what it means is that the law, as currently constituted, gives literally NO priority to anything other than investor returns ("the stockholders, Bob!").**

**In that sense, given that the law is set to ENFORCE this, it's actually hard for any large corporation to NOT be "evil", because the law requires that investor returns are the real and only important benchmark. Serving customers? Safety? Environmental damage? Even long-term profits are by the wayside, because the "investor returns" will be argued in the short term.**

**THIS is an area that needs MAJOR changes, to make it LEGALLY SUPPORTABLE for large companies to NOT sacrifice everything for the sake of stockholder returns. This is what's brought Boeing to its current pathetic state.**

**Okay, onward...**

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\*DOL should prohibit investing in ERISA plans on the basis of any factors that are unrelated to investor risks and returns.

\*DOL should return to the Trump Administration's approach of permitting only the consideration of pecuniary factors in ERISA. However, this approach should not preclude the consideration of legitimate non-ESG factors, such as corporate governance, supply chain investment in America, or family-supporting jobs.

\*DOL should consider taking enforcement and/or regulatory action to subject investment in China to greater scrutiny under ERISA. Many large retirement and pension plans remain invested in China despite its lack of compliance with U.S. accounting standards and state control over all aspects of private capital.

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**This reinforces the concept that the only thing that matters is the monetary return (unless it's involving their boogeyman "CHINA").**

**A little ways down from this, they discuss possibly bringing legal action against the fund managers who used environmental and social concerns as factors for investments.**

**A lot of the following bits focus on retirement plans, and I don't understand enough of the operations involved to judge exactly what they're planning to do here or how it would affect the plans or people involved. Maybe someone else will.**

**In the next section...**

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**PUTTING AMERICAN WORKERS FIRST**

A labor agenda focused on the strength of American families must put American workers first. As the family necessarily puts the interests of its members first, so too the United States must put the interests of American workers first.

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**The first couple of discussions here talk about phasing out the H2A and H2B visas, but -- to their credit -- there are alternative views discussed that point out that a lot of the jobs involved in agriculture are ones Americans generally won't, or can't, take due to their low pay and seasonal nature ... and that these jobs HAVE to be done in order to keep agriculture going.**

**This is of course a problem in itself -- we shouldn't be relying on foreign citizens to come here to work for shitty wages just to keep our agriculture going -- but just cutting the program off would be far worse, as those shitty jobs are still apparently better than nothing for those who take them and are keeping the rest of the country stable. This has to be addressed, but not by drastically stupid action.**

-----

**\*Congress should mandate that all new federal contracts require at least 70 percent of the contractor's employees to be U.S. citizens, with the percentage increasing to at least 95 percent over a 10-year period.**

**\*Congress must amend the law so that employers can again have the freedom to make hiring Americans a priority. Despite the significant advantages that preferring citizens over (work-authorized) aliens in hiring would provide to American workers, businesses, and the country at large, such a practice has been illegal since 1986.<sup>25</sup> This makes no sense.**

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**In some areas this may be sensible, but I have a suspicion there are various types of industries in which this might be a difficult target to achieve.**

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Leveling the International Playing Field for Workers. As recent decades of intense import competition and offshoring have made clear, American workers suffer when the U.S. opens its markets to foreign nations' minimal labor standards and exploitative conditions. While federal law already prohibits the importation of goods produced with forced labor, the prohibitions are toothless without effective means of enforcement and cover only the most basic of workers' rights.

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**Wait, what, is this the same document? (checks) Huh. Let's see where they're going with this.**

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\*Eliminate all forms of forced or compulsory labor.

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**All forms? I'm raising my hand back here, asking about for-profit prisons and prisoner labor.**

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\* Protect workers' rights to organize and participate voluntarily in a union without employer interference or discrimination.

\*Create a rapid-response mechanism to provide for an independent panel investigation of denial of labor rights at covered facilities.

-----

**Whoa, slow down there, Tex. After all the union-busting IN THIS SAME SECTION (let alone other sections of 2025), you give me this? Is this Dr. Jekyll instead of Hyde, or are you "Hyde-ing" something?**

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\* Shift the burden of proof by presuming that an alleged violation affects trade and investment, unless otherwise demonstrated.

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**And violators are guilty until proven innocent. What? I'm sincerely confuzzled at this point.**

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Investigate Foreign Labor Violations That Undermine American Workers. The United States' embrace of globalization has exposed American workers to unfair competition from nations with cheap, abundant, and often exploited labor.

American workers have, as a consequence, seen their earning power erode.

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**Aaaaand THERE it is. If we can force other countries to respect labor and pay those prices, we can exploit AMERICAN workers.**

**Okay, at least now it makes sense, if it did make it somewhat surreal while reading: They're concerned with other countries undercutting us because they can't force people to Employ American. By upgrading the quality and cost of external labor, they make it cheaper to employ Americans and then you can break American unions and such.**

-----

#### ORGANIZATIONAL AGENDA

##### Budget

\* Reduce the agencies' budgets to the low end of the historical average. The Trump Administration's FY 2020 request, \$10.9 billion, would provide a workable target for spending reductions for DOL, for example.

\* Spending reductions should occur primarily in the Employment and Training Administration (ETA).

\* Focus health and safety inspections on egregious offenders, as other inspections are often abused and usurp state and local government prerogatives.

-----

**Okay, we're back on track here. First priority is to gut the budgets of all of the DOL-related agencies, with a concentration on ETA. Also, cut way back on inspections for health and safety, because we can certainly trust most companies to do the right thing, surely?**

-----

##### Personnel

\* Maximize hiring of political appointees.

\* Appoint new EEOC and NLRB general counsels on Day One.

\* Implement a hiring freeze for career officials.

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**Straight-up here, maximize political appointees to ensure "political accountability" of the department. The General Counsels were apparently removed from their positions previously by Biden, and they're using that precedent with a (literal) vengeance.**

**Now we enter the Department of Transportation.**

**Note that this section is very near to my professional heart -- and that of the company I work for -- as we are a transportation-focused company and many of the projects we have worked on have been based on grants supported by USDOT -- the Federal Railway Administration, National Highway Traffic Safety Administration, and several others.**

-----

The U.S. Department of Transportation (DOT), with a requested fiscal year (FY) 2023 budget of \$142 billion,<sup>1</sup> was originally intended simply to provide a policy framework for transportation safety, rulemaking, and regulation. However, it has evolved to believe that its role is “to deliver the world’s leading transportation system”<sup>2</sup>—that is, to select individual projects and allocate taxpayer funds in the actual planning, developing, and building of transportation assets. Such a role is held more appropriately by transportation asset owners: primarily states, municipalities, and the private sector.

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**This is, in fact, not true. States and, especially, municipalities, are often cash-strapped and thus are highly limited in the amount and type of projects they can support. Most of their budget, and focus, goes to supporting the maintenance of existing infrastructure, or to changes that are intended to support local changes in industry or related business ventures; whether these serve the needs of the greater public, or the country in general, is not really a consideration.**

**Even less is private industry appropriate for such work. While private industry, by itself, may come up with innovative and interesting technologies and approaches, these are ONLY going to be deployed if and as they can be convincingly profitable -- and with current laws on the books, that profit has to be pretty short-term.**

**Transportation for the country isn't properly a profit-making proposition, anyway, not in the sense that private industry requires it. Providing cheap and efficient transportation may have a positive overall economic effect, but it won't be in one specific easily profitable area.**

-----

In addition to providing a safety and regulatory framework through its 11 sub-components, known as modes, the department has become a de facto grantmaking and lending organization.

...

Despite the department’s tremendous resources, congressional mandates and funding priorities have made it difficult for DOT to focus on the pressing transportation challenges that most directly affect average Americans, such as the high cost of personal automobiles, especially in an era of high inflation; unpredictable and expensive commercial shipping by rail, air, and sea; and infrastructure spending that does not match the types of transportation that most Americans prefer.

-----

**This is a ... troubling section from any point of view. "the high cost of personal automobiles"? What, is the party of free enterprise complaining that the government should be limiting prices charged by companies? "Unpredictable and expensive commercial shipping by rail, air, and sea"? Expensive is a relative thing (although a lot of the increase in cost seen in, for example, the USPS can be attributed to Republican efforts to force it to the brink of collapse), but unpredictable? If there was ANY overall unpredictability in shipping in any of the major modes of transport, you'd see a collapse in record time.**

**Or maybe they're referring to the distribution and availability issues from COVID, which had nothing to do with unpredictability and everything to do with a major shift in consumer behavior.**

**"Infrastructure that doesn't match the types of transportation Americans prefer"? Is the standard of infrastructure design based on preference, or should it be based on what's effective, efficient, and affordable? I'd personally prefer that I be picked up in a limousine and driven to my work, but I don't think that's gonna happen.**

-----

DOT's fundamental problem is that instead of being able to focus on providing Americans with affordable and abundant transportation, it has become saddled with congressional requirements that reduce the department to a de facto grant-making organization. Yet there is little need for much of this grantmaking, for two reasons:

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**Whoever wrote this either maliciously ignores, or is genuinely and startlingly ignorant of the purpose and effect of grants in the transportation sector.**

**They're also targeting my personal workspace.**

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\*New technology enables private companies to charge for transportation in many areas, which could transform how innovation is financed. It is vital to consider the role of user fees and other pricing innovations with regard to transportation infrastructure. Airport landing fees for aircraft, toll charges on roads and bridges, and per-gallon taxes on gasoline and diesel fuel are all examples of user charges that affect the decisions of transportation system users.

-----

**Wow. So public infrastructure is to become a private moneymaking, pay as you go haven, where your ability to AFFORD to get to work will be in the hands of private industry? I see no way in which this could possibly go wrong.**

**As a separate point, since I work in this area, I can tell you that private industry's technological innovation REQUIRES outside, and often Federal, support just to reach a deployable level.**

**Remember the point earlier, that modern corporations generally require an ROI on the order of months or a couple years, not decades. Safety and reliability improvements on general infrastructure doesn't show such ROI for a private company. They only show up on a SOCIETAL scale -- that is, the scale that a government is responsible for, and can judge.**

**For instance, a single transport-related death has an economic impact in the millions of dollars overall (I'll hunt up the reference if needed), but that's a DIFFUSE cost (or benefit, for reduction of deaths), not one that a single company generally sees.**

**Thus, companies have little motivation for large-scale improvement technology unless Federally supported or mandated.**

-----  
\*If funding must be federal, it would be more efficient for the U.S. Congress to send transportation grants to each of the 50 states and allow each state to purchase the transportation services that it thinks are best. Such an approach would enable states to prioritize different types of transportation according to the needs of their citizens. States that rely more on automotive transportation, for example, could use their funding to meet those needs.  
-----

**Again, this balkanizes the US transportation network into multiple areas and regions which already have enough issues dealing with their differing laws and such without adding physical transportation discontinuities.**

**What if one state has little interest in rail transport and neglects that infrastructure, but states on either side require rail for the majority of their business? Who's paying for, or directing, the maintenance or construction of rail in the state that's now spending its transportation budget on building a new airport and repairing roads?**

-----  
Meanwhile, many Americans continue to confront serious challenges with their day-to-day transportation, including costs that have increased dramatically in recent years. DOT in its current form is insufficiently equipped to address those problems. DOT's discretionary grant-making processes should be abolished, and funding should be focused on formulaic distributions to the states  
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**Put bluntly, HELL NO.**

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BUILD AMERICA BUREAU

The Build America Bureau (BAB) resides within the Office of the Secretary and describes itself as "responsible for driving transportation infrastructure development projects in the United States."<sup>5</sup> This lofty-sounding goal in practice means that the Bureau serves as the point of contact for distributing funds for transportation projects in the form of subsidized 30-year loans. [...] Should the BAB continue to exist and potentially disintermediate the private financing sector, it must maintain underwriting discipline and continue best practices of requiring rigorous financial modeling and cushion for repayment of loans in a variety of economic scenarios.  
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**I am sure there are some ill-considered projects supported by the BAB -- in an organization the size of the US Government, there's going to be some in every department. But my gut feeling on this is that these loans are targeted for long-term, infrastructure-related projects that are not individual profit-makers but diffuse**

**improvements -- like I've mentioned previously, these are really hard to show economic justification for that matters to a business.**

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#### **PUBLIC-PRIVATE PARTNERSHIPS**

Much infrastructure could be funded through public-private partnerships (P3s), a procurement method that uses private financing to construct infrastructure. In exchange for providing the financing, the private partner typically retains the right to operate the asset under requirements specified by the government in a contract called a concession agreement. In addition, the private partner is given the right either to collect fees from the users of the asset or to receive a periodic payment from the government conditioned on the asset's availability:

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**Here it's explicit; they literally want to make infrastructure licensed property of companies.**

**This is a horrid idea in several ways. One is that companies will focus on the "low-hanging fruit", the infrastructure that directly will make them more money, regardless of the value of the infrastructure in the overall country's economy and operation.**

**Another is that it gives corporate entities the power to influence and control use of infrastructure. This could be used to promote -- or choke off -- access to any areas of a state or even to parts of municipalities. Someone else can detail all the horrid ways this could be abused.**

**Yet another is that -- again because of the issue between corporate profit and the diffuse profit/benefits from things like improved overall access, reduced deaths, etc. -- private companies won't work at making innovative changes unless mandated to do so. I've seen this personally in more than one project.**

**This is a huge no, no, no.**

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DOT can oversee the testing and deployment of a wide variety of new technologies, allowing communities and individuals to choose what best fits their needs. It is the role of the private sector, not the government, to pick winners and losers in technology development. If a technology underperforms, the private sector should be liable, not the government.

The department should ensure a tech-neutral approach to addressing any emerging transportation technology while keeping safety as the number one priority. As part of this, it should work to facilitate the safe and full integration of automated vehicles into the national transportation system. Over time, these advanced technologies can save lives, transform personal mobility, and provide additional transportation opportunities—including for people with disabilities, aging populations, and communities where car ownership is expensive or impractical.

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**Do people even READ their own writing any more? Paragraph 1 says it's not the role of the government to pick winners, then paragraph 2 explicitly picks a winner.**

**Addressing the actual points, alas, it is NOT just a private industry thing, since -- as I've discussed more than once -- current rules controlling private industry don't support long-term decisions. This both discourages the development and deployment of technology that will require time to show a significant benefit, and encourages deployment of technology that can show a big return even if it's gonna cause tons of problems down the line. We've danced this dance before and it's OUR feet that will be stepped on.**

**Autonomous vehicles are a lovely idea, and they'd be great. If they work. Which they don't, yet, and they also require serious decisions to be made on things like liability. Let's say that you have autonomous vehicles that ARE, overall, better than human drivers. (they are, in some areas, now, but they are not in others). Still, who's liable if your autonomous vehicle avoids a crash by dodging onto the sidewalk, running over a couple of seniors on the way? Or, if it declines to run over the seniors, who's liable when it actually crashes into the other car?**

**This is a very serious and long-term discussion that's been a central part of the debate about autonomous vehicles, and you don't want them deployed unless you can settle just how such vehicles should legally and morally respond to sudden decisions. And whether you WANT a machine to be able to decide whether it's better to kill its passengers by crashing, or to save its passengers by running over people.**

**Of course, one has to wonder WHY they call out deploying autonomous vehicles. Someone probably has a LOT of stock invested in this.**

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From a nonregulatory point of view, DOT has pivoted from a successful focus on the voluntary sharing of data to improve safety outcomes to adoption of a more compulsory and antagonistic approach to mandating data collection and publication through a Standing General Order related to automated vehicles. This needs to be reversed.

