



# U.S. Department of Agriculture Reorganization Plan — IFAI Indian Country Impact Analysis



**2025**

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# Summary

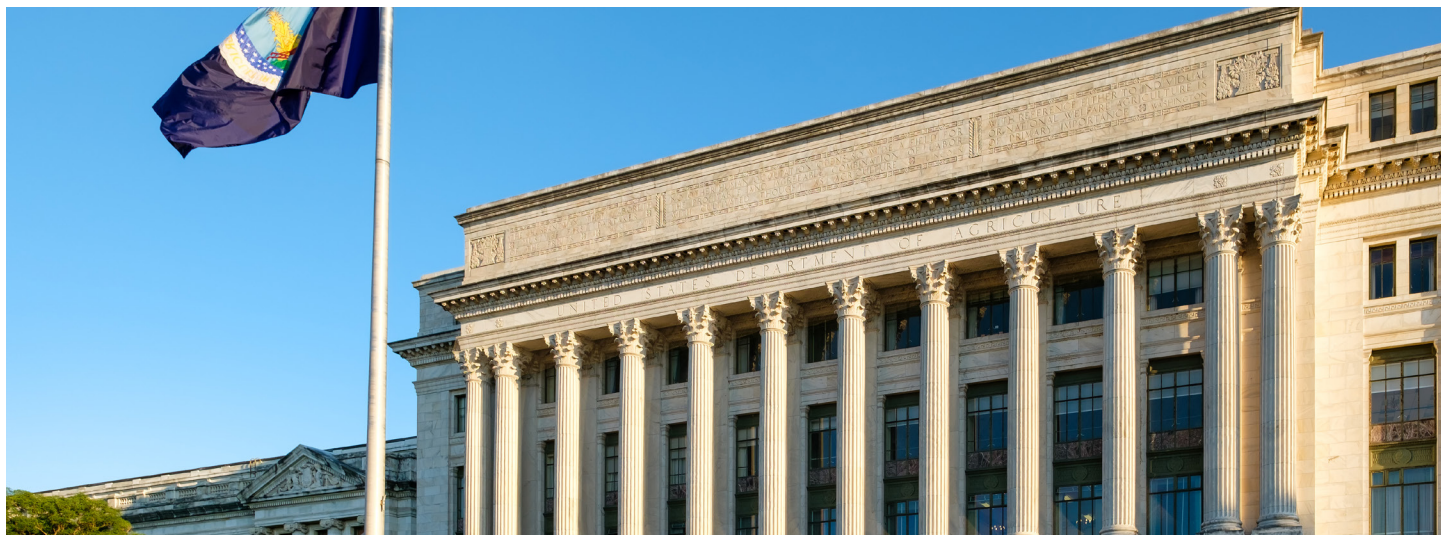
On July 24, 2025, the [U.S. Department of Agriculture](#) (USDA) issued [Secretary Memorandum: SM 1078-015 - Department of Agriculture Reorganization Plan](#) (“the plan”) authorizing a realignment of many existing USDA functions, offices, and locations.<sup>1</sup>

On September 12, 2025, USDA announced it would hold two Tribal consultations on [Oct. 14](#) and [Oct. 16](#). This affirms what a USDA representative committed to during a hearing held on July 30, 2025 with the Committee on Agriculture, Nutrition and Forestry.<sup>2</sup>

[On Friday, August 1](#), USDA announced a 30-day comment period on the proposed reorganization. All stakeholders, including USDA employees, members of Congress, and agricultural and nutrition partners, are encouraged to provide feedback by emailing [reorganization@usda.gov](mailto:reorganization@usda.gov).

The comment period is open through mid-September. While the consultations in mid-Oct. are set, Tribal governments can request consultation themselves. Tribes wishing to request formal Tribal consultation on this plan are encouraged to reach out to the Office of the Secretary directly, via the Office of Tribal Relations. IFAI has provided a template letter for consultation requests [\[here\]](#).

This plan may have significant impacts on Tribal governments, their producers and citizens as well as Tribal-serving USDA functions. Specific details regarding the plan are currently limited to what is specified in the secretarial memo and the July 30 Senate Agriculture Committee hearing and accompanying witness testimony. We provide the following analysis on Indian Country impacts based on the information available as of September 15, 2025. We will update this post with additional information should it become available.



