

2027 USDA EXPLANATORY NOTES – OFFICE OF THE GENERAL COUNSEL

Table of Contents

Preface	3
Agency-Wide.....	3
Purpose Statement.....	3
Permanent Positions by Grade and FTEs.....	5
Shared Funding Projects	6
Account 1: Office of the General Counsel	7
Appropriations Language.....	7
Lead-Off Tabular Statement	7
Project Statements.....	7
Justification of Changes.....	7
Geographic Breakdown of Obligations and FTEs	8
Object Classification.....	8
Status of Programs.....	11

This page was intentionally left blank.

PREFACE

This publication summarizes the fiscal year (FY) 2027 Budget for the U.S. Department of Agriculture (USDA). Throughout this publication any reference to the “Budget” is in regard to the 2027 Budget, unless otherwise noted. All references to years refer to fiscal year, except where specifically noted. The budgetary tables throughout this document show actual amounts for 2024 and 2025; Working Families Tax Cut Act; Agriculture, Rural development Food and Drug Administration and Related Agency Appropriations Act, 2026; and the President’s Budget request for 2027. Amounts for 2026 estimated levels include: non-enacted amounts such as Full-Time Equivalent levels, fleet levels, information technology investment levels, recovery levels, transfers in and out, balances available end of year, and obligation levels.

Throughout this publication, the Working Families Tax Cut Act is used to refer to the Public Law 119-21.

Pursuant to the Balanced Budget and Emergency Deficit Control Act of 1985, sequestration is included in the numbers for mandatory programs in 2024, 2025, 2026 and 2027.

In tables throughout this document, amounts equal to zero (0) are displayed as dashes (-). Amounts less than 0.5 and greater than zero are rounded and shown as a zero (0). This display treatment is used to prevent the masking of small non-zero amounts that do not round up to one (1). Due to rounding, some tables may not sum exactly.

AGENCY-WIDE**PURPOSE STATEMENT**

By General Order of June 17, 1905, the Secretary of Agriculture established the position of Solicitor, thereby consolidating the legal activities of the Department. In 1956, Congress established the position of General Counsel of the Department of Agriculture as a Presidential appointee confirmed by the Senate (70 Stat. 742) (7 U.S.C. 2214). The Office of the General Counsel (OGC) provides legal services and legal oversight required by the Secretary of Agriculture and USDA to achieve the Department’s mission and deliver programs and services to the American people. OGC serves as the law office of USDA and provides legal services to officials at all levels of USDA, as well as technical support to members of Congress concerning the programs and activities carried out by USDA.

OGC determines legal policy and directs the performance of all legal work conducted for USDA. All Department legal services are supervised by OGC, and the General Counsel reports directly to the Secretary. The General Counsel is the chief law officer of USDA and is responsible for providing legal services for all programs, operations, and activities of USDA. Four Deputy General Counsels, five Associate General Counsels, and four Regional Attorneys assist the General Counsel in managing the legal work of the office. In addition, the General Counsel’s office also includes the Office of Administration and Resource Management, the Office of Information Affairs, and the Office of Legislative and Regulatory Affairs.

The headquarters legal staff is divided into five divisions: (1) Marketing, Regulatory, and Food Safety Programs; (2) International Affairs, Food Assistance, and Farm and Rural Programs; (3) Natural Resources and Environment; (4) General Law and Research; and (5) Civil Rights, Labor and Employment Law. The field-based staff is organized into four regions (Eastern, Central, Mountain and Pacific) with 12 offices across the country.

Legal Advice

OGC provides both oral and written legal advice to all USDA officials. OGC also reviews administrative rules, regulations, and final agency decisions for legal sufficiency; agency agreements and contracts; and provides counsel about other agency activities.

Legislation and Document Preparation

OGC prepares draft legislation, patent applications arising out of inventions by USDA employees, contracts, agreements, mortgages, leases, deeds, and any other legal documents required by USDA agencies. OGC also provides technical assistance to Congress on legislative drafting.

Administrative Proceedings

OGC represents USDA in administrative proceedings for the enforcement of rules having the force and effect of law; in quasi-judicial hearings held in connection with the administration of various USDA programs; and defends USDA in civil rights, employment, and labor cases.

Federal and State Court Litigation

OGC works with the Department of Justice (DOJ) in all Departmental civil litigation. The bulk of this litigation involves the defense of claims brought against the USDA. OGC serves as USDA's liaison with DOJ and assists in the preparation of all aspects of the government's case in affirmative and defensive litigation.

OGC refers to matters involving allegations of criminal conduct and assists DOJ in preparation and prosecution of criminal cases. In some instances, OGC attorneys represent USDA as Special Assistant United States Attorneys, both in civil and criminal matters. By delegation, the Associate General Counsel for General Law and Research represents USDA in certain classes of cases before the United States Courts of Appeals.

Office of Legislative and Regulatory Affairs

Adopting the widely recognized best practice across federal agencies, in May 2025, legislative and regulatory coordination functions moved from the Office of Budget and Program Analysis to OGC. This change ensures the Department's regulatory coordination function provides review of regulatory and legislative matters in accordance with the Administration's review process. The managed clearance process ensures all documents submitted to the Office of Management and Budget, or for publication in the Federal Register, undergo necessary legal review and receive final approval from policy officials.

Office of Information Affairs (OIA)

OIA is responsible for the Freedom of Information Act (FOIA) and records management function of the Department. OIA provides oversight to agency records officers across the Department. The General Counsel has been delegated authority to serve as the Department's Chief FOIA Officer.

Law Library

OGC maintains the USDA Law Library, which, prior to 1982, was housed at the National Agricultural Library and includes print and electronic legal research resources and tools.

Geographic Location

The work of OGC is carried out in Washington, D.C. and four regions, which include 12 offices as follows:

- Eastern Region: Atlanta, Georgia; Harrisburg, Pennsylvania; Milwaukee, Wisconsin
- Central Region: Kansas City, Missouri; Little Rock, Arkansas; Temple, Texas
- Mountain Region: Denver, Colorado; Albuquerque, New Mexico; Missoula, Montana
- Pacific Region: San Francisco, California; Juneau, Alaska; Portland, Oregon

As of September 30, 2025, there were 232 permanent full-time employees, of which 118 were located in the headquarters office and 114 in the field offices.