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**After all the events in which car manufacturers have been shown to be at best evasive and at worst actively deceptive about their cars' capabilities, limitations, and functionality, no, compulsory information sharing seems appropriate. If VW will avoid meeting emissions standards by literally faking the performance of the car during testing, autonomous car manufacturers can't very well be trusted to come clean on the situations in which their cars will fail to be safe.**

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**CORPORATE AVERAGE FUEL ECONOMY (CAFE) STANDARDS**

One reason for the high numbers of injuries on American roadways is that national fuel economy standards raise the price of cars, disincentivizing people from purchasing newer, safer vehicles.

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**Injuries on our roadways have been declining, overall, and the majority of the causes have nothing to do with the safety or lack thereof of the vehicles; once we addressed the obvious issues with things like seatbelts, airbags, and impact absorbing structures, deaths and injuries decreased markedly.**

**Major causes of roadway injury and death are alcohol/drug impaired operation of motor vehicles, speeding and other deliberate unsafe behaviors, and deliberate evasion of safety devices like driving without a seatbelt.**

**This section goes on to talk about how the extreme fuel economy and low emissions requirements are going to damage the economy, make things unsafer on the roads, and ultimately make things more polluting.**

**To an extent, they may even have a point in some areas, but it seems that they're more concerned about keeping internal combustion engines running than in actually keeping transportation affordable for people.**

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\*Seek to refocus the FHWA on maintaining and improving the highway system.  
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**By this they're talking about ignoring any other forms of transportation such as bike paths, ferryboats, and so on, which have been being supported as alternatives and supplements to standard highways.**

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\*Remove or reform rules and regulations that hamper state governments.  
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**Translated -- allow support or lack thereof for decent infrastructure to be entirely up to states, leading to the patchwork I discussed in a prior post.**

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Reduce the amount of federal involvement in local infrastructure decisions.  
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Second verse, same as the first..

**Skipping over the FAA section, as I am not sufficiently knowledgeable about the aviation industry to even form an opinion about whether their recommendations are brilliant or nuts, we go to transit systems:**

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New micromobility solutions, ridesharing, and a possible future that includes autonomous vehicles mean that mobility options—particularly in urban areas— can alter the nature of public transit, making it more affordable and flexible for Americans.

Unfortunately, DOT now defines public transit only as transit provided by municipal governments. This means that when individuals change their commutes from urban buses to rideshare or electric scooter, the use of public transit decreases. A better definition for public transit (which also would require congressional legislation) would be transit provided for the public rather than transit provided by a public municipality.

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**So what are we saying here? That my taking an electric scooter or Uber should be counted as public transit? The whole POINT of public transit is that it's provided FOR the public, not the public can call a taxi and pay for it.**

-----

The COVID-19 pandemic caused a substantial decline in usage for all forms of transportation. Mass transit has been the slowest mode to recover, with October 2022 ridership reaching only 64 percent of the level seen in October 2019. The sustained increase in remote work has caused changes in commuting patterns. Since facilitating travel for workers is one of the core functions of mass transit systems, a permanent reduction in commuting raises questions about the viability of fixed-route mass transit, especially considering that transit systems required substantial subsidization before the pandemic.

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**There's a certain amount of sense to this set of comments. Yes, if people decide to start staying home for work more and thus don't NEED to commute, you have to re-evaluate how to do public transit.**

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Regrettably, the 2021 Infrastructure Investment and Jobs Act<sup>13</sup> authorized tens of billions of dollars for the expansion of transit systems even as Americans were moving away from them and into personal vehicles.

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**As people were moving away from them and back into their homes, using personal vehicles LESS, you dunderheads. That's one of the reasons air quality improved everywhere during the pandemic; so many fewer vehicles.**

-----

The next Administration can remove the largest obstacle to reforming labor costs. Section 10(c) of the Urban Mass Transportation Act of 1964<sup>14</sup> was initially intended to protect bargaining rights for workers in privately owned transit systems that were being absorbed by government-operated agencies. The provision has mutated into a requirement that any transit agency receiving federal funds cannot reduce compensation, an interpretation that far exceeds the original statute. Returning to the original intent would allow transit agencies to adjust fringe benefits without fearing a federal lawsuit.

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**If I understand correctly, what they're saying is "change the law so transit agencies can drop compensation rates".**

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## FEDERAL RAILROAD POLICY

The Federal Railroad Administration (FRA) is making decisions based on political considerations that are at variance with its safety mission. Instead of basing regulatory decisions on the costs and benefits of the available alternatives, FRA is promoting actions that favor the status quo and inhibit the use of technology to improve railroad safety. FRA should be making decisions based on objective evidence of the most cost-effective way to accomplish the agency's safety goals.

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**Well, that sounds dire, except that they don't really back it up. They make some statements about what FRA is doing, or what they think it's GOING to do, but it's not clear how they know these aren't achieving the goals.**

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FRA's Notice of Proposed Rulemaking (NPRM) on crew size is not based on safety considerations; it is designed to reduce flexibility by making it impossible for railroads to operate with crews of fewer than two in circumstances where there is no operational need for the second crew member.

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**My guess here is that the railroads hate having to employ people when they can automate, and if they could, they'd have NO employees on the trains. Which means no one's available to deal with emergencies. One person on an operating train seems a bare minimum, and people who are alone are easily bored and distracted and have no backup.**

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Although FRA could adopt a modern inspection program that takes advantage of technological ways to inspect track, it is refusing to amend 50-year-old track inspection requirements, leaving customers with higher costs.

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**Inspection of railroad related equipment is EXACTLY what I've been associated with for the last twenty years.**

**Yes, there are improved technologies for inspecting track. But just requiring its use would be... difficult, at best, because there are reasons for both the railroads AND the unions to fight it. Unions because current inspections require human participation, and automated inspection would be terrible for their employment.**

**Railroads because the up-front cost for installing enough automated systems to perform these inspections is huge, and you'd need to enter into some kind of maintenance contracts with the companies involved, etc.**

**There's a reason that, despite having introduced a better wheel gauge and even getting it AAR certified, the company I work for hasn't ended up wiping out the 70+ year old steel J gauge, even though the J gauge's inaccuracy and unreliability have been proven.**

**A J-gauge costs about 20 bucks or so. An Electronic Wheel Gauge fit for use in a trainyard will cost you almost three orders of magnitude more. There's new tech that may drop that cost a lot, but even if it does, the J-gauge is still way cheaper than even a simple smartphone app made for and certified by industry will be.**

-----  
It is vital that the integrity of FRA's research program be preserved. In 2022, FRA switched the management of the Transportation Technology Center (TTC) in Pueblo, Colorado, from a subsidiary of the Association of American Railroads (AAR) to Ensco, Inc. FRA seems determined to direct research to TTC, even when there are better choices with respect to the research in question, in an effort to support TTC financially and justify its decision to change management at TTC.

-----  
**This sounds like someone at the railroads is butthurt that Ensco beat them out for the contract to run TTC.**

-----  
All too often, DOT's mission is described as reducing the number of trips, using less fuel, and raising the costs of travel to Americans through increased use of renewables. These goals are not compatible with what should be DOT's purpose: to make travel easier and less expensive. That is what the American people want, and that is what DOT should provide.

-----  
**See, DOT's mission is to ensure the proper use, availability, and safety of transportation. Making it easy and less expensive has never really been DOT's mission. The interstate highway system, for instance, wasn't made (directly) to make it easy for the public to drive places, but to make it more efficient for the DOD to move materiel.**

**It's not meant to just give you cheap cars.**

**This time it's the Department of Veteran's Affairs. I am in no way knowledgeable about that specifically, so this may end up being short as I say "well, can't be sure about this" a lot. But we'll see.**

**The section starts out with a statement about the VA being a terrible organization during Obama's tenure, and by the end of 2020 being one of the most respected, with obvious implications that this was due to President Trump's policies. I can't judge that (it would take a lot of research to even begin) but that's certainly "of a piece" with the other sections of this document -- blame Obama and Biden for any failures.**

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The Agent Orange Act of 1991 significantly expanded the scope of disability benefits for those who had deployed to Vietnam, and the cost of those benefits began to increase dramatically as the Vietnam generation of veterans aged and began to experience adverse health conditions, some of which were presumed to have been caused by defoliant chemicals used in Southeast Asia....

The Sergeant First Class Heath Robinson Honoring Our Promise to Address Comprehensive Toxics (PACT) Act of 2022 addressed adverse health outcomes presumed to be the result of veterans' exposure to airborne toxins during the global war on terrorism and further expanded disability benefits to the most recent generation of veterans. These ambitious authorities, like the 1991 authorities, have the potential to overwhelm the VA's ability to process new disability claims and adjudicate appeals.

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**I get the impression, especially from wording like "adverse health conditions, some of which were presumed to have been caused by defoliant chemicals", that these two acts aren't viewed favorably by the writers, but they're not going to come out and say it.**

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VETERANS HEALTH ADMINISTRATION (VHA)

Needed Reforms

\*Rescind all departmental clinical policy directives that are contrary to principles of conservative governance starting with abortion services and gender reassignment surgery. Neither aligns with service connected conditions that would warrant VA's providing this type of clinical care, and both follow the Left's pernicious trend of abusing the role of government to further its own agenda.

-----

**Okay, they find they can still ride one of their favorite hobbyhorses here by cutting off anything for abortion or LBGTQ+ people, since obviously no veteran will ever need any such things -- or shouldn't.**

----

\*Focus on the effects of shifting veteran demographics. At least during the next decade, the VA will experience a significant generational shift in its overall patient population. Of the approximately 18 million veterans alive today, roughly 9.1 million are enrolled for VA health care, and 6.4 million of these enrollees use VA health care consistently. These 6.4 million veterans are split almost evenly between those who are over age 65 and those who are under age 65, but the share of VA's health care dollars is spent predominantly in the over-65 cohort. That share increases significantly as veterans live longer and use the VHA system at a higher rate.

-----

**Well, yes, this is an important thing to focus on. Given some of the prior sections recommended DOD actions, it seems that part of the plan of the 2025 people is to MAKE more veterans by having some new wars.**

**That aside, glancing over the issues, it's certainly true that the demographics of veterans are changing and will continue to change. In my view, a lot of these problems once more have to do with "eligibility requirements" that are designed to make it a pain in the butt to GET your care, and that require complex bureaucracies to keep track of.**

**You could save a lot of money and time by just ensuring all veterans 100%, no questions aside from verifying their service (and I suppose probably verifying honorable discharge status rather than being kicked out).**

**Naturally, this is coming dangerously close to advocating for Medicare For All. Which I do, but if we don't go there, there's still a case for doing similar approaches in this specific case.**

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**Budget**

**\*Conduct an independent audit of the VA similar to the 2018 Department of Defense (DOD) audit to identify IT, management, financial, contracting, and other deficiencies.**

**\*Assess the misalignment of VHA facilities and rising infrastructure costs. The VHA operates 172 inpatient medical facilities nationally that are an average of 60 years old. Some of these facilities are underutilized and inadequately staffed. Facilities in certain urban and rural areas are seeing significant declines in the veteran population and strong competition for fresh medical staff.**

-----

**Given the prior sections' planned "audits and reviews", I'm a bit cynical about the purpose and outcome of this proposed examination. I expect there'd be a lot of political appointees added, and the review of the facilities? Perhaps turning a lot of stuff over to private healthcare organizations.**

-----

**Identify a workflow process to bring wait times in compliance with VA MISSION Act-required time frames wherever possible.**

**1. Assess the daily clinical appointment load for physicians and clinical staff in medical facilities where wait times for care are well outside of the time frames required by the VA MISSION Act.**

**2. Require VHA facilities to increase the number of patients seen each day to equal the number seen by DOD medical facilities: approximately 19 patients per provider per day. Currently, VA facilities may be seeing as few as six patients per provider per day.**

**3. Consider a pilot program to extend weekday appointment hours and offer Saturday appointment options to veterans if a facility continues to demonstrate that it has excess capacity and is experiencing delays in the delivery of care for veterans.**

**4. Identify clinical services that are consistently in high demand but require cost-prohibitive compensation to recruit and retain talent, and examine exceptions for higher competitive pay.**

-----  
**Lessee, 19 patients per day on an 8 hour day is 25 minutes per patient. Doesn't seem so bad, after all, a lot of appointments would be shorter, right?**

**Well, now, let's knock out an hour for lunch, so that's 19 patients in 7 hours. Also, patients don't just teleport in and out and all their work get done on the dot, so you probably have to add a buffer of five minutes per patient for getting them out, finalizing forms and sending out prescriptions, and getting the next one in. So that's 19\*5 minutes, so appointments actually down to 19 in about 5.5 hours, and now it's 17 minutes per appointment.**

**If most of your workload's healthy people or people with well-known conditions and it's just a checkup, that's probably acceptable, though a bit tight. But if these are people with a lot of health problems and complicated medical histories? That's nowhere near enough time.**

**Extending hours isn't a bad idea -- after all, people get sick at any time -- but not with the same providers. I don't want to be seen by a doctor who's burning out because they've already done 60 hours of a patient every quarter hour this week.**

**A lot of this section is focused on things I can't speak to, so I'll move a bit farther on...**

-----  
**Needed Reforms**

**\*Rescind all delegations of authority promulgated by the VA under the prior Administration.**

**\*Transfer all career SES out of PA/PAS-designated positions on the first day and ensure political control of the VA.**

**\*Take a close and analytically critical look at where hybrid and remote work is a net positive as a functional necessity and where in-person collaboration and presence will help to instill a strong work ethic and a more cohesive environment for productivity from the Office of the Secretary across the headquarters enterprise.**

-----  
**Oh-HO, we're back in familiar territory indeed, and they're not even hiding it in fancy words. Kick out all the prior staff and get rid of everyone you can, replacing them with political loyalists so you "ensure political control" of the VA.**

**And then we take aim at remote work, which we saw earlier they really do not like.**

-----  
**\*Continue to maximize the use of new VA hiring and pay authorities provided by Congress in the RAISE Act<sup>6</sup> and PACT Act<sup>7</sup> as well as existing authorities in student loan forgiveness and the Public Service Loan Forgiveness program.**

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**Hmm, I'm not sure, but are they saying here "go ahead and do loan forgiveness to hire people"??**

-----

\*Foster a culture that is mission (veteran) driven, alert, engaged, and habitually responsive to the veteran, and structure an environment that promotes a flexible and agile workplace.

\*Increase employee satisfaction/experience to improve recruitment and retention of VA personnel. Go beyond the traditional focus on the extrinsic (monetary pay and bonuses) and seek creative ways to instill teamwork, loyalty, and pride.

\*Train leaders and managers to promote an energized and productive workplace culture and reward those who do it well. Ensure that senior leaders (SES) set the proper example.

-----

**These bullet points sound impressive and say exactly nothing of any use to someone trying to DO anything.**

-----

\*Support the White House Office of Presidential Personnel (PPO) in identifying a fully vetted roster of candidates to assume all key positions at VA well ahead of formal nominations. The VA is the second-largest federal agency, yet it is authorized a woefully small number of PA/PAS positions when compared to other agencies of lesser size. ... given the political attention that VA can generate for Congress and the media, PPO should understand the importance of finding talented political appointees to serve at VA.

-----

**This is a REALLY strong statement of how much they expect to take control of the VA and use it for political purposes. They're not wrong about its importance, of course.**

**There's a fairly long list of bullet points about "managing the relationship with organized labor" that, if you wade through the whole thing, seems to be mostly about how to change the way they handle labor issues and how to EXCLUDE actual organized labor from the process -- not a surprise. Then we get this:**

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\*Work with Congress to sunset the Office of Accountability and Whistleblower Protection (OAWP). OAWP was well intentioned when formed, but it is redundant with the activities of supervisors as well as equal employment opportunity, Office of the Inspector General, Office of Special Counsel, and other policies, programs, and procedures for holding employees accountable. This redundancy results in lengthy investigations, gaps in coverage, and an overall ineffective method of employee and supervisor accountability.