<sup>1</sup> The authority for memorandum issued under the authority of [Reorganization Plan No. 2 of 1953](#) (5 U.S.C. app.; 7 U.S.C. 220 I note) and [The Department of Agriculture Reorganization Act of 1994](#) (Pub. L. 103-354).

<sup>2</sup> Colloquy between Senator Tina Smith (D-MN) and USDA Deputy Secretary Stephen Vaden, Senate Committee on Agriculture, Nutrition, and Forestry, Hearing: “Review of the USDA Reorganization Proposal,” July 30, 2025, <https://www.agriculture.senate.gov/hearings/review-of-the-usda-reorganization-proposal>.





Depending on how USDA chooses to implement this plan, impacts to Indian Country may include:

- Reduced quality and frequency of knowledgeable customer service;
- Slowdown in the release of funding applications, review of funding applications, and disbursement of awarded funds for Tribal producers and Tribal governments across the USDA portfolio; and
- Fewer Tribal consultations and other work that affirms the federal trust responsibility and Tribal sovereignty.





## Physical Relocations of USDA Staff and Infrastructure

Most of the attention has been focused on moving 2,600 USDA staff out of the National Capital Region (NCR), but the plan is broader than that and indicates there will be additional relocation of regional staff around the country across multiple agencies.

It is unclear as currently written how many USDA regional staff will be asked to move. We anticipate that at minimum, the number of employees who are asked to relocate will be 5,088, and likely more.

It is unclear how USDA will retain experienced employees who are asked to relocate.

Most of USDA's employees currently work outside of the National Capital Region (NCR). Only 4.5 percent of USDA staff are located there currently. The plan states that USDA will further reduce its workforce footprint in the NCR from 4,600 to 2,000 employees. These employees will be asked to relocate to one of five regional hubs around the country:

- Raleigh, North Carolina
- Kansas City, Missouri
- Indianapolis, Indiana
- Fort Collins, Colorado
- Salt Lake City, Utah





Some, but not all, USDA agencies have a physical presence in these cities currently. Employees who do not elect to move will most likely leave their agencies.

The memo also states that USDA will “reduce or eliminate stand-alone regional offices and other similar bureaucratic management layers,” and will have these offices “co-located in the hub locations to the greatest extent possible.” This broad language would potentially relocate many more staff than the 2,600 USDA employees slated to move out of the NCR. The plan specifies that the Agricultural Research Service (ARS), National Agricultural Statistics Service (NASS), Food and Nutrition Service (FNS), Forest Service (FS), and Natural Resources Conservation Service (NRCS) will all be closing regional offices and realigning to the five hub locations.

According to the most recent USDA reports, these agencies have the following numbers of full-time field staff:

- ARS has 4,816 full-time employees (FTEs) in the field currently. Most of these FTEs are staffing over 90 ARS regional research centers, which may or may not remain open.<sup>3</sup> Of these individuals, 949 work at the five Area Offices that the memo states will be closed and realigned with the new hub locations, with some exceptions. Presumably, the Fort Collins, Colorado area office will remain open as this is a hub location. It is also possible that the Stoneville, Mississippi office will remain open despite the memo’s directive, based on remarks made by the Deputy Secretary at the hearing held by the Senate Agriculture Committee.<sup>4</sup> Recent statements by Secretary Rollins also indicate a possible concession for a service office in Iowa. The area offices currently employ the following numbers of FTEs:
  - Stoneville, Mississippi: 180
  - Albany, California: 133
  - Fort Collins, Colorado: 102
  - Peoria, Illinois: 121
  - Beltsville, Maryland: 413
- NASS currently has 435 FTEs across its 12 regional offices<sup>5</sup> None of these offices are in a hub location. Based on the memo language, all 435 NASS FTE’s would be asked to relocate. It is unclear what the new NASS regions would be.

3 U.S. Department of Agriculture. Office of Budget and Program Analysis. 2026 USDA Explanatory Notes- Agricultural Research Service. <https://www.usda.gov/sites/default/files/documents/20-2026-CJ-ARS.pdf> at 20-3.