Available Funds and FTEs

Table OGC-1. Available Funds and FTEs (thousands of dollars, FTEs)

Item	2024		2025		2026		2027	
	Actual	FTEs	Estimated	FTEs	Estimated	FTEs	Estimated	FTEs
Salaries and Expenses:								
Discretionary Appropriations	\$60,537	228	\$60,537	218	\$60,537	214	\$44,986	170
Total Available	60,537	228	60,537	218	60,537	214	44,986	170
Lapsing Balances	-624	-	-210	-	-537	-	-	-
Total Obligations, OGC.....	59,913	228	60,327	218	60,000	214	44,986	170
Other USDA:								
AgRecords Electronic Records	11,487	-	8,448	-	-	-	-	-
CCC.....	458	2	458	2	100	-	100	-
Civil Rights EEO Reimbursable.....	3,218	18	2,954	16	3,265	21	3,503	21
Detail Support.....	229	1	84	-	-	-	-	-
eDiscovery Modern Initiative.....	2,019	-	-	-	-	-	-	-
FOIAXpress and DOJ Portal.....	326	-	320	-	330	-	330	-
FS Non-Litigation Travel.....	1	-	-	-	-	-	-	-
Hazardous Material Management	716	3	852	4	875	4	898	4
Reimbursement from Agencies	-	-	-	-	-	-	15,537	44
OCFO Nonrecurring Expense	600	-	-	-	-	-	-	-
AMS Pandemic Cotton Merchandise	100	-	-	-	-	-	-	-
AMS User Fees	516	2	509	2	-	-	-	-
APHIS User Fees	10	-	1	-	5	-	5	-
Total, Other USDA.....	19,677	26	13,626	24	5,095	27	20,893	71
Total, Agriculture Available.....	80,214	254	74,163	242	65,632	241	65,879	241
Total Available, OGC	80,214	254	74,163	242	65,632	241	65,879	241

PERMANENT POSITIONS BY GRADE AND FTEs

Table OGC-2. Permanent Positions by Grade and FTEs

Item	2024			2025			2026			2027		
	HQ	Field	Actual Total	HQ	Field	Actual Total	HQ	Field	Estimated Total	HQ	Field	Estimated Total
EX	1	-	1	1	-	1	1	-	1	1	-	1
SES	16	4	20	17	4	21	17	4	21	17	4	21
GS-15.....	32	33	65	27	32	59	37	21	58	37	21	58
GS-14.....	47	47	94	51	48	104	52	48	100	59	49	108
GS-13.....	7	4	11	10	7	22	11	1	12	11	-	11
GS-12.....	11	15	26	3	6	10	10	-	10	19	-	19
GS-11.....	9	9	18	5	8	13	20	7	27	5	7	12
GS-10.....	-	-	-	-	-	-	-	-	-	-	-	-
GS-9.....	2	8	10	2	8	10	2	7	9	2	6	8
GS-8.....	1	-	1	1	-	1	1	-	1	1	-	1
GS-7.....	-	1	1	-	1	1	-	1	1	-	1	1
GS-6.....	1	-	1	1	-	1	1	-	1	-	-	1
Total Permanent	127	121	248	118	114	232	152	89	241	153	88	241
Total Perm. FT EOY	127	121	248	118	114	232	152	89	241	153	88	241
FTE.....	113	121	254	125	117	242	152	89	241	153	88	241

SHARED FUNDING PROJECTS

Table OGC-3. Shared Funding Projects (thousands of dollars)

Item	2024 Actual	2025 Actual	2026 Estimated	2027 Estimated
Working Capital Fund:				
Administrative Services:				
AskUSDA Contact Center	\$17	\$17	-	-
General Counsel Legal Compliance	-	3	\$43	\$43
Human Resources Enterprise System Management	12	13	27	26
Integrated Procurement Systems	18	18	22	22
Mail and Reproduction Management Division.....	157	179	166	167
Material Management Service Center.....	42	39	34	34
Personnel and Document Security Program	13	16	14	-
Procurement Operations Division.....	-	-	178	178
Subtotal.....	259	285	484	470
Communications:				
Creative Media & Broadcast Center.....	3	2	1	1
Subtotal	3	2	1	1
Finance and Management:				
Internal Control Support Services	13	11	1	1
Financial Shared Services.....	232	225	176	175
National Finance Center	78	81	73	73
Subtotal.....	323	317	250	249
Information Technology:				
Client Experience Center	1,786	1,622	1,168	1,145
Department Administration Information Technology Office.....	483	573	330	-
Digital Infrastructure Services Center.....	512	1,642	23	341
Enterprise Cybersecurity Services.....	162	205	190	190
Enterprise Data and Analytics Services	6	6	1	1
Enterprise Network Services.....	235	251	202	202
Subtotal.....	3,184	4,299	1,914	1,879
Correspondence Management Services:				
Office of the Executive Secretariat	2	31	25	25
Subtotal	2	31	25	25
Total, Working Capital Fund	3,771	4,931	2,651	2,638
Department-Wide Shared Cost Programs:				
Agency Partnership Outreach	22	21	10	11
America’s Agricultural Heritage.....	-	-	2	1
Diversity, Equity, Inclusion, and Accessibility	8	2	-	-
Employee Experience.....	11	8	1	-
Medical Services	52	-	-	-
NCR Interpreting Services	21	21	19	19
OCFO Shared Services Branch.....	-	-	2	3
Office of Customer Experience.....	9	4	-	-
Physical Security.....	14	17	7	7
Security Detail.....	16	23	44	44
Security Operations	23	20	20	20
Talent Group	10	10	1	-
TARGET Center	5	5	3	3
Total, Department-Wide Reimbursable Programs	191	131	109	108
Agency Total	3,962	5,065	2,783	2,732

ACCOUNT 1: OFFICE OF THE GENERAL COUNSEL

APPROPRIATIONS LANGUAGE

The appropriations language follows (new language underscored; deleted matter enclosed in brackets):

Office of the General Counsel

For expenses necessary to the Office of the General Counsel, [~~\$60,537,000~~]\$44,986,000.

