



August 26, 2025

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

CC: Deputy Secretary Stephen Vaden

Dear Secretary Rollins:

The American Phytopathological Society (APS) appreciates the opportunity to comment on USDA's reorganization (SM 1078-015). APS is a non-profit, professional organization of 3,600 plant pathology scientists and practitioners whose work safeguards agriculture, food security, and the national ecosystem to prevent billions of dollars in crop losses in the U.S. each year. Spanning industry, academia, government, and private practice, APS members study and manage plant pathogens, pests, and diseases to ensure healthy plants thrive in crops of all types across all 50 states. APS members collaborate closely with vital Federal agencies and White House offices to tackle some of the most pressing challenges facing U.S. agriculture and food security. Through efforts with the U.S. Department of Agriculture and other federal agencies, APS delivers science-based solutions that benefit farmers, consumers, and communities across the country.

The United States has been the global leader in agricultural research for many decades, and the USDA is key to this research excellence due to both its in-house research programs and its funding of exceptional research through its competitive grant programs. The U.S. must ensure that reorganization of the USDA strengthens the nation's agricultural security and our nation's ability to remain at the forefront of global agricultural research—not weakens it. The U.S. agricultural research system has been a key driver of our nation's ability to sustain impressive productivity growth in the agricultural sector year-after-year for decades. Economic analysis finds strong and consistent evidence that investment in agricultural research yields high returns, estimated to be at least \$10 of economic benefit for society resulting from every research dollar spent. While APS recognizes USDA's intent to increase efficiency and reduce bureaucracy through this reorganization, USDA's world-class research is a national treasure that must be preserved during this process.

We make the following requests as USDA leadership considers reorganization efforts:

## **Safeguard programs and facilities in the Washington, D.C., area that underpin U.S. global leadership**

APS strongly supports the National Agricultural Library located in Beltsville, Maryland. It serves an essential role as a key data hub with archives for primary scientific literature that underpin vast bodies of data and agricultural knowledge that are easily distributed to researchers and other key stakeholders from a single location. We support the USDA's plan to retain this building and also advocate for retention/reinstatement of all functions, materials, and services of the National Agricultural Library at the 2024 levels.

We believe that keeping the USDA-ARS Office of National Programs in the Washington, D.C., area has significant benefits. This Office coordinates national USDA-ARS research to focus on agricultural priorities and uphold the intent of congressionally-appropriated funds. Geographic separation from Washington, D.C., would weaken essential connections between USDA-ARS, Congress, the Administration, and stakeholders who regularly visit our nation's capital to interface with Congress and Administrative leaders. We also support key leadership from APHIS and NIFA remaining in D.C. to help advance government-wide initiatives that are key to our national and food security.

The Beltsville Agricultural Research Center (BARC) houses valuable research programs, equipment, and biological resources that underpin biosecurity, food security, and U.S. research leadership. Examples of these vital resources include national fungal and nematode culture collections; extensive electron microscopy equipment; quarantine facilities; state-of-the-art data centers for agricultural, natural resources and genomics research; and many world-renowned research programs. Relocation of these programs and resources will require careful planning and sizable investments in facilities outside of the Washington, D.C., area. It is essential that the necessary time and financial resources are appropriated to implement a transition plan that safeguards—rather than squanders—these critical assets.

## **An additional hub is needed in the West closer to western agricultural production**

The diversity and scale of U.S. agriculture demand a strong regional presence across the United States. APS supports the USDA's objective of locating hubs in proximity to its customers, but a hub located west of Salt Lake City is necessary to fulfill this objective. According to the USDA's own 2023 Economic Research Service, California is the top U.S. state in agricultural production. The five states with the largest acreage of Forest Service lands (Alaska, California, Idaho, Montana, Oregon) are also west of Utah. Additionally, diagnostic capacity near ports of entry, including those on the Pacific coast, is essential to our nation's agricultural security.

We ask that USDA ensure that reorganization decisions reinforce our ability to detect and respond to threats at our nation's borders. Existing USDA offices and laboratories located in Western States provide valuable connections to regional farmers, ranchers, foresters, and other stakeholders; support research directed towards the highest priority issues; and manage the diverse forest service lands located throughout the West. These offices and laboratories should be retained to the fullest extent possible. A hub in the western-most states that can provide

support and connection to stakeholders in the West will be crucial to successfully achieving the USDA's mission.

**Agricultural innovation depends on program continuity and minimal disruption of essential functions**

APS is concerned that the attrition from reorganization efforts will lead to a diminished USDA, especially when it comes to stakeholder engagement and funding that underpins agricultural research and plant science.

Timely and efficient grant processing is a matter of national competitiveness. When USDA previously relocated NIFA programs, it took years to fill all of the vacated positions and train new staff. This disrupted grant processing, which impeded research progress and jeopardized U.S. innovation capacity. Protecting and retaining skilled staff is critical to maintaining the global stature of USDA-funded research and providing the results that farmers, ranchers and foresters depend on for their economic well-being.

Moving USDA research programs to new locations will cause significant disruptions to research productivity. We urge the USDA to construct and implement strong transition plans to minimize research disruptions, specifically by providing funding for state-of-the art facilities tailored to accommodate displaced research programs in new locations. We are concerned that reorganization will result in the significant loss of the USDA's top scientists from the Beltsville area, who could be discouraged by the delays and disruptions caused by the reorganization. Delays and disruptions also have the longer-term risk of discouraging the next generation of scientists from entering agricultural research. A stable, well-supported USDA is critical to building the workforce that will protect the nation's crops against emerging threats.

We greatly appreciate your consideration of these important factors during your reorganization efforts. Please look to APS as a resource as we are aligned in ensuring that we maintain our role as a global leader of agricultural research.