

# USDA Southeast Alaska Sustainability Strategy Investment Recommendations

## APPENDIX C – OPPORTUNITIES AND BARRIERS

The following list contains the opportunities and barriers that were identified internally from agency employees and received via the Southeast Alaska Sustainability Strategy engagement process. We have done our best to condense while still retaining the submitter's wording. Some of the main themes that emerged from the submissions: Many of the agency application processes are written for typical rural America and presume large partner capacity making it difficult for Southeast Alaska Tribes and communities to successfully compete for federal funds; it is incredibly complex to engage and volunteer for the agencies; and, permitting complexities and timelines can slow down the ability to expand business opportunities or utilize forest products for cultural or commercial applications

### Internal Barrier Identification

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#### USDA

Recommend a specific partnering authority for Alaska which encompasses all potential non-federal entities that desire to partner with the USDA. Like the original Good Neighbor Authority with the states of Utah and Colorado, the authority could be exempt from the Federal Grants and Assistance Act (FGCCA) as well as provide clear authority that defines collaborative work beyond partner requirement matching frameworks similar to the language found in the ACES Authority.

Build extra time into consultation when consulting on topics that require traditional knowledge and input. For example, many tribes cannot comment on lands, seeds, foods, etc. without traditional direction which often must be obtained in person through a slower respectful process.

Facilitating the use of USDA programs that protect and encourage farming interests, such as Rural Development's Community Facilities Direct Loan and Grant Program and Farm Services Agency's loan programs, would help lower the financial burden of access to arable land in the region.

#### USDA Rural Development

Some USDA Rural Development programs require significant capacity to operate (i.e., rural energy savings, energy efficiency and conservation, rural business investing, single-housing repair, intermediary relending, mutual self-help housing, microentrepreneur assistance, housing preservation) that is not feasible for small, rural communities. Statewide organizations providing these services are limited. USDA should fund an organization to provide services and should consider locating staff in smaller communities.

Some USDA Rural Development programs are limited to agricultural entities and often that does not include fisheries. For example, the Farm Labor Loans & Grant could help improve seasonal seafood processor worker housing, but wild-caught seafood isn't considered an agricultural product.

Rural Development programs should be reviewed and expanded as appropriate to include fisheries and seafood processing.

#### USDA Natural Resources Conservation Service

**Barrier:** Conservation Technical Assistance (CTA) funding is tied to Financial Assistance (FA) contracting. In Alaska however, there is a paucity of available resource data on private lands, including lack of soils, wildlife, and vegetation data. Ensuring adequate resource inventories are conducted to support quality planning and development of sound

projects requires substantial staff time and travel expenses. **Solution:** Allocate additional CTA funding beyond what is typically associated with FA contracts to support staff, travel, and associated costs to correctly balance resource inventory, planning, and partnership building that are critical for successful project implementation. This will support the higher costs needed for agency travel in Southeast Alaska's complex landscape and help staff refocus efforts toward effective planning and technical assistance.

**Barrier:** As noted above, the lack of available resource data on private lands in the region is coupled with difficult and costly logistics, hazardous terrain, and potential encounters with dangerous wildlife. **Solution:** Support use of innovative technologies that increase efficiency and safety for field staff. This includes training and equipping staff in the Juneau Field Office with a drone, providing georeferenced-enabled tablets and software licenses for efficient field data collection and integration into project documents, and support field staff training in use of lidar and modeling techniques that allow for remote resource evaluation and prioritization of work activities.

**Barrier:** Current agency policies related to All Terrain Vehicle (ATV) use preclude being able to access remote field locations in a safe and efficient manner. In addition to the difficult logistics of conducting remote field work, Alaska staff are currently unable to use ATVs unless they are agency-owned and are annually inspected by a certified mechanic. These requirements make it virtually impossible to use ATVs, particularly in southeast Alaska and elsewhere in the state where road systems are isolated and often lack an agency field office or equipment storage site. There are few certified ATV mechanics in the state, and likely none located in areas not connected to the rest of Alaska or Canada by road. This policy puts NRCS staff in the position of having to choose to access some work areas by foot – possibly requiring more than 10 miles of walking per day in bear country and multiple days to complete tasks – or assuming personal and potential personnel liability in using an available vehicle to facilitate completing work in a more efficient and safe manner. **Solution:** Incorporate flexibility into the agency's national ATV use policy to allow Alaska staff to use ATVs owned by customers and partners.

