

Ms. Brooke Rollins, Secretary
United States Department of Agriculture
U.S. Department of Agriculture
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Submitted via Electronic Mail: reorganization@usda.gov

RE: Comment on Department of Agriculture Reorganization Plan

Dear Secretary Rollins:

August 26, 2025

On behalf of the undersigned organizations, individuals, and our millions of supporters, thank you for the opportunity to provide public comments on the Department of Agriculture's (Department's or USDA's) reorganization plan. Our comments focus exclusively on the reorganization plan as applied to the United States Forest Service (Forest Service or USFS).¹ Given the lack of detail in the reorganization plan, information regarding how it may affect mission critical work of the Forest Service, and engagement with other governments and stakeholders, we suggest that USDA pause its reorganization until this information is available and collaboration is undertaken.

We observe that reorganization of the Forest Service is not a new idea. As part of the Clinton administration's 1995 "Reinventing Government" effort, the General Accounting Office (GAO)² and Congressional Research Service³ found that the agency's budgetary and regional bureaucracy structures resulted in inefficiencies that should be addressed, a conclusion GAO reiterated in 1999⁴ and 2011.⁵ The Bush administration's "Management Agenda" likewise suggested consolidating agency functions government-wide.⁶ In 2017, the Office of the Inspector General examined issues of deferred maintenance of Forest Service facilities and other related issues, and identified ongoing inefficiencies at the regional level.⁷

¹ We note that SM 1078-015 focuses on the functions for which USDA is best known by the general public: providing services and support for America's farmers. While this is understandable, the Forest Service is responsible for the management of 193 million acres of national forests and grasslands and providing outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness uses on those lands. The mission of the Forest Service is therefore very different than the more traditional agricultural-focused agencies in USDA. Thus, any reorganization of the Forest Service should reflect its unique role and contribution in fulfilling the Department's mission.

² U.S. Government Accountability Office, *Forest Service Management: Little Has Changed as a Result of the Fiscal Year 1995 Budget Reforms*, GAO-RCED-99-2 (Washington, D.C.: GAO, December 1998).

³ Congressional Research Service, *The National Performance Review and Other Government Reform Initiatives: An Overview, 1993-2001* (June 4, 2001).

⁴ GAO, *Forest Service Management: Little Has Changed as a Result of the Fiscal Year 1995 Budget Reforms*, GAO/RCED-99-2 (Washington, D.C.: GAO, December 1998).

⁵ U.S. Government Accountability Office, *Forest Service Business Services: Further Actions Needed to Re-examine Centralization Approach and to Better Document Associated Costs*, GAO-11-769 (Washington, D.C.: GAO, Aug. 25, 2011).

⁶ Executive Office of the President, Office of Management and Budget, *The President's Management Agenda: Fiscal Year 2002*.

⁷ United States Department of Agriculture, Office of Inspector General, *Forest Service Deferred Maintenance*, Audit Report 08601-0004-31 (May 2017).

Despite continued scrutiny of the Forest Service’s budget and organizational structures, and the calls for reform, nothing on the scale or scope outlined in SM 1078-015 has ever been undertaken before. While we support efficient governmental procedures and structures that maximize the provision of goods and services to the American people, USDA’s reorganization plan lacks essential details to adequately evaluate whether the proposed restructuring will result in the desired outcomes or instead will compromise the Forest Service’s statutory multiple use mandate and the priorities of this administration. USDA also has not considered governmental and stakeholder input prior to implementation. Consequently, we have significant concerns about the reorganization and offer the suggestions below to achieve alignment with the Four Key Pillars outlined in Secretarial Memorandum 1078-015.

A significant concern is that the reorganization is intended to achieve a large-scale reduction in force through attrition, a goal suggested by the USDA’s own contradictory statements. While Secretary Rollins stated the agency is “not conducting a large-scale workforce reduction,”⁸ a recent press release described the plan as “another step of the Department’s process of reducing its workforce.”⁹

We are concerned that the reorganization will in fact lead to a further reduction of the Forest Service’s workforce and a resulting loss of expertise, knowledge, and productivity. The 2019 unsuccessful reorganization of the Bureau of Land Management (BLM) serves as a cautionary tale: according to news reports and a GAO analysis, that relocation led to an 87% attrition rate among affected headquarters employees (287 out of 328), a 169% increase in vacancies, and subsequent declines in productivity and delays in implementation of policy guidance.¹⁰ Without changes, we are deeply concerned that the current proposal will repeat these same, mission-degrading mistakes.

