



STATE OF WASHINGTON
— OFFICE OF GOVERNOR BOB FERGUSON —

September 2, 2025

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

Subject: Washington State Comment Regarding Proposed USDA Reorganization and Potential Impact on Washington State's Agricultural, Environmental, and Public Health Priorities

Dear Secretary Rollins:

Thank you for the opportunity to allow public comment on your reorganization proposal for the United States Department of Agriculture (USDA).

On behalf of the state of Washington, I write to express deep concerns to the proposed reorganization of the U.S. Department of Agriculture and the potential adverse effects that staff relocations and regional office closures will have on Washington state agencies. In Washington, several state agencies have strong regionalization models in place to ensure that state employees are closer to the communities and constituents they serve. This was done through careful planning, communication and consideration for proactive service delivery.

While I support carefully targeted efforts and approaches to modernize and evaluate agency inefficiencies, the lack of detail concerning the proposed changes to USDA, the relocation of regional offices, and the restructuring of responsibilities threaten to disrupt critical programs and state-federal coordination. The lack of details in this proposal along with the ongoing disruptions in federal funding and program cancellations have led to immense confusion and concerns around long-term planning, organization and partnership.

There was no consultation with states, Tribes, producers, or Congressional members prior to the announcement of this new proposal. A prior United States Government Accountability Office report found that a previous decision to move two USDA government bodies (the National Institute of Food and Agriculture and the Economic Research Service) from Washington, D.C. to Kansas City, Missouri in 2019 resulted in service disruptions and that the decision lacked high quality analysis, transparency and evidence-based policymaking. It is unclear what assurances USDA leadership is providing to state agencies and the public that the same will not happen in the current proposal to move, for example, USDA's Food and Nutrition Service (FNS) Office from the D.C. Metro area, while eliminating two regional offices, one of which serves Washington state.

I am including comments from the Washington State Department of Agriculture, the Washington State Department of Health, the Washington State Department of Fish and Wildlife, and the Washington State Conservation Commission for your consideration.

Secretary Collins
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These agencies have provided detailed comments outlining how this reorganization may affect Washington's agricultural, environmental and public health priorities. We urge you to extend the comment period and to share these comments with the public, provide more detail on the reorganization plan, and consider revising the proposed changes to ensure the continued effectiveness of USDA programs that are crucial to the well-being of our communities.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Ferguson", with a long horizontal flourish extending to the right.

Bob Ferguson
Governor

Enclosures:

- Comments from the Washington State Department of Agriculture (WSDA)
- Comments from the Washington State Department of Health (DOH)
- Comments from the Washington State Department of Fish and Wildlife (WDFW)
- Comments from the Washington State Conservation Commission (SCC)



STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE
P.O. Box 42560 • Olympia, Washington 98501 • (360) 902-1800

August 26, 2025

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

**Re: Request for Comment on Department of Agriculture Reorganization Plan Secretary
Memorandum SM 1078-015**

Dear Secretary Rollins,

Thank you for the opportunity to comment on the U.S. Department of Agriculture's (USDA) reorganization plan. Since details of the plan are not currently available, we have questions regarding how continuity of operations will be ensured, particularly during the transition period. Effective communication between regional offices and headquarters and uniform application of directives, policies, and procedures region by region will be essential.

It will also be important that all regional offices have somewhat equivalent or similar resources and capabilities to adequately support all states and territories within each region.

Thank you again for the opportunity to provide comments on the USDA's reorganization plan.

Sincerely,

Derek I. Sandison
Director



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

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August 26, 2025

Brooke L. Rollins
U.S. Secretary of Agriculture
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Re: Secretary Memorandum [[SM 1078-015](#)] reorganization plan regarding efficiency, geographic diversity, and long-term sustainability of the U.S. Department of Agriculture (USDA).

Dear Secretary Rollins:

The Washington State Department of Health (DOH) appreciates the opportunity to comment on the reorganization of the U.S. Department of Agriculture (USDA) as outlined in Secretary Rollins' Memorandum [[SM 1078-015](#)] published July 24, 2025.

DOH operates the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) program in Washington State, and serves 206,980 participants in all counties in our state. WIC supports families with healthy foods, nutrition education, infant feeding and breastfeeding support so that young children can thrive. WIC has been one of the most successful nutrition intervention programs in the nation. It not only saves lives of infants, children and pregnant women but also saves our nation healthcare costs. Parents trust and turn to WIC based on its long record of improving health outcomes for babies and young children, which is rooted in a science-based process and expert advice from WIC counselors that prioritizes consumption of healthy foods.

Food and Nutrition Service (FNS) implements the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), one of the most effective public health programs in our country. WIC has been a cornerstone of US efforts to reduce infant mortality and improve infant and maternal health outcomes for over 50 years. Disruptions to FNS will significantly impact WIC's ability to continue serving families and provide vital nutrition for low-income families at nutritional risk.

DOH has serious concerns with the plan outlined in the Secretary's Memorandum to relocate FNS out of the DC metro area and eliminate two regional FNS offices, one of which is the Western Region that serves Washington State. DOH anticipates these changes will result in loss

of staff who have institutional knowledge and experience that is vital to WIC program services. WIC is a science-based nutrition program which has historically been supported by expert level nutrition professionals at FNS who are key to maintaining the current quality of the program. Staff reductions will create challenges maintaining the current level of WIC services.

Part of the proposal's justification for closing offices and creating five new "hubs" is to bring USDA's work closer to impacted communities. However, California, home of the current Western Region office, is ranked as one of the top 2 states for agriculture production, whereas Colorado, where the closest proposed hub will be located, is ranked as 23 for agriculture production. DOH anticipates the proposed changes would cause more severe disruptions to WIC operations than we are already seeing. This proposed reorganization will lead to loss of experienced public servants at FNS who do the vital work that enables WIC to help families put healthy food on the table.