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**Oh, of course, as you work to distance organized labor from your workforce, there's no reason to have a dedicated office to ensure any form of accountability. None at all. That's sarcasm.**

**This concludes Section Three of Project 2025, and we will next enter Section Four: The Economy.**

**I suspect this will be quite a ride.**

**So, let's continue with Project 2025, an appropriate thing on Labor Day to draw attention to a document of the GOP intentions to destroy any form of organized labor, among other things...**

**Here, we enter Part Four, "The Economy", and right from the get-go we get another load of cow patties:**

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The next Administration must prioritize the economic prosperity of ordinary Americans. For several decades, establishment "elites" have failed the citizenry by refusing to secure the border, outsourcing manufacturing to China and elsewhere, spending recklessly, regulating constantly, and generally controlling the country from the top down rather than letting it flourish from the bottom up.

The proper role of government, as was articulated nearly 250 years ago, is to secure our God-given, unalienable rights in order that we might enjoy the pursuit of happiness, the benefits of free enterprise, and the blessings of liberty.

-----

**At best this rhetoric is true only in the most deceptive way -- in that it was primarily the REPUBLICAN elites, the big business elites, who did things like outsourcing all forms of work (because cheap labor, dontchaknow), recklessly overspend (it's a matter of record that deficits ALWAYS increased under the Republicans and decreased under Democrats), and so on.**

**Inserting "God" into this is one more signal that this is a document for one very particular segment of the government, and not one that recognizes "separation of Church and State".**

**The intro then goes on to cover just enough of a glimpse of what's to come to assure me that if you've found the prior segments entertaining, you'll be absolutely riveted in parts of this one!**

**So, straight into the first detailed part -- the Department of Commerce! Early in the intro, we get this whopper:**

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At the same time, the department has a higher profile now than perhaps ever in its history. It possesses key tools to address decades of poor decision-making in Washington and is central to any plan to reverse the precipitous economic decline sparked by the Biden Administration and to counter Communist China.

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**Hate to break it to you, but the Biden Administration's economy is by any reasonable measure anywhere from healthy to incredible. There's no decline of significance, though some of Trump's policies certainly did damage at the beginning.**

**"Communist China" is already making an appearance, and I'm going to have to fight my tendency to quote from Doctor Strangelove every time I see this.**

**It's worthwhile to note that while this intro makes the same kind of sweeping recommendations that the others have -- including consolidating the Bureaus of Census, Economic Analysis, and Labor Statistics into one statistical agency, eliminating NOAA outright, and moving USPTO to OMB, they then acknowledge that such sweeping change is very unlikely and that the remainder of the chapter will be focused on more achievable goals.**

**So let's see if there's anything I can comment on. With the exception of NOAA, I don't know all that much about DOC.**

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The above drain on resources leaves the Secretary of Commerce to rely upon a few dozen direct support staff, supplemented with detailees and indirect funding from each of the bureaus to execute the President's agenda and manage the diverse functions of the department. This structure empowers career staff in each bureau and makes it harder to mandate change. As such, it is vitally important that an incoming Administration fully staff OS with political appointees, send all existing detailees back to their home bureaus on Day One, and replace those detailees with trusted and knowledgeable career staff on an as-needed basis.

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**It is unsurprising, but nonetheless worth noting again, that one of the key approaches here is to literally erase most of the prior organization's institutional coherence by removing as many people as possible and replacing with vetted politically-loyal appointees. Below it's even more emphasized.**

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Administration, Budget, and Appropriations. Recent practice has been for career staff to serve as gatekeepers between department leadership and external budget and appropriations partners at the OMB and on Capitol Hill. By serving not just as a central point of contact but as the sole staff-level communicators of departmental priorities, these career officials can, have, and will slow down—and even stop—changes in policy, even at the line-office level.

Although the following is true at all agencies, it is particularly important at the Department of Commerce that political leadership be immediately installed at the Office of the Chief Financial Officer (CFO) and Assistant Secretary for Administration (ASA), and that political appointees receive a mandate to communicate with external partners alongside career staff at every stage of the budget and appropriations process. Political appointees must also monitor internal CFO operations down to the operating division level to ensure that funds are not being diverted to programs that do not align with Administration priorities, as has regularly happened in years past.

-----  
**One aspect of this that's perhaps more clearly stated in this section than in some others is that one of the points to these changes is to have \*THE ENTIRE GOVERNMENT\* run by synchronized political appointees, so that they cooperate and coordinate change in ways simply not possible without such sweeping adjustments in personnel.**

**This is the real point of Schedule F and the attempt to locate literally thousands of reliable political appointees.**

**In short, the intention is to transfer vastly more power to the Executive.**

-----  
Advisory Committees. Due to the nature of the Department of Commerce's portfolio, many of its advisory committees are populated by activists from organizations openly hostile to conservative principles who use the committees to impede conservative policy. Upon entering office, all such committees should be reviewed regarding whether they are required by statute and abolished if they are not.  
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**Another example but here even more starkly obvious: all committees not directly required WILL be eliminated, and the others converted to yes-man organizations.**

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In a conservative Administration, the ITA should operate with the following priorities:

- \*Counter the malign influence of China and other U.S. adversaries;
  - \*Enforce agreements vigorously and defend against trade violations;
  - \*Secure access to critical supply chains and technology; and
  - \*Enable the private sector to drive innovation and remain globally competitive.
- 

**We're now at "Malign Influence of China", and this is to be the International Trade Agency's top-level priority? If you have every part of your government -- military, diplomatic, and now economic -- taking as a first principle that the other largest country on Earth is a malevolent enemy, you're guaranteeing that this will become fact.**

**The others are at least arguably reasonable, though I'm not sure how you can make the private sector do anything if you're trying to eliminate regulations. And of course rigid enforcement of agreements can be just as much a potential problem as overly lax approaches.**

**Considerable portions following are in areas I can't really judge -- I don't know how the various factors in international trade work, how much threat is represented by**

**technology exchange, etc., to comment on it. The danger of China China China (with an occasional mention of Russia) is repeated on multiple pages.**

**But then we get to NOAA:**

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Together, these form a colossal operation that has become one of the main drivers of the climate change alarm industry and, as such, is harmful to future U.S. prosperity. This industry's mission emphasis on prediction and management seems designed around the fatal conceit of planning for the unplannable. That is not to say NOAA is useless, but its current organization corrupts its useful functions. It should be broken up and downsized.

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**We knew this was coming, but they're not holding back here. Their climate-change denial was bound to be a major problem, and at NOAA it encounters its nemesis -- SCIENCE -- and that cannot be allowed to prevail.**

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\*Focus the NWS on Commercial Operations. Each day, Americans rely on weather forecasts and warnings provided by local radio stations and colleges that are produced not by the NWS, but by private companies such as AccuWeather. Studies have found that the forecasts and warnings provided by the private companies are more reliable than those provided by the NWS.<sup>2</sup>

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**I am deeply suspicious of any such claims, but I haven't the time to dig into the studies. But as all of the weather stations DIRECTLY take their material from NWS, at best they could claim that there's some better analysis going on. NWS is still the primary source.**

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The NWS provides data the private companies use and should focus on its data-gathering services. Because private companies rely on these data, the NWS should fully commercialize its forecasting operations.

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**Translated: Privatize this and let the forecasting be controlled for commercial gain. If you can't imagine the ways in which allowing private corporations to direct the operations of weather forecasting could go wrong, you're not thinking hard enough.**

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Review the Work of the National Hurricane Center and the National Environmental Satellite Service. The National Hurricane Center and National Environmental Satellite Service data centers provide important public safety and business functions as well as academic functions, and are used by forecasting agencies and scientists internationally. Data continuity is an important issue in climate science. Data collected by the department should be presented neutrally, without adjustments intended to support any one side in the climate debate.

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**"Don't show us any evidence our denialism is a problem" is what they're saying here.**

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\*Withdraw the 30x30 Executive Order and Associated America the Beautiful Initiative. The 30x30 Executive Order and the American the Beautiful Initiative are being used to advance an agenda to close vast areas of the ocean to commercial activities, including fishing, while rapidly advancing offshore wind energy development to the detriment of fisheries and other existing ocean-based industries.

\*Modify Regulations Implementing the Marine Mammal Protection Act and the Endangered Species Act. These acts are currently being abused at a cost to fisheries and Native American subsistence activities around the U.S.

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**Commercial fishing, especially using the large "factory ships", has been shown to be highly damaging and it may indeed be necessary to close lots of areas of the ocean for large-scale commercial fishing (as opposed to small, individual fishing boats). Their dislike of wind power really doesn't have relevance to this except that they don't want it used in commercial areas 'cause someone can't make money on it.**

**This echoes earlier sections dislike of environmental and species protection. While it's probably a good idea to examine such regulations' impact on traditional Native American survival practices, the commercial impact should be a secondary or tertiary consideration.**

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\*Downsize the Office of Oceanic and Atmospheric Research. OAR provides theoretical science, as opposed to the applied science of the National Hurricane Center. OAR is, however, the source of much of NOAA's climate alarmism. The preponderance of its climate-change research should be disbanded. OAR is a large network of research laboratories, an undersea research center, and several joint research institutes with universities. These operations should be reviewed with an aim of consolidation and reduction of bloat.

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**This isn't a surprise at all, it's absolutely predictable that they HAVE to cut off one of the larger sources of actual research in the topic of anthropogenic climate change if they're going to succeed in plugging their ears until the oceans rise.**

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\*Break Up the Office of Marine and Aviation Operations and Reassign Its Assets to Other Agencies During This Process. The Office of Marine and Aviation Operations, which provides the ships and planes used by NOAA agencies, should be broken up and its assets reassigned to the General Services Administration or to other agencies.

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**While I cannot PROVE it, my suspicion here is that the purpose is to deprive NOAA of the tools to perform a lot of its research, so that even if they find a particular agency isn't easily shut down, it will still be unable to perform its work.**

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\*Ensure Appointees Agree with Administration Aims. Scientific agencies like NOAA are vulnerable to obstructionism of an Administration's aims if political appointees are not wholly in sync with Administration policy. Particular attention must be paid to appointments in this area.  
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**Yet again they emphasize this. And to be fair, I suppose it's IMPORTANT for their goals to emphasize this at NOAA, because NOAA in some ways is one of the most dangerous organizations facing them.**

**We're still in the DoC, now to "BUREAU OF ECONOMIC ANALYSIS AND THE OFFICE OF THE UNDERSECRETARY FOR ECONOMIC AFFAIRS", which is a bit of a mouthful.**

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The data produced by BEA are used by government and business decision-makers to understand the state of the nation's economy. A new Administration should ensure that BEA conducts its statistical analysis in a consistent and objective manner, with the Undersecretary for Economic Affairs taking a strong interest in BEA's operations and data products. A new Administration should also study the feasibility of merging all statistical agencies (Census Bureau, Bureau of Economic Analysis, and the Department of Labor's Bureau of Labor Statistics, etc.) under one bureau to increase efficiency and better coordinate cross-departmental issues.  
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**The latter bit was mentioned before. I'm not sure what to think of the idea, but it is probably a good idea to keep analytics of different types and purposes separate. Analysis for economic purposes isn't nearly the same thing as tracking demographics for census purposes or labor tracking. They're related, but far from identical.**

**The earlier paragraph is one of the more UNDERSTATED mentions of their intention to control the type and interpretation of information, but it's still there.**

**Under the Census Bureau, there's a number of questionable elements, but they all can be seen in play in the following bullet point:**

-----  
**\*Abolish the National Advisory Committee and reevaluate all other committees. The Census Bureau National Advisory Committee on Racial, Ethnic, and Other Populations (NAC) was established by the Obama Administration in 2012 and rechartered by the Biden Administration in 2022. The committee is a hotbed for left-wing activists intent upon injecting racial and social-justice theory into the governing philosophy of the Census Bureau. The NAC should immediately be abolished by the incoming Administration.**

**The NAC charter gives the Secretary of Commerce the authority to terminate the committee. Since the Secretary of Commerce established the NAC in 2012 under the FACA, the Secretary is authorized to terminate the NAC. The new Administration should**

**also reevaluate and potentially abolish all non-statutory standing committees within the Census Bureau, including the Census Scientific Advisory Committee.**

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**So yeah, basically eliminate anything even hinting at non-conservatism, including any questions or approaches that may capture an understanding of social and racial interactions in our society, and abolish any groups that are in a position to provide such influence. This includes getting rid of anything having to do with "Science", obviously.**

**They also definitely will include a citizenship question on the next Census.**

**They'd like to abolish the Economic Development Administration, but failing that:**

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\*Consolidation of decision-making to the Assistant Secretary's office to better align funding with conservative political purposes. For example, funding initiatives in rural communities destroyed by the Biden Administration's attack on domestic energy production would be well within the scope of EDA's mission.

\*Leveraging of the direct hire authorities established in the Trump Administration for special initiatives or disaster/recovery funding. Leaving these programs to entrenched career employees with their ties to the regional offices will do little to advance the conservative agenda.

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**As with others, the whole idea is to make sure that "the conservative agenda" is pushed, by removing anyone who isn't a vetted appointee or at least putting vetted appointees into controlling positions.**

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MBDA [Minority Business Development Administration] has the appearance, on its face, of perpetuating racial bias by focusing on minority advancement rather than economic need or other criteria. This is why the Trump Administration proposed eliminating funding for the agency in 2017. Many conservatives ask why the government is funding this activity, which often amounts to business and management consulting services offered by private sector entities. Eventually, the Trump Administration changed course and proposed that MBDA continue to exist as a permanently authorized entity focused on policy rather than offering services. Despite this change, many conservatives understandably see MBDA as problematic on a philosophical level.

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**They concede, however, that Congress spoke loudly on this issue and it's not likely they can abolish it -- much as they'd obviously like to. However, they intend to use it to capture and control "hearts and minds", and have some points to pursue:**

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\*Conducting policy analysis on the benefit of free markets, the evils of socialism and Communism, and the destructive effect of taxes and regulations on minority businesses;



-----  
**So propaganda (apparently taken from the 1950s) and a strong attempt to, in essence, make any minority owned business join non-minority owned businesses in attitudes and behavior. If we can't stop the minorities from getting in, we can at least make them as not-minority ACTING as possible.**

**The other changes are to remove, as much as possible, any active support role of the MBDA and make it just an informational supplier.**

**Now, into the USPTO:**

-----  
...As such, a conservative Administration must constantly work to strengthen IP rights and combat the incorrect view that strong IP rights somehow limit innovation...  
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**This is a fine statement and not, necessarily, wrong -- except that the way they wish to enforce IP rights to make them "strong" is much more likely to favor the companies than the individual, which does, in fact, limit innovation.**

-----  
\*Oppose efforts to provide intellectual property waivers for cutting-edge technologies, including for COVID-19 vaccines and therapeutics, through the World Trade Organization's Trade-Related Aspects of Intellectual Property Rights agreement or any other mechanism.  
-----

**This is reinforced here by what amounts to a statement that it doesn't matter how many people in the world might benefit, you'd better be paying up. These people probably can't understand the inventors who have chosen to just hand over their inventions to the world because it was the right thing to do.**

**The short section on NIST shows that they want to spin off and privatize as much of that as feasible, and extend commercialization (while bringing the US more heavily into making of standards).**

Since I've gotten a couple of the same "it's not official" comments, I'm going to reiterate:

**It is true that this is not an "official policy document" -- at the moment. It is not true that that makes it irrelevant. Its concepts and approaches were favorably spoken of by the Trump campaign (until they realized they'd better pretend they didn't like it), the people who've made it are pretty much all associated with Trump and the far-right, and mostly the Christian Evangelical side, too.**

**Moreover, this is not a casually-produced thought experiment. This is a very large, carefully researched, professionally written nine hundred-plus page PROPOSAL -- a very clear and detailed plan of action to accomplish the goals set forth in each section. Given that the individuals producing each section are all**

professionals who would command extremely high hourly rates for their work, this document probably took several years, and millions of dollars, to produce. The people who made this did not do so as a lark. They didn't do it as a "gosh, imagine if we could" thought experiment. They produced this as a solid, deliberate, focused plan of action to embody their plan for the country in the mechanisms of government at every level, in every division of the government.

