Tribe-facing

[Tribal Nation Letterhead]
[DATE]

The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

The Honorable Stephen Vaden
Deputy Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

Dear Secretary Rollins and Deputy Secretary Vaden:

On behalf of the **[Tribal Nation]**, a sovereign Tribal government and Treaty partner of the United States, we write to express concern regarding the U.S. Department of Agriculture's "Department of Agriculture Reorganization Plan" outlined in Secretary Memorandum 1078-015.

Tribal Nations are integral to U.S. agriculture. Nearly 80,000 Tribal farmers and ranchers steward more than 63 million acres of land, producing $6.5 billion in agricultural sales in 2022. Within our own Nation, agriculture is a cornerstone of our economy, food security, cultural preservation, and stewardship of trust lands. **[If you would like to add more about your Nation's agricultural presence, you may include it here. For example: "Our Nation has ___ producers farming and ranching ___ acres of Tribal and trust land, generating approximately $___ in annual sales."]**

While we support USDA's goal of improving services, reducing red tape, and enhancing accountability, we are deeply concerned that this plan was developed without formal government-to-government consultation with Tribal Nations. The proposed consolidation of Tribal relations functions and relocation of USDA offices and staff will have disproportionate and harmful impacts on Tribal governments and citizens. **[Optional insert: "In our community, producers must already travel ___ miles to access USDA services. Additional consolidation would place them ___ miles away, creating serious burdens and reducing access."]**

It also remains unclear how the reorganization will uphold USDA's statutory and Treaty obligations to Tribal Nations. For example, the reorganization plan does not speak to how USDA will fulfill statutes such as 7 U.S.C. §2279(i), which provides that "[t]he Secretary shall require the Farm Service Agency and Natural Resources Conservation Service . . . to include where there has been a need demonstrated, in each county that has a reservation within its borders, to establish a consolidated suboffice at the tribal headquarters of said reservation and to staff said suboffice as needed, using existing staff, but no less than one day a week or under such other

arrangement agreed to by the tribe and the Department offices." **[Optional insert: "Our Nation currently hosts a USDA sub-office that serves ___ Tribal producers each year. Removing or consolidating this office would directly limit program access for our citizens."]**

These changes also risk diminishing the expertise within USDA that is essential for addressing the complex jurisdictional landscape in Indian Country, where USDA programs and Bureau of Indian Affairs requirements often intersect. Loss of Tribal agricultural expertise would harm USDA's ability to fulfill its obligations to Tribal Nations.

We emphasize that consultation with Tribes is not equivalent to public comment. Consultation is critical to upholding "the Department's unique government-to-government and political relationship" with Tribes and honoring "the United States' trust relationship and Tribal treaty rights." Public input, while valuable, cannot substitute for the government-to-government process required by law and reaffirmed in USDA policy. Therefore, while we appreciate Deputy Secretary Vaden's stated commitment before the Senate Agriculture Committee on July 30, 2025, to "hear from all [your] stakeholders, including Tribes," we are concerned that this approach does not reflect the unique government-to-government relationship between the federal government and Tribes. Tribes are not merely "stakeholders" of the USDA but sovereign nations whose relationship with the federal government is defined in treaties, statutes, and the Constitution. Consultation with Tribes is a formal, government-to-government process that is legally distinct from engaging with feedback from stakeholders or constituencies.

Finally, we are troubled by Deputy Secretary Vaden's comparison of consolidating Tribal relations functions to the consolidation of civil rights functions. The trust and treaty obligations that underpin the federal government's relationship with Tribal Nations are not civil rights issues. Drawing such an analogy mischaracterizes the legal foundation of our nation-to-nation relationship and risks undermining the very purpose of a dedicated Office of Tribal Relations. In the same way USDA utilizes its Office of External and Intergovernmental Affairs to connect with state, county, and local elected and appointed officials, the Office of Tribal Relations serves as the counterpart for USDA to connect with Tribal elected and appointed officials.

For these reasons, we urge USDA to initiate formal consultation with Tribal governments prior to implementing the reorganization plan. Doing so will ensure that any changes are workable, solutions-oriented, and respectful of the United States' obligations to Tribal Nations. **[Optional closing addition: "As leaders of the ___ Nation, we take seriously our responsibility to ensure the survival of our agricultural economy for future generations. USDA must not proceed without hearing directly from Tribal governments and producers."]**

Thank you for your attention to this matter. We look forward to your timely response and to engaging in meaningful consultation.

Sincerely,
[Name, Title]
[Tribal Nation]