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Dear Members of the Tongass Transition Collaborative,

In the spring of 2022, the State of Alaska Division of Forestry (ADOF) and The Tongass National Forest (TNF) entered into an agreement, funded through the Southeast Alaska Sustainability Strategy Initiative, to continue jointly working on the Region's transition to a forest products industry primarily sustained by young-growth trees.

Specifically, the parties agreed to reconvene and support the Tongass Transition Collaborative (TTC). The TTC was tasked as a forum for continuing to monitor and help implement the Tongass Transition recommendations, including a broad selection of ideas and recommendations from a wide set of stakeholders for consideration by the TNF. Additionally, the TTC was to assist the Tongass with its scheduled 5-year review of the Tongass Land and Resource Management Plan (Forest Plan). The TTC was formed in the fall of 2022 and held its first meeting in December 2022.

The purpose of this letter is to respond to the TTC's suggestions for the path forward for each of the young-growth goals identified in the *Tongass Transition Collaborative 5-Year Review of the 2016 Tongass Land Management Plan Amendment, dated August 29, 2023*.

We acknowledge your assessment of progress achieved to date. As you have outlined below, there are significant challenges and barriers toward implementation of our young-growth goals identified in the Forest Plan. While there continue to be many challenges to implementing the 2016 Forest Plan that are outside of our control, the Forest Service acknowledges that there are things that we can do to work to support a successful transition to a young-growth industry in the region. Please see our specific responses to the TTC's suggestions for the five goals the TTC's review focused upon, below.

Goal 1 (*Provide a sustainable young-growth timber supply that sustains long-term timber yields while maintaining or improving habitat conditions for wildlife and fish at the landscape level*)

Suggestions and Responses:

1a. *Review the Tongass Advisory Committee's (TAC's) vision for young growth and update the Forest Plan with a young-growth emphasis. (See TAC Final Recommendations, 2015.)*



Agency response: The Tongass agrees that the TAC's vision for young-growth forest management is important for the regional economy in Southeast Alaska; to not only provide volume for local and regional purchasers, but to provide for wildlife habitat improvement, access for subsistence harvest, and other important amenities for the residents. On April 26, 2024, an official notice was filed in the Federal Register stating that the Tongass was going to initiate the assessment phase of a revision to the 1997 Forest Plan. This plan revision is long overdue and will help the Forest build cohesive direction on the future of the Tongass' young-growth forests as well as all other resources managed on the Tongass. This revision will resolve the 2016 Forest Plan having a separate chapter dealing with forest management and will better integrate all aspects of timber and vegetation management on the Forest.

1b. Work with industry to calculate sustained yield for the next 10-15 years and to manage young growth so that it can be profitable for the industry.

Agency response: In response to the TAC recommendations in the 2016 Forest Plan, the Tongass National Forest entered into an agreement with ADOF in 2016 to jointly conduct a forest-wide inventory of young-growth stands. The inventory data collected information covering over 42,000 acres of young growth. This information was incorporated into the Forest Planning and Projection System (FPS) that allows the inventory information to be tracked spatially and grown over time, allowing the data to not become stagnant. In addition to the actual data, the ADOF hired Terra Verde to conduct an extensive mapping exercise that subdivided all the Forest's young growth into ecological units and applied consistent vegetation labels on all polygons across the Forest. This exercise has helped to strengthen the existing data by reducing the effect of productivity variability across managed stands.

After all the young-growth stands were mapped, Terra Verde re-aggregated all the inventory data into the newly mapped stands and extrapolated data from inventoried stands into un-inventoried stands with the same vegetation label, allowing each stand to then be grown forward using each stand's unique site index.

In 2021, the 2nd phase of this effort began, to include mapping of all young growth on non-National Forest System (NFS) land across Southeast Alaska. The same process will be done as with the NFS young-growth forests where the ecological stands will then be populated with inventory data, allowing each stand to be projected out for future volume and species composition. This effort will lead to one unified young-growth map that can be modeled, allowing for cooperation across landowners in the region to plan for a sustainable and predictable flow of young-growth forest.

1c. Recognize that continued management is / will be necessary to promote habitat value and to consider the impacts of no management activity in high value watersheds.