LEAD-OFF TABULAR STATEMENT

Table OGC-4. Lead-Off Tabular Statement (in dollars)

Item	Amount
Estimate, 2026	\$60,537,000
Change in Appropriation	<u>- 15,551,000</u>
Budget Estimate, 2027	<u>44,986,000</u>

PROJECT STATEMENTS

Table OGC-5. Project Statement on Basis of Appropriations (thousands of dollars, FTEs)

Item	2024		2025		2026		2027		Inc. or Dec.	FTE Inc. or Dec.	Chg Key
	Actual	FTEs	Actual	FTEs	Estimated	FTEs	Estimated	FTEs			
Discretionary Appropriations:											
Legal Services	\$60,537	228	\$60,537	218	\$60,537	214	\$44,986	170	-\$15,551	-44	(1)
Total Appropriation.....	<u>60,537</u>	<u>228</u>	<u>60,537</u>	<u>218</u>	<u>60,537</u>	<u>214</u>	<u>44,986</u>	<u>170</u>	<u>-15,551</u>	<u>-44</u>	
Total Available	60,537	228	60,537	218	60,537	214	44,986	170	-15,551	-44	
Lapsing Balances	-624	-	-210	-	-537	-	-	-	-	-	
Total Obligations	<u>59,913</u>	<u>228</u>	<u>60,327</u>	<u>218</u>	<u>60,000</u>	<u>214</u>	<u>44,986</u>	<u>170</u>	<u>-15,551</u>	<u>-44</u>	

Table OGC-6. Project Statement on Basis of Obligations (thousands of dollars, FTEs)

Item	2024		2025		2026		2027		Inc. or Dec.	FTE Inc. or Dec.
	Actual	FTEs	Actual	FTEs	Estimated	FTEs	Estimated	FTEs		
Discretionary Obligations:										
Legal Services	\$59,913	228	\$60,327	218	\$60,000	214	\$44,986	170	-\$15,551	-44
Total Obligations	<u>59,913</u>	<u>228</u>	<u>60,637</u>	<u>218</u>	<u>60,000</u>	<u>214</u>	<u>44,986</u>	<u>170</u>	<u>-15,551</u>	<u>-44</u>
Add back:										
Lapsing Balances	624	-	210	-	537	-	-	-	-	-
Total Available	<u>60,537</u>	<u>228</u>	<u>60,537</u>	<u>218</u>	<u>60,537</u>	<u>-</u>	<u>44,986</u>	<u>170</u>	<u>-15,551</u>	<u>-44</u>
Total Appropriation.....	<u>60,537</u>	<u>228</u>	<u>60,537</u>	<u>218</u>	<u>60,537</u>	<u>-</u>	<u>44,986</u>	<u>170</u>	<u>15,551</u>	<u>-44</u>

JUSTIFICATION OF CHANGES

Base funds will allow the Office of the General Counsel to continue to provide legal oversight, maintain the Office of Information Affairs, responsively serve legal needs and support all activities of the Department. In accordance with administration policy announced in the Budget, OGC will follow new government-wide grants guidance prohibiting the use of Federal funds to pay for subscriptions to academic journals, as well as for the publication of research results that are not specifically required by Federal statute or approved in advance by a Federal agency. This policy preserves funds to support actual research by ensuring that the American taxpayer does not pay for

(1) A decrease of \$15,551,000 and 44 FTEs (\$60,537,000 and 214 FTEs available in 2026).

(A) A decrease of \$15,537,000 in salary adjustments and 44 FTEs.

A decrease in base funds will reduce OGC staff from 214 to 170. At this level OGC will continue to provide legal oversight and maintain the Office of Information Affairs to support the Department. If combined with a corresponding amount in reimbursements from USDA agencies receiving legal services, OGC staff can remain at the staffing level of 214. OGC will continue to assist the Secretary and USDA agencies by providing legal advice, preparing transactional documents, representing the Department in administrative proceedings, providing technical assistance to Congress, and assisting the Department of Justice in

litigation involving USDA. OGC also provides legal services to support USDA agencies in achieving their missions and offers legal assistance in areas that include but are not limited to farm programs, nutrition, food safety, and rural development. At this level, OGC will continue to ensure that the quality of OGC’s advice remains high, and OGC will continue to provide legal services such as technical assistance to Congressional members and staff, issuing formal legal opinions, drafting regulations and legislative language for Department priorities like the Farm Bill, and defending the Department against lawsuits.

(B) A decrease of \$14,000 for National Security Related Expenses being transferred to the Office of Homeland Security (\$14,000 available in 2026).

The decrease in funds of \$14,000 for National Security Related Expenses, being realigned to the Office of Homeland Security (OHS), will enhance efficiency and effectiveness within USDA. This strategic realignment will centralize resources under OHS, which provides leadership in national security through policy development, emergency preparedness and response initiatives, and threat mitigation coordination. Consolidating the budget under OHS eliminates redundancies, ensures more coordinated resource allocation, and improves the execution of departmental security policies, ultimately bolstering the USDA's resilience and readiness without compromising overall security.

GEOGRAPHIC BREAKDOWN OF OBLIGATIONS AND FTEs

Table OGC-7. Geographic Breakdown of Obligations and FTEs for Agricultural Research (thousands of dollars, FTEs)

State/Territory/Country	2024		2025		2026		2027	
	Actual	FTEs	Actual	FTEs	Estimated	FTEs	Estimated	FTEs
Alaska	\$874	6	\$1,272	6	\$1,297	6	\$1,326	6
Arkansas.....	1,203	7	1,109	6	167	1	-	-
California	3,754	15	3,570	13	2,851	10	2,881	10
Colorado	2,714	13	2,935	14	2,107	9	2,132	9
District of Columbia.....	36,199	112	35,308	103	41,255	133	26,283	90
Georgia	3,761	16	3,670	17	1,995	8	2,015	8
Missouri.....	2,209	11	2,203	11	1,888	9	1,893	9
Montana	1,297	7	1,452	7	1,064	5	1,075	5
New Mexico.....	1,119	5	1,202	6	313	1	234	1
Oregon.....	1,869	11	2,508	11	2,134	9	2,157	9
Pennsylvania.....	1,874	9	1,812	8	1,825	8	1,863	8
Texas.....	1,015	24	1,314	6	1,097	5	1,108	5
Wisconsin	1,653	9	1,820	9	1,843	9	1,861	9
Mexico.....	128	1	152	1	164	1	178	1
Obligations.....	59,913	228	60,327	218	60,000	214	44,986	170
Lapsing Balances	624	-	210	-	537	-	-	-
Total, Available.....	60,537	228	60,537	218	60,537	214	44,986	170

OBJECT CLASSIFICATION

Table OGC-8. Classification by Objects – Discretionary Funding (thousands of dollars)