They include methods to broaden the number of political appointees, clear steps to locate, vet, and prepare the thousands of appointees needed, specific directives about how best to implement their plan that will evade many of the checks and balances theoretically present to prevent such "organizational capture" of the government, and so on and so forth.

The individual sections are also "of a piece" with the overall document. There are no areas in which they seriously conflict, though they can, and on occasion do, note where their own movement has some disagreement on which direction to take. Despite that, the document is a coherent, focused, and consistent whole, whose philosophical, religious, and political elements are at the core of its planned actions.

It is supported by, and in many cases written by, people who will be in positions of power to aid in implementing it.

So to try to dismiss this as "not official" is at best naive and at worst is really saying "I agree with what they want to do and I want you to stop making it sound bad". Millions of dollars, many many person-hours of work, and a ton of thought went into Project 2025, and for a deadly serious purpose.

It's not official... NOW. But there is EVERY intention to MAKE it official policy if the GOP were to win the Presidency. And the overall thrust and purpose of Project 2025 is to make the ENTIRE FEDERAL SYSTEM an arm of the Executive Branch, to carry out the President's "vision", as guided and directed by a primarily highly conservative, "Christian" Evangelical, and self-deludedly backward-looking belief system.

And that makes it a very, very important document to examine, to be aware of, and for me to warn about insofar as I might.

We're still in the Department of Commerce, starting with the National Telecommunications and Information Agency (NTIA).

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\*Support free speech and hold big tech accountable. Immediately conduct a thorough review of federal policy regarding free speech online and provide policy solutions to address big tech's censorship of speech.

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**This sounds very nice, but the rest of 2025 makes clear that what they mean by "big tech's censorship of speech" is "not repeating right-wing talking points uncritically".**

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Utilize new tools to eliminate threats to national security. Fully implement the Trump Administration's Information and Communications Technology and Services (ICTS) Executive Order authorities in a way that ensures long-term success and the legal viability of this new national security tool.<sup>9</sup>

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**This is part of their "foreign adversary" initiative. While there's certainly a need to keep our IT infrastructure and data secure, the specific order in question is focused on adversarial relationships with foreign governments.**

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\*Support the commercial space industry. Advocate for licensing decisions at the Federal Communications Commission that continue to enable U.S. dominance in the commercial space industry.

-----

**This is rather vague and makes me curious about what "licensing decisions" aren't being made that they want to have happen, and who benefits from it.**

-----

\*Review FirstNet. Evaluate the performance and long-term value proposition of FirstNet in view of modern technologies that will render it obsolete.

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**"FirstNet" is a combined government-AT&T project to provide a fully interoperable national network for all forms of first responders, to address one of the primary problems encountered in multi-organization emergencies: they can't talk to each other electronically because there are literally thousands of separate communications setups for the different first responder organizations.**

**Certainly the program could use a review (it's still not complete despite starting out back in 2012), the way this is phrased implies that there's already a solution that will "obsolete" FirstNet. I'm not aware of any such solutions, unless they think everyone will just do a Zoom call in the middle of a fire.**

**Onward now to the Department of the Treasury!**

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The U.S. Treasury Department has a broad regulatory and policy reach. The next Administration should make major policy changes to: (1) reduce regulatory impediments to economic growth that reduce living standards and endanger prosperity; (2) reduce regulatory compliance costs that increase prices and cost jobs; (3) promote fiscal responsibility; (4) promote the international competitiveness of U.S. businesses; and (5) better respect the American people's due process and privacy rights.

-----

**"Reduce regulatory impediments", in context of other areas of this document, usually means "let big business do whatever the hell it wants", as does ""reduce regulatory compliance costs".**

**"Promote fiscal responsibility" is just a funny, funny joke coming from the political side that's run the budget into the red the most, similar to the "respect the American people's due process and privacy rights" bit.**

**Let's see what they've got. Here's their overall focuses for the agency:**

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\*Tax policy and tax administration;

\*Fiscal responsibility;

\*Improved financial regulation;

\*Addressing the economic and financial aspects of the geopolitical threat posed by China and other hostile countries;

\*Reform of the anti-money laundering and beneficial ownership reporting systems;

\*Reversal of the racist "equity" agenda of the Biden Administration; and

\*Reversal of the economically destructive and ineffective climate-related financial-risk agenda of the Biden Administration.

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Well, no surprises here. More "CHINA!" fear, more Mirror-World "trying to improve underserved populations' positions is racist", and more science denial.

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The Biden Administration Treasury Department has failed badly in achieving every one of the agency's core objectives. The financial affairs of the nation have seldom been in worse condition, with the national debt expanding by more than \$4 trillion in Biden's first two years in office. No President in modern times—perhaps ever—has been more fiscally reckless than has the Biden Administration.

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**There's a Biblical quote that's apropos, "...why beholdest thou the mote that is in thy brother's eye, but considerest not the beam that is in thine own eye?" Biden's run a lot less red ink than his predecessor, Mr. Trump, and in general in the modern era it's been much more the Republican than the Democratic presidents that have been "reckless" in their spending.**

**Of course, we can give the authors a LITTLE sympathy: when they were writing this, Biden was still dealing with Trump's incompetence and cleaning up his messes. How could they possibly know that by 2024, Biden would be presiding over the most powerful US economy in decades?**

**This makes a lot of their following rant against the "woke agenda" ... much less convincing, as their argument **DEPENDS** on Biden's policies having made things worse for everyone, while in fact things certainly haven't worsened overall since Trump was ousted, and in many ways have improved.**

**Still, I'll quote a bit of it just to show the direction they are going:**

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The soundness and stability of U.S. currency, the dollar, has been put at risk because of the worst inflation in four decades. American families have been made poorer by Biden's economic strategy of taxing, spending, borrowing, regulating, and printing money. The average family has seen real annual earnings fall about \$6,000 during the Biden Administration.<sup>1</sup> In 2022, the average American's 401(k) plan dropped in value from \$130,700 to \$103,900—more than 20 percent.<sup>2</sup>

Why has the Biden Administration failed to achieve virtually all components of its mission? Under the leadership of Treasury Secretary Janet Yellen, the department has made "equity" and "climate change" among its top five priorities.

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**Okay, enough of that, let's see if we can find some more substantial material.**

**In Tax Policy:**

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\*First, the tax system should raise the revenue necessary to fund a limited government for constitutionally appropriate activities. It should raise this revenue such that it: (a) applies the least economically destructive forms of taxation;<sup>16</sup> (b) has low tax rates on a broad, neutral tax base; (c) minimizes interference with the operation of the free market and free enterprise; and (d) minimizes the cost to taxpayers of compliance with and administration of the tax system.

\*Second, the tax system should minimize its adverse impact on the family and the core institutions of civil society.

\*Third, the tax system should be applied consistently—with special privileges for none—and respect taxpayer due process and privacy rights.

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**While these seem largely innocuous, you can see some of the setup in here already, with the "smaller government", "low tax rates on a broad, neutral base", the mention of The Family, and "special privileges for none". We can probably guess where this is going... but why guess when we can read on?**

-----  
Intermediate Tax Reform. The Treasury should work with Congress to simplify the tax code by enacting a simple two-rate individual tax system of 15 percent and 30 percent that eliminates most deductions, credits and exclusions. The 30 percent bracket should begin at or near the Social Security wage base to ensure the combined income and payroll tax structure acts as a nearly flat tax on wage income beyond the standard deduction. The corporate income tax rate should be reduced to 18 percent. The corporate income tax is the most damaging tax in the U.S. tax system, and its primary economic burden falls on workers because capital is more mobile than labor.<sup>17</sup>  
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**Whoa nelly, there's a lot here already.**

**Flat taxes or nearly flat taxes are REGRESSIVE, having a much greater impact on the poor than the wealthy, for a large number of reasons that pretty much boil down to "everyone needs a certain amount to live on". If I'm just keeping things together with 50k income, taking away 15-30 percent with no way to even that out (child tax credits, etc.) sends me down the tubes. If I'm making 3 million a year, taking away 15 or even 30 percent won't put me in the poorhouse.**

**This is why progressive taxation exists: I don't tax the first X amount at all, then the next X amount I tax low, next X amount I tax medium, and last X onward I tax high, thereby assuring that those lower down lose the least, because they can afford the least. Eliminating deductions and exclusions is a really tough thing to do, especially when you're flattening the tax rates, unless you really do want to hammer down the lowest groups even more; while rich people certainly make use of lots of loopholes, poor and middle-class people often RELY on their deductions and exclusions to stay afloat, even though it's only a matter of thousands rather than millions of dollars.**

**The bit about the corporate income tax being the most damaging and therefore needing to reduce it is the worst kind of twaddle. In the favorite Golden Age of the 50s they like to remember, corporate income taxes were around 50%. Whether it damages the workers or not depends on other factors that also changed over the years.**

**So what this REALLY boils down to is, once more, reduce taxes on the rich and corporations and drop the weight on the lower classes.**

**But wait, there's more!**

-----  
Capital gains and qualified dividends should be taxed at 15 percent. Thus, the combined corporate income tax combined with the capital gains or qualified dividends tax rate would be roughly equal to the top individual income tax rate.<sup>18</sup> The system should allow immediate expensing for capital expenditures and index capital gains taxes for inflation.  
-----

**So reducing the capital gains tax as well (yes, there are lower brackets, but for the big corporations involved it's always the highest one, and here it's getting cut). We're not done, though...**

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In addition, intermediate tax reform should repeal all tax increases that were passed as part of the Inflation Reduction Act,<sup>19</sup> including the book minimum tax, the stock buyback excise tax, the coal excise tax, the reinstated Superfund tax, and excise taxes on drug manufacturers to compel them to comply with Medicare price controls. The next Administration should also push for legislation to fully repeal recently passed subsidies in the tax code, including the dozens of credits and tax breaks for green energy companies in Subtitle D of the Inflation Reduction Act.<sup>20</sup>

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**It's not a surprise, but there it is, if they intend to balance the budget, it ain't through taxes, so you can bet it's by cutting all the programs they hate. Green energy can take a flying leap, and coal can get a boost.**

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Universal Savings Accounts. All taxpayers should be allowed to contribute up to \$15,000 (adjusted for inflation) of post-tax earnings into Universal Savings Accounts (USAs). The tax treatment of these accounts would be comparable to Roth IRAs. USAs should be highly flexible to allow Americans to save and invest as they see fit, including, for example, investments in a closely held business. Gains from investments in USAs would be non-taxable and could be withdrawn at any time for any purpose. This would allow the vast majority of American families to save and invest without facing a punitive double layer of taxation.

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**Here's where the utter disconnect between the rich and the regular becomes clear. Making a new "savings account" will help the "vast majority of American families"? The vast majority of American families can't take thousands of dollars and throw them into what amounts to a pit for years, even if the pit would eventually throw back more money. They don't HAVE that money to invest.**

**This is a lovely little side thing for people already in the 1% bracket, but not for the regular people. 401k's only work at all because there's a direct match going on, in which the employer throws in extra money for whatever the employee takes out. And even those aren't going to be a thousand a month investments for "the vast majority" of Americans.**

-----

Entrepreneurship. To encourage entrepreneurship, the business loss limitation should be increased to at least \$500,000. Businesses should also be allowed to fully carry forward net operating losses. Extra layers of taxes on investment and capital should also be eliminated or reduced. The net investment income surtax and the base erosion anti-abuse tax should be eliminated. The estate and gift tax should be reduced to no higher than 20 percent, and the 2017 tax bill's temporary increase in the exemption amount from \$5.5 million to \$12.9 million (adjusted for inflation) should be made permanent.<sup>21</sup> The tax on global intangible low-taxed

income should be reduced to no higher than 12.5 percent, with the 20 percent haircut on related foreign tax credits reduced or eliminated.<sup>22</sup>

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**Again, this isn't for "the majority" of Americans, especially the estate and gift taxes bit. Currently estate taxes can reach 40 percent, so this amounts to a twenty percent break for anyone with lots of money.**

**So basically "let's just stop taking in money for the government from rich people" is what this is saying.**

-----

All non-business tax deductions and exemptions that were temporarily suspended by the 2017 tax bill should be permanently repealed, including the bicycle commuting expense exclusion, non-military moving expense deductions, and the miscellaneous itemized deductions.<sup>23</sup> The individual state and local tax deduction, which was temporarily capped at \$10,000, should be fully repealed. Deductions related to educational expenses should be repealed. Special business tax preferences, such as a special deduction for energy-efficient commercial building properties, should be eliminated.<sup>24</sup>

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**Huh, so deductions for people that AREN'T wealthy need to be eliminated, if I'm reading this right (moving, bicycle, energy efficiency, etc.). What a curious thing. You'd almost think they want the ordinary people to carry the weight. Especially when "educational expenses" can't be deducted. Yeah, Mr. Rich Guy, YOU can afford to send little Bobby to Harvard, but the rest of us can't.**

-----

Wages vs. Benefits. The current tax code has a strong bias that incentivizes businesses to offer employees more generous benefits and lower wages. This limits the freedom of workers and their families to spend their compensation as they see fit—and it can trap workers in their current jobs due to the jobs' benefit packages. Wage income is taxed under the individual income tax and under the payroll tax. However, most forms of non-wage benefits are wholly exempt from both of these taxes.

To reduce this tax bias against wages (as opposed to employee benefits), the next Administration should set a meaningful cap (no higher than \$12,000 per year per full-time equivalent employee—and preferably lower) on untaxed benefits that employers can claim as deductions. Employee benefit expenses other than tax-deferred retirement account contributions should count toward the limitation, whether offered to specific employees or whether the costs relate to a shared benefit like building gym facilities for employees.<sup>25</sup> Tax-deferred retirement contributions by employers should not count toward this limitation insofar as they are fully taxable upon distribution.

