



August 12, 2025

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,

As co-chairs of the Native Farm Bill Coalition (NFBC or the Coalition), a coalition of more than 170 member Tribes and Intertribal/Tribal organizations, we are writing to request that the U.S. Department of Agriculture (USDA) hold formal Tribal consultations regarding the "Department of Agriculture Reorganization Plan" as outlined in Secretary Memorandum 1078-015.

While the NFBC supports your goal of increasing services, reducing red tape, and improving effectiveness and accountability, we are concerned that the reorganization plan was developed prior to and without formal Tribal consultation. The reorganization plan includes significant structural and operational changes, including the consolidation of Tribal relations functions and relocation of agency offices and staff, but it remains unclear how the reorganization will impact USDA's statutory obligations to Tribes because consultation has not occurred. For example, Memorandum 1078-010 underscores the "political relationship carried out by the Department of Agriculture arising by Treaty or statute with respect to federally recognized Indian Tribes, American Indian Tribal citizens and Alaska Natives." However, the reorganization plan does not speak to how the 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.”

These changes have profound and potentially adverse impacts on the ability of Tribal Nations and their citizens to access essential USDA programs and services and lead to the loss of Tribal agriculture expertise throughout USDA – expertise around how USDA and the Department of the Interior’s Bureau of Indian Affairs (BIA) have overlapping and sometimes conflicting guidelines for accessing USDA programs for the more than 56 million acres of land under Tribal jurisdiction.

The necessity for consultation between the USDA and Tribal governments is critical to upholding “the Department’s unique government-to-government and political relationship” with Tribes . . . “[and] honor[ing] the United States’ trust relationship and Tribal treaty rights.” Meaningful consultation offers opportunities for USDA to engage Tribal leaders around workable, solutions-oriented outcomes that will further enhance agriculture operations and development in Indian Country.

We would like to note that we recognize USDA has [announced](#) that it is seeking public input by August 26, 2025. However, this public comment period does not constitute Tribal consultation, and we would discourage USDA from considering it as a replacement for Tribal consultation.

In addition, 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 connected with Tribal elected and appointed officials.

For this reason, we urge you to uphold this commitment by immediately initiating meaningful consultation with Tribes on USDA’s reorganization plan and ensuring the continuation of services and programs for



Tribes and their citizens. We look forward to working with you to put America's farmers first and to advance rural prosperity. Thank you for your attention to this critical matter.

Sincerely,

Cole Miller  
Co-Chair, Native Farm Bill Coalition  
Chairman, Shakopee Mdewakanton Sioux  
Community

Kari Jo Lawrence  
Co-Chair, Native Farm Bill Coalition  
CEO, Intertribal Agriculture Council

**Undersigned by members of the Native Farm Bill Coalition**

- Bear River Band of the Rohnerville Rancheria
- Big Pine Paiute Tribe of the Owens Valley
- Blackfeet Nation
- Blue Lake Rancheria
- Cabazon Band of Mission Indians
- Caddo Nation of Oklahoma
- Central Council of the Tlingit and Haida Indian Tribes of Alaska
- Cher-Ae Heights Indian Community of the Trinidad Rancheria
- Cherokee Nation
- Chickasaw Nation
- Chippewa Cree Tribe
- Choctaw Nation of Oklahoma
- Colorado River Indian Tribes
- Colusa Indian Community
- Comanche Nation
- Confederated Salish and Kootenai Tribes of the Flathead Nation
- Confederated Tribes of the Grand Ronde
- Confederated Tribes of the Umatilla Indian Reservation
- Duckwater Shoshone Tribe
- Eastern Band of Cherokee Indians
- Fallon Paiute-Shoshone Tribe
- Fond du Lac Band of Lake Superior Chippewa
- Forest County Potawatomi Community
- Fort Belknap Indian Community
- Guidiville Band of Pomo Indians
- Hoopa Valley Tribe
- Hualapai Tribe
- Iowa Tribe of Kansas and Nebraska
- Kashia Band of Pomo Indians
- Kasigluk Traditional Elders Council
- Kenaitze Indian Tribe
- Keweenaw Bay Indian Community
- Kickapoo Tribe in Kansas
- Kickapoo Tribe in Oklahoma
- Kiowa Tribe of Oklahoma
- Kootenai Tribe of Idaho
- Lac du Flambeau Band of Lake Superior Chippewa Indians