4 Colloquy between Senator Cindy Hyde-Smith (R-MS) and USDA Deputy Secretary Stephen Vaden, Senate Committee on Agriculture, Nutrition, and Forestry, Hearing: “Review of the USDA Reorganization Proposal,” July 30, 2025, <https://www.agriculture.senate.gov/hearings/review-of-the-usda-reorganization-proposal>.

5 U.S. Department of Agriculture. Office of Budget and Program Analysis. 2026 USDA Explanatory Notes- National Agricultural Statistics Service. <https://www.usda.gov/sites/default/files/documents/19-2026-CJ-NASS.pdf> at 19-4.





- FNS has 1,386 FTE's in 7 regional offices.<sup>6</sup> Of these offices, only one—the Denver, CO-based Mountain Plains Regional Office—is geographically proximate to a new hub city. It is unclear if the Denver office would close and relocate sixty-four miles to Fort Collins, or if it would be allowed to remain. Based on the text of the memo, all other offices would close, consolidate to five regions, and employees would be asked to relocate.
  - Robbinsville, New Jersey
  - Chicago, Illinois
  - Denver, Colorado
  - Boston, Massachusetts
  - Atlanta, Georgia
  - Dallas, Texas
  - San Francisco, California
- U.S. Forest Service (USFS) has over 30,000 employees, and also makes more hires seasonally due to the nature of the agency's work.<sup>7</sup> Like most other USDA agencies, the majority of USFS employees are based in the field; only 11% of the agency's personnel costs are spent on personnel in their Washington, D.C., office.<sup>8</sup> The agency also recently further reduced D.C. office space in FY24 by terminating a lease there.<sup>9</sup>
- NRCS: The vast majority of NRCS employees are based in the field. The agency has only 191 FTEs in the NCR, with 11,312 in the field.<sup>10</sup>
  - The memo specifically states that NRCS will realign its regional structure with the five hubs. However, NRCS does not maintain "Regional offices" in the same way that other agencies do. NRCS does have four Regional Conservationists who oversee the work of State Conservationists within their respective regions, but these four individuals are part of the NRCS leadership team and located in the NCR—part of only 191 NRCS employees located there—not in physical regional offices stationed in the West, Central, Northeast, or Southeast NRCS regions.
  - If the memo is suggesting that in realigning NRCS "regions" to the five hub locations, NRCS field staff will be asked to relocate, that will require over 11,000 employees to move and could result in catastrophic staff losses to the agency which would seriously undermine its service to producers and landowners across the country.

It is also unclear if this realignment of NRCS regions will impact the Regional Tribal Conservation Advisory Councils (RTCACs).

6 U.S. Department of Agriculture. Office of Budget and Program Analysis. *2026 USDA Explanatory Notes- Food and Nutrition Service*. <https://www.usda.gov/sites/default/files/documents/34-2026-CJ-FNS.pdf> at 34-6.

7 U.S. Forest Service. Agency Organization. <https://www.fs.usda.gov/about-agency/organization>.

8 U.S. Department of Agriculture. Office of Budget and Program Analysis. *2026 USDA Explanatory Notes- U.S. Forest Service*. <https://www.usda.gov/sites/default/files/documents/nre-fs-fy26-cj-final.pdf> at 29a-27.

9 Id. at 29a-19

10 U.S. Department of Agriculture. Office of Budget and Program Analysis. *2026 USDA Explanatory Notes- Natural Resources Conservation Service*. <https://www.usda.gov/sites/default/files/documents/28-2026-CJ-NRCS.pdf> at 28-10.



Based on these existing field staffing numbers at these agencies, a very conservative estimate would relocate at minimum an additional 2,488 USDA employees from their current regional locations near the producers and landowners they serve to new locations in the five hub cities. We reach this number by adding the number of ARS Area Office Staff (minus the Fort Collins and Stoneville locations), the number of NASS regional staff, and the number of FNS regional staff. We do not have enough information in USDA's plan to calculate the exact number of FS or NRCS employees who will be asked to relocate. However, both of these agencies have significant numbers of field staff (over 41,000 combined), so the total number of USDA employees asked to relocate may be much larger. At minimum, we estimate that 5,088 USDA employees will be asked to relocate (2,600 from the NCR, and a minimum of 2,488 from regional ARS, FNS, and NASS staff).

