



Thursday, August 28

United States Department of Agriculture

1400 Independence Avenue SW

Washington, DC 20250

To whom it may concern,

On behalf of the Institute for Agriculture and Trade Policy (IATP), we write today in opposition to USDA's proposed reorganization as it is written. IATP is a Minnesota-based research and advocacy organization that has existed for nearly 40 years. We have a deep understanding of the role the United States Department of Agriculture (USDA) plays in the lives of farmers and in rural communities.

Farmers are going through a lot of challenges right now – grain prices are low, input costs are high, and there's a lot of uncertainty in the market. Reductions in service at USDA should not be added to the list.

Minnesota has lost 22% of its USDA staff since January, and that number will likely rise by the end of the year. In some county offices, most of the staff are gone.¹ Many of the folks who have left or been terminated were experienced staff who spent years forging partnerships with farmers and building trust and quality service. Farmers looking for off-farm income often work in their local USDA office to help their neighbors navigate complicated applications and be a friendly, knowledgeable, and familiar face. With the layoffs earlier this year, quality of service or knowledge were not taken into account.

Farmers in northern Minnesota were confused earlier this year to find the Baudette office slated for closure, only for USDA to backtrack and realize it would go against Farm Bill statute to close this office. In short, when it comes to USDA, farmers have seen confusion and a reduction in service quality. This planned reorganization will likely exacerbate these issues. While the USDA announcement on the reorganization claims a goal is to bring the Department closer to the farmers it serves, the combined reorganization and staff layoffs do the opposite.

At IATP, one of the many things we do is conduct research on the usage of Natural Resources Conservation Service (NRCS) cost-share programs such as the Environmental



Quality Incentives Program (EQIP) and the Conservation Stewardship Program (CSP). In Minnesota last year, over 70% of the applicants to these two programs were unable to access funding.ⁱⁱ These two programs are popular and voluntary, assisting farmers with conservation improvements on their farm. The planned reorganization and its ultimatum to NRCS staff and their family to leave their home and move across the country will undoubtedly shed knowledgeable, committed public servants who could work to streamline these programs so they can help more farmers and conserve our soil and water resources. The farmer-facing service of NRCS has already been weakened, and now it appears the nuts and bolts of the service will also be weakened. There are improvements to be made to NRCS programs, including a much-needed rethinking of the Conservation Assessment Ranking Tool (CART) that will be much harder with a massive reduction in staff.

Research is another key part of USDA's mission. With the relocation of the Economic Research Service (ERS) and National Institute for Food and Agriculture (NIFA) in 2019, we saw the abandonment of important research projects, including those looking at yield improvements and drought resistance, while shedding decades of experience we still haven't recovered from. Natural disasters and trade disruptions are challenging farmers at levels that border on a crisis. USDA can provide important tools to help farmers manage these issues.

Animal and plant health will likely be harmed by the proposed reorganization. In a time when highly pathogenic avian influenza (HPAI) and new world screwworm are threatening our farmers and ranchers and their animals, we should not be making it harder to respond. The longer we go with reduced capabilities to track and respond to HPAI and new world screwworm, the likelier it is these animal health risks will get out of hand. As a Minnesota-based organization, we are also concerned with the planned closure of the Animal and Plant Health Inspection Service (APHIS) office closure in South St. Paul. Without these resources locally, it will be harder for Minnesota farmers to ensure their products are healthy for consumers, and harder for those farmers to prosper.

As food prices increase and hunger remains a pressing issue in communities across the country, planned changes at USDA will likely make it harder for those who rely on nutrition programs, as well as county, state, and tribal agencies that administer these programs. Rural communities are more reliant on federal nutrition assistance programs such as the Supplemental Nutrition Assistance Program (SNAP) and the Women, Infants, and Children (WIC) program.ⁱⁱⁱ Our rural communities face enough challenges as it is – we should not add to the list.



Before closing out our comments, we also ask that USDA post comments publicly and ask for feedback on the reorganization plan through the Federal Register. Transparency is key when stewarding taxpayer dollars, and it is important for the public to know that feedback will be read and considered, as well as understanding the breadth and depth of feedback the department is receiving. We intend to make our comments public, and we ask for your help in making all comments public, for transparency's sake.

We would be happy to speak with you more about our concerns with USDA's proposed reorganization, including the risk for longer wait times for farmers, who are already facing reductions in service quality. Thank you for considering our feedback.

Sincerely,

The Institute for Agriculture and Trade Policy

ⁱ <https://www.agri-pulse.com/articles/22487-workforce-cutbacks-strip-many-nrcs-offices-of-staff>

ⁱⁱ <https://www.iatp.org/keep-the-door-open>

ⁱⁱⁱ <https://frac.org/blog/snaps-critical-role-in-rural-communities-and-the-consequences-of-cuts>