Item No.	Item	2024 Actual	2025 Actual	2026 Estimate	2027 Estimated
Personnel Compensation:					
	Washington D.C.	\$17,401	\$18,625	\$15,979	\$14,796
	Personnel Compensation, Field	16,718	17,193	14,750	13,121
11	Total personnel compensation	34,119	35,818	30,729	27,917
12	Personal benefits	11,937	12,347	11,675	10,936
13.0	Benefits for former personnel	-	3	-	-
	Total, personnel comp. and benefits.....	46,056	48,168	42,404	38,853

Item No.	Item	2024 Actual	2025 Actual	2026 Estimated	2027 Estimated
Other Objects:					
21.0	Travel and transportation of persons	127	29	50	25
22.0	Transportation of things.....	8	1	1	1
23.1	Rental payments to GSA.....	1,744	1,650	1,574	1,287
23.2	Rental payments to others.....	-	40	177	164
23.3	Comms, utilities, and misc. charges	305	420	437	421
24.0	Printing and reproduction.....	82	59	65	30
25	Other contractual services	-	-	-	-
25.2	Other services from non-Federal sources Other goods and services from Federal sources.....	5,826	3,653	6,164	615
25.3	Supplies and materials	4,558	5,224	8,059	3,513
26.0	Equipment.....	1,164	701	1,044	75
31.0	Insurance Claims and Indemnities	43	344	25	5
42.0	Total, Other Objects	-	38	-	-
	Total, Other Objects	13,857	12,129	17,596	6,133
99.9	Total, new obligations.....	59,913	60,327	60,000	44,986
DHS Building Security Payments					
	(included in 25.3)	\$248	\$269	\$274	\$274
Position Data:					
	Average Salary (dollars), ES Position	\$206,537	\$209,896	\$211,995	\$214,115
	Average Salary (dollars), GS Position	\$145,535	\$151,114	\$154,136	\$148,092
	Average Salary, GS Position	14.2	14.3	14.4	13.8

This page was intentionally left blank.

STATUS OF PROGRAMS

The Office of the General Counsel (OGC) provides legal services to the Secretary of Agriculture and subordinate employees. OGC provides proactive, accurate, creative, and prompt legal services to ensure lawful delivery of the Department's programs.

Current Activities

OGC advises on almost every Departmental activity and provides daily counsel on a broad range of legal issues. OGC reviews all of USDA's regulations and provides advice regarding contracts, mortgages, leases, deeds, and other legal documents that include multi-million dollar business transactions. OGC attorneys provide extensive drafting and technical assistance to Congress on legislative proposals. OGC's practice is also litigation intensive. OGC represents or assists in the representation of USDA in disputes in every conceivable tribunal, including administrative bodies, the Federal and State courts, and the World Trade Organization, among other fora. OGC's services include responding to legal inquiries and preparing legal opinions on a broad range of issues regarding the Department's authorizing statutes, as well as laws of general applicability, fiscal law matters, and constitutional issues. OGC collaborates with the Department of Justice (DOJ) in trial and appellate litigation.

Selected Examples of Recent Accomplishments by OGC

- OGC provided extensive assistance to DOJ in multiple challenges to the Administration's Executive Orders relating to numerous subjects including improving the federal personnel system, ensuring proper use of taxpayer dollars in the administration of federal programs, and increasing access to natural resources on federal lands.
- OGC led USDA's deregulatory efforts to consolidate disparate USDA agency National Environmental Policy Act regulations as a single streamlined rule.
- OGC successfully defended a precedent-setting \$40 million administrative claim against a State for improper Supplemental Nutrition Assistance Program payments.
- OGC assisted DOJ in the recovery of approximately \$83 million for wildfire damage on Forest Service lands as well as participated in senior negotiations related to wildfire damage claims across five separate fires totaling more than \$1.2 billion in U.S. damages.
- OGC completed action on over 36 administrative complaints under the Packers and Stockyards Act resulting in \$419,939 in civil penalties and in payments of over \$9.4 million to livestock sellers and producers.

Office of Information Affairs (OIA)

The Freedom of Information Act (FOIA) requires executive agencies to disclose to the public agency records, except for those records that are protected from disclosure under one or more of the nine statutory exemptions or three statutory exclusions. OIA serves as the focal point for USDA's FOIA program. OIA provides day-to-day coordination and ensures statutory compliance with FOIA. OIA processes FOIA requests, consultations, and appeals on behalf of all USDA staff offices except the Office of the Inspector General.

This past year, the OIA successfully executed a strategy to process the surge in incoming requests. OIA received a total of 2,720 initial requests and processed 2,345 initial responses. That is a 38.8 percent increase in incoming requests and a 36.6 percent increase in processed initial requests. Less than 1 percent of the records processed by OIA were administratively appealed. OIA coordinated the closure of USDA's 10 oldest FOIA requests and coordinated the release of more than 100+ multi-component records requests.

OIA is also responsible for USDA's compliance with the Federal Records Act (FRA). Under the FRA, USDA must create and manage information that documents its work and safeguard certain information. This Act also requires that agencies maintain and dispose of records according to an approved records schedule. OIA has begun work on a multi-year plan to rebuild the Department's

record management (RM) program to standardize training, raise the visibility of the program, and create an entirely digital infrastructure for USDA's RM program.

A notable initiative included the development of day one RM training for all incoming political appointees. Due to the unprecedented number of retirements in 2025, OIA successfully completed hundreds of RM exit clearance sessions to ensure proper retention of assets, transfer of institutional knowledge, and termination of secured access for exiting personnel.

OIA also developed a Records Schedule Information Report to facilitate oversight of record schedules across USDA, and to increase the ability to recognize trends, furthering compliance with the Departmental Records Program Plan of Corrective Action stemming from a 2022 National Archives and Records Administration inspection.

Office of Legislative and Regulatory Affairs (LRA)

In May 2025, legislative and regulatory coordination functions moved from the Office of Budget and Program Analysis to OGC to ensure USDA's regulatory work aligns with the Administration's priorities. This change ensures the regulatory coordination function is housed within the Department's legal leadership, thereby adopting the widely recognized best practice across federal agencies. The managed clearance process ensures all documents submitted to the Office of Management and Budget (OMB) or for publication in the Federal Register undergo necessary legal review and receive final approval from policy officials. This approach supports legal compliance and policy alignment.