**Barrier:** Natural Resource Conservation Service program eligibility requires soil or land-based agricultural production. **Solution:** Expressly incorporate aquaculture and mariculture into existing programs; and reenact programs or adopt flexibilities or initiatives within existing programs that allow NRCS to work on land controlled or owned by local units of government such as municipalities, boroughs, and school districts. To enhance long-term sustainability and economic opportunities within the region, opportunities exist to assist hydroponic, aquaponic, greenhouse, or urban agriculture or mariculture operations.

**Barrier:** Due to their restrictive nature, current guidelines for the Regional Conservation Partnership Program have substantially decreased the kind of innovative work that has been the keystone of successful projects such as the Hoonah Native Forest Partnership and Keex Kwaan Community Forest Partnership. This is largely due to the decreased availability of Technical Assistance funds to partners. **Solution:** Waive or substantially decrease the required match restrictions on RCPP agreements to allow for additional Conservation Technical Assistance funding in RCPP agreements.

**Barrier:** Field office staff training emphasizes the knowledge, skills, and abilities typical of Natural Resources Conservation Service projects and workload in the Lower 48. In southeast Alaska however, staff need to be skilled at using remote sensing and Geographic Information Systems as well as field data collection methods, and be knowledgeable in forestry, wildlife, fish habitat, and small-scale agricultural methods that are more aligned with off-grid and remote approaches used in developing areas of the world. **Solution:** Provide additional CTA funding as stated previously to support staff training attendance that is better aligned with the region's workload (including training in forestry, aquatic organism passage, fish and stream habitat, wildlife and upland habitat, and practices to support small-scale vegetable and flower production) and facilitate NRCS staff attendance in Forest Service trainings such as the National Advanced Silviculture Program.

**Barrier:** There is a recurrent and ongoing need to integrate resource stewardship, agricultural/forestland/mariculture production, food security interests, and economic/community development opportunities into programs across USDA and other agencies. Additional agency capacity is needed in order to facilitate collaboration and project development that supports the values outlined in the Southeast Alaska Sustainability Strategy initiative for the long term. **Solution:**

Revive the Resource Conservation and Development program, which incorporated Natural Resource Conservation Service staff that work collaboratively with regional economic development organizations to improve economic opportunities in the natural resources sectors. Alternatively, create a position/s for southeast Alaska that have a similar focus as the former RC&D Coordinators.

## **USDA Forest Service**

Agency Structural Challenges around Partnership Programs – suboptimal organizational structure inhibits engaging partners. For example, the Partnership Program is currently housed as a sub-program under Recreation. This means: Partnership personnel may need Recreation Director approval to discuss partnerships with non-Recreation programs; many consider partnerships as a Recreation function which inhibits realizing partnerships in non-Recreation programs; recreation funding has disproportionately borne the brunt of supporting partnerships that should be funded more broadly. Solution: An independent Partnership Program would enjoy greater maneuverability, broader acceptance and could broker a wider range of funds.

Streamline the administrative effort involved in volunteering on agency lands. Generally, District staff do not have time to complete these requirements and simply decline the offer of support. Nonprofit partners with volunteer programs can be responsible for deploying volunteers on NFS lands without additional federal requirements because they carry liability insurance, have their own safety policies, and can supervise their volunteers.

Solution: Master agreements between federal and nonprofit partners would formalize cooperative communication procedures, the types of work conducted, and the safety policies insured by the nonprofit.

The degree of risk tolerance (by Rangers) is inconsistent in how we use and deploy volunteers and partners. For example, agency regulations have been applied to volunteer organizations despite their own signed agreements, oversight, insurance, and risk tolerance. Both parties are interested and willing but cannot reconcile expectations for the indemnification clauses in the volunteer agreement, including concerns over who manages risk under our volunteer agreements. This includes alcohol, firearms, and various certifications we require of our personnel (e.g., flight operations and certifications such as defensive driving, boat operators, chainsaw, etc.). How and when do we apply these various certifications to volunteers when an organization has taken on full responsibility for the volunteer effort?

Ability to pay for Fisheries Resource Monitoring Projects (FRMP). The Forest Service lost its ability for FRM contracts on FS Lands about two years ago. It remains unclear if it is an official policy. A solution to pay for these projects via the Office of Subsistence Management (OSM) at the US Fish and Wildlife Service (FWS) was explored but has substantial barriers in regard to OSM capacity and a 23% charge for administrative overhead. A funding solution must be found to ensure these important projects move forward. Typically, the principal investigators for FRMP projects on FS lands are from three main agencies/organizations. They are the FS, Alaska Department of Fish and Game, and Tribes. Thus, in each case, there are varying financial authorities, policies and issues that apply in funding the different entities.