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**WOW. So under the guise of trying to "help" workers, this is a gigantic screw.**



**Let me translate the above: Employers will be taxed on any non-salary/pay benefits above 12k a year, so they have no reason to offer any better benefits. There will be no reason for them to pay larger wages either.**

**We will relieve the American Worker of the concern about losing benefits when changing or losing a job by making it so less benefits will be available. (as an example, in my current job, my health insurance ALONE is about 12k, so all other benefits suddenly have no attraction to my employer)**

-----  
Employers should also be denied deductions for health insurance and other benefits provided to employee dependents if the dependents are aged 23 or older.  
-----

**"Screw your employees' kids. If the brats are in their 20s they'd better have their own insurance or just die already!"**

-----  
The public finance literature is clear that a consumption tax would minimize government's distortion of private economic decisions and thus be the least economically harmful way to raise federal tax revenues.<sup>28</sup> There are several forms that a consumption tax could take, including a national sales tax, a business transfer tax, a Hall–Rabushka flat tax,<sup>29</sup> or a cash flow tax.<sup>30</sup>  
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**Going into detail on all these different concepts would take a long time, and really the only key point is that these are almost all HIGHLY regressive tax schemes that affect rich people far less than those lower down on the scale, and of course are just as subject to manipulation as any other form of tax.**

-----  
Supermajority to Raise Taxes. Treasury should support legislation instituting a three-fifths vote threshold in the U.S. House and the Senate to raise income or corporate tax rates to create a wall of protection for the new rate structure. Many states have implemented such a supermajority vote requirement.  
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**This makes sense, of course, if you manage to get all the taxes on your rich friends lowered, you want to make it really hard to raise them again.**

-----  
Tax Competition. Tax competition between states and countries is a positive force for liberty and limited government.<sup>31</sup> The Biden Administration, under the direction of Treasury Secretary Janet Yellen, has pushed for a global minimum corporate tax that would increase taxation and the size of government in the U.S. and around the world.  
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**What the f\*\*\* is "tax competition"? Do they mean "having places with low taxes where I can hide my money is advantageous to the rich?" Yeah. That's likely why the idea of a global minimum tax is appealing, as it would eliminate the smoke and mirrors shuffling of assets from one haven to another.**

-----

Organization for Economic Co-operation and Development. The Organization for Economic Co-operation and Development (OECD), in conjunction with the European Union, has long tried to end financial privacy and impose regulations on countries with low (or no) income taxes. In fact, on tax, environmental, corporate governance and employment issues, the OECD has become little more than a taxpayer-funded left-wing think tank and lobbying organization.<sup>32</sup> The United States provides about one-fifth of OECD's funding.<sup>33</sup> The U.S. should end its financial support and withdraw from the OECD.

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**"the OECD has become little more than a taxpayer-funded left-wing think tank" -- stop, man, I was already sold on it, you don't have to push harder.**

-----

Doubling the IRS? The Inflation Reduction Act contains a radical \$80 billion expansion of the IRS—enough to double the size of its workforce.<sup>34</sup> Unless Congress reverses this policy, the IRS will become much more intrusive and impose still greater costs on the American people.

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**By "the American people" they mean "the wealthy people that the additional personnel are intended to focus on, who make it a pain in the ass to assess them compared to a regular Joe making 35k a year"**

-----

For the IRS to change and become more accountable, more transparent, and better managed, there is a need to increase the number of Presidential appointments subject to Senate confirmation, and not subject to Senate confirmation, at the IRS. At the very least, Congress should ensure that the Deputy Commissioner for Services and Enforcement, the Deputy Commissioner for Operations Support, the National Taxpayer Advocate, the Commissioner of the Wage and Investment Division, the Commissioner of the Large Business and International Division, the Commissioner of the Small Business Self-Employed Division, and the Commissioner of the Tax Exempt and Government Entities Division are presidential appointees.<sup>38</sup>

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**It's a very familiar song by this point, but once more they're singing the praises of using political appointees to seize control of a Federal agency, "organizational capture" at its finest.**

**Another NOTE for the "it's not official" commentary:**

**The Heritage Foundation is directly responsible for multiple laws on the federal and state level (and I would not be surprised on the local level as well). They**

**provide, specifically, tailored bills for submission to their client's legislature, along with guides for exactly how to "market" it to the target audiences. They are NOT a "theoretical" think tank; they are a MANUFACTURER of law to specification -- to be precise, to conservative specification.**

**The documents they produce are intended to be either used to direct policy, or to BECOME policy. A document like this one is intended for the exact use stated throughout: to guide the actions of the next Conservative President (or the next guy who can be manipulated by the Conservative/Evangelical "Christian" movement). The people who made this document are ALREADY working on the actual text of the Executive Orders and bills to be introduced in the first 180 days of said President's term.**

**So don't let anyone divert you by claiming it's "just a think tank" or "it's not official" or any similar bullcrap. Sure, it's not official YET -- because Trump hasn't been elected. Hopefully he won't be -- but do not believe for one splintered second that just kicking him to the side of the road will stop this. It will require a concerted effort for years to smack this kind of thinking down hard enough that it loses its momentum.**

**OKAY, enough of that, now let's look at the document in question again...**

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Legal protections for taxpayer rights and privacy have improved during the past three decades, but they remain inadequate.<sup>42</sup> Congress should do more. For example, interest on overpayments should be the same as interest on underpayments rather than the government receiving a higher rate, the time limit for taxpayers to sue for damages for improper collection actions should be extended, the jurisdiction of the Tax Court should be expanded, and the tax penalty system should be reformed by rationalizing the penalty structure and reducing some of the most punitive penalties.<sup>43</sup>

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**This section doesn't seem utterly out-there, though I question the details of apparently simply assertions. For instance, while it seems logical that the IRS should penalize itself in interest as much as it penalizes taxpayers, it strikes me that this might make "overpaying my tax bill" into a peculiar but useful investment strategy.**

**Me, I wonder why the IRS, given that they're both empowered to collect the data and, apparently, capable of analyzing it, can't just automatically send out a bill or a refund to everyone, with only those disputing the IRS' numbers having to file a detailed return.**

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\*Ensuring that the National Taxpayer Advocate can make his or her own personnel decisions to protect its independence;

\*Ensuring NTA access to files, meetings, and other information needed to assist taxpayers or investigate IRS administrative practices;

\*Requiring the IRS to address the NTA's comments in final rules and including the NTA in deliberations prior to the release of a proposed rule; and

\*Authorizing the NTA to file amicus briefs independently.

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**Again, I'm not sure there's anything off in this section -- though I am suspicious of whether the "independent personnel" bit means "pack with political appointees so they help out rich people".**

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One of the primary reasons that Congress mandates ever-increasing information reporting is that the Treasury Department and the Joint Committee on Taxation staff almost always overestimate how much revenue will be gained from still more burdensome information reporting, and they do not estimate or report private compliance costs. Congress and the Treasury Department must undertake a serious review of the information reporting regime and reduce the burden on the public—especially small businesses. Small businesses suffer disproportionately from complexity and administrative burdens.

Costs do not increase linearly with size, so elevated administrative costs have an adverse effect on the competitiveness of small firms.

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**Some of the above is absolutely true, though I'm surprised that they only call out small businesses and not, you know, the regular taxpayers, for whom the filing of tax returns is often an obscure, stressful PITA.**

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Budget. The operating budget of the IRS should be held constant in real terms. The resources allocated to the Office of the Taxpayer Advocate should be increased by at least 20 percent (about \$44 million). The Office of Equity, Diversity, and Inclusion should be closed. Provided that IT management is changed; an effective, well-considered implementation plan is adopted; and serious oversight is put in place, additional resources dedicated solely to IT modernization may be warranted.

-----

**Okay, so increase the section of the IRS dedicated to arguing with itself, and close the office dedicated to equality. Hold the entire budget constant in real terms? How do they mean that? If they hold it to the same dollar amount (adjusted for inflation), it will become increasingly less able to handle the workload as the overall size of the country's economy increases.**

-----

(International Affairs)

International organizations such as the OECD, the World Bank, and the International Monetary Fund espouse economic theories and policies that are inimical to American free market and limited government principles. The global elites who operate the IMF regularly advance higher

taxes and big centralized government. The IMF has intervened in American policy debates—and has even recommended that the U.S. raise taxes.

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**Horrors, the idea that anyone would raise taxes. Sorry, I left my "taxation is theft" stuff behind twenty years ago.**

**This section is basically all about preventing any outside influence on the US economy and pushing our agenda on outside groups.**

-----

#### FISCAL RESPONSIBILITY

Treasury should make balancing the federal budget a mission-critical objective. The federal budget absorbs enormous resources from the economy, both in money taken from taxpayers and in money borrowed. The budget should be balanced by driving down federal spending while maintaining a strong national defense and not raising taxes.

-----

**Again, this is a laugh and a half coming from the party with the real record of reckless spending.**

**Except it's not so funny when you look at what they say, because if you're gonna balance the budget without raising taxes (indeed, cutting them, as we see above) and keeping the military in its current state or even stronger, why then there's only one set of programs you could target to make up the literally trillion-dollar cuts: Social Security, Medicare, and related social programs.**

**Get ready for the big screw, guys.**

-----

The Treasury must act more assertively in international financial institutions to protect and advance U.S. national interests—and oppose those that do not. It should employ a carrot-and-stick approach by increasing its activity and commitment to those financial institutions that are willing and able to adjust to this new approach and by zeroing out or potentially exiting those institutions that rely on U.S. capital while advancing agendas that run counter to U.S. interests.

\*A major emphasis of effecting this change must be the addition of a large new cadre of U.S. professionals and contractors at these international financial institutions.

\*The U.S. must insist on the hiring and support of this human capital as a condition to future funding.

\*The U.S. should also examine increasing or decreasing its ownership levels in these institutions in order to achieve maximum leverage.

-----

**WOW.**

**If I am reading this correctly, they're basically saying that any international financial organization (bank, etc.) of significance that the US does business with should be FORCED to hire US personnel and contractors at a certain level -- or else.**

-----  
Committee on Foreign Investment in the United States. The interagency Committee on Foreign Investment in the United States should realign its priorities to meet the United States' current foreign policy threats, especially from China.  
-----

**Their China bee keeps buzzing around their bonnet, but I think they actually make some legitimate points in this section, most particularly the idea that the DOD should be co-chair in this particular committee, as it IS a national security issue at least as much as an economic one.**

-----  
Greenfield Investments. Congress should close the loophole on greenfield investments and require CFIUS review of investments in U.S.-based greenfield assets by Chinese-controlled entities to assess any potential harm to U.S. national and economic security. In the 2018 Foreign Risk and Review Modernization Act (FIRRMA),<sup>51</sup> one important category of foreign transactions left out of the bill was greenfield investments, particularly by Chinese state-owned enterprises (SOEs). Greenfield investments by Chinese SOEs pose a unique threat, and they should be met with the highest scrutiny by all levels of government.

Greenfield investments result in the control of newly built facilities in the U.S., and they were not addressed in FIRRMA primarily because governors and state governments embrace them. That is understandable; they typically bring the promise of creating American jobs. However, the goal of such Chinese SOEs is to siphon assets, technological innovation, and influence away from U.S. businesses in order to expand the global presence of the Chinese Communist Party.  
-----

**This is not entirely unreasonable, either. It's really an international version of the current problem of major corporations purchasing tons of residential real estate -- it gives the entity in question entirely unreasonable amounts of potential leverage on everything in range of their operations.**

**I'm not afraid of "communists" who don't really exist, but I am concerned about the Chinese Corporate State as much as I am the American Corporate Community.**

-----  
Treasury should examine creating a school of financial warfare jointly with DOD. If the U.S. is to rely on financial weapons, tools, and strategies to prosecute international defensive and offensive objectives, it must create a specially trained group of experts dedicated to the study, training, testing, and preparedness of these deterrents. Recent experience has demonstrated that the U.S. cannot depend on the rapid development and deployment of untested, academically developed financial actions, stratagems, and weapons on an ad hoc basis.  
-----

**I don't like the focus on "all international interaction as warfare" here, but in practice this is also not an entirely ridiculous idea.**

**Still in the Department of the Treasury.**

-----

#### **IMPROVED FINANCIAL REGULATION**

One of the priorities of the incoming Administration should be to restructure the outdated and cumbersome financial regulatory system in order to promote financial innovation, improve regulator efficiency, reduce regulatory costs, close regulatory gaps, eliminate regulatory arbitrage, provide clear statutory authority, consolidate regulatory agencies or reduce the size of government, and increase transparency.

Merging Functions. The new Administration should establish a more streamlined bank and supervision by supporting legislation to merge the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the National Credit Union Administration, and the Federal Reserve's non-monetary supervisory and regulatory functions.

U.S. banking law remains stuck in the 1930s regarding which functions financial companies should perform. It was never a good idea either to restrict banks to taking deposits and making loans or to prevent investment banks from taking deposits.

-----

**I am admittedly naive in the financial area, but it seems to me that many of the problems we saw over the last 20-30 years happened whenever financial companies were allowed to expand their functionality beyond what had been previously regulated.**

**Given that the supporters of 2025 are primarily very wealthy people whose entire livelihood depends on the manipulation of investments/financial instruments rather than doing what we in the regular sector would consider "a job", I must look with GRAVE suspicion on what appears to be an intention to perform a broad, sweeping expansion of the capabilities -- and presumably a reduction of restrictions -- of financial institutions.**

-----

Policymakers should create new charters for financial firms that eliminate activity restrictions and reduce regulations in return for straightforward higher equity or risk-retention standards. Ultimately, these charters would replace government regulation with competition and market discipline, thereby lowering the risk of future financial crises and improving the ability of individuals to create wealth.

-----

**To someone in my field, this translates to "Free market and competition will always produce the best results". Which we all know, or should know, is absolutely not true when the market competition isn't to "provide the best product" but to "maximize the income/value of my shareholders", which -- BY LAW -- is what corporations have to do.**

**The most recent example of "we deregulated and trusted companies, and killed people" is Boar's Head, of course, where the Trump deregulation of inspections resulted in the**

**company failing to meet old standards of safety and performance, killing at least nine people and now, apparently, leading to the closure of the entire plant and Boar's Head discontinuing liverwurst entirely.**

**Unless, and until, corporate law is focused on the requirements to provide value for the consumer, the employee, and the general public BEFORE corporate value, market forces will NEVER be the ideal sole control of corporate operations.**

-----  
Dodd–Frank Revisions. Congress should repeal Title I, Title II, and Title VIII of the Dodd–Frank Act.<sup>52</sup> Title I of Dodd–Frank created the Financial Stability Oversight Council, a kind of super-regulator tasked with identifying so-called systemically important financial institutions and singling them out for especially stringent regulation. The problem, of course, is that this process effectively identifies those firms regulators believe are “too big to fail.”<sup>53</sup>  
-----

**In my (again limited) understanding, this is sort of a Bizarro-world description of Dodd-Frank, which was created to put more stringent regulations on financial institutions and reduce their ability to prey on consumers.**

**While, as I say, I'm not educated in this area, that would fit with the general thrust of the rest of the document, which is basically "The rich people need you to stop regulating them so hard".**

-----  
Treasury plays a role in funding the conservatorships of Fannie Mae and Freddie Mac. It should work to end the conservatorships and move toward privatization of these massive housing finance agencies. This would restore a sustainable housing finance market with a robust private mortgage market that does not rely on explicit or implicit taxpayer guarantees.  
-----

**"Privatization" in these kind of financial settings always means "there's a way my rich sponsors can make a lot of money from this", and almost never means "this will actually improve things for the average person.**

**Are there ever reasons to privatize things, move them away from government control? Sure. But an awful lot of the things that we've put under government oversight got there because they WERE privatized before, and the result was terrible.**

**Even when it comes to finances rather than OSHA safety, it is often the case that the regulations are written in blood.**

-----  
**ANTI-MONEY LAUNDERING AND BENEFICIAL OWNERSHIP REPORTING REFORM**  
The Financial Crimes Enforcement Network is a relatively small bureau within the Treasury Department with approximately 285 employees and a FY 2022 budget of \$173 million.<sup>58</sup> Although FinCEN makes a significant contribution to law enforcement efforts, it also does demonstrable, substantial and widespread economic harm because it: (1) is largely oblivious to



those adverse economic effects; (2) conducts almost no meaningful cost-benefit analysis or retrospective review of regulations; (3) has been subject to extraordinarily lax oversight by both Congress and the Treasury Department; and (4) demands total transparency by those it regulates but is itself disturbingly and purposefully opaque. For example, FinCEN no longer issues an annual report<sup>59</sup> and no longer publishes cash transaction report (CTR) data.