The agencies listed above are those specifically named in the memo as agencies that will close regional space and relocate to hubs. However, the broad language of the memo does not preclude USDA leadership from making additional closures to other regional offices in other agencies. Other USDA agencies currently maintain regional presences to carry out various essential functions. For example, some of these agencies carry out critical food system and food supply chain management oversight. These functions are significantly important to safeguarding the American food supply and supporting American food businesses, and relocating them could have negative impacts on the American supply chain and economy. The plan does not expressly identify such offices for closure, but the plan's broad language does allow for their movement. USDA has not provided further clarity about these offices.

For administrative support functions – which the memo defines as having “concentrations of human resources staff that support the delivery of critical public safety functions” – the department will maintain existing offices in Albuquerque, New Mexico and Minneapolis, Minnesota. However, in discussions with the Senate, USDA seemed to indicate that at least as regards the Albuquerque location, only some employees will remain in these offices, while others will be asked to relocate.<sup>11</sup> It is unclear what the ratio of employees remaining versus moving will be.

The plan further states that existing USDA critical service centers and laboratory facilities will remain open in:

- St. Louis, Missouri
- Lincoln, Nebraska
- Missoula, Montana

<sup>11</sup> Colloquy between Senator Ben Ray Luján (D-NM) and USDA Deputy Secretary Stephen Vaden, Senate Committee on Agriculture, Nutrition, and Forestry, Hearing: “Review of the USDA Reorganization Proposal,” July 30, 2025, <https://www.agriculture.senate.gov/hearings/review-of-the-usda-reorganization-proposal>.





However, USDA maintains additional laboratory facilities across other agencies, like AMS and FSIS. These are not identified in the memo and it is unclear if they will remain open. In some cases, these labs are utilized for critical food safety testing,<sup>12</sup> and their closure would be detrimental to the health and safety of American families and the American food supply. In other cases, these labs are part of key research and development infrastructure that helps drive American innovation and economic development by reaching agricultural markets. The labs support industry, research institutions, and even the U.S. military, and their closure might represent a national security concern.<sup>13</sup>

### *Closure of Federal buildings in the NCR*

As part of its move away from the NCR, USDA's plan identifies several physical office buildings and laboratory spaces in the NCR that will close and/or be sold. The chart below indicates these properties, as well as the agencies currently located there.

Facility	Status	Address	USDA Agencies Located at Site
<a href="#">Department of Agriculture, South Building</a>	To be vacated	1400 Independence Ave SW, Washington, DC 20250	Main HQ for all USDA Mission Areas
<a href="#">Braddock Place</a>	To be vacated	1320 Braddock Place, Alexandria, VA 22314	Food and Nutrition Service
<a href="#">Beltsville Agricultural Research Center (BARC)</a>	To be eventually vacated	10300 Baltimore Ave, Beltsville, MD 20705	Agricultural Research Service  National Agricultural Library  Animal and Plant Health Inspection Service research labs
<a href="#">George Washington Carver Center</a>	To be sold or transferred	5601 Sunnyside Ave, Beltsville, MD 20705	Agricultural Research Service  National Institute of Food and Agriculture  Office of the Chief Scientist  Office of the Assistant Secretary for Civil Rights

<sup>12</sup> Food Safety Inspection Service. Office of Public Health Science (OPHS). <https://www.fsis.usda.gov/contactus/fsis-offices/office-public-health-science-ophs>.

<sup>13</sup> Agricultural Marketing Service. National Science Laboratories. <https://www.ams.usda.gov/services/lab-testing/nsl>.



## Potential Indian Country Impact of Physical Relocations and Closures

We estimate that a minimum of 2,544 employees will leave USDA due to relocation.

It is still unclear exactly how many USDA staff will be asked to move.

Tribes may experience significant slowdown in funding awards and a decline in customer service as a result of staff losses.