## **USDA State and Private Forestry**

Background: SE Alaska experienced a loss of forest industry from the early 90's through the mid 2000's. Since then, work has been done to increase the areas competitiveness in the global market. While the global market provides the appeal of financial security, there is a serious demand for affordable construction materials within Alaska, specifically climate appropriate housing. Before the loss of industry, there was a strong competitive market for locally produced dimensional lumber, glulam beams and other structural components. Implementing resources to expand an already existing market will improve the forest economy in the short term while research and development can be done

Problem Statement:

1. The grading and stamping program developed by Ketchikan Wood Technology center was cost prohibitive for the size and type of sawmills in the area
2. Reduced reliability of wood supply on the Tongass
3. Restricted markets due to lack of a certification program to allow the use of locally produced lumber in construction applications

#### 4. Loss of industry and infrastructure

##### Proposed solution:

A local use dimension lumber program allows for small sawmill owners to access a larger market for the rough-cut dimensional lumber that they are producing. Currently, graded and stamped lumber is required in all load bearing construction applications. Since the state of Alaska does not have a grading and stamping program available for sawmill owners, the majority of the wood used for construction is sourced from the lower 48. The housing market is struggling in the state, providing locally produced resources for structures that will allow for financing and insurability will greatly improve the housing market in Alaska.

As a team, we believe one of the appropriate first steps should be to create a program/system that will allow for expanding the current lumber market not only in SE Alaska but also the greater part of the state. The initial phase is to create a local lumber use program that allows for the use of green rough-cut lumber in some construction applications including 1 to 2 family homes and some outbuildings.

##### Steps to implementing a Local Use Lumber Program

1. Buy in from the State Legislature: Example 2007 Wisconsin Act 208, North Carolina House bill DRH40101-MH-41A, New Hampshire Native Lumber Law
2. Development of grading parameters and requirements -Model after The Ketchikan Wood Technology Center grade standards for AK Species
3. Education of Stakeholders through a Training program (AK DOF or Extension) - Sawmill Owners – Receive a certification to independently inspect their product for the appropriate specifications deemed by the program
4. Buy in and approval from Architects, Building Inspectors & Construction Companies/Contractors

#### **Public Input received via the engagement process:**

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##### **Petersburg Economic Development Council**

Congress established the Secure Rural Schools program in 2000 to compensate for the lack of timber production. Secure Rural Schools was intended as a transitional program while federal timber policy was developed to bring greater stability to these communities. Unfortunately, that stability has never materialized, and communities face the same uncertainty each year waiting to find out whether SRS will be extended and funded. Secure Rural Schools funding formula is based on national forest acreage and per capita income as it compares to ALL SRS communities. Comparing per capita personal income in Alaska rural communities in the lower U.S. puts Alaskans at a distinct disadvantage because it fails to recognize the significant difference in cost of living across these geographies. With an end to old-growth harvest on national forests, communities need a long-term solution for the Secure Rural Schools program to provide stability and certainty and improve equity across the program.

There is opportunity for local communities to benefit from the growing market for carbon credits. Local communities generally do not have sufficient contiguous land to develop an offset program and would need federal partners to participate. Jobs associated with managing the forest bring a significant amount of economic diversity into small rural communities. Federal employees have the highest average wages in our community, so these jobs have a significant direct impact to our economy as well as corollary impacts to enrollment in schools, community volunteers, etc. In the last ten years, federal employment in Petersburg has dropped by 31 average annual jobs; the majority these lost jobs were with the Forest Service. While we understand the agency is shrinking region-wide, the FS should do everything to minimize adverse impact on smaller communities. As an example, when “Tongass Unification” occurred, the Agency committed to having a Deputy Supervisor stationed in Petersburg. The position still exists but was relocated to Ketchikan. Consider prioritizing retention of Tongass-wide jobs INTO smaller communities like Petersburg and ensuring career ladders exist for employees who would like to stay in smaller communities.

##### **SalmonState**

In addition to directly investing in projects that support Southeast Alaska's regional seafood system, the USDA should remove barriers currently preventing Southeast Alaska's seafood harvesters from accessing USDA grant and loan programs. Specific places where the USDA can modify and improve its grants/loans to better meet the needs of Southeast Alaska's small-scale seafood harvesters:

- The development of additional tools and resources that provide greater clarity on whether seafood businesses qualify for funding, and if so, if funding is limited to aquaculture or wild capture seafood.
- Specific personnel that act as liaisons between the direct seafood marketing sector and USDA that provide additional technical and grant writing assistance, communicate funding opportunities, and provide resources for applicants.
- Shorter applications and more manageable reporting standards that are more appropriate for local, small-scale seafood harvesters.
- Reevaluation of the USDA's definition of "local" (currently a 400-mile radius) for seafood products in local and regional grants.
- The incorporation of seafood into the USDA's food systems-related grants.
- Adding verbiage to the Seafood Processors grant that prioritizes some of the funding distributed by state agencies for small-scale, community-based seafood processors.
- Including/Encouraging organizations that apply for funding like TEFAP to procure local seafood alongside other local products.
- Reinstating an Agricultural Research Service (ARS) program in Alaska that can work with local seafood harvesters and communities to develop innovative solutions that address seafood quality, utilization, and product development.