Agency response: In May 2023, the TTC met in Klawock, AK and one of the presentations made by Forest Service silviculturists included an in-depth analysis of young-growth stands in the Staney and Thorne Bay basin areas to predict changes in stand structure over time to provide indications of potential effects to deer habitat over time. The analysis included a display of predicted wildlife habitat projected out 150 years

with scenarios that included no management for the next 150 years and one that fully implemented the 2016 Forest Plan. Having a healthy mix of age classes within a basin over time greatly decreases the number of acres that are in a stem-excluded state at any one time. The analysis in the two basins clearly showed that active vegetation management can not only provide a supply of volume for wood products but will help maintain an abundant understory which will, over time, provide benefit to habitat value.

1d. Provide longer-term contracts (e.g. 10 years) so that the industry can survive market fluctuations.

Agency response: The Agency typically sets a contract length based upon the size of the timber sale offering and other factors. Typical timeframes are 1 – 3 years but the Agency certainly has the allowance to provide a longer time frame in contract terms. The Agency acknowledges that this may be beneficial to operators that are working to develop and respond to new markets for young-growth timber.

1e. Consider shipping safety, taking into consideration the fact that loads of young growth logs are heavier than equivalent old growth log loads.

Agency response: In the spring of 2022, the TNF entered into a Challenge Cost Share agreement with the Alaska Forest Association (AFA) to advance information and technology about a young-growth forest products industry and help ensure a successful transition to young-growth forest management that sustains the industry and bolsters local economies in Southeast Alaska. Through this collaboration, AFA's unique understanding of industry's operating needs in Southeast Alaska can provide valuable input to the Forest Service, including current markets and future trends, logging and processing costs, haul and shipping considerations, and other factors unique to young-growth timber shaping industry decision making.

1f. Provide leadership to the All Landowners Group to promote information development and sharing across ownerships.

Agency response: The Forest Service has long been a partner in the All Landowners Group (LOG). The LOG used to have a rotating leadership structure but since early 2022, there has been consistent leadership in that the meetings are facilitated by someone from the State of Alaska's Office of Project Management and Permitting (OPMP) and led by an employee of the ADOF. This has led to more effective and productive meetings. The Forest Service remains an active participant and has provided information, meeting space and subject matter expertise when asked.

Goal 2 (Pre-commercially treat stands to reduce or eliminate stem exclusion, to decrease stand rotation time, and provide future silvicultural opportunities)

Forest Service response:

The Tongass greatly benefited from the PCT Task Force recommendations from fall 2020 and continues to work on diversifying contract mechanisms and developing a variety of project sizes to accommodate different businesses. The Forest also has extended contract lengths to allow for use of migrant workers. The issue of funding for thinning has temporarily been resolved through national legislation like the Budget Infrastructure Law and the Inflation Reduction Act. Both

have allowed the Tongass to fund precommercial thinning and other stand improvement work through contracts, agreements and workforce development. We are taking steps to develop future funding mechanisms to continue such work both on and off National Forest System lands via a variety of OneUSDA agreements with the Denali Commission.

Suggestions and Responses:

2a. Continue to implement the PCT Task Force recommendations.

Agency response: The Forest Service has made significant progress in making changes to the program, particularly in the past 3 years. In 2022, a region-wide ID/IQ contract was awarded to several contractors with varying ranges of capabilities. We've been able to award small and more complex contracts (i.e. riparian management area thinning) through the use of agreements with tribal entities and environmental organizations like the Mule Deer Foundation and the Nature Conservancy.

The use of agreements with tribes, corporations and conservation organizations has allowed for the development of local workforce.

Although there has been no formal change with the Department of Labor, the Tongass has successfully worked with some contractors to come to a common understanding of meeting the camp standards and has successfully had remote thinning camps for the past 3 years.

2b. Continue to highlight the importance of thinning for multiple benefits.

Agency response: The TNF resource specialists continue to highlight the many benefits of thinning, which include faster tree growth, decrease of time in stem exclusion, a more-diverse and abundant understory, greater stand stability and healthier trees that can withstand potential damage agents caused by climate change.