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**My knowledge here is very vague, so my only comment on this section is that I have to wonder if such financial crime oversight agencies get in the way of what a lot of companies would like to do.**

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#### THE "EQUITY" AGENDA

Under the Biden Administration, the Treasury Department has appointed a Counselor for Racial Equity, established an Advisory Committee on Racial Equity, and created an office for Diversity, Equity, Inclusion, and Accessibility. All these should be eliminated. Treasury has created several new offices to promote "equity" and has made this its first of five strategic goals in its Fiscal Year 2022–2026 Strategic Plan. "Equity" is identified as a cross-cutting theme in 15 of 19 of the plan's objectives.

The avowed purpose of these initiatives is to implement policies that deliberately favor some races or ethnicities over others. The casual acceptance and rapid spread of racist policymaking in the federal government must be forcefully opposed and reversed.

-----

**Yep, back to the Mirrorworld, where "helping to bring up people who have been historically oppressed" is equated with the oppression they suffered in the first place. I'm an old white guy and I can still tell that this is bullpuckey.**

-----

Identify every Treasury official who participated in DEI initiatives and interview him or her for the purpose of determining the scope and nature of these initiatives and to ensure that such initiatives are completely ended.

Make public immediately all communications relating to the work of the Treasury's critical race theory and DEI initiatives.

Treat the participation in any critical race theory or DEI initiative, without objecting on constitutional or moral grounds, as per se grounds for termination of employment.

Expose and make public all training materials and initiatives designed to single out any race, ethnicity, or sex for special treatment.

-----

**"Are you now, or have you ever been, in favor of helping other people?" is now going to be grounds for termination.**

-----

#### CLIMATE-RELATED FINANCIAL RISK

Treasury has created a new departmental office, "Climate Hub," and has made "combating climate change" one of the Biden Treasury Department's top five principal goals. The next Administration should eliminate the Climate Hub Office and withdraw from climate change agreements that are inimical to the prosperity of the United States.

-----

**"Stop trying to save the world, we're trying to make money over here!"**

**Denying science because their backers can't or won't plan longer-term is really a pretty sad position to take, but these guys have committed to it.**

-----

Yet history shows that economic growth and technological/scientific advance through human ingenuity are by far the best ways to prevent and mitigate extreme weather events.

-----

**This shows one of the major breaks of understanding -- done by some quite deliberately, others out of ignorance -- where they equate "climate change" with "weather events".**

**Indeed, our high-tech society and capabilities are invaluable in allowing us to address the consequences of major natural disasters. They ALSO make us more vulnerable to them in an overall sense. A group of hunter-gatherers with no real infrastructure can just move away from areas that no longer are idea for their use. A modern city is pretty much stuck where it is, and moving it is an absolutely monumental task to even contemplate, let alone carry out.**

**Climate change ultimately requires the movement of entire living areas and industries, and the current change is not slow enough to allow that transition to be simple or inexpensive. If, for instance, the breadbasket of the USA shifted slowly over a period of several thousand years, this would allow time for the areas becoming the breadbasket areas to develop the soils and infrastructure to support farming. If it takes a couple hundred years, you'll find yourself without a breadbasket for quite a while.**

**The same thing is true with other climate-mediated changes. It's not that the world will no longer support life, it's that the entire balanced mechanism of our civilization is NOT DESIGNED for major world change. We have a built in set of assumptions of what climates are found in what areas, in what crops grow where, and so on and so forth. If and when major shifts happen -- the Gulf Stream collapsing, for instance -- it will have consequences across vast areas and many different countries, consequences no one country can address -- especially after the fact.**

**Now there IS a point there that China and other nations aren't helping with this, but the answer isn't to just shrug and give up, but to figure out how to convince everyone to get in on the game.**

-----

U.S. Trade and Development Agency. Congress should eliminate the U.S. Trade and Development Agency (USTDA). The USTDA is intended to help companies create U.S. jobs through the export of U.S. goods and services for priority development projects in emerging economies. The USTDA links U.S. businesses to export opportunities by funding project planning activities, pilot projects, and reverse-trade missions while creating sustainable infrastructure and economic growth in partner countries.

These activities more properly belong to the private sector. The best way to promote trade and development is to reduce tariff and non-tariff trade barriers. Another way is to reduce the federal budget deficit, and thereby federal borrowing from abroad, freeing more foreign dollars to be spent on U.S. exports instead of federal treasury bonds.

-----

**Again we see a privatization focus which I find quite suspect.**

**It's also amusing as here Project 2025 is explicitly anti-tariff, but the Republican/Trump party is pushing tariffs.**

**This finishes the Department of the Treasury section. I will skip the next section on The Export-Import Bank, partly because of my lack of knowledge of that subject, and also because unlike prior sections, this one is two opposing essays, one saying EXIM needs to be abolished, the other saying it needs to stay.**

**So next up -- The Federal Reserve!**

**I have to also hesitate to delve into this section, because a lot of it's really opaque to me. I don't know enough to argue or agree with many of the assertions. There are at least a couple of things to note, though.**

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Under free banking, banks typically issue liabilities (for example, checking accounts) denominated in dollars and backed by a valuable commodity. In the 19th century, this backing was commonly gold coins: Each dollar, for example, was defined as about 1/20 of an ounce of gold, redeemable on demand at the issuing bank. Today, we might expect most banks to back with gold, although some might prefer to back their notes with another currency or even by equities or other assets such as real estate. Competition would determine the right mix of assets in banks' portfolios as backing for their liabilities.

-----

**This idea is just plain stupid. The total amount of money currently in circulation is more than four times the amount of gold the US Government has on hand, and if you had to cover other assets, I'm pretty sure the entire world doesn't have enough. There's no hard assets you could pledge to cover the trillions and trillions of dollars needed.**

**Plus the touching faith in the "free market" is almost adorable if it weren't so dangerous.**

**They mention the gold (or similar) standard a couple more times in a few places, including one where they try to pretend that it's fine if you don't actually HAVE the reserves -- that it's okay as long as people BELIEVE they can turn in their money for gold.**

**The rest of the Federal Reserve section is too opaque for me, so I'll leave that to others.**

**So now we head into an area of near interest to me -- the Small Business Administration (SBA).**

-----

Although PPP worked through private lenders and as a result experienced relatively less fraud than EIDL experienced, it is estimated “that at least 70,000 [PPP] loans were potentially fraudulent.”<sup>6</sup>

-----

**And were then forgiven in massive amounts, often to larger businessmen. Funny, that. But we can't forgive student loans, no sir.**

-----

COVID-19 Lending Program Accountability and Cleanup. A major immediate priority for the next Administration should be a final accounting and accelerated cleanup of fraudulent COVID-19 loan and grant activity. As noted by the SBA IG, “managing COVID-19 stimulus lending is the greatest overall challenge facing SBA, and it may likely continue to be for many years as the agency grapples with fraud in the programs....”<sup>40</sup>

Consider bringing in private-sector support and expertise to close out these programs. Forgiveness and fraud must be dealt with as swiftly as possible, and law enforcement officials must pursue fraud vigorously. Entities receiving PPP loans that did not meet eligibility for forgiveness must be required to pay back the money.

For example, under the CARES Act,<sup>41</sup> PPP loan applicants generally were eligible only if, together with all their affiliates, they had no more than 500 employees. Numerous Planned Parenthood affiliates self-certified eligibility for PPP loans during the initial wave of loans that were governed by the CARES Act's size requirement. Many Senators and Representatives asserted that these Planned Parenthood organizations were ineligible because—considered together with their affiliates—they exceeded the maximum eligible size.<sup>42</sup>

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**The presumed COVID fraud is one of their major SBA subjects, and here we see one of the reasons: people they don't like getting money. (I will guarantee you that there's plenty of similar organizations they'll never mention, because they're not Planned Parenthood)**

**Other parts of it are beating the same worn-out drums (the insistence that trying to improve a group's position is identical to oppression, for instance) as other sections. I'm not seeing much new or glaringly surprising here. It's not terribly surprising, as they do support, to some extent, small businesses, they just don't want the government helping the wrong ones, like those that are more minority or disadvantaged.**

-----  
Eligibility of Religious Entities for SBA Loans. Current SBA regulations<sup>46</sup> and SBA Form 1971<sup>47</sup> make certain religious entities ineligible to participate in several SBA loan programs. The Trump Administration proposed a rule that would remove the provisions on the ground that they violate the First Amendment.<sup>48</sup> Subsequent Supreme Court decisions have made their unconstitutionality clearer.<sup>49</sup>

In an April 3, 2020, letter to Congress pursuant to 28 U.S. Code § 530D,<sup>50</sup> the Trump Administration SBA advised that two such provisions violate the Free Exercise Clause of the First Amendment and that it therefore would not enforce them. On January 19, 2021, the Trump Administration SBA proposed a rule to remove all of the unconstitutional religious exclusions from its regulations.<sup>51</sup> The SBA has not acted on the proposed rule.

A similar religious exclusion once appeared in the regulation governing eligibility for SBA Business Loan Programs,<sup>52</sup> but it was removed in a June 2022 final rule that noted tension with the First Amendment and Supreme Court precedent.<sup>53</sup> That final rule announced that the SBA would nonetheless continue to make religious eligibility determinations for business loan applicants to comply with putative Establishment Clause requirements,<sup>54</sup> but Supreme Court precedent and Office of Legal Counsel memoranda refute the notion that large government-backed loan programs raise any Establishment Clause concerns.<sup>55</sup>

-----

This is an interesting section because the implication is that they're choosing some religion to target. In actuality, I took the time to examine the form 1971 that they mention a bit later, and here's the relevant bit:

**Nature of the Religious Component (Please check all that apply)**

- **Sale of religious books, music, artifacts, gifts, and/or other religious items.**
- **Religious instruction, counseling, or indoctrination with regard to any items sold (including those listed immediately above).**
- **Religious instruction, indoctrination, or counseling whether to adults or children (includes use of religious material at day care facilities).**
- **Religious broadcasting (e.g., religious music, religious programming, including instruction, indoctrination, counseling, and religious services).**
- **Generation, Sale or distribution of newspaper, journal, or other religious publications.**
- **Creation or development of religious materials (e.g. writings, music, artifacts, computer software, religious art, etc.).**
- **Prayer, religious worship, or religious service**
- **Provision of reading room or other space to conduct lectures, readings, prayer, worship, or other activities related to religion.**
- **Other:** \_\_\_\_\_

**Explain the nature of each of the religious components checked above (attach separate sheet if necessary)**

**SO. All it's doing is checking to see if your "small business" is primarily a religious organization, and will be using SBA (government) money for religious purposes.**

**This is perfectly consistent with separation of church and state, and it's obvious that the problem for 2025 is that they would LIKE their churches to qualify for the loans.**

-----

*(on the Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) programs)*

\*Continue the SBIR and STTR programs as they successfully fund the next wave of technological innovation to compete with Big Tech.

\*Urge Congress to expand the amount that other agencies are required to set aside from their general R&D budgets for the SBIR program.

-----

**This is actually a POSITIVE recommendation, and their logic behind it is accurate; the SBIR investments have, overall, been disproportionately successful at producing new and innovative solutions to various challenges. A lot of my career has been focused on SBIR proposals and projects.**

**There are of course less savory possible actions they may take (there has already been a lot of push to make the SBIR program more open to VC firms), but as a general concept, hey, here's a good one for once.**

-----

At the same time, the SBA is an outlier among competing economies in not considering medium-sized enterprises along with small businesses, often referred to collectively as small and medium-sized enterprises (SMEs). Medium-sized and regional businesses are increasingly critical to maintaining competition. The next Administration should:

\*Encourage Congress to create a "medium-sized business" classification with its eligibility for programs confined to access to capital programs from projects for which credit elsewhere does not exist.

-----

**This may not be a bad idea, but one would want to maintain a clear separation between the small and medium sizes, as things like the SBIR program are already very highly competitive, and the likely "medium-sized" businesses would be able to seriously outperform small companies in a lot of these areas.**

**Okay, well, in the "Trade" section, we have another example of the "Dueling Conservatives", in which one espouses "Fair Trade" and the other "Free Trade" approaches. These clash often, and I'm not going to try to analyze this section now because, honestly, while both have some terrible suggestions, and also have a lot of material I find utterly opaque, there's no specific thrust one way or the other here. It is, at the least, fairly even-handed in its arguments on both sides, whether I suspect the actual \*policies\* recommended by either one would end up sucking.**

**So from this section, we go to "Independent Regulatory Agencies", which sounds promising even in the opening paragraph:**

-----

In addition to the executive departments and agencies discussed previously, a number of independent commissions exist that are loosely affiliated with the executive branch. In general, the President can appoint people to these commissions but cannot remove them, which makes them constitutionally problematic in light of the Constitution's having vested federal executive power in the President. Nevertheless, they exist, their constitutional legitimacy has generally been upheld by the courts, and there will be an opportunity for the next Administration to use them as forces for good, particularly by making wise appointments.

-----

**"We're annoyed that we can't remove people with wrongthink from these commissions, but hey, at least we can put our own people on them and probably achieve enough control"**

-----

In Chapter 28, FCC Commissioner Brendan Carr writes that the FCC chairman "is empowered with significant authority that is not shared" with other FCC members. Under a new chairman, he writes, "[t]he FCC needs to change course and bring new urgency to achieving four main goals: [r]eining in Big Tech; [p]romoting national security; [u]nleashing economic prosperity; and [e]nsuring FCC accountability and good governance."

-----

**"Reining in Big Tech" sounds like a good idea, except that when you follow the discussion, what they mean is that there's actually some of the large social media and related groups that, on occasion, try to make people talk about facts rather than whatever the Republicans want them to believe. They call factchecking and such "attempts to drive diverse political viewpoints from the digital town square", rather than "attempts to keep nutjobs' fever dreams from being given equal treatment with actual thinking people".**

**But this is just the intro; let's get to the meat.**

-----

For example, the current SEC has proposed a climate change reporting rule that would quadruple the costs of being a public company.<sup>3</sup>

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**I'm doubtful of this level of increase. I suspect it would depend greatly on what kind of company you were, how large a company you were, and so on. The real problem for the Project is, obviously, that it has to do with climate change, that they don't believe in.**

-----

Recommendations;

\*Three basic categories of firm: private firms, an intermediate category of smaller firms,<sup>4</sup> and public firms;

\*Reasonable, scaled disclosure requirements; and

\*Specified secondary markets for the securities of these firms.<sup>5</sup>

[Going on to say]

With regulatory authority delegated by the government, both the Public Company Accounting Oversight Board (PCAOB) and FINRA have proved to be ineffective, costly, opaque, and largely impervious to reform. To reduce costs and improve transparency, due process, congressional oversight, and responsiveness, PCAOB and FINRA (Financial Industry Regulatory Authority) should be abolished, and their regulatory functions should be merged into the SEC.