Southeast Alaska is a place where we still have biologically rich ecosystems that support a robust seafood industry that provides economic opportunities for local residents as well as highly-valued, nutritious protein that's sold around the world. As the USDA develops the Southeast Alaska Sustainability Strategy and begins to allocate funding to the region's local industries and communities, it's essential that the USDA invest in Southeast Alaska's working waterfronts and provide increased funding opportunities for Southeast Alaska's local, small-scale commercial fishermen and seafood industry members. Doing so will help ensure that Southeast Alaska remains a place where both wild fish and local communities thrive for generations to come.

#### **National Forest Foundation:**

Suggestions for Overcoming Challenges and Barriers to Investments in the Southeast Alaska Sustainability Strategy: The Tribes and communities in Southeast Alaska are unique based on their cultural make up, geographic location and relative isolation from the rest of Alaska and the continental United States. Through our 18 years of investing in the Tribes, communities, and the Tongass National Forest we have identified challenges and barriers that may reduce the effectiveness and timeframe for implementation of the USDA's Southeast Alaska Sustainability Strategy. For your consideration, we have identified some suggested solutions to overcome these challenges.

#### **Limitations to Leverage Tribal and Partner Capacity and Support:**

The authorities allowed by Congress for the U.S. Forest Service to administer funds through agreements with Tribes, nonprofit organizations and communities are limited in their flexibility in achieving programmatic and monetary outcomes. Many Tribes and nonprofit organizations will often enter into Challenge Cost Share Agreements through the Department of Interior and Related Agencies Authority. This agreement requires a 20% match to all funds conveyed to the Tribe or partner. While this match can be cash or in-kind, it can be a barrier for some entities especially if they have a lower capacity to raise matching funds.

In addition, if the Tribe or nonprofit partner would like to subcontract work under that agreement, USFS Handbook states that the cooperator, "must provide a substantial cash contribution toward the cost of the contract" (FSH 1509.11, Chp 70). The Forest Service has issued guidance to define the term "substantial", which is calculated through a formula

that can require the “cooperator” to provide up to 50% cash match to pay the contractor. This requirement is cost prohibitive when a Tribe or nonprofit partner is managing a project with a large budget and it reduces the cooperator’s ability to provide needed capacity and support to the agency.

The Watershed Restoration and Enhancement Authority (Wyden Authority) does allow for a Tribe or nonprofit organization to enter into a Cooperative Agreement to complete watershed restoration and associated activities without a match requirement. This authority is useful for many activities related to watershed restoration but is not applicable to recreation improvement projects and many other desired outcomes outlined in the Southeast Alaska Sustainability Strategy.

### **Challenge Matching Non-federal Funds to Federal Dollars**

The National Forest Foundation has been successful in raising non-federal funding from foundations, corporations, and individuals to support multiple projects on Alaska’s national forests through the Alaska Forest Fund. However, the number of philanthropic entities that can provide these matching two funds in Alaska are limited, especially in Southeast Alaska. Donors oftentimes like to provide funding locally and without large philanthropic opportunities in the region, it is difficult for Tribes or nonprofit partners to meet the 20% or up to 50% match requirements in agreements with the U.S. Forest Service.

With current and future federal funding available through Southeast Alaska Sustainability Strategy, Great American Outdoor Act, and the Infrastructure Investment and Jobs Act (pending in Congress), there will be a lot of funding available that Tribes and nonprofit partners cannot utilize to assist the agency with increased capacity and project support with the existing match requirements.

A suggestion for deploying funding for implementation of Southeast Alaska Sustainability Strategy is to review available authorities and agreement instruments available at USDA through Rural Development or NRCS that may be used to meet the intended goals of Southeast Alaska Sustainability Strategy without the high match requirements. Any agreement and authority that provides a reduction or elimination of the match requirements will allow the agencies to leverage the assistance available in working with the Tribes and nonprofit partners throughout Southeast Alaska to meet the goals of the Southeast Alaska Sustainability Strategy.

