



August 20, 2025

Ms. Brooke Rollins, Secretary
United States Department of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Submitted via electronic mail: reorganization@usda.gov

RE: Comment on USDA Reorganization Plan for USFS

Dear Secretary Rollins:

On behalf of the New Mexico Wilderness Alliance (“New Mexico Wild”), thank you for the opportunity to provide public comments on reorganization plan proposed by the United States Department of Agriculture (USDA). New Mexico Wild is a nonprofit 501(c)(3) grassroots organization dedicated to the protection, restoration, and continued enjoyment of New Mexico’s wildlands and wilderness areas. Founded in 1997, we achieve our mission through administrative protection, federal wilderness designation, and ongoing stewardship. We represent thousands of individual members from all corners of New Mexico and across the nation who care deeply about the management of our National Forest System lands.

Our comments below focus exclusively on the reorganization plan as applied to the United States Forest Service (“USFS” or “Forest Service”).

A. USDA Should Provide More Information and Conduct More Stakeholder Engagement Before Moving Forward with Any Reorganization Plans.

As a preliminary matter, we are concerned about the lack of detail in the reorganization plan, as set forth in Secretarial Memorandum SM 1078-015. To fully evaluate the proposal, the public needs comprehensive information about how the plan may affect the Forest Service’s mission-critical work. We urge USDA to amplify its engagement with other governments, stakeholders, and the public before moving forward. USDA should pause its reorganization until USDA has provided this information and undertaken stakeholder engagement.

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B. The Regional Offices Play a Critically Important Role in the USFS Decision-making Process and Organizational Structure.

First, based on the information available to the public at this time, New Mexico Wild strongly opposes the plan to eliminate the U.S. Forest Service’s nine (9) Regional Offices and shutter the institution’s research facilities. The Regional Offices play a vital role in the agency effectively and efficiently implementing its multiple use mission. In addition to timber harvest, grazing, and resource extraction, the Forest Service manages wildland firefighting efforts, the country’s largest sources of drinking water, important fish and wildlife habitat, traditional cultural landscapes, historical and archaeological resources, and unparalleled recreation opportunities. New Mexicans depend on these essential values and services and want to see our public lands managed for the public good, for the benefit of current and future generations.

The Forest Service’s Regional Offices play an essential role in the department’s organizational structure. Many Regional Office staff have years of experience at the District and Forest level, and/or specialized training. Many of these staff have narrow roles (e.g., Regional Wilderness Program Manager, Threatened and Endangered Species Program Manager) that allow them to provide field units with expert advice related to controversial management challenges and/or complex legal, regulatory, and policy requirements and tradeoffs. By providing assistance to and oversight of field units, staff at the Regional Offices help to facilitate defensible decisions at the field level.

The Regional Foresters have been delegated decision-making authority in the 2012 Planning Rule, as well as various Forest Service Manual chapters for decisions that are typically controversial or complex, for instance for the use of motorized equipment in federally designated wilderness. Reserving these particularly complex decisions for the Regional Forester ensures for appropriate engagement of subject matter experts in the Regional Office. This structure ensures that decisions are better aligned with legal, regulatory, and policy requirements that field-level staff may not fully understand, due to their typically broad scope of duties and responsibilities.

Removing the Regional Forester position from the planning rule and directive system without expressly reassigning each of these duties will render the agency’s procedures incoherent and legally inoperative, stalling forest plan and project implementation. Additionally, abolishing the Forest Service Regional Offices will result in the loss of decision-making authority that has been strategically delegated to the Regional Foresters as well as opportunities to engage with staff who have subject matter expertise that is narrow but deep. Decisions made at the District and Forest levels will become

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less consistent, and more of these decisions will violate legal, regulatory, or policy requirements. If the integrity of decisions decrease, litigation and administrative challenges will increase, with a commensurate slowdown in implementation of management activities and a reduction in the agency’s ability to manage the national forests effectively and efficiently on behalf of the American people.

C. Forest Service Research and Research Stations Serve the American Public.

Second, New Mexico Wild strongly supports the research and development work conducted by the Forest Service and the existing Forest Service Research Stations. We oppose the USDA proposal to consolidate the existing five (5) Research Stations into a single Station in Fort Collins, Colorado. 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. We urge USDA to retain localized knowledge and ecosystem-based research in any modernization of USDA structure.

D. The Proposed Reduction in the USDA Workforce Is Short-sighted and Contrary to the Public Interest.

Finally, we are concerned by USDA’s statement that the reorganization will help the agency achieve “another step of the Department’s process of reducing its workforce.” The proposed reorganization comes at a time when the Administration has demanded a 25% increase in logging on National Forest System lands while proposing a budget that will gut the federal forest workforce — potentially cutting 90 percent of wildland fire management staff and 70 percent of national forest system staff, based on analysis by the Washington Post.¹ We are dismayed that the reorganization proposal is just one of many strategies being employed to achieve a large-scale decimation of the federal

¹ Merrill, Jeremy B. et al. “The White House’s plan to downsize the federal government, in charts.” Washington Post, July 16, 2025, available at <https://www.washingtonpost.com/politics/interactive/2025/white-house-budget-federal-government/>.



workforce, and not a good faith effort to increase government efficiency. These reckless actions place New Mexico's communities, sovereign Tribal nations, wildlife, public lands, cultural resources, and drinking water supply in danger.

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. As a federal agency managing critically important natural and cultural resources on behalf of all Americans, the USFS should strive for transparency, principled consensus building, and the thoughtful incorporation of input from all interested stakeholders.

New Mexico Wild is committed to continuing our relationship with the USFS in New Mexico, and we look forward to opportunities to help ensure that any reorganization plan is sound, durable, and will allow the Forest Service to continue to provide significant benefits to New Mexico's communities and economies.

Sincerely,

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