LRA staff manages the coordinated review and policy approval of USDA's regulatory and legislative workload. Between October 1, 2024, and September 30, 2025, LRA coordinated the review and clearance of a total of 1,028 documents. This included 233 regulatory workplans, 209 interagency regulatory reviews, 280 legislative referral memoranda, 92 Federal Register notices, 69 not significant regulations, 68 funding announcements, 40 regulations exempt from OMB review, and 37 economically significant regulations. USDA achieved deregulatory savings of \$9.5 million in 2025. The Department took action to implement Executive Order 14192 "Unleashing Prosperity Through Deregulation" with a total of 73 deregulatory documents, including four deregulatory notices, 14 deregulatory regulations or withdrawals, and rescission of 12 obsolete rules and 43 regulatory guidance documents. For 2026, USDA projects savings of at least \$21.3 million from finalized deregulatory actions, notably from FSIS. This estimate represents a significant increase from 2025. Combined, USDA is estimated to be able to provide deregulatory savings of at least \$30.8 million.

Marketing, Regulatory and Food Safety Programs Division (MRFSPD)

MRFSPD provides legal advice and litigation support to the Food Safety and Marketing and Regulatory Programs Mission Areas. In 2025, MRFSPD completed action on over 36 administrative complaints under the Packers and Stockyards Act (PSA). Those administrative efforts overall resulted in favorable decisions in all filed cases, \$419,939 in civil penalties and in payments of over \$9.4 million to livestock sellers and producers. In addition, numerous violators of the PSA were ordered to cease and desist from operating in violation of the Act, and numerous violators were removed from the livestock industry by Decision and Order suspending their registration to operate subject to the PSA. MRFSPD also advised the Agricultural Marketing Service (AMS) in several livestock Dealer Trust Claim matters wherein dealers and producers were owed several millions of dollars; two of those matters closed during 2025, and the remainder are currently being litigated and working towards resolution in various federal district courts. Finally, MRFSPD held a PSA reparation hearing regarding a dispute between the Oklahoma National Stockyards and the Oklahoma City Livestock Exchange on the tariff rate charged to all producers.

MRFSPD assisted AMS to conclude a multi-year formal rulemaking on the National Federal Milk Marketing Order pricing formula. The final rule amended the pricing provisions in the eleven Federal Milk Marketing Orders and a referendum was conducted among eligible producers. MRFSPD drafted 76 reparations decisions involving more than \$3.1 million in disputed claims and completed action on over 36 administrative complaints under the Perishable Agricultural Commodities Act (PACA). These administrative complaints, consent decisions, and decisions and orders resulted in favorable decisions in all filed cases, collective recoveries for produce dealers in the amount of over \$6.7 million, civil

penalties assessed against PACA violators in the amount of \$150,000.00, and revocation of numerous PACA licenses.

MRFSPD devoted significant time to accomplishing Presidential priorities, including completing numerous Food Safety and Inspection Service (FSIS) deregulatory actions such as removal of various regulations from the Code of Federal Regulations regarding: the standard of identity for Tripe with Milk; publication of state meat and poultry establishments pumped bacon sampling. MRFSPD filed complaints involving several critical Animal and Plant Health and Inspection (APHIS) programs and obtained favorable decisions in 22 cases. MRFSPD worked closely with APHIS to finalize high priority rulemakings, including a final rule delisting *Brucella* spp. as a select agent and an interim final rule related to high path avian influenza.

MRFSPD continues to work with DOJ to defend all three agencies against several significant legal challenges to agency policies in federal courts, including rulemakings related to bioengineered food disclosure, the organics program, enforcement of the Horse Protection Act, and FSIS line speeds regulations.

International Affairs, Food Assistance, and Farm and Rural Programs Division (FAIRD)

FAIRD provided extensive legal advice and assistance to the Farm Service Agency (FSA), Foreign Agricultural Service (FAS), Risk Management Agency (RMA), Natural Resources Conservation Service (NRCS), Food and Nutrition Service (FNS), and the Rural Development Mission Area (RD). This included implementation of the American Relief Act, 2025, Further Continuing Appropriations and Disaster Relief Supplemental Appropriations Act, 2025, the One Big Beautiful Bill Act, and discretionary uses of funds as authorized by the Commodity Credit Corporation (CCC) Charter Act.

FAIRD provided critical assistance in the implementation of the Secretary's disaster relief agenda through the Emergency Commodity Assistance Program, Emergency Livestock Relief Program and Flood and Wildfire Program, and Supplemental Disaster Relief Program, as well as the Marketing Assistance for Specialty Crops program. FAIRD provided guidance to FSA on legal challenges to certain prior ad hoc pandemic and disaster programs and provided counsel regarding the modernization of the operation of the Agricultural Foreign Investment Disclosure Act of 1978. FAIRD provided legal advice to the RMA and the Federal Crop Insurance Corporation Board of Directors in the administration of policies covering approximately \$192 billion of U.S. agricultural production. The advice related to numerous matters including terms of crop insurance policies, regulations, litigation, compliance issues, administrative proceedings, and final agency determinations. FAIRD assisted RMA in establishing policies, publishing regulations, implementing laws, and responding to FCIC stakeholders including farmers and Congress. FAIRD advised NRCS on a variety of legal issues involving numerous conservation programs and including advising NRCS on transitioning Partnerships for Climate Smart Commodities to the Advancing Markets for Producers initiative; the process to terminate grants; and the rescission of Inflation Reduction Act funds for NRCS programs.

FAIRD is the principal office providing advice to FAS. FAIRD provided legal advice regarding implementation of international food assistance and developmental programs such as the Food for Progress and market development programs including the Market Access Program. FAIRD served as primary counsel for USDA in the successful dispute under the United States-Mexico-Canada Agreement challenging Mexico's genetically engineered corn ban and provided advice in trade negotiations to protect U.S. and USDA agricultural interests.

After a contentious administrative process and hearing, FAIRD successfully defended FNS' claim of approximately \$40 million against a State for its SNAP payment errors. While the State has appealed to Federal district court, FAIRD's skillful and thorough representation at the administrative level established a strong, clear record. The decision made by the Administrative Law Judge (and potentially, by a federal court) provides valuable precedent in supporting the actions of FNS to hold States accountable for improper administration of SNAP. FAIRD also assisted in the initiative to collect SNAP household data to determine levels of fraud, waste, and abuse. This ongoing effort will eliminate silos among State-retained data and allow the Federal government more transparency into the more

than 40 million individuals who receive SNAP. FNS will use the data analysis to improve SNAP program integrity.