### **Sitka Conservation Society**

- The Tongass and Chugach temperate rainforests are an incredible natural resource, and provide many services to society, from quality timber products to habitat for salmon, deer and other wildlife to a magnet for recreation-based tourism and a sink for atmospheric carbon. Not all of these many “ecosystem services” can be maximized at once, but with careful planning, many benefits could be achieved simultaneously when considered holistically across landscapes. Consideration and enhancement of the primary ecosystem services provided by the forest is not currently a part of forest-wide young-growth planning, for the most part, beyond provisioning of board-feet of merchantable timber and relatively simple considerations made for wildlife (i.e., connectivity between habitat patches not generally quantified and prioritized), but the current transition to a young-growth harvest strategy presents a prime opportunity for such integrated planning.
- The Tongass plays a very important role in climate policy and in the complex issue of climate change. The temperate rainforest of the Tongass, its soils, and the soils of its muskegs and wetlands sequester more carbon than almost any other landscape in the world. With Administration mandates on climate and global action on climate becoming more and more of a priority as climate impacts become more and more dire, it is important to put the Tongass's role front and center.

### **Private Citizen**

I would like to see funds from the Southeast Alaska Sustainability Strategy be used to reinvigorate the USFS research program, in partnership with other regional entities like the University of Alaska Southeast, local field institutes like Tidelines Institute, based in Gustavus, Alaska, and the PNW FS Research Station. An archipelago of the size and complexity of the Alexander Archipelago is one of our world's greatest living laboratories to study change, yet it takes a lot of resources to carry out small or large scale research projects. Therefore, I would also like to see an investment in partnership opportunities for regional organizations and non-profits. There is a tendency to focus on partnerships with existing entities, but investment in a diverse set of partners and organizations will be necessary. For example, there are many communities not represented in the Sustainable Southeast Partnership and Indigenous Guardians network that the Forest Service is using as a cornerstone for current funding.

#### **JK Forest Products, LLC**

Upgraded cellular capability on POW, we have no phone service or internet in our industrial business park. Satellite is the only option.

#### **Private Citizen**

The Forest Service needs to reinvest in its Tongass recreational cabin infrastructure. Over the past 40 years the FS has neglected maintenance, additions and planning for its cabin network. As demand has grown for this infrastructure, the Forest Service has not kept up.

#### **Waterbody, LLC**

As a business that utilizes non-timber forest products (NTFP) in our product manufacturing, I'd love to see an effort put forth to make NTFP permits more accessible and available to small businesses. I've been told by USFS staff that the agency isn't set up to deal with such small-scale harvesters and have been relegated to sourcing materials on State Forest lands. I'd like to be able to access National Forest lands and utilize my business to demonstrate economic viability of NTFPs harvested sustainably. Limited access to harvestable areas limits our ability to scale, and our ability to spread plant harvests out widely to ensure the resources remain viable and thrive without pressure from over harvesting.

#### **Southeast Alaska Land Trust**

Since its founding in 1995, SEALT has grown steadily to meet the land conservation needs of Southeast Alaska, from an all-volunteer organization to four full-time staff and a membership base of over 250 supporters. Despite this growth, our current staff capacity is not able to meet Southeast Alaska's full potential for private land conservation. At this moment, we have numerous possible acquisitions -- some with funding partly or completely secured -- and not enough staff to implement them at the speed that private landowners are making them available.

#### **Alaska Sustainable Fisheries Trust**

Sitka has experienced a sequence of privately owned boatyards converting to other land uses, which parallels a national loss of working waterfront capacity widely recognized as a threat to coastal economies and cultures. No boatyard within 500 miles can accommodate the Sitka fleet. The loss of economic activity, jobs and sales revenue to Sitka will undermine economic, social, and cultural stability.

#### **Southeast Exposure Outdoor Adventure Center, Inc.**

In the interest of encouraging multi day visitors, the Department of Agriculture could reinvest fees for special use permits directly back into the areas where the use took place. For example, the sad shape trails and cabins of Misty Fjords National Monument, Cleveland Peninsula and the West Behm Canal. Permits could be streamlined somehow so that operators have some flexibility in days and areas utilized. Some areas are off limits to small operators, so this, too should be reconsidered.

#### **WECAN (Women's Earth & Climate Action Network) International – Tongass Women For Forests**

We are very interested in seeing how we can work together with S.A.S.S. We were spurred into action by the easy political manipulation of the 2001 ROADLESS RULE that eliminated Title VIII of the 1980 AK National Interest Lands Conservation Act (ANILCA). ANILCA Title 8's Alaska Federal Subsistence Board is composed of five (5) federal agencies from two (2) separate Departments, the Interior and Agriculture, each with their own Codes of Federal Regulations, each agency with its own jurisdictions and responsibilities. Our Tongass Women for Forests concept is to scrap the Federal Subsistence Board that was congressionally created and not called for in ANILCA. And re-create environmental protection into an Indigenous Tribal land management of the Natural Resources we depend upon. The federal agency roles will be reinterpreted to work on behalf of the beneficiaries in support mode rather than overseeing.

