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The Western Landowners Alliance advances policies and practices that sustain working lands, connected landscapes and native species.

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August 26, 2025

The Honorable Brooke Rollins  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

*Re: Comment on USDA's reorganization plan, as outlined in Secretary Memorandum 1078-015.*

Dear Secretary Rollins:

The Western Landowners Alliance (WLA) is a landowner-led, nonpartisan organization whose members steward millions of deeded and leased public acres across ten western states. We work to advance the policies and practices that sustain working lands, connected landscapes, and native species. Our members depend on USDA programs and expertise: NRCS and FSA to keep operations economically viable while advancing conservation; Forest Service grazing permits; USDA-APHIS for disease management and animal damage control; Agricultural Research Service science for innovation; and Forest Service firefighters protecting the forest–ranch interface. The USDA is a vital partner, and its continued effectiveness is essential for our members across the rural west.

We support USDA's efforts to seek greater efficiency, but our producer members are concerned about how reorganization will impact their operations. Producers have shared that the greatest barrier to timely service are not simply the number of employees, but the regulatory and procedural burdens like NEPA requirements, the ESA nexus, and other bureaucratic mandates that slow program delivery and make partnerships challenging. Many have observed that reductions in staff and the loss of long-term personnel at local offices make it increasingly difficult to get the work done such as completing environmental reviews, maintaining and monitoring grazing permits, and accessing timely support from FSA and NRCS offices. Our members are worried that further consolidation may make these challenges worse for producers who depend on the USDA as a partner in their daily operations.

Producers have also expressed concern about the USDA's declining workforce. Since January, USDA has lost an estimated 15,000 employees<sup>1</sup>, raising real concerns about who will carry out the Department's critical work. At the same time, escalating wildfire suppression costs consume a disproportionate share of USDA's budget, making it harder to sustain other programs and

<sup>1</sup> Hanrahan, R. (2025, May 6). *More than 15,000 employees leaving USDA*. *Farm Policy News*. Retrieved from <https://farmpolicynews.illinois.edu/2025/05/more-than-15000-employees-leaving-usda/>

services like routine road maintenance, for example. Our members note that salaries, while increased in recent years, have barely kept pace with inflation and remain below private-sector competitors. They worry this will make it even harder for USDA to retain skilled staff with the local knowledge and experience necessary to serve rural communities effectively.

We understand that it takes years for USDA staff to build the trust, relationships, and familiarity with local conditions required to serve productively. As one rancher put it, “we depend on people who know the land and the community, not just the rulebook.” Any reorganization must recognize the value of experience and relationships as much as formal credentials.

WLA has spent many months gathering input from western thought leaders and groups about the USDA and its services. As a long-time USDA partner and with input from these leaders across the west, WLA respectfully offers the Department the following recommendations:

- We ask that the USDA carefully evaluate workforce and community impacts before reducing or eliminating stand-alone regional offices. Any transition should include plans to maintain continuity of services to farmers, ranchers, and rural communities that rely on USDA’s presence.
- Agency culture was noted as is a significant concern. Agencies such as the USFS are often slowed by fear of litigation, which prevents timely or proactive action. Frequent staff turnover—especially among forest supervisors—creates further instability and makes it difficult to maintain consistency across field, regional, and national offices. Our members’ experience is clear: when a solid, stable team of agency staff is in place, they can work effectively within the regulatory system to meet the needs of both permittees and the public. We recommend that USDA prioritize building and retaining stable, experienced local teams and avoid cutting staff whose knowledge and relationships are essential to effective management.
- We recognize that there are communication gaps between USDA leaders, agency leadership, and state and local staff. We welcome USDA’s attempt to improve this through reorganization and encourage the USDA to strengthen bidirectional communication between these entities.
- We also ask that the USDA improve the accessibility and transparency of agency leadership. Often, it has been difficult for producers to access and meet with agency leadership, regardless of their location. We ask that organization charts, areas of responsibility/positions, and contact information for agency and program leadership are accessible to the public. Information sharing should not be cumbersome.
- We ask the USDA to strengthen partnerships with non-federal agencies, such as the states and partner groups like WLA. Support should be directed toward local collaborative efforts, with greater emphasis placed on community-based decision-making. Where USDA agencies identify gaps in their ability to deliver their mission, or where opportunities exist to expand the impact of programs or initiatives beyond what the

agencies can accomplish on their own, partnerships with non-federal agencies and organizations should be created or expanded. Many examples are currently in place to support agriculture and working lands, such as the Good Neighbor Authority, Stewardship Agreements, and the Regional Conservation Partnership Program. These are good models for expansion. However, agencies need clear opportunities, defined processes, and streamlined approvals to support and engage in locally led partnerships.

- Traditional federal hiring processes and timelines are so cumbersome that strong local candidates often accept other opportunities. Producers are concerned that positions critical to supporting land stewardship go unfilled or are staffed by people without local knowledge. Our members encourage USDA to streamline hiring by valuing candidates who live in the communities where positions are based and by recognizing practical experience alongside formal education. They ask that hiring not be slowed during the reorganization but instead made more efficient.
- We ask that the Agricultural Research Service (ARS) capacity not be diminished through proposed elimination of Area Offices or consolidation of Research Stations. ARS's mission of solving agricultural problems at both local and national scales must remain intact. Investments have led to increased timber, livestock, and crop production and improved land and water management for fish and wildlife. We request that these facilities, including experimental forests, ranges, watersheds, and other agricultural experiment stations, and their staff capacity, be maintained.
- We recommend safeguarding the quality, accuracy, and consistency of National Agricultural Statistics Service (NASS) data during consolidation into five USDA hubs. Quality control is essential to effective program administration.
- We suggest prioritizing the continuity and accessibility of Food and Nutrition Service programs during the reduction from seven to five regions, ensuring that states and local communities are not disrupted.
- We question the phase-out of nine Forest Service Regional Offices, particularly given the severity of wildfire risks in the West. Regional capacity remains critical for fire preparedness, response, and recovery. We hope that the proposed USDA consolidation of Research Stations into Fort Collins will not reduce regionally tailored science. Maintaining the Fire Sciences Lab and the Forest Products Lab is essential to wildfire protection and market development.
- The NRCS is vital to delivering cost-share and technical assistance to our producers. Alignment with hub locations must not come at the expense of local and state-level capacity.
- Finally, we would like to maintain existing Animal and Plant Health Inspection Service (APHIS) centers as proposed, while ensuring that broader consolidations do not limit APHIS's ability to respond quickly and effectively to plant and animal health threats.

We appreciate the opportunity to provide comments on this significant proposed reorganization. Our members believe USDA must pursue efficiency, but they urge that eliminating employees

not be viewed as the solution. The greater need is to streamline processes, improve partnerships and communication, and retain good staff. WLA members value USDA as an essential partner, and we urge the Department to ensure that its core mission is not put at risk by reductions in staff and capacity that undermine service delivery.

Sincerely,

*Shaleas Harrison*

Shaleas Harrison  
Policy Manager  
Western Landowners Alliance