These changes will likely result in fewer employees across USDA mission areas, agencies, and offices, further reducing the availability of staff to support Tribal governments and producers. Past relocation efforts of USDA agency offices have resulted in staff vacancies, lost productivity, and loss of institutional knowledge. For example, USDA relocated the Economic Research Service (ERS) and the National Institute of Food and Agriculture (NIFA) from the NCR to Kansas City, Missouri in 2019. As a result, the agencies lost more than half of their staff, and sustained vacancies in key positions.<sup>14</sup> In relocating, the agencies suffered a decline in productivity.<sup>15</sup> While employee numbers have recovered, most staff are recent hires lacking significant institutional knowledge.<sup>16</sup>

In the Senate Agriculture Committee hearing on July 30, 2025, USDA noted that the department would utilize lessons learned from that 2019 move in relocating staff under the plan to mitigate losses in both staff and knowledge.

14 U.S. Government Accountability Office, Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce, GAO-23-104709 (Washington, D.C.: GAO, 2022), 13, <https://www.gao.gov/assets/d23104709.pdf>.

15 Id., 13.

16 Id., 37.





To date, there is no information within the current plan that would indicate that the expected outcome of this reorganization would be different enough from the 2019 ERS/NIFA move to prevent the same kinds of staffing and knowledge losses from happening here. The breadth of this plan extends well beyond two agencies and, as written, will consolidate existing regions for multiple agencies and attempt to relocate staff away from current duty stations. Absent details of best practices to mitigate negative impacts, the plan as written will likely result in significant staff losses and the loss of institutional knowledge in mission areas and agencies across the department. If the agencies subject to relocation under this plan see the same rate of attrition that ERS/NIFA experienced in their 2019 move, USDA will lose a minimum of 2,544 employees, along with their subject matter expertise. This is a conservative estimate based only on the limited information we have in USDA's plan. This estimate also only assumes a 50% attrition rate, when the ERS/NIFA attrition rate was slightly greater than 50%.

These staff losses will impact Tribal Nations. Where Tribes have established strong working relationships with USDA agency regional staff, they will likely see service disruptions as those regional offices close, and staff are either absorbed into a new regional hub or leave federal service if they cannot relocate. Requests for funding applications for grant and loan funding that Tribes and Tribal producers rely upon from impacted agencies will be slower to be released, slower to be reviewed, and slower to be awarded. Less Departmental expertise also means less understanding of the unique legal circumstances of Tribal-federal relations, putting Tribes once again in the position of needing to build new relationships and educate new federal staff about the trust responsibility and Tribal sovereignty, creating more of a bureaucratic hurdle for Tribes than exists currently.







# Tribal Relations and Governance

## Consolidation of Tribal Relations Functions

The memo notes that all Tribal-related mission area responsibilities will be consolidated inside the Washington D.C.-based Office of Tribal Relations (OTR). It states that the consolidation of these mission areas into OTR will be focused on “all statutorily required Tribal relations functions.” While this may streamline some operations, it raises questions about capacity, visibility, and responsiveness to Tribal governance needs.

Student programs under the [Office of Partnerships and Public Engagement](#) (OPPE) are to be realigned to the Agricultural Research Service, which may affect Tribal youth engagement and internship opportunities.

### Potential Indian Country impact of Tribal Relations and Governance

- Impacts are unclear as currently written
- Moving Tribal-serving employees from their agencies into either mission areas or OTR may impede their ability to appropriately carry out their responsibilities and worsen service to Tribes
- Moving student programs to ARS may result in a slowdown in service provision to Tribes due to the ARS office closures and potential staff losses.

As written, the plan does not specify the scope of duties called to consolidate in all Tribally- statutorily required, relevant mission areas. While enshrined in law, the Office of Tribal Relations’ current team is limited in size and personnel. At many departmental agencies and mission areas with staff in the current regional and county offices, Tribal-focused staff carry out statutorily required work serving Indian Country agriculture production and nutrition programs. OTR plays a vital role in ensuring Tribal Nations have an easily located point of contact with USDA. OTR’s placement within the Office of the Secretary has been recognized by both Tribal leaders and by Congress as an essential expression of USDA’s acknowledgment of the unique government-to-government relationship that USDA has with Tribal Nations.