### **City and Borough of Wrangell**

- One of the key issues that Wrangell faces as well as other small communities, is the ability to provide matching funds. Wrangell has an enormous critical needs list, but project costs and often matching funds to grants that could be obtained are not available within our existing budgets. Time to find and apply to grants helps, but on large scale health and safety projects, the match for the grant is well beyond the ability for the budget and even a loan or to raise costs to cover expenses.
- Administrative Challenges setting up agreements between partners and landowners, especially when dealing with private, Borough, USFS and State of Alaska
- To have Shovel Ready Projects is often a hefty expense to be ready for construction. Often times the engineering design can be in the millions of dollars and small communities have to treat this aspect as a full blown "project" to plan for and seek funding assistance.
- Reimbursable funds may be challenging for smaller communities. Especially on larger projects, loans may need to be take, increasing the cost of the project to provide working capital while projects are underway and grants process reimbursements.
- USFS over analyzing environmental issues during the NEPA process because of the fear of litigation. This can delay and increase costs enormously.
- Our daily activities produce carbon emissions which put harmful carbon dioxide into the environment. To help reduce the impact of the carbon emissions produce through these everyday activities, Communities could consider setting aside valuable timber land for the investment of offsetting carbon uses. Wrangell has entitlement land and is investigating economic use of these lands. Some that may have multiple valuable environmental benefits could be considered for carbon offset programs.
- Changing regulations for the secondary effluent discharges are going to dictate and require the Borough to provide additional treatment at the sewer treatment plant. This is new regulatory requirement and the Public Works Department is still determining what type of treatment and how to implement the new mandates from the State of Alaska. These new regulatory requirements will affect more than just Wrangell.

### **Alaska Fisheries Development Foundation**

The development of the mariculture industry is well aligned with the strengths and assets of Southeast Alaska... Right-sizing infrastructure expansion with industry needs - When developing a new industry, it is difficult to accurately scale and time the level of infrastructure expansion required to meet industry needs without exceeding or underestimating those needs. The solution is not to work in isolation or silos. The multiple components in the [comprehensive plan](#) incorporate an integrated approach, because the success of each component shares an interdependent casual nexus with each other. As structured, this combination of components will be a catalyst to launch long-term economic growth in the mariculture sector.

### **Sitka Salmon Shares**

Sitka Salmon Shares, a direct-to-consumer e-commerce seafood company, has built a viable market that supports the important interconnected goals of bolstering the long-term health of fisheries ecosystems and the fishing communities in the places we work.

USDA's current policies do not accommodate support for research innovation for wild harvested seafood and aquatic products prior to their arrival at land-based processing facilities. Currently, the onboard handling period between



capture and the processing plant, which is critical to determining product quality, safety and value, lacks research support. We feel the current USDA policy creates a barrier to the scientific innovations our fishermen will need to remain economically competitive and productive food producers.

To that point, we request that USDA reinstates an Agricultural Resource Service program in Alaska dedicated to delivering cutting-edge, scientific tools and innovative solutions for Alaska's seafood producers, and work alongside industry and communities to support the nourishment and well-being of our communities and ensure the economic competitiveness and excellence of our wild fisheries' resources.

Additionally, we recommend that the USDA expand support offered to various U.S. food producers to the U.S. seafood producers and fishermen, and specifically to models, such as Sitka Salmon Shares, that contribute to diversifying sustainable food value chains. For some applicable programs, such as the Farmers Market and Local Food Promotion programs, the definition of locally and regionally produced food products prevents local seafood processing businesses that have pivoted to e-commerce platforms the ability to participate.

Fundamentally, we request the USDA partner with small seafood producers, like ourselves, to develop agency expertise and more effectively coordinate with other local seafood businesses in Southeast Alaska to prioritize the seafood industry in the Southeast Alaska Sustainability Strategy.

#### **Private Citizen**

Facilitate supplemental private assistance of FS maintenance tasks on recreation infrastructure (cabins, trails, campgrounds) on Prince of Wales Island by engineering a legal path and funding mechanism to accomplish to-standard maintenance using local businesses, including Outfitter-Guides.