We urge you to reconsider this reorganization so that vital services for the WIC program are not disrupted.

Sincerely,



Dennis E. Worsham
Secretary of Health
Washington State Department of Health

cc: Micheal Ellsworth, Federal Relations Director, DOH
Meghan Jernigan, Federal Relations Deputy Director, DOH
Kristin Peterson, Chief, Office of Policy, Planning & Evaluation, DOH
Michele Roberts, Assistant Secretary, Prevention and Community Health, DOH
Jessica Todorovich, Chief of Staff, Office of the Secretary, DOH
Brittany Tybo, Director, Office of Nutrition Services, DOH



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street, Olympia, WA

August 27, 2025

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

**Re: Request for Comment on Department of Agriculture Reorganization Plan Secretary
Memorandum SM 1078-015**

Dear Secretary Rollins,

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to comment on the U.S. Department of Agriculture's (USDA) Reorganization Plan. Since details of the plan are not currently available, we have questions regarding how continuity of operations will be ensured, particularly during the transition period. The proposed plan does not provide enough detail, specificity, or clarity on the reorganization plan, or how it will impact services at the state and local level for us to make a comment on without speculation. The lack of detail and the potential incremental nature of the rollout make it very hard to make a definitive statement about how the proposed changes would be beneficial or detrimental to services.

The reorganization plan offers no timeline for reorganization and does not demonstrate how the proposed changes will benefit the farmers and ranchers that you serve. It is estimated that USDA has lost more than 16,000 employees since the beginning of the year and the relocation of Washington DC staff is likely to exacerbate gaps in service to these customers, as it did with previous relocations of USDA offices. Reductions of staff impact services at every level of the organization. WDFW is concerned about continued staffing cuts and the ongoing hiring freeze that keeps state and local offices from filling positions that are vitally needed to serve partners and clients. We are also concerned about office closures, the loss of institutional knowledge, lower output and longer wait times for services that often come with reorganization changes like these.

Additionally, if the plan is implemented, the elimination of the U.S. Forest Service Region 6 Regional Office in Portland would lead to disruptions in continuity of service and create uncertainty in delegation of authority. Currently, the Regional Office provides oversight and signatory authority for agreements as well as technical support in wildlife, fisheries, engineering, NEPA compliance, and the Northwest Forest Plan (NWFP). This will also lead to delays to cross-boundary forest health work such as Good Neighbor Authority (GNA) and Shared Stewardship. WDFW's work with USFS through GNA, Shared

Stewardship, and multiple MOUs relies on timely agreement processing. We recommend that the USDA publish a crosswalk of authorities for agreements, compliance, and interagency coordination in Washington to ensure continuity.

The NWFP depends on long-term monitoring and region-specific science provided by the Pacific Northeast Research Station (PNWRS). Consolidation of this and other Research Stations will lead to weakening the adaptive management framework the NWFP relies on, undermining interagency and state partnerships critical to its success. USDA should maintain a strong, regionally based PNWRS presence, guarantee uninterrupted funding for NWFP monitoring, and ensure scientific leadership remains located in the Pacific Northwest.

Should the reorganization plan proceed, effective communication between regional offices and headquarters and uniform application of directives, policies, and procedures across regions will be essential. It will also be important that all regional offices have somewhat equivalent or similar resources and capabilities to adequately support all states and territories within each region.

We value our USDA partners and the services they provide to achieve our shared goals. We hope to have the opportunity to comment in the future on any concrete changes that may reduce or eliminate these services or otherwise place them at risk.

Thank you again for the opportunity to provide comments on the USDA's reorganization plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly Sussewind", with a stylized flourish at the end.

Kelly Sussewind
Director



STATE OF WASHINGTON
CONSERVATION COMMISSION

PO Box 47721 • Olympia, Washington 98504-7721 • (360) 407-6200 • FAX (360) 407-6215

August 25, 2025

Secretary Brooke Rollins
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

RE: Secretary Memorandum [[SM 1078-015](#)] reorganization plan regarding efficiency, geographic diversity, and long-term sustainability of the U.S. Department of Agriculture (USDA).

Secretary Rollins,

The Washington State Conservation Commission appreciates the opportunity to comment on the reorganization of the U.S. Department of Agriculture (USDA) as outlined in Secretary Rollins' Memorandum [[SM 1078-015](#)] published July 24, 2025.

The Washington State Conservation Commission (SCC) coordinates Washington's 45 conservation districts. Conservation districts are local governments established under state law to administer voluntary natural resource management programs at the local level. Districts work with thousands of landowners and producers to help them efficiently manage land and water resources on private and public lands across the state. Conservation districts are the boots on the ground working directly with farmers and ranchers to achieve natural resources goals. As non-regulatory agencies, conservation districts are trusted local partners in communities across the state. SCC and conservation districts work closely with USDA to accomplish our goals. We rely on USDA's science, data, and technical standards to support the implementation of locally led solutions that meet the needs of producers.

As details of the reorganization plan are not yet available, we have questions about how the plan may impact local service delivery and the backend resources necessary for functional state and local offices. As an example, we work closely with the Natural Resources Conservation Service (NRCS). Washington State NRCS is already operating

at less than 65% of 2019 staff levels. Further staffing uncertainty and loss of institutional knowledge may impact our collective efforts to get conservation on the ground.

We urge you to consider the impacts to state offices, continuity of services, and the value of the current partnership model as you further develop the reorganization plan.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Thompson', with a long horizontal stroke extending to the right.

James Thompson
Executive Director
Washington State Conservation Commission