The TNF has recently joined a precommercial thinning workgroup, led by the Forest Sciences Research Lab (FSL), to develop research questions that can be answered by the 20 years of monitoring data collected through the Tongass-Wide Young Growth Study (TWYGS), which was initiated in 2001. Other partners in this endeavor include the Alaska Department of Fish and Game, along with The Nature Conservancy and Mule Deer Foundation.

2c. Prioritize PCT where the benefits will be the greatest.

Agency response: The TNF silviculturists have worked extensively with other resources to best determine precommercial thinning by development of 5-year plans. Ideally, the age, productivity, and species composition of units, where the stands lie on the landscape, and connectivity needs would drive the prioritization of the thinning program. With a decrease in timber harvest and the associated road maintenance dollars and other access difficulties, often time logistics play into the prioritization.

There are currently approximately 45,000 acres of young-growth stands considered in the ‘thinning window’ and these are being prioritized with the goal of precommercially thinning, as many of the trees will soon become too big for precommercial treatments.

Recently, biologists from ADF&G have reached out to work collaboratively to prioritize stands for the greatest benefit to wildlife habitat and subsistence hunters in Game Management Unit 2 (Prince of Wales Island).

2d. Use different terminology that highlights the multiple benefits of thinning. The terms “pre-commercial thinning” and “wildlife treatments” refer to thinning practices that have multiple benefits. Common language could illustrate that both terms refer to the same treatment and achieve multiple goals.

Agency response: The Tongass has long recognized the importance of a common language. Different terms were used in the 1997 Forest Plan Revision and subsequent amendments. There has been an ongoing effort by Tongass Silviculturists to establish a common terminology and this will be incorporated into the upcoming Forest Plan revision.

Goal 3 (Create opportunities in young-growth management and the full utilization of forest products in a manner that enhances the economic vitality of the region and the resilience of local communities)

Forest Service response:

The TNF acknowledges a lack of a predictable supply of young-growth volume that is NEPA cleared and shelf-ready to respond to interested operators. Several landscape-level projects that included young-growth harvest units were put on hold and then cancelled after the July 15, 2021, announcement of the Southeast Alaska Sustainable Strategy (SASS). The Tongass is in the process of beginning to implement projects identified through the SASS forest management (SASSfm) public process that occurred through the spring and summer of 2023.

Suggestions and Responses:

3a. Create integrated thinning projects aimed at meeting multiple objectives (i.e., combine silviculture and fish/wildlife biology expertise to devise prescriptions).

Agency response: In the fall of 2022, the TNF initiated a process, that took more than a year, developing a 10-year priority project area list for integrated forest management – working from the ground up with ideas and recommendations from Tribes, partners and the public. We heard loud and clear that *restoration is a priority, management should uplift recreation and tourism, and timber and forest products remain important in Southeast Alaska.*

A team of TNF scientists and experts finalized a list of project areas that covers the full range of management activities, including precommercial and commercial thinning projects in young growth to meet multiple resource objectives, to implement the greatest diversity of public needs. It is recognized that our partners will be vital to building and sustaining the capacity we need to complete a list of priorities this large.

3b. Focus on economic viability and scale when designing young-growth units and silvicultural prescriptions.

Agency response: Economic viability and a variety of project sizes to accommodate the needs and abilities of potential purchasers is an important consideration in any project design. The TNF acknowledges a current lack of NEPA-cleared volume that would allow for a variety of timber sale sizes and prescriptions to meet the needs for creating economically viable projects. The TNF also recognizes a need to create ‘shelf’ volume to allow timber sale purchasers to have certainty in their business, allowing for investment in new equipment to accommodate young growth.

3c. Recruit expertise from existing/current timber industry.

Agency response: In the spring of 2022, the TNF entered into a Challenge Cost Share agreement with the Alaska Forest Association to advance information and technology about a young-growth forest products industry and help ensure a successful transition to young-growth forest management. The schedule of work in this agreement includes contracting with industry experts to help the Forest understand what potential legislative, policy and industry standards may need changing to be successful at transitioning. This agreement will be in place until the spring of 2027.

3d/e. Continue to support and expand community forest partnerships (e.g., Keex’ Kwaan Community Forest Partnership) and Continued investment in workforce development.