#### **Leighty Foundation**

The "Climate Change" emergency presents SE AK with the opportunity to leverage the cruise ship industry's need to nearly-totally de-carbonize and de-GHG-emission their entire fleet and all shoreside operations. This transformation of SE AK communities' energy and transportation sectors is beyond the scope of available resources, except for the necessary investment in convening and sponsoring a collaboration among all parties to:

1. Imagine the transformation, in each community, in the total visitor industry, and in each industry sector. Integrate the transformation into all aspects of community life, enabling each to meet its urgent "climate change" response goals.
2. Establish a protocol for estimating benefit: cost ratio for each candidate option and scenario.
3. Outline options for motivating and helping and requiring the visitor industry, especially the cruise ship sector, to meet an agreed transformation schedule; include carbon pricing applied to all fossil fuel use required for the SE AK season, wherever the fuel is acquired and consumed.

#### **Private Citizen**

One way to improve Southeast Alaska's food security is to create some agricultural tracts near communities that can be used for community gardens, leased for production farms, etc. Finding decent land close to town for growing food is a problem. Since the Forest Service is part of the US Department of Agriculture, it seems like creating some small and mid-sized agriculture zones is a good fit for Southeast Alaska. These agriculture zones should include places for warehousing (so we can store more of our food) and for processing it for market. In addition to outdoor agriculture, creating spaces for vertical indoor gardening will help us be able to produce food all year instead of just in the summer.

#### **Glacier Gardens**

We would like to propose a small change in management of the previously logged areas of SE Alaska, to address the Climate Crisis, it is an acceptable practice in Carbon Dioxide Removal (CDR) to bury biomass such as brush, dead wood, shrub alder, and little trees that have been thinned.

#### **Private Citizen**

I'm just so discouraged that the trails have been completely ignored when more and more people, local and tourists are looking for hiking opportunities. We need ways to be outdoors that don't include airplanes-expensive. These trails are all assessable by boat and lead you to fabulous places to fish, recreate, beauty, and into our unique rainforest!

If you are still looking for input on how to spend \$\$, TRAIL MAINTENANCE! There are trails on our island and on the mainland near our island that have been so neglected that many are no longer functional. Both locals and tourists are looking for outdoor activities that get them into our rainforest, connect to lakes for trout fishing, etc.

### **Space Pirate Films LLC**

Filmmaking in Southeast Alaska is a sustainable use of the Forest. Other states offer incentives to attract productions to their region. Films based here provide local jobs and promote tourism. Either directly fund projects or provide a financial incentive program. Directly funding projects could be done with grants. Financial incentives could be modeled after successful programs in other states and provide funding based on a yearly budget.

### **Private Citizen**

Significant time and resources were invested in the Tongass Advisory Committee to help address much of this and for the first time ever a unanimous agreement was made with all stakeholders for a path ahead for the Tongass. My concern at the time, that has come true, is the inability of the USFS to implement the Plan and to see this direction this Sustainability Strategy is taking negates almost two years of investment with the TAC. The TAC clearly determined that our young growth timber does not produce a product that can compete in the U.S. markets and small local sales will not support more than a few jobs so we need to keep the current timber industry going to maintain viable markets and infrastructure.

### **Private Citizen**

A series of forest therapy trails could contribute to health and wellbeing of local residents and provide opportunities for visitors as well. Trails could be regional as well as local and can be both short term and long-term investments.

### **Sitka Sound Science Center**

The Sitka Sound Science Center (SSSC) would like to sign a no cost Memorandum of Understanding (MOU) with the USDA Forest Service. Sitka Sound Science Center is a nonprofit based in Sitka that aims to improving understanding of the marine and terrestrial ecosystems of coastal Alaska through science research and science education.

A no cost Memorandum of Understanding would be a product that makes it more efficient to conduct science research and science education in Southeast Alaska. Because the U.S. Forest Service owns so much of the land in and around communities in Southeast Alaska, permitting can be a barrier for conducting research by outside institutions.

A formal MOU could streamline and encourage research that is important to people who live here such as landslide research and forest ecology. Additionally, our organization can facilitate US Forest Service personnel visiting classrooms and conducting impactful educational experiences that are designed alongside of school district teachers and administrators.

### **Sunnyside Farms**

Small farming could produce a great deal of food for our communities. We rely on a very long and now rather fragile supply line for our food. We badly need investment help in setting up small farms to grow basic foods such as milk, meat, eggs, vegetables- this help should include money for clearing land, digging wells, building barns, buying basic livestock and so on. Having a network of many small farms growing diverse foods near towns would be a huge help to our sustainability and would also be a way to use the waste food resources from towns (feeding chickens or pigs or making compost).

Replacing the timber industry's positive economic benefits requires the addition of new, viable industries. Agriculture is a raw material opportunity for improved production and value-added marketing in Haines. With regional cooperation and participation, this concept may be regionalized to include producers from other communities. With proper

coordination, other regional producers could also join together and add their products to an opened Southeast Alaska fresh/stored root crop market.

