



August 26, 2025

Hon. Brooke Rollins
U.S. Secretary of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Secretary Rollins,

On behalf of the California Association of Resource Conservation Districts (CARCD), we appreciate the opportunity to comment on the proposed USDA Reorganization Plan. In California, ninety-five (95) Resource Conservation Districts work in partnership with farmers, ranchers, forestland owners, and communities to deliver technical assistance, financial support, and conservation education. We recognize the intention to streamline federal operations, but we are deeply concerned that aspects of the reorganization risk undermining USDA's ability to achieve its stated goals and could negatively impact the people and lands we serve.

We feel strongly that such a far-reaching proposal merits more time for consideration and more details - including information on costs and benefits of the proposed changes - so that California producers and the organizations that work to serve them have the opportunity to evaluate potential impacts and provide constructive feedback.

California's Unique Role in U.S. Agriculture

California is the nation's agricultural leader, delivering nearly \$60 billion in production value annually across 24 million acres. Our state accounts for approximately 11% of total U.S. agricultural output and produces over 400 commodities, far more diverse than any other state. This sector also generates at least \$4.4 billion in tax revenues that support local, state, and federal budgets. California's agricultural diversity, combined with serious natural resource challenges such as drought, wildfire risk, and water scarcity, requires USDA programs that are responsive, flexible, and locally informed.

We are concerned that relocating USDA regional oversight outside California (e.g., NRCS oversight shifting to Salt Lake City and Forest Service oversight to Fort Collins) could reduce the responsiveness of USDA programs to California's unique agricultural systems, specialty crop producers, and forest management challenges. Local USDA staff in Service Centers and district offices are trusted partners, but they need strong, in-state leadership to ensure maximization of programs and best use of taxpayer dollars.

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Impacts on Resource Conservation Districts and Local Partnerships

RCDs partner closely with USDA agencies, particularly the Natural Resources Conservation Service (NRCS) and the Forest Service, to deliver technical and financial assistance that supports soil health, water quality, wildfire resilience, habitat restoration, and agricultural productivity.

The proposed reorganization poses several risks:

- Consolidating regional offices out-of-state will reduce access to technical expertise and timely decision-making.
- Centralizing grant and contracting functions far from California could delay financial assistance to farmers and ranchers.
- Forest and watershed coordination may be weakened, despite California's agricultural viability being directly tied to healthy upland forests and effective post-wildfire recovery.
- California-specific research and innovation capacity could be diminished if ARS priorities are set nationally rather than regionally.

Without adequate support, RCDs will face greater difficulty meeting already high demand for assistance from those adapting to water shortages, wildfire impacts, and other resource challenges.

Recommendations

Respectfully, we urge USDA to do the following:

- Extend the comment period and provide additional details about consolidations and other proposed changes so that producers and other affected organizations have the opportunity to provide constructive feedback.
- Provide a cost-benefit analysis with a focus on how proposed changes can actually benefit US producers, including those in California.
- Maintain California-based USDA leadership capacity within NRCS and Forest Service to ensure program decisions reflect California's agricultural and forest realities.
- Preserve strong local technical assistance and grant administration to avoid delays in getting resources to producers who urgently need them.
- Formalize and strengthen state-level partnerships with California Department of Food and Agriculture (CDFA), University of California Cooperative Extension, and

CARCD to improve program delivery.

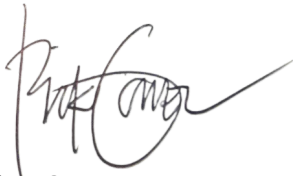
- Ensure flexibility in program design so that specialty crop producers, small-acreage farms, and forestland owners are well-served, not disadvantaged by uniform national models.

Conclusion

California's agricultural and forest systems are not only vital to our state but to the nation's food security, economy, and environmental health. CARCD strongly supports USDA's goal of efficiency, but we believe that consolidation and centralization must not come at the expense of responsiveness to local needs. We urge USDA to recognize the unique role of California and its RCDs in ensuring that federal investments in conservation achieve the greatest possible return for farmers, ranchers, forestland owners, and the American public.

Thank you for the opportunity to comment. We look forward to continuing our strong partnership with USDA to advance conservation, agricultural viability, and community resilience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Gomez", with a stylized flourish extending from the end.

Rick Gomez

President, California Association of Resource Conservation Districts