

August 26, 2025

Deputy Secretary Stephen Vaden
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

RE: USDA Opens Public Comment Period on Department Reorganization Plan
Comments submitted electronically to reorganization@usda.gov

Dear Deputy Secretary Vaden:

The signed nonprofit organizations write to you as partners with unique ongoing collaborations with the U.S. Forest Service in the Pacific Northwest Region. Our partnerships with the U.S. Forest Service are built on both formal agreements and strong professional relationships with key public servants. We write to share our on-the-ground perspectives with your team and offer some specific input on the planned reorganization.

We encourage you to consider the network of partner organizations as you determine the future structure and location of U.S. Department of Agriculture functions. Nonprofit partners play key roles in extending the capacity of Forest Service staff. Partnering with nonprofits, Tribes and states is a core way that the agency fulfills its mission. **Secretary Rollins has identified through the secretarial memorandum the importance of efficiency, geographic diversity and long-term sustainability.** We believe that continuing to support robust partnerships is key to achieving all three values. We hope this letter helps clarify ways your team might restructure while continuing to provide outstanding outdoor recreation access in the 16 National Forests, one National Grassland, two National Scenic Areas, two National Volcanic Monuments, and four National Recreation Areas that currently form Region 6 of the U.S. Forest Service.

Region 6 (Washington/Oregon) is a national leader in utilizing the shared stewardship model to efficiently leverage nonprofit organizations to improve natural resource conditions. Our organizations provide extensive visitor education to users through in-person engagement, outdoor education programming, and public communications. We gather information about visitation and resource conditions, assist the agency in planning and project coordination, as well as performing many other functions that increase agency capacity and support public enjoyment of national forest lands. To narrow the scope of this letter, our comments are primarily focused on partners' contributions to on-the-ground trail maintenance. Helping the agency maintain its facilities is a tangible way in which many of our organizations interact with your staff and increase the outputs of the U.S. Forest Service. However, trail maintenance is merely one example of partner contributions. **We ask that leaders think holistically about the contributions of partners to the success of the agency and maintain the conditions**

needed to sustain the partnerships that function as a powerful force multiplier for the department.

Outdoor recreation is vital to our economy. Spending on outdoor recreation accounts for more than 2% of our national gross domestic product. Providing recreational opportunities is a key contribution of the U.S. Forest Service to our economic well-being. Former Forest Service Chief Randy Moore told the Senate Energy and Natural Resources Committee in 2022 that "recreation on National Forest System lands sustains more private sector jobs than any other Forest Service program and provides the greatest economic stimulus for many local communities adjacent to or within the National Forest System." There are more than 24,800 miles of trails on U.S. Forest Service land in Oregon and Washington. Trails are vital to the public's ability to access national forests. They are also used by agency staff including those responding to wildland fires. Trails, like all recreation assets, require maintenance. It takes thousands and thousands of hours of work to maintain our legacy trail system in Region 6, but this work is done at very low cost to the American taxpayer. Locally, one reason that the agency is so efficient and receives such a strong return on investment is that volunteers accomplish much of the trail maintenance. In 2024, about 50% of trail maintenance in Region 6 was accomplished by volunteers (~5,307 miles maintained). We know that the percentage of trail work completed by volunteers will be considerably higher this year.

The large amount of volunteer trail maintenance in Region 6 is a successful and efficient model. Volunteers cannot replace paid staff. Volunteers do not have the same scope of work as professional crews, but volunteers can make important contributions. Our organization's volunteer programs have grown and benefited tremendously from the support of regional office Forest Service personnel. Many trail maintenance organizations maintain regional Challenge Cost Share agreements that allow our organizations to operate on numerous forests. These agreements reduce the administrative burden of coordinating our work and provide the U.S. Forest Service flexibility. When Congress has provided increased support for trails, following natural disasters or during periods when the agency has received project-based funding like the Great American Outdoors Act, the Forest Service has been able to use partnership agreements to quickly implement priority work. Given the broad range of programs managed by the U.S. Department of Agriculture we would like to share two examples of how partners leverage federal dollars to help the Forest Service accomplish more of its important work

