



# CALIFORNIA FARM BUREAU FEDERATION

EXECUTIVE OFFICES

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## **RE: Comments for USDA Reorganization (Docket No. USDA-2017-0001)**

Dear Secretary Perdue:

On behalf of the California Farm Bureau Federation and our 48,000 members, I thank you for the opportunity to comment on the proposed reorganization within the United States Department of Agriculture (USDA).

The essential role of the USDA to promote and protect America's agricultural industry cannot be overstated. America's farmers, ranchers and the rural communities in which they live and work, make up less than 2% of the general population of the United States, yet we help feed and clothe not only our own nation, but a significant part of the world.

We are encouraged by the establishment of an Undersecretary of Trade, as the ability to move our agricultural products to markets and eager consumers throughout the world are critically important to the economic vitality of our rural communities. We are however, concerned about the potential negative impacts to those same rural communities with the proposed restructuring of the Rural Development mission area.

### **OFFICE OF TRADE UNDERSECRETARY**

CFBF is optimistic about the creation of the Undersecretary for Trade and Foreign Agricultural Affairs at USDA, in accordance with a provision in the 2014 Farm Bill. California's 300 plus agricultural commodities are in demand throughout the world. In 2015 alone, California exported more than \$20 billion of agricultural products, proving to be a vital portion of the state's \$47 billion farm-gate crop value. It is important to have a mission area solely focused on opening new markets, maintaining relationships with current trade partners, and striving to reduce trade barriers around the world. We commend you for your swift action to establish this office.

### **FARM PRODUCTION AND CONSERVATION MISSION AREA**

The proposal to move the Natural Resources Conservation Service into a new mission area, along with the Farm Service and Risk Management Agencies, provides some unique opportunities.

Establishing a structure which could streamline and provide for more efficient interactions between FSA and NRCS is a laudable goal. Many growers in California benefit from a "one-stop-shop" when an FSA and NRCS office is housed in the same building. Additionally, at times producers are confronted with redundancies in the paperwork requirements that could perhaps be better addressed should the agencies fall under the same mission area. We have long supported working lands programs over retirement programs, and this change could provide an increased focus on promoting working lands solutions in those areas where FSA currently administers the Conservation Reserve Program.

A mission area focused on conservation, along with an appropriate safety net, and risk management tools, could create opportunities for a reduction in duplication and increased information sharing across agencies.

## **RURAL DEVELOPMENT ASSISTANT TO THE SECRETARY**

CFBF is concerned with the proposed change to remove the Undersecretary position within the Rural Development (RD) mission area and create a new “Assistant to the Secretary” position. The fact that a name for this position has already been put forward prior to the deadline for public comment on this proposal may mean our comments are unnecessary, but we wish to lay them out for the record.

Rural communities rely on the programs and loans offered through RD. California families and businesses received almost \$1 billion from RD programs in 2016, with most of the funding going towards assisting low-income families with rent and housing loans.

Some of our concerns include:

- The Assistant to the Secretary would not require Senate confirmation, though the position sounds like the current *Assistant Secretary* position which does require Senate confirmation. This new position would therefore carry less weight than either an Undersecretary or Assistant Secretary position.
- An Assistant to the Secretary lacks the accountability of a Senate confirmed Undersecretary. The new position located in the Secretary’s office could create an undue burden for the Secretary.
- The challenge of leading the affairs of three distinct RD agencies could become difficult as the Secretary directs other USDA mission areas and offices. The day-to-day activities of a new Assistant to the Secretary could not be achieved in the same manner as an Undersecretary who had deputies, special assistants, and executive assistants.
- This calls additional attention to how agency budgets would be proposed, developed and defended before the White House Office of Management and Budget, as well as Congress.

## **CONCLUSION**

We applaud your efforts to make the USDA the most effective and efficient organization it can be. The leadership you have exhibited as Secretary of USDA has provided a fresh perspective to the Department and shown your desire to try new ways to get things done. We appreciate your efforts to protect and promote American agriculture and rural communities, and look forward to working with you in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Wenger", with a long horizontal flourish extending to the right.

Paul Wenger