



August 26, 2025

U.S. Department of Agriculture
Attn: USDA Reorganization Plan Comments
reorganization@usda.gov

SUBMITTED VIA EMAIL

Re: Runners for Public Lands Comments on USDA Department Reorganization Plan

Dear Secretary Rollins and Deputy Secretary Vaden:

Runners for Public Lands (RPL) appreciates the opportunity to comment on the U.S. Department of Agriculture's (USDA) Department Reorganization Plan announced on August 1, 2025. Our nonprofit represents runners across the United States who care deeply about conserving public lands and ensuring equitable access to healthy, runnable landscapes. RPL empowers runners to protect public lands and expand access to nature for all by, in part, working closely with U.S. Forest Service (USFS) staff to plan trail stewardship, support volunteer programs, and secure special-use permits for community running events.

The USDA's July 24, 2025, Reorganization Plan (SM 1078-015) would significantly weaken the Department's ability to protect lands, respond to wildfires, and serve rural communities. By consolidating nine Forest Service regional offices, closing research stations, and centralizing key functions far from the places they manage, USDA risks eroding local expertise, diminishing accountability, and repeating the damaging staff losses seen in past federal relocations. At a time of worsening wildfire seasons and urgent climate challenges, the Department should be expanding capacity in the field, not dismantling it.

While we respect USDA's goal of improving efficiency and increasing geographic diversity in staffing, we have serious concerns that the proposed reorganization is unrealistic given the Forest Service's current workload and staffing shortfalls. This plan risks weakening the agency's ability to address some of the most pressing challenges facing our national forests—including climate-driven wildfires, recreation infrastructure maintenance, and equitable public access.

1. Risk to On-the-Ground Capacity and Local Expertise

Phasing out all nine regional offices, consolidating research stations to Fort Collins, and relocating approximately 2,600 Washington-based positions to five hubs represents a massive structural shift. At a time when USFS is already struggling to fill vacancies in recreation, fire, and resource management roles, this reorganization risks further attrition and loss of institutional knowledge.

For example, many Forest Service trails require careful seasonal management, erosion control, and coordination with ski resorts and county trail crews. Losing regional recreation specialists could delay approvals for maintenance and reroutes. Similarly, many USFS trails need frequent repairs after seasonal flooding; these projects often require regional-level engineering and environmental compliance expertise.

Recommendation: The Forest Service should maintain and expand regional technical assistance teams for recreation, wilderness, and fire management. These teams—modeled on existing specialized units like the Forest Service’s Remote Sensing Applications Center in Salt Lake City, UT, and the Southern Research Station in Asheville, NC—would provide direct, hands-on support to forest and district offices and preserve access to subject-matter experts and maintain continuity of service.

2. Negative Impacts on Recreation Access and Stewardship

Community trail races and volunteer stewardship days depend on timely, predictable permitting and coordination with local USFS staff and regional experts. Shifting permit processing to distant hubs without increasing field capacity is likely to delay projects, defer trail maintenance, and reduce the number of events that can be approved.

For example, many large ultra-trail running races, such as the Wasatch Front 100 Mile Endurance Run (Uinta-Wasatch-Cache National Forest), rely on multi-district permits and careful environmental review to manage aid stations, waste removal, and wildlife impacts. For complex events, local district staff may not have the expertise necessary to execute a permit in a timely manner, and rely on regional technical Special Uses experts, often with decades of experience in the field, to guide them through the permit processing system. Other permitted races depend on USFS district staff to coordinate with the race director and volunteer trail crews each year for snow damage repairs and course clearing. When permit approvals slow, small rural communities that rely on trail tourism lose both economic benefits and the social value of public events. Deferred maintenance also leads to unsafe conditions and degraded resources—undermining the public’s trust in the agency. Regional staff commonly provide technical support and capacity to forest and district staff to complete these necessary tasks.

Recommendation: Expand recreation e-permitting systems as soon as possible and set clear national processing timelines. Require annual public reporting on permit backlogs and maintenance metrics.

