

August 31, 2025

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

Re: *Department of Agriculture Reorganization Plan (SM 1078-015)*

Dear Secretary Rollins,

Western Growers (WG) welcomes the opportunity to provide comments on the proposed reorganization of the U.S. Department of Agriculture (USDA).

WG is an agricultural trade association headquartered in California. Our members are small-, medium- and large-sized businesses that produce, pack and ship fruits, vegetables, and tree nuts from our home states of California, Arizona, Colorado, and New Mexico. Beyond our home states, WG members produce in – and directly contribute to the economies of – more than 30 states in the United States. In total, our members account for roughly half of the annual fresh produce grown in the United States, providing consumers with healthy, nutritious food. Indeed, WG has long had the slogan “We grow the best medicine.” Increasing the consumption of fresh produce is central to President Trump’s Make America Healthy Again (MAHA) Initiative, thus investment in the nation’s nutritional security through safe domestic production and delivery of fresh produce is mission critical to his vision.

For an industry that generates over \$115 billion in agricultural value¹, the share of USDA support –in terms of funding and staff expertise – comes primarily in the form of federally-led or supported research, specialty crop-centric grant programs, and procurement. As a result, several of the proposals cause concern.

Proposal: Beltsville Agricultural Research Center (BARC) will be vacated over multiple years to avoid disruption of critical USDA research activities.

WG appreciates that this Administration, among other things, emphasizes the need to accelerate and augment alignment between all the federal branches that oversee food and nutritional safety. We therefore urge that the Beltsville Agricultural Research Center (BARC) be maintained and continue its leadership in assuring safe and efficient production of specialty crops. BARC is instrumental in developing and verifying pragmatic solutions or the prevention of devastating crop diseases, pests, and the prevention of human pathogen contamination of fresh produce commodities.

Most notably, the BARC is the keystone for federal food safety research. Produce farmers can spend up to 6.8%² of their annual revenue on food safety compliance costs, making this research area vital for both their economic viability and the nation’s food security. The Environmental Microbial & Food Safety Laboratory (EMFSL) in Beltsville has been instrumental for pre- and post-harvest intervention strategies to reduce contamination risk in the produce supply chain, support compliance with FDA food safety rules, protect public health, and enhance consumption of healthy produce. EMFSL is the premiere, and one of the only laboratories in the U.S. that supports research on foodborne parasites. Since 2022 the state-of-the-art Building 307 has housed the majority of EMFSL, and its renowned scientific experts and customized equipment and facilities are specifically designed and

¹ [USDA-NASS, 2022 Census of Agriculture – Specialty Crops, October 2024](#)

² USDA-ERS. *Estimated Costs for Fruit and Vegetable Producers To Comply With the Food Safety Modernization Act’s Produce Rule*. August 2018

optimized to work with foodborne pathogens and fruit and vegetable crops. No other existing ARS laboratory has equivalent scientific expertise, facilities or equipment, so it is improbable that such a research infrastructure could be relocated or rebuilt elsewhere without significant and irreversible disruption to research - not to mention the underutilization of an advanced facility that was built only three years ago at taxpayer expense.

Along with EMFSL, there are 16 other agricultural research laboratories at BARC. Research here also provides expert identifications and detailed information of newly observed plant pathogens, insects and mites to APHIS-Plant Protection and Quarantine (PPQ) in support its activities.

At this time, there are no fewer than 40 different research projects taking place at the BARC that are of value to the specialty crop industry, ranging from exploring the use of artificial intelligence and machine learning to detect pathogens and viruses, to developing more precision and ultraviolet applications to reduce chemical usage on crops. These projects will all be impacted, denying farmers critical information on how to cost-effectively improve food safety and farming practices for the American public.

We must underscore what a closure would mean for our country's scientific manpower. Our industry and country owe much of its success to the dedication of USDA's scientists and researchers, whose credentials are unmatched. Following the 2019 relocation of NIFA and ERS, GAO found that both agencies' workforce levels and productivity drastically declined; the 'rebound' took years, was not a full recovery, and the pool of new hires collectively had far fewer years of experience than the employees that ultimately left the department.³ We anticipate an even more severe brain drain will occur with a closure of BARC – one that will not rebound. The market competition for scientists is persistently fierce, and we are fearful of permanently losing these public servants to the private sector, as well as to other crop and research areas.