However, OTR is a relatively small office when viewed against the backdrop of USDA's programs, authorities, and staff numbers as a whole. These programs, authorities and staff numbers are vast, and USDA staff and offices are necessarily spread across the country in order to reach the communities and producers USDA exists to serve. Because of this practical reality, OTR alone cannot be responsible for meeting all of USDA's obligations to Tribes. As a result, Tribal leaders have previously called for more Tribal expertise throughout the Department, embedding Tribal liaisons, Tribal relations and Tribal Affairs staff who have Indian Country experience in all USDA Mission Areas, agencies, and offices, to advise and align each USDA agency with its unique statutory, trust, and treaty obligations to Tribes. Several USDA agencies today do maintain additional Tribal-serving staff, including but not limited to the Animal and Plant Health Inspection Service (APHIS), Farm Service Agency (FSA), Forest Service, Natural Resources Conservation Service (NRCS), Risk Management Agency (RMA), Rural Development (RD), and the Food and Nutrition Service (FNS).

It is unclear what the memo proposes regarding these existing roles that are located outside of OTR. The memo notes that these functions will be consolidated to mission areas, which would theoretically remove these Tribal-facing employees from their respective agencies and roll them into broader work, away from the subject matter-specific work their positions were designed to do. This may limit the efficiency of these positions. For example, if the memo does intend to relocate these roles, the NRCS Tribal Liaison position would move out of NRCS as an agency and into the Farm Production and Conservation (FPAC) mission area, which has separate staff and organizational function and is further removed from the actual land stewardship and conservation-focused work that the NRCS Tribal Liaison has the expertise to do. This creates an additional layer of bureaucracy for Tribes and for the Tribal Liaison positions at USDA. The memo strongly opposes creating additional layers of bureaucracy and actively states that the plan seeks to reduce such layers, so perhaps the Tribal-serving positions will be able to remain inside their respective agencies rather than rolling into mission areas.







Finally, although Tribal-serving positions across agencies may frequently liaise with OTR staff in their current agency roles, they are not part of the OTR reporting structure currently and likely should not be. In much the same way that movement into mission areas would remove these expert staff from their subject matter-specific work with Tribes, moving these staff out of their respective agencies and into OTR could also hamper their ability to act as subject matter experts within their specific agencies, limiting USDA's effective service to Tribes. In both cases, moving these employees also raises legal questions regarding use of appropriated funds. OTR's budget, for example, is appropriated separately from any other agency or mission area. Reorganizing these employees away from their agencies without the express direction of Congress may violate federal budget laws.







# Tribal Producers and Agricultural Services

**Workforce Realignment:** USDA is reducing its workforce primarily through voluntary programs. Field-based services like those under Farm Production and Conservation Mission Area (FPAC) have already been affected by voluntary resignations. These staffing reductions may impact Tribal government and Tribal producer access to technical assistance, conservation programs and loan services available under departments including:

- [FPAC Business Center](#)
- [Natural Resources Conservation Service \(NRCS\)](#)
- [Risk Management Agency \(RMA\)](#)
- [Farm Service Agency \(FSA\)](#)

**Regional Office Consolidation:** According to the memo, NRCS will be aligned with the five new USDA hub locations. As noted above, it is unclear what this means given the existing NRCS structure. For existing staff who do not relocate to those hubs and choose to leave agency service, there may be fewer on-the-ground support services for Indian Country.

## Potential Indian Country Impact for Tribal Producers and Agricultural Services

Tribal producers and governments utilizing USDA programs – which have often reported slow service from these farm-and-ranch-focused agencies – may face greater delays should regional reorganizations and county level office closures proceed.





# Food and Nutrition Service (FNS) Restructuring

**FNS Regional Restructuring:** As noted above, the memo states that FNS will close its headquarters office in Alexandria, Virginia, and then reduce and consolidate its seven regional offices to the newly proposed five USDA hubs over the course of the next two years. This could:

Disrupt program management for Tribal-population serving nutrition programs such as [Food Distribution Program on Indian Reservations](#), [Special Supplemental Nutrition Program for Women, Infants, and Children \(WIC\)](#), the [Supplemental Nutrition Assistance Program \(SNAP\)](#) and more.