Agency response: During the internal process of developing SASSfm, there was a focus on emerging and potential community forest partnerships. Through investments from the Budget Infrastructure Law, several agreements have been created that allow funding for some of these community forests to conduct work on private and public land. These investments into the community forest partnerships have led to continued and increased investment in workforce development. Other workforce development includes funding and utilizing the Alaska Youth Stewards (AYS) program. Using the Alaska National Interest Lands Conservation Act (ANILCA) hiring authority, the TNF hired two employees to lead the AYS crews each year. Community Forest Partnerships have expanded to include the Hoonah Native Forest Partnership, Keex’ Kwaan Community Forest Partnership, and the Klawock Indigenous Stewards Forest Partnership.

3f. Invest in/subsidize biomass projects that utilize harvest waste (e.g., Southeast Conference wood pellet project).

Agency response: State and Private Forestry in the region has been assisting the Tongass with moving biomass projects forward. They have financially assisted with the pellet mill in Ketchikan, seven Cordwood Boilers for Southeast Island School District, two for Craig, one for Hydaburg, Hoonah, Sitka and Ketchikan.

Southeast Conference has recently been awarded funds for the analysis to create a Biomass Development Opportunity Zone for Prince of Wales Island. Since 2022, Southeast Conference has also been planning for a pellet mill demonstration project that

will make pellets from a variety of materials, including discarded pallets, cardboard, logging slash and discarded lumber.

3g. Provide short-term subsidies for habitat restoration

Agency response: The Agency has recently partnered with the Mule Deer Foundation (MDF) to jointly develop projects with the primary objective of improving wildlife habitat. An additional objective is to remove the wood for use in forest products. With the multiple objectives and, currently, low-value young-growth wood, these treatments will be contracted through service contracts and/or integrated resources service contracts. This will provide habitat improvement, forest products, and small sale opportunities for interested operators to work in young-growth forests.

3h. Utilize young growth for local construction (e.g., log / lumber kits for recreational cabins and affordable housing)

Agency response: The Bipartisan Infrastructure Law that was passed in 2021 provided over \$14 million for the Alaska Cabins Project, which will result in approximately 25 new cabins located across the Tongass and Chugach National Forests. The Regional Office has stipulated that wood harvested and processed on the National Forests of Alaska will be used in the construction of all these cabins, that will be located in boat- and road-accessible areas, with locations determined through a public input process. The use of local wood and operators may provide some new opportunities for young-growth wood from the TNF.

In May 2023, the State of Alaska Senate passed Bill 87, which amends state law to allow for a Local Use Lumber Program. On August 30th, 2023, the Governor signed the bill into law.

This new program in Alaska provides training and education that will allow small sawmills to self-certify their lumber. The Local Use Lumber Program trains sawmill operators to grade their lumber.

This effort is expected to increase the marketability of young-growth forest products produced in-state, lower home-building costs and stimulate rural economies as currently, most local sawmills are unable to afford membership with accredited grading agencies, restricting the available lumber markets for smaller mill owners. Training sessions were held this summer in Palmer, Alaska and on Prince of Wales Island.

3i. Integrate young-growth logs into training and education (e.g., local high schools are using young growth woodworking/shop class)

Agency response: There is a National USFS Housing Strategy that has encompassed the following strategic goals: “Promote and develop markets for sustainably grown wood, particularly for low-value timber and for use of wood as a “green building material” and “Create jobs and opportunities for local communities to sustainably produce and use wood products and provide contracting opportunities in communities for small businesses.” On the Tongass, the Sitka Conservation Society (SCS) and the Sitka Ranger District (SRD) are collaborating to find ways to build affordable, equitable housing for

Forest Service employees using locally-sourced, young-growth timber products from the TNF. One goal of this Housing Opportunities Module Experiment (HOME) is to provide for workforce development and community involvement.

3j. Provide road access for young-growth projects.

Agency response: As the Tongass works to implement integrated forest management projects per SASSfm, the Forest is looking at ways to coordinate projects across time and space that meet multiple objectives to potentially share costs of access. The Regional Office is also considering ways to support some road reconstruction costs in support of vegetation management treatments.

3k. Support mill and timber operator capacity (e.g., through financial investment/subsidies; donations of cants/logs).

