



August 26, 2025

Secretary Brooke Rollins  
U.S. Department of Agriculture  
140 Independence Avenue S.W.  
Washington, DC 20250

Re: Stakeholder Comments on Department Reorganization Plan

Dear Secretary Rollins,

The Ruby Valley Strategic Alliance (RVSA) appreciates the opportunity to comment on the U.S. Department of Agriculture's Reorganization Plan as outlined in Secretarial Memorandum 1078-015 (Memorandum).

The Ruby Valley Strategic Alliance is a diverse alliance of individuals and organizations that find common ground through shared conservation values for the greater Ruby landscape in Southwest Montana. In our landscape, working ranches and public lands are inextricably tied; we believe management decisions about both are strengthened through lasting partnerships. We value maintaining and enhancing our working lands, outdoor way of life, wilderness heritage, quiet country, and high-quality recreation experiences. The RVSA works collaboratively on a foundation of trust to respond to threats to our values, advocate for the places and way of life we cherish and promote positive stewardship of Ruby Valley.

#### **CONCERNS REGARDING THE CURRENT REORGANIZATION PLAN**

While we agree that there is value in analyzing USDA structure and bringing agencies closer to the lands they manage, we have concerns regarding the reorganization plan as outlined in Secretarial Memorandum 1078-015 because much of what is being proposed does just the opposite.

#### **Function Consolidations**

Per the Secretarial Memorandum, there will be a consolidation of departments focused on functions like grants, contracting, financial assistance, and communications, among others. It is our impression that this consolidation will happen USDA-wide, resulting in potentially one shop handling all these functions across USDA departments and programs. Examples of ways these functions touch down in our operations and in Southwest Montana, and why we have concerns with this concept, are below:

- Grants and financial assistance programs for ranchers are tools used to invest in operations and can be critical to recovery following natural disasters and drought years. To hear that these

programs will be consolidated further away from the people within FSA and NRCS who we know and work alongside in our communities, and possibly even transferred out of USDA to other federal agencies, is concerning for us. We are also concerned by the idea that one department would be tasked with handling grants for everything from food banks to trail projects and feel this broad-brush approach will set staff up for failure, result in stalled and flawed processes, and poorly meet the needs of the public.

- Communications must be tailored to the audience you are trying to inform, and in western communities, the Forest Service provides critical information regarding public safety during fire season. If communications were pulled farther from the ground and consolidated outside of the Forest Service, we anticipate the messages would be less effective, and slower, leading to increased public safety risks.
- Contracting for fuels projects can be slow and arduous as it is and requires specialty knowledge to do correctly. If this were pulled away from the Forest Service and managed by the Office of the Assistant Secretary for Administration and the Office of the Chief Financial Officer as is suggested in the Memorandum, we fear that forestry expertise will be lacking and will result in even less effective fuels project contracting. Fuels projects would be better implemented if contracting were handled at the line officer level, given that these individuals are responsible for working with local entities and the public on the project. We would rather see authorities regarding contracting and oversight for fuels projects placed closer to the ground, not farther away as this Memorandum suggests. Fuels contracting within the Forest Service has already been centralized to a degree over the last 20 years, which has resulted in clear, documented, and demonstrated data showing this produces vastly less efficient and drastically less effective fuels projects. The very nature of what this reorganization seeks to accomplish will be undermined by this kind of function consolidation, and the success rate for fuels projects will be further damaged. It also feels unreasonable for one shop to handle all contracts for USDA, when that broad scope could require staff to understand everything from timber sales to food inspections.

### **NRCS Snow Survey**

The NRCS Snow Survey and Water Supply Forecasting Program embedded within USDA is extremely important for Southwest Montana where the bulk of our water comes from winter snowfall in our mountains. The data gathered by this team is used for wildfire forecasting, agriculture, river management, avalanche forecasting, and municipal water supply management. Collecting this data requires having people on the ground to manage sensitive SNOTEL equipment high in the mountains during the summer and winter seasons. Per the Memorandum, it appears that the Montana Snow Survey team will be consolidated with other snow survey programs and relocated to Fort Collins or Salt Lake City. We fear moving the snow survey program out of state would mean delays in repairing SNOTEL equipment, as staff would have to travel from Colorado or Utah and would result in less accurate snowpack and water supply information.

### **Forest Supervisor Oversight**

The reorganization proposed for the Forest Service eliminates the 9 Regional offices across the US. These offices oversee myriad things, including management and oversight of each of the National Forest's and their staff. Without these 9 Regions, 154 National Forests will no longer have a place to report too other than directly to the office of the Chief of the Forest Service. Having 154 direct reports seems like an impossible task for the Chief and is concerning. The result that this will have will be less efficiency, less production, significantly less oversight, and an overall inconsistency that will confuse the public and jeopardize the very mission and results so desired at this point.

### **Longterm Forest Health and Partnership Implications**

The Memorandum proposes to consolidate the Rocky Mountain Research Station in Montana with other research stations, and combine them into a single location in Fort Collins, Colorado. The Rocky Mountain Research Station presently plays a vital role in informing the management of National Forests in Montana and across the west. Research conducted in Montana contributes to our national understanding of forest management, wildfire, invasive species, public land grazing, habitat utilization, forest products, and much more. Our forests in Southwest Montana are at a crossroads, where many places are experiencing new pressures and challenges, and new information and tools are required if we are to steward these places for the next generation. If the Rocky Mountain Research Station is shut down in Montana, we fear that stewardship measures will be misguided and long-term forest health will decline.