FAIRD provided legal advice to the Rural Utilities Service, Rural Business Cooperative Service, and Rural Housing Service, which collectively administer more than 90 programs serving rural America. In carrying out Administration priorities in 2025, FAIRD closely worked with RD to ensure that existing and future financial assistance agreements comported with goals such as maximizing American energy potential including supporting endeavors to close over \$10 billion in rural energy projects through the creation of novel, complicated transaction documents.

Natural Resources and Environment Division (NRED)

NRED played a pivotal role in providing legal advice to the Forest Service (FS) on compliance with a plethora of Federal environmental and administrative laws governing management of the 193 million-acre National Forest System (NFS). NRED counseled the FS on legal issues arising under laws including the Administrative Procedure Act, the National Environmental Policy Act (NEPA), the Mining Law of 1872, the Mineral Leasing Act, the National Forest Management Act (NFMA), the Healthy Forest Restoration Act, Clean Water Act, National Historic Preservation Act, and the Endangered Species Act (ESA). NRED provided support to the FS regarding policies and priorities contained in more than a dozen new Executive Orders and numerous contracts, grants, and other business agreements concerning conservation programs. NRED provided advice on the rescission of outdated and unnecessary regulations, as well as streamlining the process for regulatory amendments including efforts to re-evaluate the structure of FS processes for issuing guidance through the handbook and manual system. NRED reviewed legislative reports and testimony for congressional hearings, responded to numerous requests for technical drafting assistance, and provided legal advice to the FS regarding realty, water, access and law enforcement issues as well as the timing and process for payments under the Secure Rural Schools Act. NRED provided critical analysis regarding NEPA matters as a result of appellate and Supreme Court decisions affecting NEPA compliance including advice on the development and promulgation of new USDA-wide NEPA regulations. This assistance involved working across USDA to develop strategies to streamline procedures for NEPA compliance.

NRED advised the FS on litigation strategies concerning a broad array of actions affecting NFS including hazardous fuel projects, infrastructure projects, key energy development initiatives, proposed mineral development, and land exchanges. NRED continually coordinated with DOJ to develop and present persuasive litigating positions on numerous land use issues including the use of aerial fire retardants, management of wild horses and burros, management of feral cattle in national forests, livestock grazing, infrastructure permitting, vegetation management, and activities in wilderness areas. NRED supports USDA efforts to remediate hazardous waste sites on USDA property and facilities resulting from past activities on NFS such as abandoned mines and oil and gas wells and once active defense sites. These efforts included drafting orders and documents to mitigate public health and safety risks and to restore natural resources.

NRED also provided counsel regarding livestock grazing on NFS lands including developing range improvements and activation of recently vacated allotments. This support included advice on new policy guidance, interpretation of existing grazing authorities, and review of current grazing practices to identify efficiencies and the need for revisions.

General Law and Research Division (GLRD)

GLRD, in coordination with attorneys from DOJ and other OGC divisions and offices, is responsible for presenting USDA's legal position in cases on appeal. GLRD's responsibilities include reviewing briefs and advising DOJ in cases affecting USDA programs before the United States Supreme Court, Federal circuit courts, and State appellate courts. GLRD also is responsible for preparing USDA's recommendations to DOJ about whether to appeal adverse decisions of various lower courts or to participate as amicus in Supreme Court or other appellate cases. GLRD assisted DOJ in antitrust litigation in cases such as *In re Granulated Sugar*, *In re Pork Antitrust Litigation*, *In re Cattle and Beef Antitrust Litigation*, and *In re Turkey Antitrust Litigation*.

GLRD is responsible for legal issues and litigation related to reorganizing USDA, issuing delegations of authority, complying with the Federal Vacancies Reform Act, and analyzing procurement and grant issues. GLRD provides department-wide advice on matters related to fiscal law and appropriations, including implementing rescissions, reviewing Congressional notifications and correspondence, and addressing inquiries from the Government Accountability Office (GAO). GLRD defended the government in litigation before Federal courts and administrative forums, including approximately 31 protest-related matters initiated before the GAO and seven matters initiated before the Civilian Board of Contract Appeals, as well as those continued from the previous year.

GLRD provides the primary legal support for Departmental Administration, the Office of the Chief Financial Officer (OCFO), the Office of the Chief Scientist, and for the Research, Education, and Economics (REE) Mission Area (REE). For REE, GLRD frequently provided legal services to the National Institute of Food and Agriculture and the Agricultural Research Service (ARS). In addition, GLRD assisted with responses to requests for information and technical assistance from Congress and answered questions surrounding the Farm Bill's expiration and its extension. GLRD advised OCFO on implementing new policies and procedures in response to several Executive Orders.

GLRD handles the legal work and litigation that arises under the Freedom of Information Act (FOIA), the Federal Tort Claims Act, the Privacy Act, and the Federal Advisory Committee Act for USDA agencies and offices. GLRD continued handling and supporting DOJ in numerous FOIA cases. Many of these cases involve complex disclosure and privacy issues for records of private individuals and sensitive records of senior USDA officials. Similarly, GLRD handled numerous requests for records requested through subpoenas and other discovery requests in matters under litigation.

GLRD participated in Federal interagency initiatives with respect to biodefense, counterintelligence, and human trafficking. GLRD provided advice and guidance on sensitive matters before the Committee for Foreign Investment in the United States, helping to ensure the security of the Nation's agricultural resources. GLRD advised USDA personnel on national security matters including issues relating to cybersecurity and information technology.

GLRD provides advice regarding intellectual property (IP) issues involving patent procurement, copyrights and trademarks, invention rights, assignments, licenses, and technology transfer from USDA to the private sector. GLRD represented USDA before the U.S. Patent and Trademark Office (USPTO) regarding patents and trademarks and assisted DOJ in patent and copyright infringement litigation. GLRD provided advice to the Food and Nutrition Service on new branding for the Supplemental Nutrition Program for Women, Infants, and Children and branding for the Summer Nutrition Program for Kids. This included due diligence research for conflicting trademarks and applications for trademark registrations at the U.S. Patent and Trademark Office (USPTO). GLRD also provided IP legal advice and drafted documents for the Agricultural Marketing Service regarding invention rights in research funded by marketing order checkoff funds and in the acquisition and renewal of a trademark registration owned by a terminating marketing order. GLRD coordinated patent application work between the Forest Service (FS) and Animal and Plant Health Inspection Service contractors and the USPTO.