Agency response: The USDA Forest Service Wood Innovations Program expands and creates markets for wood products and wood energy that support long-term, sustainable management of National Forest System lands and other forest lands. The program has two national competitive grants programs, as well as project activities funded under discretionary agreements and annual work plans. The Forest Service State and Private Forestry national office provides leadership and coordinates national program emphasis areas, develops national partnerships, and provides market and technical support for biomass timber, renewable wood energy, and other emerging wood products. Each of the nine Forest Service regions provide technical and market development leadership to the Wood Innovations Program and serve as the key point of contact for program grant recipients in their region. They also link regional priorities with on-the-ground activities and national program focus areas.

In 2022, \$2 million in grants was awarded to entities throughout the State of Alaska. In 2024, that amount was more than quadrupled, with \$8.3 million of grants awarded. In the years 2022-2024, the R10 Wood Innovations Accomplishments included funding for 34 projects across the state.

3l. Conduct research into young-growth markets and demand (e.g., what lumber contractors are willing to purchase), including how to diversify products from each tree/log.

Agency response: In the spring of 2022, the TNF entered into a Challenge Cost Share agreement with the Alaska Forest Association to advance information and technology about a young-growth forest products industry and help ensure a successful transition to young-growth forest management. Some of the work may include looking into what a future demand may be for young growth.

3m. Support and implement community projects through the Southeast Alaska Sustainability Strategy (SASS) (e.g., support community forest partnerships).

Agency response: In the fall of 2022, the TNF initiated a process, that took more than a year, developing a 10-year priority project area list for integrated forest management – working from the ground up with ideas and recommendations from Tribes, partners and the public.

A team of TNF scientists and experts finalized a list that covers the full range of management activities, including precommercial and commercial thinning projects in young growth to meet multiple resource objectives, to implement the greatest diversity of public needs. The extensive list of activities was ranked according to many decision criteria.

Goal 4 (Harvest of young-growth timber supports a variety of mill sizes and operators across the forest, including small and micro sales that support economic opportunities)

Challenges:

- Need much more robust variety of sales
- There is not enough supply
- Uncertainty about future supply
- Approaches to YG require an aggressive, innovative, multi-faceted, integrated mindset

Agency response: The Tongass recognizes all of the above challenges. The primary goal currently is to NEPA-clear the vegetation management activities that were identified under the SASSfm public involvement effort. It is recognized that there is currently a lack of ‘shelf volume’ that could help provide for a variety of sale types and sizes. Having a robust amount of ‘shelf volume’ would help ease uncertainty of supply and allow for taking different approaches to implementing sales and treatments in our young-growth forests.

4a. Connect inventory data to sale offerings (e.g., map sustained yield to determine sale locations). Need to offer where it is cost effective

Agency response: The inventory data that the Tongass maintains is very dynamic. In the past year, through the efforts of a SASS investment with the Division of Forestry, we were able to acquire a map of all young growth in the region and extrapolate Tongass stand exam data into non-National Forest System lands young-growth stands based upon the stand typing which matches that of the Tongass.

The Forest has also done a forest-wide analysis of basins of young growth. Applying various economic factors, a total of 54 basins were rated on a basis of 1-3 on how they *currently* would provide available young growth, with least cost in terms of haul distances and road reconstruction as an example of just a few of the factors considered.

There is also an effort to take a long-term look at supply of young growth over time on two road systems: False Island and Corner Bay. This analysis will provide an optimization of young-growth volume and understory habitat for wildlife across time and space. This will provide information on how to maintain a long-term, viable supply for local operators in the area.

4b. Pursue Environment Assessments (EAs) instead of Environmental Impact Statements (EISs), especially for micro-sales.

Agency response: The last three projects that have included harvest of young-growth timber have been NEPA-cleared utilizing EAs rather than EISs. One of the projects,

Thorne Bay Basin, contains a large amount of acreage of young-growth timber harvest to meet multiple objectives along with many other integrated resource activities. The hope is that this project can provide a template of how to identify, analyze, and implement future integrated resource management projects that clear a variety of activities within a broad geographic area such as a watershed or basin. We have also established a standing interdisciplinary work group to coordinate various activities within a project area.