We also value the partnerships that presently exist through the Rocky Mountain Research Station. With offices in Bozeman and Missoula, it employs 50 USDA employees, and 150 non-USDA employees who work alongside the research station through Montana's two universities, non-profit organizations, state, and tribal governments. Through these partnerships, Montana draws in talented researchers, supports jobs in the public and private sector, and furthers the education of the students in our university systems. If the Research Station were moved out of state, impacts would reach far beyond that of the USDA payroll.

### **RECOMENDATIONS GOING FORWARD**

As previously stated, we see opportunities to streamline USDA operations inclusive of the Forest Service and offer below several ideas on an improved process.

#### **Reorganizing the Forest Service Regional Offices**

As opposed to eliminating an entire tier within the Forest Service and then trying to understand the implications and gaps in agency function, we encourage you to analyze the roles and duties played within the Regional Offices and decipher which of these are critical to the wider function of the Forest Service, which might be amended, shifted, or eliminated, and determine the reorganization structure from there.

The Memorandum currently calls for the elimination of the Regional Office model and reorganization into 5 USDA-wide hubs and does not appear to have a plan for the work that currently takes place within the 9 Forest Service Regional Offices. Tasks and duties handled within the Regions and examples of how they touch down in Southwest Montana are below:

- The Regional Office that oversees Montana currently provides supplemental capacity to forests lacking key staff to complete the NEPA process. This includes supplementing ID teams, providing the latest guidance on litigation issues and regulations, offering specialized expertise in geospatial, engineering, and contracting, and providing guidance on how to implement and respond to new policies. These functions are essential to completing NEPA and getting project work done on the ground and will still be required should the Regional Offices go away.
- For Forest Wide decisions like Forest Plans and Travel Management Plans, the Regional Office steps in to handle and mediate objections from the public. Having a team from the Region with local knowledge of the area is critical to ensure decisions make sense for the landscape and prevents conflict within small communities where the local Forest Service staff may be direct neighbors with the objectors.
- The Regional Offices ensure that each National Forest within the Region operates consistently with one another. This is critical to ensure that policies and guidance are being administered fairly and minimizes litigation risk within each forest itself.
- The Regional Office serves an important role in interfacing with the State government, Montana Fish Wildlife and Parks, and members of Congress. In a state like Montana with a large amount of public land, threatened and endangered species, and many species of interest to the public, the Forest Service plays a key role in managing habitat for these species. This requires close collaboration and communication with state agencies and is currently handled by the Regional Office. This can be a significant amount of work that we do not foresee decreasing.

### **Addition of Missoula, Montana as a USDA Regional Hub**

As currently envisioned in the Memorandum, the Forest Service Regional Office model will be replaced by 5 USDA Regional Hubs in North Carolina, Missouri, Indiana, Colorado, and Utah. While we recognize that these locations may make sense for producers who farm, we are concerned that these hubs are primarily located in places with little to no Forest Service land in the vicinity. This does not work for agriculturalists in Montana, who often rely on public land grazing allotment leases through the Forest Service for their business models. We propose that Missoula, Montana be added as a 6<sup>th</sup> hub city. This hub could focus on Forest Service issues and the management of forested lands and would eliminate the need to shift staff away from the current Forest Service Region One office and the Rocky Mountain Research Station in Missoula.

The addition of a Missoula Hub would also produce cost savings in line with the intended outcome of this reorganization. The hub cities were partly chosen because of their federal locality rate. The rate for Missoula is 16.82% - lower than the rate for any of the 5 cities listed as potential USDA hubs.

### **Ongoing Opportunity for Public Comment**

As you work through this reorganization process, we ask for additional opportunities to provide public input. We are invested deeply in the success of Montana, and many aspects of our livelihoods are

intertwined with programs nested within USDA. As such, we are stakeholders in this process and would appreciate the opportunity for further comment.

## **CONCLUSION**

In closing, we ask that you reevaluate the broad consolidation of functions across USDA, the consolidation of the NRCS Snow Survey team, and think longer term about forest health and partnership implications. We ask you to consider a reorganization plan rooted in a strong analysis of core tasks and duties within Forest Service Regional Offices and the addition of a Missoula, Montana USDA Hub City with a focus on US Forest Service lands and processes.

Above all, we ask that you consider the vast opposition to this plan that you have heard from experienced retirees, local permittees, elected officials, and the American public who depend on these Forest Service lands. The prudent action to take is to stand down on the proposal and engage the very folks that know the consequences of these actions before going any further with a reorganization. There has been much damage already done to the Forest Service and USDA, and it is time to stand down and re-evaluate before going any further.

Thank you for considering our comments.

Sincerely,

### **The Ruby Valley Strategic Alliance:**

John Anderson, Ruby Dell Ranch

Neil Barnosky, Ledford Creek Grazing Association & Silver Spring Ranch

Gary Giem, Warm Springs Grazing Association & Giem Angus Ranch

Les Gilman, Gilman IH Cattle Company

John Helle, Helle Livestock

Donna McDonald, Upper Canyon Ranch Outfitters

Rick Sandru, Ruby Valley Stock Association & Sandru Ranch

Duke Gilman, Madison County Commissioner

Ruby Valley Conservation District

George Trischman, Former Chairman, Montana Public Lands Council

Chad Klinkenborg, Montana Land Reliance

Chris Edgington, MT Trout Unlimited

Dan Durham, Ruby Habitat Foundation

Kayje Booker, Wild Montana

Jim Berkey, The Nature Conservancy

Kathryn Eklund, The Wilderness Society

Sally Schrank, The Greater Yellowstone Coalition