# NATIVE FARM BILL COALITION

- Little Traverse Bay Bands of Odawa Indians
- Menominee Indian Tribe of Wisconsin
- Mescalero Apache Tribe
- Mille Lacs Band of Ojibwe
- Morongo Band of Mission Indians
- Muscogee (Creek) Nation
- Native Village of Noatak
- Native Village of Port Lions
- Native Village of White Mountain
- Navajo Nation
- Nez Perce Tribe
- Northern Cheyenne Tribe
- Oglala Sioux Tribe
- Oneida Nation
- Organized Village of Saxman
- Osage Nation
- Paiute Indian Tribe of Utah
- Pala Band of Mission Indians
- Pascua Yaqui Tribe
- Passamaquoddy Tribe - Pleasant Point
- Pauma Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Poarch Band of Creek Indians
- Pokagon Band of Potawatomi Indians
- Ponca Tribe of Nebraska
- Potter Valley Tribe
- Prairie Island Indian Community
- Port Gamble S'Kallam Tribe
- Pueblo of Jemez
- Pueblo of Laguna
- Pueblo of Tesuque
- Pyramid Lake Paiute Tribe
- Quapaw Tribe
- Quinault Indian Nation
- Red Cliff Band of Lake Superior Chippewa
- Red Lake Band of Chippewa Indians
- Resighini Rancheria
- Rosebud Sioux Tribe
- Saint Regis Mohawk Tribe
- San Carlos Apache Tribe
- San Juan Southern Paiute Tribe
- Santo Domingo Pueblo
- Santee Sioux Nation in Nebraska
- Sault Ste. Marie Tribe of Chippewa Indians
- Scotts Valley Band of Pomo Indians
- Seneca Nation
- Shakopee Mdewakanton Sioux Community
- Shoshone-Paiute Tribes of the Duck Valley Indian Reservation
- South Fork Band of Temoke Western Shoshone
- Spirit Lake Tribe
- Summit Lake Paiute Tribe
- Suquamish Indian Tribe
- Three Affiliated Tribes of the Fort Berthold Reservation
- Village of Venetie
- Walker River Paiute Tribe
- Wampanoag Tribe of Gay Head
- White Earth Band of Chippewa Indians
- White Mountain Apache Tribe
- Winnebago Tribe of Nebraska
- Wiyot Tribe
- Yakama Nation
- Yavapai-Apache Nation
- Yerington Paiute Tribe
- Zuni Tribe of the Zuni Indian Reservation
- Affiliated Tribes of Northwest Indians
- All Pueblo Council of Governors
- American Indian Alaska Native Tourism Association
- Columbia River Intertribal Fish Commission
- Great Lakes Indian Fish & Wildlife Commission
- Intertribal Agriculture Council



# NATIVE FARM BILL COALITION

- Intertribal Buffalo Council
- Intertribal Timber Council
- Kawerak, Inc. (20 communities/Native Villages)
- National Congress of American Indians (NCAI)
- National Association of FDPIR Programs (NAFDPIR)
- Native American Fish & Wildlife Society
- Northwest Indian Fisheries Commission (NWIFC)
- United South and Eastern Tribes (USET)
- Alaska Federation of Natives
- Alaska Native Health Board
- Alaska Village Initiatives
- Akiptan, Inc. Community Development Financial Institution
- Bear Cub Consulting
- College of Menominee Nation
- Elderberry Wisdom Farm
- First Nations Development Institute
- Fort Berthold Allottee Land & Mineral Owners Association
- Friendship House Association of American Indians
- Four Bands Community Fund
- Hempstead Project Heart
- Ho-Chunk, Inc.
- Indigenous Hemp Farmers Cooperative
- Kamahameha Schools
- (Hoopa) Klamath Trinity Resource Conservation District
- Lakota Funds
- Makoce Agriculture Development, Inc
- Mesa Grande Business Development Corporation
- National Association of Conservation Districts (NACD) Tribal RPG
- National Caucus of Native American State Legislators
- National Indian Education Association
- National Indian Health Board
- Native American Community Development Corporation
- Native American Contractors Association
- Native American Financial Officers Association
- Nixyáawii Community Financial Services
- Northern Shores Community Development, Inc.
- Numu Allottee Association
- Oklahoma Tribal Engagement Partners (OKTEP)
- Omaha Nation Far
- Osni Ponca, LLC
- Salish Kootenai Housing Authority
- Sixth World Solutions
- South Dakota Native Homeownership Coalition
- Tatanka Funds
- Toohnii Binaneest'ą' Altaas'éeí Alliance (ToohBAA)
- Sovereign Council of Hawaiian Homestead Associations (SCHHA)
- MAZON: A Jewish Response to Hunger