-----

**Not knowing lots about finance and securities, I can't directly comment on this much, but it strikes me that abolishing oversight boards and merging their authority into the SEC (where they mention the top people have almost full authority) has some obvious dangers.**

**The general thrust of drastic simplification sounds nice, but that makes me suspect that it's mostly the large investors that benefit from removing a lot of existing regulation. Financial crashes are not as obvious as industrial accidents, but in effect both sets of regulations are generally written only after someone's blood was spilled, literally or metaphorically.**

-----

Discrimination based on immutable characteristics has no place in financial regulation. Offices at financial regulators that promote racist policies (usually in the name of "diversity, equity, and inclusion") should be abolished, and regulations that require appointments on the basis of race, ethnicity, sex, or sexual orientation should be eliminated. Equal protection of the law, equal opportunity, and individual merit should govern regulatory decisions.<sup>9</sup>

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**Another entry in the "we are equating attempts to level the playing field with the processes that made it not level to begin with" category.**

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## ENTREPRENEURIAL CAPITAL FORMATION

Financial regulators should remove regulatory impediments to entrepreneurial capital formation.<sup>11</sup> In the absence of the fundamental reform outlined above, the SEC should:

\*Simplify and streamline Regulation A (the small issues exemption)<sup>12</sup> and Regulation CF (crowdfunding)<sup>13</sup> and preempt blue sky registration and qualification requirements for all primary and secondary Regulation A offerings.<sup>14</sup>



\*Either democratize access to private offerings by broadening the definition of accredited investor for purposes of Regulation D or eliminate the accredited investor restriction altogether.<sup>15</sup>

\*Allow traditional self-certification of accredited investor status for all Regulation D Rule 506 offerings.

\*Exempt small micro-offerings from registration requirements.<sup>16</sup>

\*Exempt small and intermittent finders from broker-dealer registration requirements and provide a simplified registration process for private placement brokers.<sup>17</sup>

\*Exempt peer-to-peer lending from federal and state securities laws and reduce the regulatory burden on Regulation CF debt securities.

\*Make the Title I Emerging Growth Company (EGC) exemptions permanent for all EGCs.

\*Reduce the regulatory burden on small broker-dealers and exempt privately held, non-custodial broker-dealers from the requirements to use a PCAOB-registered firm for their audits.

-----

**As I said, I'm not well up on investments and such, but a lot of these provisions are setting off a LOT of alarm bells, most of them having to do with what appears to be a common theme of making a lot of types of investment basically non-regulated or at least harder to track. Many of them are ones that could involve smaller investors -- and reducing regulation on those, I suspect, means "it's a lot easier to trick Grandma into dumping her life savings into my Kickstarter now".**

-----

#### BETTER CAPITAL MARKETS

To improve capital markets, the SEC should:

\*Preempt blue sky registration, qualification, and continuing reporting requirements for securities traded on established securities markets (including a national securities exchange or an alternative trading system).<sup>19</sup>

\*Terminate the Consolidated Audit Trail (CAT) program.<sup>20</sup>

\*Abolish Rule 144 and other regulations that restrict securities resales and instead require a company that has sold securities to provide sufficient current information to the market to permit reasonable investment decisions and secondary sales.

-----

**Whoa, hold on there, Tex. Same warning bells here, with a screaming red siren on "Terminate the CAT program". There's a REASON you want to be able to track -- audit -- financial transactions, and honestly a lot of those apply to that War On Drugs you claim to want to pursue. Removing this tracking requirement is a really big warning flare.**

-----

Congress should:

\*Prohibit the SEC from requiring issuer disclosure of social, ideological, political, or “human capital” information that is not material to investors’ financial, economic, or pecuniary risks or returns. The proposed SEC climate change rule, which would quadruple the costs of being a public company, is particularly problematic.<sup>21</sup>

\*Repeal the Dodd–Frank mandated disclosures relating to conflict minerals, mine safety, resource extraction, and CEO pay ratios.<sup>22</sup>

\*Oppose efforts to redefine the purpose of business in the name of social justice; corporate social responsibility (CSR); stakeholder theory; environmental, social, and governance (ESG) criteria; socially responsible investing (SRI); sustainability; diversity; business ethics; or common-good capitalism.

\*Prohibit securities regulators, including SROs, from promulgating rules or taking other actions that discriminate, either favorably or unfavorably, on the basis of the race, color, religion, sex, or national origin of such individual or group.

-----

**AAAAAaaaand here the mask comes off ENTIRELY.**

**Bullet point one there is "the only value is monetary; don't bother the stockholders with information about the rivers you'll poison."**

**Bullet point two is "how dare you impede my CEO pay increase by bringing up slave labor and worker safety? Some of them may die... but that is a price we are willing to pay."**

**Bullet point three is "the stockholders, Bob, who's helping THEM out?", a direct reinforcement of the idea that the ONLY responsibility of a company is to increase shareholder value at the expense of anything else. There is no social responsibility -- or, indeed, any responsibility at all -- outside of "make the shareholders more value, and do it FAST".**

**Bullet point four is "and make sure no one can ever CHANGE these rules to make companies have to give a damn."**

**This set of points may be the single clearest statement of the "Screw You and Screw Later Generations, I've Got Profit!" attitude of modern Republican corporatism.**

-----

\*Statutorily limit the time for an investigation to two years with no extensions. Long investigations harm private parties and the quality of justice. With adequate management processes, the SEC should not need more than two years even for complicated matters.

-----

**Uhhh-HUH. This would be true if we assume that all parties would LIKE a rapid conclusion, but it is well-known that the targets of investigations fight, very strongly, against such investigations. The only real winners with such a change are the companies being investigated; if they can fight for only two years -- a pretty short time in this kind of situation -- they're home-free.**

**As the next short section is on Commodities and I have no idea what it's talking about, I skip it.**

**Digital Assets is the next piece:**

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Both the SEC and the CFTC have been irresponsible actors in the digital asset area. They have had more than a decade to promulgate rules governing digital assets, yet the SEC has utterly failed to do so, and the CFTC has provided only minimal guidance. Instead, both agencies have chosen regulation by enforcement—and have done it poorly. They neither adequately protect investors nor provide responsible market participants with the regulatory environment that they need to thrive.

The SEC and CFTC should clarify the treatment of digital assets (coins or tokens). Specifically, they should:

\*Promulgate a joint regulation providing that a holder of digital assets may not be deemed a party to an investment contract or an investor in a common enterprise unless, while the enterprise is a going concern, the holder is entitled to a share of the earnings or profits of the common enterprise or a defined flow of payments from the common enterprise in consideration of the investment or unless, upon liquidation, the holder has rights against the assets of the common enterprise. Otherwise, the digital asset shall be deemed a commodity to be regulated by the CFTC, not the SEC.

\*Amend the definition of commodity to include digital assets that are not a security as so defined and amend the definition of security to make it clear that a certificate (digital, electronic, or otherwise) that represents ownership of commodities and is convertible into a physical commodity on demand is not a security but a commodity.

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**I quote the above in almost entirety simply for reference. I THINK it's referring to "cryptocurrency" and similar things, which makes me suspect someone wants these things to be regulated as little as possible. As they're basically scam pyramids, that's not surprising.**

**That's it for this section for me -- next is the Consumer Financial Protection Bureau, which I am sure they hate with a burning passion.**

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The Consumer Financial Protection Bureau (CFPB) was authorized in 2010 by the Dodd–Frank Act. Since the Bureau's inception, its status as an "independent" agency with no congressional

oversight has been questioned in multiple court cases, and the agency has been assailed by critics<sup>33</sup> as a shakedown mechanism to provide unaccountable funding to leftist nonprofits politically aligned with those who spearheaded its creation.

....

Passage of Title X of Dodd–Frank was a bid to placate concern over a series of regulatory failures identified in the wake of the 2008 financial crisis. The law imported a new superstructure of federal regulation over consumer finance and mortgage lending and servicing industries traditionally regulated by state banking regulators. Consumer protection responsibilities previously handled by the Office of the Comptroller of the Currency, Office of Thrift Supervision, Federal Deposit Insurance Corporation, Federal Reserve, National Credit Union Administration, and Federal Trade Commission were transferred to and consolidated in the CFPB, which issues rules, orders, and guidance to implement federal consumer financial law.

-----

**A shorter and less slanted description would be that the CFPB was created in response to the disastrous crash of 2008 and is intended to create an agency, independent of the ordinary line of legislatures and economic decisionmakers who allowed 2008 to happen, which would be a defense against the excesses of banks and other financial institutions, aided and abetted by people in the Federal government.**

**As one might guess, this is a source of great stomach upset to the authors of 2025, since "protecting the consumer" is inherently a left-wing concern, and thus all the organizations supported by the CFPB are leftist.**

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The CFPB is a highly politicized, damaging, and utterly unaccountable federal agency.<sup>52</sup> It is unconstitutional. Congress should abolish the CFPB and reverse Dodd–Frank Section 1061, thus returning the consumer protection function of the CFPB to banking regulators<sup>53</sup> and the Federal Trade Commission.

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**Of course, THIS time we can trust the banking regulators. 2008 was all an innocent misunderstanding, and so we should just go back to those halcyon days.**

**In a pig's eye.**

**A short but very revealing section. Now on to the Federal Communications Commission!**

-----

The FCC is an independent regulatory agency that has jurisdiction over interstate and international communications by radio, television, wire, satellite, and cable.<sup>1</sup> Five Commissioners are appointed by the President and confirmed by the Senate for fixed five-year terms.<sup>2</sup> The FCC does not have any other presidentially appointed, Senate-confirmed officials. Ordinarily, the five-member FCC is divided politically three to two with a majority of Commissioners from the same political party as the President.

...

## POLICY PRIORITIES

The FCC needs to change course and bring new urgency to achieving four main goals:

- \*Reining in Big Tech,
- \*Promoting national security,
- \*Unleashing economic prosperity, and
- \*Ensuring FCC accountability and good governance.<sup>15</sup>

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**This section, in contrast with some of the other recent ones, is a lot more... \*obfuscated\*. Much of the verbiage, in fact, could be taken to mean the same thing as it would coming from a left-wing source. "reining in Big Tech", for instance, is something that both sides could agree needs to be done. The discussion in that section is ... cloudy, because it is clearly relying on the reader understanding what is meant by "Nowhere is that clearer than when it comes to Big Tech and its attempts to drive diverse political viewpoints from the digital town square."**

**Despite the extensive promotion of right-wing paranoid fantasies online, what the 2025 authors mean by the above is that they believe Big Tech is driving away right-wing sources and favoring the left. This is an interesting form of delusion, but it informs their entire discussion if you understand things in that perspective.**

**What they INTEND to do is put controls on the internet that allow the government to censor it to fit their perceptions of "appropriate" material. They just spend a lot of words and handwaving to obscure this.**

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Support efforts to empower consumers. The FCC and Congress should work together to formulate rules that empower consumers. Section 230 itself codifies "user control" as an express policy goal and encourages Internet platforms to provide tools that will "empower" users to engage in their own content moderation. As Congress takes up reforms, it should therefore be mindful of how we can return to Internet users the power to control their online experiences. One idea is to empower consumers to choose their own content filters and fact checkers, if any. The FCC should also work with Congress to ensure stronger protections against young children accessing social media sites despite age restrictions that generally prohibit their use of these sites.

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**"empower consumers to choose their own content filters and fact checkers, if any."**

**This is one of the giveaway lines. This is related to the well-known internet cry of "I did my research". The fact is that the average person has neither the knowledge, the skill, or**

**the time to accurately and reliably sort out facts from faux in the immensity of the social media world. Such things require specialized knowledge and a lot of effort.**

**I'm performing this analysis of Project 2025 on purely an educated amateur armchair basis. I have little standing to claim I am some kind of expert. And this is just ONE document of importance. I can't do this to even a HUNDREDTH of the stuff I run across online. And I am, by any reasonable measures, NOT an average person.**

**What Project 2025 implies with the above line is that they want to eliminate the possibility of ORGANIZED fact-checking (since "reality has a left-wing bias"), and let people either have no fact checking, or have to find their own without any form of structure or methodology to sort out which groups are full of utter twaddle and which ones have something real to say.**

**This, combined with rules for them to regulate content in new ways, would make large-scale media easily directed to the political aims they have already described earlier.**

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**\*Address TikTok's threat to U.S. national security. As law enforcement officials have made clear, TikTok poses a serious and unacceptable risk to America's national security.<sup>22</sup> It also provides Beijing with an opportunity to run a foreign influence campaign by determining the news and information that the app feeds to millions of Americans.**

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**They may even have a point here. There is some reason to believe TikTok is being used for potentially nefarious ends.**

**The problem with just banning large social media sites "for national security" is that the same logic can be used to basically shut ANY of them down -- even if, or perhaps ESPECIALLY if, the site is providing unbiased and accurate information.**

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**\*Stop aiding the CCP's authoritarian approach to artificial intelligence. The CCP has set itself a goal of becoming the global leader in artificial intelligence (AI) by 2030. Beijing is bent on using this technology to exert authoritarian control domestically and export its authoritarian governance model overseas. U.S. businesses are aiding Beijing in this effort— often unwittingly—by feeding, training, and improving the AI datasets of companies that are beholden to the CCP.**

-----

**You know, I have no doubt that they're 100% correct here. However, they're saying nothing about stopping the malign operation of NOT-Chinese AI work, which is also stealing the work of every creative on the planet, so I'm not really sure they intend to address the real problem here.**

**A later section discusses the problems of bandwidth allocation, but it's almost entirely framed as "free up spectrum" rather than addressing the reasons that you CAN'T just go around "freeing up spectrum".**

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Advance America's space leadership. One of the most significant technological developments of the past few years has been the emergence of a new generation of low-earth orbit satellites like StarLink and Kuiper. This technology can beam a reliable, high-speed Internet signal to nearly any part of the globe at a fraction of the cost of other technologies. This has the potential to significantly accelerate efforts to end the digital divide and disrupt the federal regulatory and subsidy regime that applies to communications networks. The FCC should expedite its work to support this new technology by acting more quickly in its review and approval of applications to launch new satellites.

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**There's a major problem with this, which is only now becoming more apparent to the general public: launching thousands of satellites is starting to interfere with other operations, especially both visible and radio astronomy. Put up twenty or even fifty satellites for GPS, okay, not so bad. Put up thousands of satellites in lower orbits, whipping around across every possible field of view? That's a problem. And one that will become a WORSE problem -- possibly leading to a real Kessler Syndrome disaster in which a cascading set of collisions of satellites make it almost impossible to continue safe space operations.**

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Correct the FCC's regulatory trajectory and encourage competition to improve connectivity. The FCC is a New Deal-era agency. Its history of regulation tends to reflect the view that the federal government should impose heavy-handed regulation rather than relying on competition and market forces to produce optimal outcomes.

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**Naturally, they want to change that. But there's a good reason for this setup: media communications ARE the commons, they're the town square, and leaving the access and distribution and use of the power of modern communications mostly up to companies is a terrible, terrible idea.**

**Now, the Federal Election Commission!**

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While the FEC has exclusive civil enforcement authority over FECA,<sup>2</sup> the U.S. Justice Department has criminal enforcement authority, which is defined as a knowing and willful violation of the law.<sup>3</sup> Because the FEC is an independent agency and not a division or office directly within the executive branch, the authority of the President over the actions of the FEC is extremely limited.

As former FEC Commissioner Bradley Smith has said, the FEC's "[r]egulation of campaign finance deeply implicates First Amendment principles of free speech and association."<sup>4</sup> The FEC regulates in one of the most sensitive areas of the Bill of Rights: political speech and political activity by citizens, candidates, political parties, and the voluntary membership organizations that represent Americans who share common views on a huge range of important and vital public policy issues.

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**To an extent, this is true, but as we will see in the next section, their main concern is that it's potentially influenced by Democrats. In my view, there's not nearly ENOUGH regulation. The fact that companies are allowed to invest in candidates is offensive.**

-----  
In 2025, when a new President assumes office, the term of five of the current FEC commissioners will have either expired or be about to expire: (list of 3 Republican and 2 Democratic commissioners)

During their terms, the three Republican commissioners have demonstrated with their votes and their public statements that they believe the FEC should not overregulate political activity and act beyond its statutory authority, construe ambiguous and confusing provisions against candidates and the public instead of the government, and infringe on protected First Amendment activity.