For existing staff who do not relocate to those hubs and decide to leave agency service, there may be fewer on-the-ground support services for Indian Country.

The majority of FNS Tribal Affairs positions are located within the FNS Regional Offices. If they are unable to relocate, those positions and the expertise the individuals filling them bring to FNS will vanish.

## Potential Indian Country Impact of FNS Restructuring

[A 2019 reorganization](#) of FNS regional offices elicited strong opposition from Tribes who noted the decision was undertaken without any prior Nation-to-Nation consultation. Prior to the July 2025 secretary's memorandum concerning USDA's wholesale reorganization, Tribes had no visibility on departmental realignment. As of time of writing, USDA has committed to Tribal consultation as part of their larger 30-day consultative process with all interested parties, but USDA has not set a date for Tribal consultation.

In partnership with Tribal and State governments, FNS administers a breadth of nutrition programs, many of which serve Tribal citizens. For example, Tribal governments, operating through Indian Tribal Organizations (ITOs), administer FDPIR for citizens of over 276 different Tribal Nations across Indian Country. In administering FDPIR, including managing matters of program integrity, ITOs work closely with the staff at their designated FNS Regional Office. FNS Regional Office staff are essential partners for ITOs, and ITO subject matter experts often maintain close working relationships with their counterparts at FNS Regional Offices. Tribes strongly objected to the 2019 FNS Regional Office realignment in part because these relationships are pivotal to the successful administration of FNS programs on Tribal lands, and without being consulted in advance, Tribes had no way to offer prior input or shape a process that would impact their service to their citizens.

Tribal leaders and their nutrition staff administering, implementing and delivering USDA programs often find themselves educating federal staff on reoccurring issues impacting the programs stemming from situations like these. Loss in staff currently stationed in headquarters and regional offices who cannot, or will not relocate, will directly impact FNS-administered programs like FDPIR at the local, Tribal level.



## Forest Service (USFS) – Restructuring

**USFS Restructuring:** The Forest Service will phase out its nine existing regional offices as well as consolidating stand-alone research stations to a single location in the Fort Collins, Colorado hub. This includes reduced operations at a USDA state-office in Juneau, Alaska as well as a service center in Athens, Georgia. The memo notes the USFS office phase outs will account for the ongoing fire season. The reductions may also phase into the administration’s planned reorientation of wildland firefighting responsibilities to the U.S. Department of the Interior.<sup>17</sup>

**Existing Research Facilities:** Two existing forestry-focused centers, the Missoula Fire Sciences Laboratory in Montana - [Missoula Fire Sciences Laboratory in Montana](#), and the [Forest Products Laboratory in Madison, Wisconsin](#) – will remain open.

### Potential Indian Country Impact of USFS Restructuring

Tribes play a pivotal role in forest management and have been stewarding forests on this continent for thousands of years. In navigating today’s legal realities, Tribes often rely on co-stewardship agreements with the USFS in carrying out many of these forest stewardship duties, empowering local control in forest management practices using traditional ecological knowledge and contemporary best management practices.

At its annual symposium in June 2025, the Intertribal Timber Council identified the gaps that persist in these opportunities for Tribes, especially in funding and support disparities for Indian Country lands.<sup>18</sup> Tribal leaders particularly highlighted the lack of fire suppression resources, noting that they are not often allocated to Indian Country. ITC resources also describe how Tribes working with USFS have engaged in habitat restoration and other key forest land management activities, making Forest Service a critical partner to Tribes with lands bordering Forest Service-managed lands.<sup>19</sup>

Much of this work between federal and Tribal staff takes place with staff from regional offices that are now facing consolidation and relocation. According to statements made during the July 30 Agriculture Committee, the new regional hub sites of Salt Lake City, Utah and Ft. Collins, Colorado were chosen for their existing USFS staffing. Unfortunately, those locations are considerably distant from many Tribal forest lands, such as the Cherokee National Forest located on the lands of the Eastern Band of Cherokee Indians in North Carolina, the Chippewa National Forest on the lands of the Leech Lake Bands of Ojibwe in Minnesota, and the vast acreage of Alaska Native forestland.