The work being done at Beltsville and the unique equipment it has for the produce sector simply cannot be replicated or relocated, and no amount of time in a multi-year drawdown or transition can mitigate that. Ultimately, the closure of BARC detracts from a crucial mission USDA and WG share: solving food safety problems and productivity issues for farmers and the American public in order to provide more domestically grown healthy food to improve the American diet.

Proposal: USDA will relocate much of its Agency headquarters and NCR staff from the Washington, D.C. area to five hub locations, including a Western hub based in Salt Lake City. The selection of these [five] hub locations takes into consideration existing concentrations of USDA employees and the cost of living for USDA employees.

The cited objective is “to ensure USDA is located closer to the people it serves while achieving savings to the American taxpayer”, while the hub selection purportedly “takes into consideration existing concentrations of USDA employees and the cost of living for USDA employees.” While these may be logical parameters to guide consideration, the lack of a detailed methodology and full analysis on each of the locations does not convince us that they are truly the best options to fulfill all criteria. For the western region, there are many other areas with lower costs of living than Salt Lake City; areas that are far closer to the nation's specialty crop epicenters than Salt Lake City; and areas that have higher concentrations of USDA infrastructure than Salt Lake City.

Additionally, the consideration of existing USDA presence should take into account not just the number of employees and buildings, but also the mix and balance of the types of mission areas that are covered. A given location may have heavy USDA presence, but if it is predominately in areas like forestry management or forage research, that presents no value to the specialty crop industry.

³ [GAO, Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce. December 2022.](#)

For our farmers, the level of expertise and years of experience within the local DC region vastly outweigh any perceived proximity improvements the new hubs purport to offer. We do not share the confidence of others that current staff will relocate to Salt Lake City or other newly identified hubs, nor that there will be sufficient expertise and infrastructure in these locations to quickly fill the voids. Rather, we fear an exodus that will shake industry's confidence in USDA's ability to support it and disproportionately set back our farmers at a time when they face many existential challenges. We saw this play out empirically when USDA moved ERS and NIFA.

We urge USDA to not move forward with these locations and instead engage in a much more transparent and deliberative process with a cross-section of agriculture stakeholders from all regions and commodity types, as well as with states and Congress.

Proposal: The Agriculture Research Service will eliminate its Area Offices. Residual functions will be performed by its Office of National Programs.

Research conducted at ARS satellite sites is crucial for the fresh produce industry, of which the predominate share is based in the western United States. Satellite sites provide science-based solutions to challenges in food safety, pest management, and crop quality. These centers develop and validate detection methods for pathogens and pesticide residues, improve farming practices, and support regulatory frameworks with reliable data. The ongoing and future work of these sites and their researchers ultimately help produce farmers meet crucial food safety standards, manage risks, maintain consumer trust, and support a healthy and accessible domestic supply chain.

This research is best performed within the regions where food production is occurring, allowing for boots-on-the-ground, real-time engagement, dialogue on priority needs, and rapid review of the feasibility of solutions that may be developed. Research conducted out of context of the local or regional needs of farmers will be less effective in delivering what produce farmers need to continue to be competitive and productive.

Proposal: USDA has and will continue to fully leverage voluntary programs such as the Deferred Resignation Program (DRP), Voluntary Early Retirement Authority (VERA) and Voluntary Separation Incentive Payments (VSIPs). The Department will also leverage directed and voluntary reassignments to ensure the workforce is aligned with mission priorities. Focused and limited Reductions in Force will be implemented only if needed and only after approval by USDA's Deputy Secretary.

We also urge that no further cuts be made to vital researcher and personnel positions. Our country's premiere agriculture research infrastructure cannot exist without the expertise and dedication of its research community. Indeed, WG has separately identified to USDA several key positions, including research technicians and plant pathologists supporting vital ARS food safety and pest research functions, that should be reinstated and filled from the staffing consolidations undertaken by the Department of Government Efficiency earlier this year.

Proposal: South Building will be vacated.

We recognize USDA's interest in ensuring taxpayer-funded federal buildings are being utilized efficiently; indeed, this was one of the major justifications for the return-to-office mandate that was implemented earlier this year. Nevertheless, we must stress that there are several crucial specialty crop program areas and seasoned staff that are predominantly housed in the USDA South Building. The Office of Pest Management and Policy (OPMP), the Agriculture Marketing Service Specialty Crops Program (SCP), the Technical Assistance for Specialty Crops (TASC) program and more broadly the Foreign Agricultural Service (FAS), and Animal & Plant Health Inspection Service (APHIS) are notable examples. We simply wish to underscore the need to preserve those functions in the National Capital region and the staff who support them as they are relocated from the South Building.

