



August 18, 2025

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Secretary Brooke Rollins
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Rollins:

Thank you for the opportunity to comment on USDA's proposed reorganization. We share the Department's goal of creating an organization that is more efficient and effective, and responsive in managing public lands. However, as currently described, the proposal falls short of that goal. Without adjustments, it risks reducing operational capacity, weakening essential relationships, and misaligning resources with mission needs. We offer the following concerns and recommendations as they relate to the USDA Forest Service (FS).

1. Functions of Forest Service Regional Offices

The proposal calls for eliminating FS Regional Offices but does not explain how their essential functions will be maintained. The FS manages over 193 million acres of publicly owned natural resources on 154 National Forests and 20 National Grasslands in 42 states. Regional offices provide specialized expertise—such as timber strike teams, engineering and safety inspections, fire and aviation training, incident management teams, forest planning, and realty services—that cannot be feasibly staffed at each individual forest or centrally in Washington, D.C. Regional Office specialists have deep institutional knowledge and provide invaluable support and perspective to Forest and District level specialists. They should be in close

geographic proximity to the lands they steward, not hundreds or thousands of miles away in new hubs. Eliminating these capabilities without clear replacement strategies would have serious operational consequences and impact on the agency's ability to implement its core functions.

2. Span of Control and Reporting Structure

Currently, 120 Forest Supervisors report to nine Regional Foresters, who in turn report to the Chief. Removing the regional level raises the question of whether these supervisors would become direct reports to the Chief—a scenario that would be unmanageable and counterproductive. Regional Foresters also maintain critical relationships with States, Tribes, Congressional offices, and partner responsibilities the Chief cannot absorb without significant loss of effectiveness. Any alternative structure must preserve these executive-level functions.

3. Functions of Forest Service Research Stations

We are overwhelmingly supportive of Forest Service Research and Development (R&D), and its Research Stations. This proposal calls for consolidating all stand-alone Research Stations into a single location in Fort Collins, Colorado. Forest Service R&D is a world class organization with a rich history and stellar reputation. Research staff across the country work with local field managers, universities and other partners to deliver practical solutions to ensure the FS can meet its mission. Consolidating all research stations into a single location will seriously degrade the agency's ability to deliver essential goods and services to the American people.

4. Role and Location of Proposed Hubs

It appears the proposed “hubs” would primarily relocate staff now based in the Capital region and at the various regional offices. Because the majority of NFS lands lie west of the Rockies, the current hub locations do not adequately serve these areas. This raises concerns about leadership effectiveness, responsiveness, cost efficiency, collaboration, availability for high level briefings, and alignment with the geographic distributions of National Forest System (NFS) lands and R&D units.

5. Recommendations

We urge USDA to:

- Reassess the reorganization plan with input from Congressional committees, stakeholders, and the public.
- Ensure that any changes retain essential regional functions, manageable spans of control, and strong external relationships.
- Align hub locations with the geographic reality of National Forest System lands and Research Station locations.
- Ensure that the reorganization plan will allow the Forest Service to continue to provide significant benefits to rural communities and rural economies as it has for generations.
- Analyze past reorganization efforts to avoid repeating mistakes and build on proven successes.

Conclusion

America's national forests and grasslands are an immeasurable treasure—supporting timber, oil and gas, mining, and livestock production, generating over \$1 trillion in annual outdoor

recreation, and supplying drinking water to 60 million Americans. These amazing landscapes are actively managed and protected by Forest Service staff every day.

The Forest Service's organization must be carefully designed to meet its legislatively mandated responsibilities. This is an effort worth taking the time to get right. The plan lacks detail and information regarding how it may affect mission critical work, and the engagement with other governments and stakeholders. NAFSR stands ready to share our experience and insights to help design a structure that truly improves efficiency and public service delivery.

Sincerely,

Steve Ellis

Steve Ellis, Chair
National Association of Forest Service Retirees