4c. Encourage Forest Service sponsored activities that work with local operators to utilize Tongass young growth (e.g., building recreation cabins with young growth).

Agency response: As discussed under 3h and 3i, the Tongass is pursuing avenues to encourage utilization of Tongass young growth in local projects. The Bipartisan Infrastructure Law that was passed in 2021 provided over \$14 million for the Alaska Cabins Project, which will result in approximately 25 new cabins located across the Tongass and Chugach National Forests. The Regional Office has stipulated that wood harvested and processed on the national forests of Alaska will be used in the construction of all these cabins. Through a project called HOME (Housing Opportunities Module Experiment) the Sitka Conservation Society (SCS) and the Sitka Ranger District (SRD) are collaborating on small home designs constructed with locally sourced, young-growth timber products from the TNF. This will offer an opportunity to build affordable, equitable housing for Forest Service employees, and contribute to workforce development and community involvement.

4d. Use challenge cost share agreements and partnerships as a more efficient approach to young-growth management. (E.g., identifying a local partner who can produce the desired product).

Agency response: Since the announcement on the Southeast Alaska Sustainability Strategy in July 2021, there have been significant investments made with many partners, interested parties and tribal entities throughout the region. Some examples follow: The Alaska Division of Forestry has been working with State, Private and Tribal Forestry and the Tongass National Forest in partnership to develop a regionwide map of young growth, to collect data, using local, developing workforce in support of various projects across the region. An agreement was put into place to reconvene the Tongass Transition Collaborative as well as the Landowner's Group. These groups have worked to identify challenges, opportunities and to provide important input and support across interests. Via the SASS investments, we have developed the internal knowledge, capacity, and ability to craft partnership agreements effectively and efficiently.

4e. Provide leadership direction to source wood locally to the extent possible.

Agency response: Leadership at the WO and the Regional level actively supports utilization of locally sourced young-growth timber on the Tongass through projects such as the Alaska Cabins Project and the HOME project in Sitka (see 3h, 3i, and 4c above). As discussed above, the Forest Service is working with the State and other partners to share information and develop a workforce to support continued projects across the Tongass.

4f. Create larger-scale young growth pilot/experimental projects implemented through partner organizations (e.g., provide young-growth supply to an entity like The Nature Conservancy to manage small sales to local operators, through a Challenge Cost-Share Agreement or other contracting mechanism).

Agency response: The Tongass National Forest has been working with the Mule Deer Foundation to implement vegetation treatments in older young-growth stands that provide for an improvement in wildlife habitat treatment while also removing the trees to provide a supply of young-growth volume for local purchasers. The Sitka Ranger District has also been working with the Sitka Conservation Society on a tiny homes initiative to help with the regional housing crisis. This project is looking to develop a locally sourced supply of young-growth wood.

4g. Practice co-intent within timber/development LUDs (e.g., thinning projects that support wildlife habitat and produce commercial product)

Agency response: The Tongass, in partnership with some of our national partners, has been working to identify and implement small projects within co-intent areas to benefit multiple resources while providing a supply of young-growth volume to our various operators across the Forest. The Mule Deer Foundation has most recently begun a partnership with the Tongass to improve wildlife habitat while producing some commercial wood for the local economies. Other projects currently in NEPA analysis, such as the Thorne Bay Basin Integrated Resource Management EA, are proposed as integrated projects to restore and support habitat while providing a commercial young-growth timber sale.

4h. Adjust sale designs to make them more affordable/accessible for small operators.

Agency response: The Tongass is committed to ensuring an affordable, consistent supply of timber from the Forest. As an example, the Big Thorne Timber Sale EIS cleared young-growth units that had complicated prescriptions that met the 2008 Forest Plan. The 2016 Forest Plan has afforded more flexibility and as a result, the Forest has been analyzing each unit to see if they can be slightly modified to better fit the needs of the small operators that are showing an interest in purchasing young-growth volume.

It is recognized that in order for operators to make a transition to a lower-quality timber supply, that the supply needs to be consistent, long-term, and for the road construction/reconstruction costs to be minimized. Simpler prescriptions and unit designs can greatly improve the economics of timber sales.

4i. Access existing equipment more suited to young growth (e.g., machinery/equipment already in use in the lower 48 states).