Proposal: Consolidate contracting functions in the ASA. ‘Although contracting resources will be consolidated, dedicated teams for commodity procurement and wildland firefighting incident support will continue to exist.’

Since 2018, USDA-AMS has made great strides in improving and expanding the purchase, management, and distribution of fresh produce. When more fresh fruit and vegetable purchases were mandated through the Food Purchase and Distribution Program (FPDP) and then again through the Farmers to Families Food Box Program, USDA staff lacked practical understanding of how fresh produce should be handled and incorporated into federal procurement channels. Through the dedicated efforts of AMS and other nutrition-focused arms of the USDA, the agency now better grasps the nuances of produce grading, pricing, and supply peaks, to the benefit of both the American farmers they are supporting, and the American children and families they are feeding. We urge you not to rehome or consolidate these functions under USDA’s general procurement operations, which simply cannot replicate or manage the necessary expertise for our unique products.

Moreover, the MAHA Commission has expressed interest in increasing the amount of fresh produce purchased by the government (and presumably under firm “Buy American” standards). We are encouraged by the prospect of more U.S.-grown product making its way to our schools and citizens in need, but then it would be even more critical for USDA to *expand* its procurement staff and processes related to produce rather than reduce this capability.

Proposal: Animal and Plant Health Inspection Service centers will remain at current locations as they are located in USDA hub locations.

We appreciate the recognition of APHIS’s existing work and value, and we support the decision to preserve the current Western and Eastern hubs. We also support the preservation of APHIS’s laboratory network, as they are already strategically placed to best respond to outbreaks and other industry needs. Furthermore, we strongly support the maintenance (and enhancement) of APHIS staff and resources at key U.S. ports of entry, as well as USDA-supported dog detection teams.

Proposal: Consolidate grants and financial assistance to provide better controls and promote efficiency. This consolidation will include, where feasible, the transfer of grant making and administration functions from USDA offices and agencies that currently have limited capacity to perform such duties to other offices and agencies.

One of the most consequential types of support this department offers us is through the handful of grant programs that are exclusively dedicated to the specialty crop industry. The Specialty Crop Block Grant, the Specialty Crop Research Initiative, and TASC are all foundational. Like the concerns we have about procurement changes, we do not support any restructuring that would place these programs and the funds they oversee in the hands of other subagencies and staff that lack the knowledge and experience to assess our highly diverse crop portfolio and complex needs. Moreover, these programs are consistently oversubscribed and historically receive strong Congressional support and additional funds; they need *more* department support and experienced staff focused on produce, not less.

Proposal: Mission area and agency resources will be realigned to the consolidated functions.

We recognize that any amount of departmental reorganization may necessitate administrative and functional changes. However, the push for efficiency should preserve USDA’s core mission: to protect and promote the U.S. farmer. We are concerned that the proposal to consolidate functions and realign mission areas, will make USDA less responsive and more difficult to access for our producers. Simply put, specialty crops require vigorous support and service by specialty crop-centric staff and programs.

We cannot support any attempt to dismantle vital support for our unique agricultural products and house them into completely unrelated commodity arms. We appreciate the repeated commitments made by Secretary Rollins and Undersecretary Vaden to ensure all farmers and crops are supported by USDA fairly and equitably; one way to do so is to ensure our existing foothold within the agency is not undercut and folded into areas that do not ultimately understand or prioritize our sector.

In conclusion, MAHA anchors prevention and systematic reforms across health, food, and environmental systems to improve public well-being. Within this framework, promoting safe fresh produce diets is critical to ensuring the U.S. fresh produce sector has the resources and support currently offered by the USDA to advance the MAHA agenda. U.S. specialty crop farmers are key to ensuring a healthy and affordable food system, and it is imperative that USDA's specialized resources and support for them are not undercut by this proposed reorganization. We look forward to working with you and President Trump on these recommendations and other proposals that will maintain and enhance USDA's leadership in supporting our country's produce farmers and the health of all citizens.

Sincerely,



Dennis Nuxoll
Vice President for Federal Affairs
Western Growers