Civil Rights, Labor, and Employment Law Division (CRLELD)

CRLELD provides advice to management at USDA offices and client agencies on matters involving civil rights, human resources, labor relations, and employee relations and in a variety of situations such as disciplinary actions, informal complaints of employment discrimination, and program implementation. CRLELD represents USDA before the Equal Employment Opportunity Commission (EEOC), the Merit Systems Protection Board (MSPB), the Federal Labor Relations Authority, the U.S. Office of Special Counsel, and other administrative tribunals and assists DOJ in similar civil rights claims brought in federal district and appellate courts, and the Court of Federal Claims. In 2025, CRLELD handled a caseload of 583 active cases, taking on 307 new cases and appeals. CRLELD was also responsible for defending USDA in approximately 440 administrative EEOC hearings and appeals and 21 administrative Merit Systems Protection Board appeals.

CRLELD's work in defending USDA from consolidated MSPB appeals filed by approximately 1,800 terminated probationary employees resulted in dismissals of the appeals as moot after USDA returned the employees to status quo ante pursuant to other preliminary injunctions. CRLELD assisted DOJ in 50 federal court cases, including civil rights cases challenging aspects of USDA programs. CRLELD also represented USDA regarding whistleblower retaliation allegations, where the Office of Special Counsel conducted investigations or pursued resolution. This representation resulted in improved defense of USDA in all civil rights, labor and employment complaints and a savings of at least \$90 million.

CRLELD assisted DOJ in numerous ongoing lawsuits challenging Executive Orders (EOs) and Administration Guidance, including litigation involving: Unions' Challenge to Large Scale RIFs, Probationary Terminations and Deferred Resignation Program; Unions' Challenge to Rescission of Collective Bargaining; Unions' Challenge to Exclusion from Federal Labor-Management Programs (APHIS/PPQ); Union's Lawsuit Challenging Large-Scale RIFs; Unions' Challenge to Termination of Probationary Employees; Challenge to EOs on Employees Encumbering DEIA Positions; Challenge to Removal of Inspectors General; Challenge to Disclosure of Personal Information to DOGE; and Challenge to EOs Banning Affirming Care, among other challenges.

CRLELD provided legal review and drafting of template agreements for approximately 5,400 employees' participation in two Deferred Resignation Programs (DRPs) and responded to Agency requests for assistance on issues related to employees who wanted to elect after the deadline, who declined to participate in EEO proceedings after they were placed on administrative leave, and who wanted to negotiate additional DRP terms. CRLELD successfully achieved 45 dismissals of EEOC complaints brought by employees who elected DRP by arguing that the terms in the agreements released any EEOC matters that were filed or could have been filed.

In furtherance of Executive Order 14219 Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative, CRLELD assisted with drafting language for the proposal to remove the outdated and unnecessary Title 7 CFR Part 15f regulations pertaining to the processing of Section 741 hearings regarding USDA program discrimination from 1981 through 1995.

Regional Offices

These offices provide critical legal services to the USDA agencies charged with implementing programs at the regional, State, and local levels.

The Eastern Region of OGC consists of three field offices located in Atlanta, Harrisburg, and Milwaukee. This office serves all USDA Agencies across 22 states, the District of Columbia, Puerto Rico, and the Virgin Islands including 29 National Forests. The Eastern Region is responsible for title work and various land-acquisition cases for the FS, as well as for NRCS conservation easement acquisitions. In 2025, the Region completed over 250 land and conservation easement acquisitions, accumulating over 100,000 acres valued at over \$120 million. The Region assisted RD with the origination, servicing, restructuring, and collection of more than 1,300 matters, including loans and grants worth over \$2.2 billion. The Region also managed a considerable volume of related litigation, which involved over \$13 million, often stemming from bankruptcies and foreclosures linked to its extensive loan portfolio. Among its key accomplishments, the Eastern Region conducted over 200 eligibility reviews for program participants and issued more than 250 instructions for loan closings. Furthermore, the Eastern Region handled multifamily housing-related legal work, involving eligibility reviews of loan applicants, examination of loan proposals, and preparation of closing instructions. These efforts resulted in the completion of hundreds of transactions involving close to 200 multifamily housing projects. The Eastern Region also provided assistance to FSA on loan issues, bankruptcies, and third-party foreclosures in over 400 matters valued at more than \$13 million. For several years, FNS has actively implemented measures aimed at reducing the prevalence of trafficking in SNAP. Currently, the Eastern Region is managing over 120 open cases.

The Eastern Region provided assistance to the FS in response to major damage caused by Hurricane Helene which inflicted severe damage to infrastructure, transportation corridors, and interdependent commercial systems throughout the Southern Appalachians. The need for rapid federal approvals for

emergency reconstruction, including in-stream work, temporary bridges, and the use of National Forests, raised significant environmental, engineering, and public safety concerns, significantly expanding OGC's advisory and litigation workload. These emergency actions also resulted in season-long closures of whitewater recreation, generating substantial public interest and necessitating close coordination between the Forest Service, the DOJ, and stakeholders to address concerns and emerging disputes.

The Central Region consists of offices in Kansas City, Little Rock, and Temple, Texas and provides legal advice and services to all USDA agencies and activities in a 13-State Region. Central Region attorneys provided advice to the FS in an increasing number of cases due to adjacent landowners contesting boundary and property lines including erecting gates and other barriers to access National Forests. In providing advice to NRCS in 2025, the Central Region processed over 161 easements under the Agricultural Conservation Easement Program. In addition, Central Region attorneys provided significant assistance to DOJ in several cases, including the successful defense of an action in which the plaintiffs alleged the "Swampbuster" provisions of the Food Security Act of 1985 were an unconstitutional taking and violated the Commerce Clause as well as contending that USDA's rules exceeded its statutory authority. Central Region attorneys assisted in the successful defense of USDA in several actions in various forums brought by employees, former employees, or job applicants alleging various types of workplace discrimination or mistreatment.

