Society for Conservation Biology North America
The North America Section of a global community of conservation professionals

Submitted via email (at reorganization@usda.gov) on 8/22/25.

COMMENT LETTER:

On behalf of the Society for Conservation Biology North America (SCBNA) - part of the global Society for Conservation Biology representing **nearly 3000** members from six global regions - we write in opposition to the proposed **reorganization plan** for the United States Department of Agriculture (USDA).

The USDA's proposed reorganization would relocate 2,600 Washington-area staff to regional offices and close or consolidate research-related facilities, including Agricultural Research Service area offices, Forest Service regional offices, and research stations.[1]

Such consolidation threatens locality-specific, conservation-relevant research (e.g., research into wildfire behavior or species habitat).[2] Additionally, conservation management programs like the CRP or wildfire management also depend on functional local presence; for instance, in their shared video testimonials, 7 retired USFS Chiefs strongly opposed proposed cuts and the transfer of wildfire management to the Department of the Interior, citing the role of regional & district USFS personnel in effective fire management.[3, 4] Without such support, farmers—who are both producers and land stewards—will struggle to sustain practices that protect soil, water, and biodiversity for the future. Taken together, these changes would weaken the USDA's scientific capacity and undermine its conservation and sustainability programs across the country.

The loss of experienced staff is another concern. More than 15,000 USDA employees have already left through retirement or buyouts.[5] In the past, relocations (e.g., Economic Research Service and NIFA) caused up to 75% loss of staff and reduced output.[6] The proposed reorganization risks repeating this pattern, as many experienced scientists and administrators may not relocate or be replaced adequately.

Implementing such a large-scale restructuring with minimal stakeholder or Congressional input undermines both the agency's legitimacy and its long-term effectiveness.[7]

SCBNA opposes the rapid dismantling of USDA's decentralized research and conservation infrastructure. Protecting the integrity of science and the capacity for locality-specific research is important for both agricultural productivity and environmental resilience.[8]

We recommend that USDA officials:

1. Pause or scale back implementation until transparent and comprehensive impact assessments are completed with input from Congress, farmers, USDA and conservation scientists, and other stakeholders;

2. Protect research and conservation programs, especially those that are locally based and community-facing, where continuity and accessibility are what make conservation and land stewardship effective; and
3. Commit to scientific integrity and locally grounded approaches to ensure that conservation research and ecosystem stewardship can continue without disruption.

Sincerely,

Lauren Jonaitis
Vice President of Policy, SCBNA

References:

[1] U.S. Department of Agriculture. *Secretary's Memorandum SM 1078-015: Department of Agriculture Reorganization Plan.* Washington, DC: USDA, July 24, 2025. https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf.

[2] Elsa T. Berthet, Vincent Bretagnolle, and Sabrina Gaba, "Place-based Social-ecological Research Is Crucial for Designing Collective Management of Ecosystem Services," *Ecosystem Services* 55 (March 30, 2022): https://doi.org/10.1016/j.ecoser.2022.101426.

[3] Adam Baumgart-Getz, Linda Stalker Prokopy, and Kristin Floress, "Why Farmers Adopt Best Management Practice in the United States: A Meta-analysis of the Adoption Literature," *Journal of Environmental Management* 96, no. 1 (December 1, 2011): 17–25, https://doi.org/10.1016/j.jenvman.2011.10.006.

[4] Our Common Legacy - @usdaForestService Courtesy @metgroupvideo #publiclands #nationalforests. (2025, July 29). Forest Bridges: The O&C Forest Habitat Project [Video]. YouTube. https://www.youtube.com/watch?v=51wUE4JSv3w

[5] See note 1 above.

[6] Congressional Research Service. *Relocation of the USDA Research Agencies: NIFA and ERS.* By Genevieve K. Croft. In Focus, IF11527. Washington, DC: Congressional Research Service, May 1, 2020.

[7] Jens Newig et al., "Does Stakeholder Participation Improve Environmental Governance? Evidence From a Meta-analysis of 305 Case Studies," Global Environmental Change 82 (June 8, 2023): https://doi.org/10.1016/j.gloenvcha.2023.102705.

[8] Keith Fuglie et al., "RESEARCH, PRODUCTIVITY, AND OUTPUT GROWTH IN U.S. AGRICULTURE," *Journal of Agricultural and Applied Economics* 49, no. 4 (July 19, 2017): 514–54, https://doi.org/10.1017/aae.2017.13; David W. Cash et al., "Knowledge Systems for Sustainable Development," *Proceedings of the National Academy of Sciences* 100, no. 14 (May 30, 2003): 8086–91, https://doi.org/10.1073/pnas.1231332100.