3. Weakened Wildfire and Climate Response

USFS fire management is already stretched thin responding to longer fire seasons and more severe wildfires. Centralizing staff and reducing regional coordination capacity will make it harder to respond rapidly to wildfire incidents that threaten trail corridors and rural communities. For example, following the 2022 Mosquito Fire that burned 16 miles of the famous Western States Trail—home to the Western States 100 Endurance Run—the Tahoe National Forest announced that the Western States Trail from Michigan Bluff to Last Chance Township would remain closed through 2023, citing lingering burn-scar hazards. In response, the USFS Pacific Southwest Regional Office (Region 5) provided critical coordination and approvals for the post-fire programs and resources that enabled the on-the-ground work such as hazard tree removal, erosion control and tread restoration to mitigate risks from rain and runoff. In so doing, the Region 5 Office was responsible for speeding the process of unlocking emergency funding, and providing technical staff and approvals so the Tahoe/Eldorado forests could lift the closures in time for the 2023 race season.

Recommendation: Prioritize maintaining or increasing regional fire and restoration planning capacity and publicly commit to and invest in wildfire readiness.

4. Unrealistic Timeline and Lack of Field-First Safeguards and Lessons from Past Federal Relocations

The plan’s aggressive one-year timeline for closing regional offices and relocating staff does not appear feasible without disrupting essential services. Past federal relocations have resulted in significant staff losses, reduced productivity, and multi-year recovery periods. Implementing such changes while simultaneously meeting wildfire, recreation, and climate resilience goals is unrealistic without substantial additional resources.

The plan echoes past federal relocations that resulted in severe staff losses, diminished institutional knowledge, and multi-year recovery periods. For example, when USDA relocated the Economic Research Service and the National Institute of Food and Agriculture out of Washington, D.C., nearly 75% of affected employees left rather than move. GAO later concluded that these actions “significantly reduced capacity, delayed research, and weakened stakeholder relationships” (GAO-20-425).¹ Similarly, USDA’s Inspector General has warned that large-scale reorganizations often create years of disruption before efficiency gains are realized.²

Recommendation: The Forest Service should pause implementation of this reorganization plan and conduct an extended public comment period to ensure that trail runners and public land users of all kinds can be heard and that the agency is making informed decisions about one of the country’s most important land management agencies. A rushed implementation of this plan threatens recreation access, fire readiness, and resource management.

Conclusion

The trails and landscapes runners cherish—from the White Mountain National Forest in New Hampshire to the Cleveland National Forest in southern California—depend on a Forest Service organization that is both efficient and deeply connected to local communities. Without adjustments, this reorganization plan risks slowing or halting essential work to maintain trails, process permits, and protect landscapes from wildfire and climate impacts. The USDA and USFS should pause and reconsider the plan so that the agency is strengthened—not weakened—and that local capacity, field expertise, recreation access, wildfire readiness, and ecological stewardship remain core priorities.

Rural communities, farmers, recreation interests, and conservation partners deserve a USDA that is closer to the land, not further away. We urge the Department to suspend implementation of SM 1078-015 until it can demonstrate that these changes will not compromise wildfire preparedness, rural services, recreation access, and the Department’s essential mission of safeguarding

¹ U.S. Government Accountability Office (GAO), *Agricultural Research: USDA’s Relocations of ERS and NIFA* (GAO-20-425, Mar. 2020).

² USDA Office of Inspector General (OIG), *Top Management Challenges for USDA FY 2020* (Oct. 2019).

America's lands and communities.

Thank you for considering these comments. Runners for Public Lands stands ready to work with USDA leadership to ensure that any reorganization strengthens, rather than undermines, the Department's effectiveness.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen Baker".

Kathleen Baker
Executive Director
Runners for Public Lands

Runners for Public Lands is a 501(c)(3) nonprofit dedicated to protecting public lands and expanding access to nature. Our mission is to empower runners to protect public lands and expand access to nature for all. Our vision is a world in which everyone has access to healthy, runnable landscapes.