\*The President assuming office in 2025 must ensure, if the three Republican commissioners do not wish to remain on the FEC past their terms, that nominees for these positions share the views of those commissioners.

\*Also, to the extent that the President has the ability to negotiate with the Democratic Party leader in the Senate, he should try to temper any choice of the opposition party to ensure that this individual does not have extreme views on aggressive overenforcement that would severely restrict political speech and protected party, campaign, and associational activities.

-----  
**Hey, this is a fun little section. The bit discussing the three Republican commissioners doesn't go on to say a darn thing about the Democratic ones... but by IMPLICATION says that the Democrats "...overregulate political activity and act beyond (their) statutory authority, construe ambiguous and confusing provisions against candidates and the public [...], and infringe on protected First Amendment activity."**

**This is further implied (though not stated, oh dear no, they haven't SAID any such thing!) by the second bullet point above, implying that there may not be any chance of negotiating with the Democrats.**

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\*The President must ensure that the DOJ, just like the FEC, is directed to only prosecute clear violations of FECA. The department must not construe ambiguous provisions against the public instead of the government or apply FECA in a way that infringes on protected First Amendment activity

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**What I find interesting here is that, thus far, they've given NOT ONE EXAMPLE of these "ambiguous provisions" being construed against the public, or any infringement on First Amendment activity. This makes me very interested to know exactly what they're thinking of.**



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It should be but is not always obvious to overzealous government prosecutors that if a federal law is confusing, it would be unjust to prosecute individuals who are unable to determine if they are violating the law.

\*The President should direct the DOJ and the attorney general not to prosecute individuals under an interpretation of the law with which the FEC—the expert agency designated by Congress to enforce the law civilly and issue regulations establishing the standards under which the law is applied—does not agree.

\*In making prosecution decisions, DOJ should be instructed to consult and consider all official actions by the FEC that interpret the law including prior enforcement actions, regulatory pronouncements, and advisory opinions, just as private practitioners, the public, and political actors must do.

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**Again, they're being ASTONISHINGLY coy about specifics, yet this section, and the following section:**

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It is fundamentally unfair for the DOJ to prosecute an individual for supposedly violating the law when the FEC has previously determined that a similarly situated individual has not violated the law. Furthermore, this rule should apply even when there is a tied or three-to-three vote by the FEC commissioners whether in an enforcement action or an advisory opinion since under the statute, the FEC cannot take any action unless there are four affirmative votes.

Again, it seems obvious that if the commissioners designated by Congress to interpret the law are unable to determine what the law requires, then it is unfair to prosecute a citizen for violating that law. The DOJ should not engage in criminal prosecutions that stretch legal theories and defy FEC interpretations and regulations.

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**... make it quite clear that they're talking about a specific case or cases, about an "individual" doing something having to do with an "election" in which there was, apparently, some dissent about the interpretation of the law, in which the Republicans were disputing with the Democrats.**

**I wonder what PARTICULAR "individual" might have been held by the Democrats to be committing violations of campaign finance law and related operations, that the Republicans feel they must specifically address this issue?**

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In recent years, the FEC has failed to defend itself against litigation filed by political allies of certain Democrat commissioners. It takes four votes to authorize the general counsel of the FEC to defend a lawsuit filed against the agency, and those commissioners have refused to provide that fourth vote, so “the public was treated to the scandalous spectacle of the Commission—an

independent agency of the United States government—defaulting in litigation before federal courts.”<sup>11</sup>

These cases involved enforcement matters in which the commissioners disagreed on whether a violation of the law had occurred. Accordingly, the final votes of the commissioners did not approve moving forward with enforcement because there were not four affirmative votes that a violation of the law occurred.

-----

**Looking around, I \*think\* what's going on here is that the FEC's being paralyzed by (A) its even makeup of commissioners, so there's no way to break ties, (B) the polarization between, for example, the Republicans who think Citizens United was a great idea and the Democrats who don't.**

-----

\*The President should direct the attorney general to defend the FEC in all litigation when there is a failure of the commissioners to authorize the general counsel of the agency to defend it. No legislation would be needed to accomplish this; the DOJ has the general authority to defend the government and its agencies in all litigation.

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**What this means is that they can keep older decisions from being challenged, basically, or at least make it much harder.**

**However, if we just look a little further on, we FINALLY get a specific look at their concerns:**

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\*The President should vigorously oppose all efforts, as proposed, for example, in Section 6002 of the “For the People Act of 2021,”<sup>14</sup> to change the structure of the FEC to reduce the number of commissioners from six to five or another odd number. The current requirement of four votes to authorize an enforcement action, provide an advisory opinion, or issue regulations, ensures that there is bipartisan agreement before any action is taken and protects against the FEC being used as a political weapon.

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**And THERE we have the reference we've been looking for. The For The People Act in question is about increasing voter access to the polls -- including by-mail and early voting -- as well as automatic or same-day registration, as well as limiting the ability to strike people from the rolls. In essence, it's an attempt to fight back against the various tactics used by the Republicans (primarily) to stop Democratic voters from voting.**

**Everything in that Act is, obviously, anathema to the authors of 2025, and that means opposing any and every part of it.**

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There are numerous other changes that should be considered in FECA and the FEC's regulations. The overly restrictive limits on the ability of party committees to coordinate with

their candidates, for example, violates associational rights and unjustifiably interferes with the very purpose of political parties: to elect their candidates.

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**So they want to increase the ability of campaigns to coordinate with candidates, want to keep Citizens United untouched, and, later, increase campaign contribution limits and index them to inflation.**

**Seems like what they want is to hand corporations more chance to be the primary voters.**

**That's it for that section. Next up -- The Federal Trade Commission!**

**This section begins with a generalized description of the FTC and its work in, most importantly, enforcing anti-trust activities. At first, this sounds fairly even-handed, compared to most of what we've seen thus far, but if we go down a few pages we find the good ol' Heritage Foundation music is still playing its same old tunes...**

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Beyond antitrust injury, we are witnessing in today's markets the use of economic power—often market and perhaps even monopoly power—to undermine democratic institutions and civil society. Practices such as Environmental, Social, and Governance (ESG) requirements on publicly traded corporations and their inclusion in business agreements, the so-called “de-banking” of industries and individuals, and the interference of large internet firms with democratic political discourse undermine liberal democracy, a truly open society, and, indeed, rule of law.

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**Gods forbid companies consider anything other than moneymaking in their operations. It undermines democracy and rule of law!**

**[Bugs Bunny] "Whatta maroon."[/Bugs Bunny]**

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(Quoting Milton Friedman)

[T]here is one and only one social responsibility of business—to use its resources and engage in activities designed to increase its profits so long as it stays in the rules of the game, which is to say, engages in open and free competition, without deception or fraud.<sup>10</sup>

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**This is, of course, a ridiculous statement. This approach is where you get strip-mined counties and poisoned air and land.**

**It is not, unfortunately, a LEGALLY ridiculous statement, because business law has, in fact, reinforced the idea that it's not merely "increase profits", but "provide value for shareholders", and THAT in an increasingly short term.**

**This is why businesses CAN'T actually work for their long-term interest, absent a very unusual set of stockholders; it's the reason for "enshittification", there's literally no**

**mechanism present in business law to allow a company to say "you know, long term we'll serve ourselves AND our customers better by NOT harvesting every ounce of profit from them now."**

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ESG Practices as a Cover for Anticompetitive Activity and Possible Unfair Trade Practices. It has long been suspected, and is now increasingly documented, that corporate social advocacy on issues ranging from “Diversity, Equity, and Inclusion” (DEI) to the “environmental, social, and governance” (ESG) movement also serves to launder corporate reputation and perhaps obtain favorable treatment from government actors. In a recent Senate Judiciary hearing, Senator Josh Hawley asked FTC Chair Lina Khan if the FTC had conditioned merger reviews on ESG or critical race theories adopted by the firms involved. Khan responded by saying that she turned down deals when firms offered social justice policies in return for approving unlawful deals. In response to a similar question from Senator Tom Cotton, Khan responded that firms try to come to the FTC to get out of antitrust liability by offering climate, diversity, or other forms of ESG-type offerings, but that there is no ESG loophole in the antitrust laws.<sup>14</sup> Her comments suggest that there is a movement of firms attempting to use both ESG and DEI as a sort of reputational laundering to avoid enforcement of potentially criminal activity. The FTC should set up an ESG/DEI collusion task force to investigate firms—particularly in private equity—to see if they are using the practice as a means to meet targets, fix prices, or reduce output.

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**Well, yes, it's well known that firms will try any maneuvers to get away with more. Targeting ESG/DEI is, of course, a specific intention of Project 2025. But we get a clearer look at their thought processes here:**

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Cancel Culture, Collusion, and Commerce. As a corollary, businesses that make general offers of service to the public forego profits by refusing to service a lawful activity, i.e., fossil fuel extraction or gun manufacturing, raising similar concerns. When banks or internet platforms refuse customers based on their political or social views (as distinguished from religious views), they forgo profits.

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**This is a LOVELY illustration of the hypocritical mental gymnastics they're going through to justify their one-directional activities. "political or social views (as distinguished from religious views)".**

**How, exactly, do you distinguish those from each other? Indeed, given what we've seen previously, we should probably note that the INTENDED meaning of the above is "(as distinguished from proper evangelical Christian religious views)", because I'm quite sure they'd be pretty twitchy about a company making its choices based on Islam, Buddhism, Wicca, or atheist principles (as they often call atheism a religion).**

**Taken with the prior bits, what they MEAN is that the only political/social values that SHOULD be used to direct corporate behavior are THEIRS. No left-wing ideas need apply.**

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Businesses, particularly those that enjoy certain government privileges or relationships and/or market power, should not replace democratic decision-making with their own judgment on controversial matters.

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**Now, hold on there, guys. Aren't you the same people who like to say that freedom of speech and such applies to businesses? That they are, in effect, people? Well, a person doesn't have to keep his religion or social beliefs out of his decisionmaking. Are you trying to deprive businesses of their rights to express themselves?**

**The remainder of this section discusses other problems, primarily internet/social media related ones -- and while some of the same old biases are still present, there are some actually worthwhile questions asked in the section, for which the author admits there are no clear answers. The problem of social media influence, Google's search engine dominance, psychological and business effects of the Big Tech companies, are definitely real and need to be addressed. I don't think the conservative approach will help, but at least some of them are aware that there are problems.**

**The next, and last (FINALLY!) section is titled "Onward!", and discusses the document as a whole.**

**One VERY IMPORTANT point made straight-out by this section is that -- as many have contended -- Project 2025 is NOT some isolated think-tank exercise, but is a deliberate plan of action THAT DESCENDS DIRECTLY FROM the Reagan era. The first "Mandate for Leadership" -- which is the subtitle of Project 2025 -- was the blueprint for the Reagan era:**

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Candidate, then President-elect, then President Ronald Reagan's "feisty new kid on the conservative block—The Heritage Foundation"—had the answer, and it was Mandate for Leadership.

First published in January 1981, the original Mandate served as a conservative plan of action for the Reagan Administration, providing much of the blueprint for the Reagan Revolution. It contained more than 2,000 detailed, actionable policy recommendations to move the federal government in a conservative direction.

The recommendations ranged from internal bureaucratic reorganizations to plans to implement specific, fundamental changes in every imaginable policy area— from tax and regulatory reform to strengthening national defense to reforming social programs. All were carefully crafted, vetted, and pieced together.

On January 21, 1981, at the first meeting of his Cabinet, President Reagan distributed copies of Mandate, and many of the study's authors were recruited into the Administration to implement its recommendations.

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**The author of this section was involved in that very first version, so the continuity and intentionality of this document with policy enacted even FORTY YEARS AGO is conscious and personal. This is PART OF A PROCESS. Trump \*himself\* is an aberration, but he is one that the Heritage Foundation's approach USES -- he can be, and has been, fit into their program as the loud and obvious problem that hides the trojan horse -- the Mike Pence and J D Vance -- who can be the actual handler.**

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Soon after President Donald Trump was sworn in, his Administration began to implement major parts of the 2016 Mandate. After his first year in office, the Administration had implemented 64 percent of its policy recommendations.

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**Again, this is an unambiguous statement of just how Project 2025 is not some airy-fairy set of handwavy ideas, but deliberate policy. Its predecessor was used by and enacted by Trump and his cronies. This one will be enacted by any conservative President they can get into office.**

**UNDERSTAND THIS. This document is \*a game plan\*. All the ridiculously terrible things it talks about doing, the next Conservative President WILL DO.**

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For example, they must rein in the Environmental Protection Agency, which declared backyard streams navigable waterways that then fall under its authority. They must rein in the Internal Revenue Service, including its 87,000 new employees hired to pick through every detail of what Americans make and how they spend their money. They must rein in agencies such as the Occupational Safety and Health Administration, which the Biden Administration weaponized to attempt to force COVID-19 vaccine mandates on 84 million Americans through their workplaces.

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**Since this is a summary chapter, it's nicely compressing the lunacy into concentrated chunks of delusion and paranoia. (as though COVID-19 vaccination is somehow different from the other mandated vaccinations we already get, for instance)**

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That's why today, Heritage President Kevin Roberts, Project 2025 Director Paul Dans, the whole Heritage team, more than 50 organizations, and more than 360 experts from throughout the conservative movement have come together to continue the Mandate for Leadership tradition of creating policy solutions to solve the biggest issues facing America—solutions based on the core principles of free enterprise, limited government, individual freedom, traditional American values, and a strong national defense.

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**Remember back when I was spitballing the cost of this thing? Look above. I was WAAAAAY too conservative (ha!) in my estimate. This is the Heritage Foundation's biggest single priority, and it was done with a vast amount of help. I would be willing to**

bet that Project 2025 represents something around fifteen to twenty million dollars or even more in effort.

And with that, I reach the end of this huge document of, well, EVIL. This is the classic banal evil, flavored with some truly repellent apocalyptic evangelical sprinkles, and it is a clear and present danger. Even if we win this election cycle, the next version of this -- Project 2029 or whatever they may call it -- will be waiting in the next.

I STRONGLY RECOMMEND that those who favor an actually free and socially kind society recognize that we need to have the same sweeping plan of action -- to enact policies swiftly, comprehensively, and efficiently to make it difficult, if not impossible, for people like the Heritage Foundation to make their fascist little dream into reality.

**Final Notes:**

The ultra-short version: the afterword (titled "Onward") removes any possible doubt that this is an actual plan of action by people who have done this kind of thing before; the first version of "Mandate for Leadership" was produced for Reagan's presidency, and he took it as a direct policy guide. The same was true for Trump in 2016.

This pleasantly written, carefully researched, exhaustively designed document is a blueprint for the takeover of the USA by a conservative movement directly influenced -- or perhaps infected -- by a frightening and far too widespread, venomous version of evangelical Christianity. The Heritage Foundation likely spent tens of millions of dollars to develop this document, as they give a list of the people and the number of organizations involved in its creation.

Do not underestimate the people pushing this. Do not think that Trump himself cares or even understands what they're going to use him for; he's just a convenient chesspiece, to be used to get their agenda in place. They don't NEED Trump. Vance, Cruz, or more likely someone we haven't heard of yet, will be their next weapon.

If we on the left don't get our shit together and start working for real, they're gonna win eventually.

If you've read this far, thanks for having the patience. Feel free to contact me at [seawasp@sgeinc.com](mailto:seawasp@sgeinc.com) if you have any questions or comments or want to talk about making a professionally-formatted and more readable version.