Central Region attorneys provided legal assistance to RMA in matters involving Approved Insurance Providers and their participation in the crop insurance program including providing assistance to DOJ in actions taken filed at the Civilian Board of Contract Appeals or in District Court. A significant part of the Region's work involves RD's loan and grant programs including the Community Facility Program that makes available loans and grants that finance essential community facilities such as hospitals, clinics, libraries, daycare centers, fire stations, fire trucks, ambulances, and water and sewer systems all of which contribute to the vitality and viability of rural America. The Region provided assistance to RD in transactions involving various debt instruments, in particular, Master Trust Indentures and municipal bond transactions that have become increasingly complex. As post-pandemic foreclosures accelerate, the Region has provided increased assistance relating to RD's Housing Programs. In the Special Loan Servicing Modification Program, private lenders accelerated foreclosure actions on defaulted mortgages and other third-party actions by competing creditors all required the involvement of this office in the defense of approximately 500 such actions. Central Region attorneys provided programmatic support and defensive litigation and advice to FNS regarding SNAP and other food assistance programs. FNS uses a variety of detection methods to monitor SNAP retailers who may be involved in a variety of violations or non-compliance. Central Region attorneys successfully defended these judicial challenges in numerous cases. Central Region attorneys provided legal support to the Farm Production Conservation and Business Center in a variety of matters. For example, USDA is a tenant in hundreds of Service Centers in rural America, and Central Region attorneys processed many property transfers to new ownership to ensure that leases were being legally transferred, and the property was properly managed and maintained.

The Mountain Region consists of offices in Lakewood, Colorado; Albuquerque; and Missoula, Montana. This office handled over 1,600 new matters in 2025 including matters involving 59 National Forests and 16 National Grasslands. Most of the Region's legal work in 2025 involved FS decisions to: harvest timber, implement projects to reduce the threat of wildfire and restore forest health, approve and administer surface use and occupancy in connection with private mining operations; allow livestock grazing, construct energy infrastructure, and operate recreational facilities. The assistance provided to the FS principally involved advice related to NEPA, NFMA, and the ESA in program planning. The Region assisted DOJ in the defense of over 150 cases including cases related to prescribed burns and assisted with affirmative fire claims for suppression costs and damages.

The Mountain Region advised on FS decisions related to several mines and proposed mining projects involving coal and critical minerals including advice on: NEPA for coal leasing at the Skyline Mine in Utah, permitting issues for critical minerals, including handling litigation challenging the FS's approval of plans of operations for the Pinto Valley Mine copper and molybdenum project in Arizona, and the

Stibnite Mine gold and antimony project in Idaho. Mountain Region attorneys were significantly involved in continuing to help the FS navigate the pending, Resolution Copper land exchange, which resulted in numerous different lawsuits to stop the exchange, one of which encompassed a Petition filed with the U.S. Supreme Court for a Writ of Certiorari, which the Court subsequently denied.

Most of the FS range management programs rests in the area serviced by this office which requires significant assistance on many decisions authorizing livestock grazing on NF lands. The matters or cases typically involved challenges to grazing authorizations by nongovernmental organizations under NEPA and ESA. Attorneys also advised on or defended other FS decisions that indirectly supported grazing operations on NFS rangelands, such as defending decisions to remove feral horses or excess wild horses, to maintain stock water rights held in support of the FS's range program, to control prairie dog populations, and to conduct predator damage management.

The Mountain Region provided substantial assistance to other USDA agencies throughout 2025, particularly FSA and RD in furtherance of their farm program and rural development missions. For FSA, the Region helped the agency navigate bankruptcy proceedings, assisted in the resolution of numerous requests for equitable relief, and advised the agency on a variety of legal issues involving trusts, foreclosures, and borrower/loan servicing matters. For RD, the Region helped the agency obligate millions of dollars in funding, to include loans and grants involving the Water and Environmental Program, Community Facilities Programs, and Multifamily Housing Program.

The Pacific Region consists of offices in San Francisco, Portland and Juneau and provides advice to USDA agencies in Alaska, Washington, Oregon, California, Hawaii, Nevada, and Idaho, as well as American Samoa, Guam, the Republic of Palau, the Federated States of Micronesia, the Commonwealth of the Northern Mariana Islands, and the Republic of the Marshall Islands. The Juneau office plays a unique role in advising the Alaska Federal Subsistence Board and USDA officials on controversial issues regarding subsistence resources for rural residents of Alaska including matters such as advising USDA officials on legal issues associated with a proposed change in the status of the city of Ketchikan to allow its residents to obtain a priority for subsistence purposes. This office assisted DOJ in a successful case at the Ninth Circuit Court of Appeals involving federal authority to enforce a priority for subsistence fishing on the Kuskokwim River. The decision preserves rural Alaska residents' priority over urban residents of places like Anchorage when fishing in navigable waters within federal reservations.

Pacific Region attorneys advise USDA agencies concerning a variety of types of contracts and contract disputes. Areas of contract advice include FS procurement, stewardship contracts, cooperative agreements, timber sales, leases, and licenses. Similar assistance is provided with respect to commercial transactions involving RD and FSA; for example, this office provided advice and compliance reviews for RD agencies in loan and grant transactions, totaling more than \$252 million in loans and \$28 million in grants in 2025. When client agency contracts are the subject of disputes, OGC Pacific Region attorneys provide first-chair representation of client agencies before the Civilian Board of Contract Appeals and support to DOJ in litigation before the Court of Federal Claims and the Federal Circuit. Notably, our advocacy recently led to a positive outcome in a Court of Federal Claims case in which the plaintiff sought significant damages for breach of contract and takings arising out of the Forest Service's revocation of special use authorizations for telecommunications sites on national forest lands.

The Pacific Region advised the FS in responding to proposals for hydropower and other alternative energy projects. This office works closely with FS hydropower assistance teams with management of FERC-authorized hydropower and transmission projects on NFS lands in the Region, including relicensing and decommissioning of existing facilities and the completion of a new operating plan for the Bonneville Power Administration's administration of thousands of miles of powerline facilities and access roads across a vast expanse of FS lands.

The Pacific Region provides critical support to DOJ in litigation related to wildfires, assisting in the recovery of more than \$83.1 million in damages in 2025. Catastrophic wildfires in Washington, Oregon, and California resulted in dozens of FS emergency closure orders being issued, which

attorneys reviewed and revised as needed on an expedited basis. These attorneys advise FS Law Enforcement & Investigations agents regarding the scope of their authority when handling matters with varying degrees of nexus to NFS lands and review agreements with local sheriff departments to confer California peace officer status on FS law enforcement officers.

The Pacific Region provides advice to the FS on a wide range of special use permits authorizing individuals and entities to engage in specified activities in national forests including assistance to address non-compliance with permit terms. These matters included assisting the FS to resolve complex permit-based relationship issues including rights with respect to bottled water extraction in a national forest and the use of privately owned cabins in Alaska that are used for traditional and customary purposes.