- Volunteer trail maintenance creates significant financial savings. In 2024 Washington Trails Association's volunteers contributed 52,161 hours (more than \$1.96 million in donated labor) of trail maintenance on national forest lands and greatly increased the capacity of the Forest Service to maintain its trail system. As part of a decades-long partnership, the Forest Service provides funding to Washington Trails Association that is used to hire trail crew leaders. Each seasonal trail crew leader employed by WTA facilitates about 4,000 hours of in-kind labor by leading volunteer projects on Forest Service trails. This is a highly efficient way for the agency to maintain certain types of recreation assets.
- Region 6 facilitates a saw program with over 15 unique organizations across 3 states, collaborating on saw mentorship, training, and safety for both chainsaw and crosscut

operations. This successful program supports hundreds of certified sawyers throughout Region 6 to respond in the aftermath of wildfire and natural disasters, and annual logouts to maintain trail corridors vital to the region's tourism economy.

Our existing model depends on retaining the Forest Service side of the public-private partnership. We benefit greatly from having regional staff with local knowledge who understand our work and can proactively address the challenges nonprofit partners face. Region 6 recreation staff, such as the regional trails program manager, have the positional authority to unlock opportunities and solve problems while retaining a close connection to the frontline operations. These staff are accessible and possess local knowledge. In many cases, moving Forest Service functions out of the Pacific Northwest would decrease the long-term sustainability of agency operations. For this reason our organizations offer the following input that we hope you will consider as you restructure the department:

Our requests:

- Position a director of recreation and trails in the Pacific Northwest to oversee a team to support the National Forest System's focus on outdoor recreation and the needs of local communities.
- Continue to locate key staff members, such as a knowledgeable trail program lead, in the Pacific Northwest, to support nonprofit partnerships and maintain Region 6's highly developed and successful network of volunteers. As you consider the opportunity cost of relocating positions, please study the cost savings from partnerships as part of your analysis and ensure your new structure maintains the strengths of the existing system.
- Maintain Forest Service positions needed to support strong partnership relationships, including staff able to manage grants and agreements. Locate these staff locally so relevant personnel can maintain an understanding of key partners, forest priorities and local conditions.
- Having a skilled saw program manager who understands the needs of partners supports safe operations and prevents adverse outcomes. We ask that you continue to designate a regional saw program manager who is accessible to partners and able to offer advanced in-person trainings. This person should be tasked with maintaining clarity about the saw program curriculum and ensuring partner groups can maintain critical certifications during the reorganization of the department.
- Region 6 includes two congressionally designated national scenic trails (the Pacific Crest NST and the Pacific Northwest NST). Under the National Trails System Act, the Secretary of Agriculture has responsibility for Forest Service administered national scenic trails. The Secretary has delegated that responsibility to Regional Foresters. Under the current system Regional Offices include national scenic trail administrators to ensure proper management of these congressional designated areas. It is imperative that each national scenic trail continues to have a trail administrator to comply with existing law and policy. To be effective, these trail administrators, who are subject matter experts on their respective trails, should be located as close to their trails and key nonprofit partners as possible.

- We trust that you will identify ways to maintain strong intergovernmental relationships with Tribal nations. Please ensure that decision makers have a deep understanding of the unique histories of the tribes in the Pacific Northwest. Avoid misunderstandings by locating key U.S. Forest Service leaders and their staff in the area and making them available to key stakeholders.

Thank you for considering our input. Our organizations would be happy to talk with your team or provide answers to any questions you might have about our comments. We look forward to continuing to collaborate with the U.S. Department of Agriculture as we work to make sure that the public can enjoy and benefit from national forest lands for generations to come.

Sincerely,

Washington Trails Association

Deschutes Trails Coalition

Evergreen Mountain Bike Alliance

Oregon Trails Coalition

Oregon Equestrian Trails

Siskiyou Mountain Club

Southern Oregon Trail Alliance

The Mountaineers

Trailkeepers of Oregon