Need for Public and Governmental Engagement

The United States Forest Service is a public-facing public service organization that manages 193 million acres of publicly-owned natural resources. Staff are spread across the country, and they live and work in the very communities where they steward our nation’s forests. They are active community members, neighbors, leaders, and contribute to the local (often rural) economies in which they live and work. Any discussion of changes to the structure of the agency, as well as where and how the agency implements its core functions, must include the public and governments (Tribal, state, local) it serves and with which it partners.

⁸ U.S. Department of Agriculture, Secretary’s Memorandum 1078-015, Department of Agriculture Reorganization Plan (Washington, D.C.: USDA, July 24, 2025), <https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf>

⁹ U.S. Department of Agriculture, *Secretary Rollins Announces USDA Reorganization, Restoring the Department’s Core Mission of Supporting American Agriculture*, press release, July 24, 2025, <https://www.usda.gov/about-usda/news/press-releases/2025/07/24/secretary-rollins-announces-usda-reorganization-restoring-departments-core-mission-supporting>

¹⁰ U.S. Government Accountability Office, *Bureau of Land Management: Better Workforce Planning and Data Would Help Mitigate the Effects of Recent Staff Vacancies*, GAO-22-104247 (Washington, D.C.: GAO, November 2021), <https://www.gao.gov/assets/720/717653.pdf>; Lisa Rein, *Trump officials moved the jobs of hundreds of Bureau of Land Management staffers out of D.C. More than 87 percent of them quit*, The Washington Post, January 28, 2021, <https://www.washingtonpost.com/climate-environment/2021/01/28/trump-blm-reorganization/>

While we appreciate the current public comment period, seeking unilateral, one-time “input” from those with which the Forest Service interacts is not a dialogue or even engagement. Instead, USDA should take the time to listen to and talk with sovereign Tribal nations, states, and stakeholders *in their communities* to understand how the Forest Service should be restructured to better serve the needs of these communities, which will be different depending on the ecological and socioeconomic setting of each community. At the same time, while there is no “one size fits all” solution to how government can best serve its constituents, some challenges are best addressed at a regional or national level.

Only by engaging in authentic and robust conversation with sovereigns and the public will USDA and the Forest Service understand what services it needs to deliver to society, and the best mechanisms in which to do so. Failing to engage in this dialogue risks further alienating the government from the public it serves.

Elimination of Regional Offices

The reorganization plan directs the Forest Service to eliminate the nine Regional Offices and to consolidate those functions into five “hubs.” As external stakeholders and partners, we acknowledge that structural improvements and efficiencies can and should be made at the Forest Service’s Regional Offices. However, there are essential functions that the regions are both practically and legally best suited to serve.

Practically, the current Regions generally represent ecoregions with similar ecological settings, processes, and stressors that makes a regional perspective and management direction appropriate and relevant. Centralizing administrative functions such as grants, agreements, budget allocation, and research in these geographically-relevant nodes ensures that local variation is reflected in management approaches, partnerships, and agreements.¹¹ Regional specialists also have deep institutional knowledge, having often served as District- and Forest-level specialists in their careers, and they provide invaluable support and perspective to more junior local staff; and it should be a top priority to retain the institutional knowledge of regional specialists. Managers should be located in close proximity to the lands they steward, not hundreds or thousands of miles away in the new hubs in Utah, Colorado, Indiana, Missouri, and North Carolina.

Legally, the Forest Service’s 2012 Planning Rule assigns several functions to the Regional Offices and Foresters, such as the designation of Species of Conservation Concern (36 C.F.R. §§ 219.7(c)(3), 219.9(c)), implementation of broadscale monitoring (36 C.F.R. §§ 219.12(a)(1), (b)(1)-(b)(4), (c)(2)), and resolution of plan and project administrative objections (36 C.F.R. §§ 219.56(e)(1)-(e)(2), 218.3(a)). Additionally, federal statutes assign specific responsibilities to the Regional Foresters that cannot be delegated, such as the pilot authority to appoint Resource Advisory Committee (RAC) members (16 U.S.C. § 7125(g)). The Directives System also include

¹¹ We are very concerned that all legal instruments (grants, agreements, memorandums of agreement, contracts, etc.) between regional offices or Regional Foresters and nonfederal entities will need to be renegotiated because the governmental signatory to those agreements will no longer exist. Given that the Forest Service already had limited staff capacity to process such agreements, it is unclear whether the agency will have sufficient capacity to timely renegotiate every legal instrument between the former nine regions and nonfederal signatories. What is the Department’s plan to address this need?

numerous references to Regional Forester responsibilities (including delegated authorities from the Chief),¹² and removing the Regional Forester position from the Directive system without expressly reassigning each of these duties may render the agency's own Directives incoherent and legally inoperative, stalling forest plan and project implementation.

Importance of Forest Service Research & Research Stations

We are overwhelmingly supportive of Forest Service research and development, and the Research Stations. However, under the Department's reorganization plan, the existing five Research Stations will be consolidated into a single Station in Fort Collins, Colorado. We do not support this transition.