Under current USFS structure, regional offices provide certain Tribal Forestry services. Phasing out these offices could disrupt established lines of communication, programmatic work, and service in Indian Country.

<sup>17</sup> U.S. Senate Committee on Energy and Natural Resources. Statement of Tom Schultz, Chief of the Forest Service, U.S. Department of Agriculture, Before the United States Senate Committee on Energy and Natural Resources, Concerning the President’s Fiscal Year 2026 Proposed Budget for the USDA Forest Service. July 10, 2025. <https://www.energy.senate.gov/services/files/987180A9-CAFD-41F6-8159-18557B2849DA>.

<sup>18</sup> Intertribal Timber Council, “Intertribal Timber Council Symposium 2025: Advancing Co-Stewardship and Resilient Forest Management,” Medium, July 2025, <https://medium.com/@intertribaltimbercouncil/intertribal-timber-council-symposium-2025-advancing-co-stewardship-and-resilient-forest-management-2b734ced0dcc>.

<sup>19</sup> Intertribal Timber Council—Indian Forest Management Assessment Team, “Breaking Point: The State of Tribal Forestry Today,” 2023, <https://storymaps.arcgis.com/stories/c1f1ca11f6774341b70550e8b8cc1801>.





# National Agricultural Statistics Service (NASS) Restructuring

This service will reduce and consolidate its twelve regions to align with the proposed five USDA hubs over a multi-year period.

Among many other duties, NASS is responsible for the National Census of Agriculture, a national dataset that provides an impartial and comprehensive picture of American agriculture. These data are vitally important to industry and to policymakers. They showcase sectors of American agriculture economic metrics, give insight to emerging markets, and provide benchmarks for measurable success. These data help policymakers understand trends and make informed decisions about farm programs and policies.<sup>20</sup> Census of Agriculture data also help USDA predict and respond to market trends, which is critically important to producers and agribusiness operators. The data NASS receives and stewards is considered sensitive and protected as a matter of national security. American agriculture and national security operations may experience disruptions in efficiencies and informed decision-making if NASS mission areas' service delivery is impacted by staff attrition secondary to reorganization.

## Potential Indian Country Impact of NASS Restructuring

For many years, Native producers have been undercounted by the National Census of Agriculture. Through better partnerships with Tribal Nations, NASS—operating through regional offices—has been able to improve its relationship with Tribes and improve the accuracy of Native producer counts with each successive census. NASS regional offices are currently responsible for large geographic areas, all of which have a Tribal presence—whether from individual American Indian/Alaska Native producers, the location of Tribal lands and Tribal governments, or both. Consolidation from twelve regions to five will disrupt the agency's ability to gather and disseminate accurate information to all stakeholders, including those in Indian Country. The most recent Ag Census, published in 2022, contained substantive information relevant to Indian Country, including to reservation-level data points.<sup>21</sup> The scope of Tribal agriculture was significant:

More than 78,000 Tribal producers across the U.S.;

- \$6.4 billion in revenues from Tribal producers;
- \$2.7 billion in crop revenue from American Indian/Alaska Native producers;
- \$3.4 billion in livestock revenue.

These statistics, and many more, provided policymakers at the federal and Tribal level greater insight on how to grow the Tribal food and agriculture sector. The 2022 Ag Census reported wider participation from Tribal producers, who prior to the 2017 iteration, had limited interaction with and visibility in the five-year reports. A loss of staff capability and Indian Country knowledge from NASS may result in a lack of information that decision makers at the federal and Tribal government require to boost American agriculture.

<sup>20</sup> USDA National Agricultural Statistics Service—About the 2022 Census of Agriculture. <https://www.nass.usda.gov/Ag-Census/FAQ/2022/index.php>.

<sup>21</sup> U.S. Department of Agriculture, National Agricultural Statistics Service, 2022 Census of Agriculture: American Indian Reservations (Washington, D.C.: USDA, 2024), [https://www.nass.usda.gov/Publications/AgCensus/2022/Online\\_Resources/American\\_Indian\\_Reservations/AMINDIAN.pdf](https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/American_Indian_Reservations/AMINDIAN.pdf).



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