Agency response: As discussed in response 1e, 3c, and 3l, the 2022 Challenge Cost Share agreement with Alaska Forest Association will help the Forest Service accomplish a successful transition to young-growth management that considers the logistical, economic, and equipment needs specific to a young-growth industry. AFA's unique understanding of industry's operating needs in Southeast Alaska can provide valuable input to the Forest Service, including current markets and future trends, logging and

processing costs including haul and shipping, and logistical and economic considerations associated with equipment used in a young-growth harvest-based industry.

4j. Create Young Growth Coordinators tasked within each Ranger District to connect communities with young-growth opportunities. Host the positions external to the Forest Service (e.g., within community development organizations, Tribal entities, etc.). The focus of the positions would be to serve as a link between supply and demand by helping to connect infrastructure, small business development, etc. with young-growth opportunities, and inform/educate small businesses about relevant investment opportunities and associated paperwork.

Agency response: The Tongass National Forest hired a Forest-level young-growth coordinator in 2009 as a temporary position. In 2010, that position was made permanent and has been filled with a trained silviculturist since. This position has been instrumental in providing subject matter expertise to the silvics, logistics and economics of young-growth management as well as helping to promote a common understanding of the challenges, opportunities and political realities the Forest faces during this time of transition.

Currently the Tongass is committed to maintaining the Forest-level coordinator who works closely with district silviculturists and other personnel to promote a common understanding of the resource and assist wherever needed. The Forest will re-evaluate the need for additional coordinators in the future and acknowledges the strength in having positions that are in partnership or external to the Agency.

Goal 5 (Make available a variety of potential forest products that support the development of an integrated industry based primarily upon young-growth timber harvest)

Suggestions and Responses:

5a. Pursue opportunities for a broader diversity of forest products (e.g., red cedar for cultural wood, biomass for heating buildings, etc.).

Agency response: With the investments that have been made available region-wide through the Southeast Alaska Sustainability Strategy, there has been much more opportunity to provide for cooperative efforts to find and make available cultural trees. Investments have been made such as funding a tribal field crew to document culturally significant cedar trees and compile data that can be used to ensure ecologically sustainable cultural/artisanal use. Biomass heating systems are actively being funded and are being constructed in key places around the region.

5b. Utilize as much of each tree/log as possible (e.g., lumber, locally milled value-added products such as cabin kits and furniture, wood energy such as firewood, chips, pellets and biochar/charcoal, and cultural use such as carving).

Agency response: As the supply of volume that comes off of the Tongass becomes more consistent and regular as young-growth trees become economically viable, many more opportunities should come available for the industry to become integrated where multiple products are produced and sold from young-growth wood.

5c. Purchase locally produced wood for Forest Service projects (e.g., cabins, bridges, signs, etc.) and wood energy. These purchases can encourage broader economic growth and incentivize strategic partnerships.

Agency response: The Bipartisan Infrastructure Law that was passed in 2021 provided over \$14 million for the Alaska Cabins Project, which will result in approximately 25 new cabins located across the Tongass and Chugach National Forests. The Regional Office has stipulated that wood harvested and processed on the national forests of Alaska will be used in the construction of all these cabins. A project, called H.O.M.E., based out of Sitka is working on small home designs that will be constructed using local young growth. The use of local wood and operators may provide some new opportunities for young-growth wood from the TNF. See also response 3h.

5d. Promote non-timber forest products through integrated management approaches (e.g., partner with Tribes and others to manage for berries, biomass for boilers, composting residuals, mushroom production, etc.).

Agency response: The Forest acknowledges that while non-timber forest products currently do not play a big role in the economic fabric of Southeast Alaska, there is great potential; and these products are incredibly important to the way-of-life for many who reside in Southeast Alaska. The Tongass is currently revising their 1997 Land Management Plan. A Forest Plan revision has several opportunities for formal and informal engagement in the development of a new plan. The current policies around collection of non-forest timber products are outdated and it can be cumbersome to apply for and receive a permit for collection and sale of gathered and harvested products from the Forest. The TNF encourages active engagement with the public process on all aspects of the future Tongass Land Management Plan.

5e. Address local community needs through locally sourced timber (e.g., to address housing shortage, high heating costs, etc.).