While we agree that some Forest Service research can be consolidated, collaboration between "management" and "research" should be improved and enhanced, and research should be more responsive to partner and collaborator requests for applied research and management techniques to inform proactive stewardship, we do not believe that consolidation of research functions into a single Station is prudent. The existing Research Stations are strategically located in relevant ecological settings that allow each Station to develop an expertise with respect to the management of the lands within their geographic purview. For example, while all research stations are investigating tree vigor and mortality, it is the Pacific Northwest Research Station that is exploring how more frequent heat domes are killing the iconic Douglas-fir in the Cascade range, and the Southern Research Station that is tracking the spread of the Emerald Ash Borer and designing new treatment options: this specialized regionalization makes sense and directly assists the Forest Service in delivering the best available science to managers and users. It should be retained in any modernization of the agency's structure.

Importance of State, Tribal, & Private Forestry Branch

According to the reorganization plan, the Forest Service is directed to "[c]onsolidate tribal relations functions within mission areas and ensure the Office of Tribal Relations delivers all statutorily required tribal relations functions." It is unclear what this will mean in practice, and we remind USDA that it owes a Trust responsibility to Tribes that must be honored with sufficient federal staff with the requisite expertise in Tribal relations to conduct consultation and other obligations on behalf of the federal government. USDA must ensure that the reorganization does not compromise its Treaty and Trust responsibilities.

While it provides scant information regarding how Tribal forestry needs will be addressed in the reorganization, the plan is completely silent on the fate of State and Private forestry within the Forest Service. Like Tribal forestry, State and Private forestry staff provide important services to partners and the public that are essential to achieving the policy priorities of this administration such as State Fire Assistance, Forest Health Monitoring, invasive weed control, development and implementation of Good Neighbor Agreements, Shared Stewardship Agreements, and more.

¹² See, i.e., FSM 1236.1 (Organization), 1410.44a (Controls), 1580.41a (External Relations), 2353.04g (Recreation), 1230 (Wilderness), 2404.15 (Timber Management), 2704.32 (Special Uses), 5140.43 (Fire Management), 5404.15 (Landownership).

USDA should ensure that these branches of the agency are robustly funded and staffed at the conclusion of the proposed reorganization.

Freedom of Information Act (FOIA) Functions

The reorganization plan proposes to “Consolidate Freedom of Information Act and related information management functions within the Office of General Counsel [OGC].” It is unclear what this means. To the extent that the reorganization would eliminate or downsize the local and regional Forest Service staff who currently interface with the public and collect files in their offices, we question whether OGC has the capacity or local knowledge to fulfill this function. It is essential to good government and public trust in government that the Forest Service provide timely and accurate responses to information inquiries, including FOIA requests.

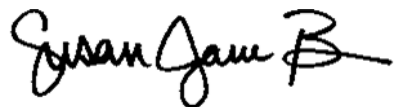
Based on our contemporary experience, the Forest Service already struggles with the timely processing of FOIA requests and responses, even though most Forests and Regions have at least one dedicated FOIA officer. For example, at the end of the last fiscal year, the Forest Service had 796 backlogged requests and 92 backlogged administrative appeals, with pending requests languishing much longer than FOIA allows by statute.¹³ The Forest Service has the equivalent of 47.25 full-time employees working on FOIA requests, whereas OGC has only 2.5. Has USDA examined whether consolidating FOIA functions within OGC will in fact decrease response times, increase efficient processing of FOIA requests, and decrease costs to the government? Even if OGC had sufficient staffing, how will those staff process requests more efficiently than local or regional forest service staff when OGC has little or no familiarity with matters known intimately by local Forest Service staff and does not possess document control of responsive records? How will this new responsibility affect OGC’s ability to respond in a timely fashion to Forest Service requests for legal advice? These questions deserve thoughtful deliberation and resolution before proceeding.

Conclusion

Thank you for your consideration of the above comments. As you move forward in the process to collect public feedback regarding the reorganization plan, we encourage the administration to provide for and schedule a lengthier public comment period, scientific engagement sessions, informational webinars, public listening sessions, Tribal consultation, and opportunities for Tribal, state, and local governments to seek cooperating agency status in the reorganization. While an efficient and responsive federal government is a shared goal for all of us, it is only through transparency, principled consensus building, and the thoughtful incorporation of feedback from the public and governments that the Department can ensure that any reorganization plan is sound, durable, and will allow the Forest Service to continue to provide the significant benefits to rural communities and rural economies that it has for generations.

¹³ See USDA FOIA Annual Report for FY24, available at [USDA FOIA Annual Report - FY 2024](#).

Sincerely,



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