Agency response: As previously discussed, one new project - the Housing Opportunities Module Experiment (HOME) - a partnership between the Sitka Ranger District and Sitka Conservation Society, is collaborating on small home designs constructed with locally-sourced, young-growth timber products from the TNF. State and Private Forestry in the region has been assisting the Tongass with moving biomass projects forward, with heating systems being funded and constructed around the region (see 3f, 3h, 3i, 4c, 4e, 5a, and 5c).

5f. Strengthen communication about funding that is available for young growth opportunities.

Agency response: The State, Private and Tribal Forestry actively works with non-National Forest System landowners to communicate and provide funding for a variety of opportunities. As described in response 3k, the USDA Forest Service Wood Innovations Program expands and creates markets for wood products and wood energy that support long-term, sustainable management of National Forest System lands and other forest lands. The program has two national competitive grants programs, as well as project activities funded under discretionary agreements and annual work plans. The Forest

Service State, Private and Tribal Forestry national office provides leadership and coordinates national program emphasis areas, develops national partnerships, and provides market and technical support for biomass timber, renewable wood energy, and other emerging wood products. Each of the nine Forest Service regions provide technical and market development leadership to the Wood Innovations Program and serve as the key point of contact for program grant recipients in their region. They also link regional priorities with on-the-ground activities and national program focus areas.

In 2022, \$2 million in grants was awarded to entities throughout the State of Alaska. In 2024, that amount was more than quadrupled, with 8.3 million dollars of grants awarded. In the years 2022-2024, the R10 Wood Innovations Accomplishments included funding for 34 projects across the state.

5g. Extract / utilize slash from thinning projects for biomass (especially near road systems).

Agency response: This potential supply of biomass from the thinning projects across the Forest has been considered several times from different entities. This is a challenging opportunity, but the Forest Service is prepared to make thinning slash available through avenues provided through the non-timber forest products program.

5h. Recognize that overseas log exports will need to continue for forest industry viability.

Agency response: The Forest Service recognizes that overseas log exports will need to continue for forestry viability. There is a developed market for overseas logs from young-growth trees and utilizing this market does provide for local harvesting, hauling and shipping jobs. This helps maintain forest industry experience in the region and allows a place for the very small operators to sell the logs they are unable to use or market in their operations.

The Tongass would like to commend the TTC on the very thorough, critical and specific observations of progress made and challenges that remain as the Forest works to transition to an industry primarily comprised of young-growth trees. The Forest also recognizes that although the TTC's primary objective was to provide an external 5-year check-in of the Forest Plan Amendment 2016, they also provided some reflections on 'Past and Future Progress' as well as recommendations for the 'Path Forward' outside of the 2016 Forest Plan Amendment.

Many of the noted reflections and challenges are deeply felt by employees of the Tongass that have been working to transition to young growth while maintaining a viable industry. It is recognized that the Tongass National Forest has long been one of the most politically visible forests in the nation and that all management actions tend to draw a lot of internal and external scrutiny. It is recognized that a different approach to all aspects of the forest management program will be needed in identifying areas, surveying the affected resources, clearing activities through the NEPA process, incorporating planned activities across time and space in a geographic area with varying ages of young growth, and providing a sufficient supply of volume in a variety of sale sizes and types to provide consistency of supply for operators to feel comfortable in making investments and management decisions. It is recognized that many of the

necessary actions to be undertaken will need to be done through collaboration and strong partnerships.

The Tongass National Forest looks forward to working with The Tongass Collaborative in the future as we navigate development of a new Forest Plan and work to implement the integrated forest management activities identified in the public SASSfm process. We value the breadth of collaboration across the group, and we look forward to working on other items identified as challenges such as identifying and NEPA-clearing a sustainable, predictable supply of young growth, working to identify and develop products and markets, ensuring that there is active and consistent community engagement and safe access to the many natural resources that the residents of Southeast Alaska enjoy and depend on.

Sincerely,

A handwritten signature in blue ink, appearing to read "Francis Sherman". The signature is written in a cursive style with a large, stylized initial "F".

FRANCIS SHERMAN
Forest Supervisor

cc: Connie Lewis; Sheila Spores