### **Sitka Trail Works**

Volunteering on USDA Forest Service lands can be a major headache for partners and District staff. With the paperwork, certification and training, and other requirements as hurdles to clear before deploying volunteers, it's often more work than it's worth, so District staff simply decline the offer of support. The FS needs to investigate ways it can streamline the process to allow nonprofit partners to be the responsible entity for deploying volunteers on USFS lands. Nonprofits with volunteer programs carry liability insurance and have their own safety policies, so should be allowed to use volunteer labor under their own supervision without the additional barriers posed by USFS. A master agreement with each nonprofit partner could serve to formalize some of the cooperative communication procedures, the types of work conducted, and the safety policies ensured by the nonprofit. We want more people lending a hand on our public lands. Don't let USDA be a barrier.

### **Private Citizen**

Bring peony farming to SEAK by promoting plantings in Gustavus open fields.

### **Private Citizen**

I want to harvest wood for some of my sculpture projects, mostly drift wood but also would like to be able to harvest small amounts of alder for future furniture projects. I don't want to do the actual harvesting but want to rely on local small one man sawmill owners for my supply.

### **Private Citizen**

Plastics are floating in the marine waters of SE Alaska and ending up on our beaches and in our fish. Alaska may seem pristine, but trash does accumulate in the ocean and on shore. Humans created the trash, and humans must remove it in order to prevent accumulation of marine debris which negatively impacts ecosystems and organisms. I propose to start a non-profit organization that removes marine debris from low-accessibility locations, such as islands without roads. The work will be seasonal, would hire local youths and other locals, and would engage volunteers. The non-profit will partner with existing organizations that restore habitat and conduct beach and roadway clean-ups.

### **Private Citizen**

Augment local trail infrastructure with locally harvested, carved, and built wood structures such as foot bridges, retaining walls, stairs, signposts, etc.

### **Hoonah Indian Association**

One of the identified barriers to biomass energy sustainability in our community is that the Forest Service lacks a definition of a "biomass sale". We ask through the SASS process that the Forest Service invest thought and policy changes to remove the barriers for communities to access woody biomass for heating and energy. This investment in the policy process can result in jobs around biomass, infrastructure investment, new forest industries, and energy sovereignty. Biomass proposals are in line with the transition to young growth strategy. The cost of this work is unknown. It should include consultation with communities to develop a strategy that meets community need and the engagement at the correct level of the Forest Service agency to direct the needed changes and guidance.

### **United Fishermen of Alaska**

Prioritizing high value salmon streams in Tongass stream restoration

Southeast Alaska is home to 2,462 fishing boats, more than any other region. Nearly 5.7 billion pounds of seafood worth \$2 billion was harvested in 2017-2018 fisheries. Processors turned it into 2.8 billion pounds of product worth \$4.7 billion. Commercial fishing is the state's largest private sector employer and cornerstone of coastal economies. In many coastal towns, commercial fishing is the only source of employment and a vital connection to income and sustenance. Logging practices, compounded by climate change and warming rivers, are jeopardizing the health of Southeast Alaska

anadromous fish. Investment in stream restoration, with a focus on high value salmon streams with failed culverts or other logging/road building damage, will return long term ecological and economic benefit

### **Private Citizen**

Maintain the trails we have. Develop new trails.

### **Ecological Exchange**

Haines is at a crossroads with how to move forward on the heels of devastating economic and natural disasters. Industrial logging and mining threaten the way of life for natives and non-native locals alike.

### **Organized Village of Kake**

Regenerative ocean farming holds significant potential as a strategy for addressing traditional food security in the rural archipelago of Southeast Alaska. With limited arable land, this region needs new and innovative strategies for local food production...Increased kelp production in these rural Alaska Native communities will serve both traditional food security and cultural food needs while also enabling the establishment of new food businesses, driving capital to the region, and boosting employment, particularly among Alaska Native individuals.

### **Private Citizen**

There are nearly 15,000 rivers in southeast Alaska that discharge more than twice as much water as the Mississippi River annually and provide habitat for billions of salmon. These salmon support subsistence and commercial harvests in the region valued at over \$27 million dollars per year. For those of us who call Southeast Alaska home, we know the value of these salmon and rivers is invaluable. Even with the value of salmon and intact river systems being recognized, infrastructure and tools to monitor these river systems are severely lacking.

### **Haines Huts and Trails**

Unlike many other communities in the region, the Chilkat and Chilkoot Valleys are a patchwork of private, state, and federal land management jurisdictions. The Southeast Alaska Sustainability Strategy has the ability to transform not only the communities within the Tongass National Forest, like Sitka, Juneau, and Ketchikan, but the many diverse communities across the archipelago that are facing similar infrastructure, growth, and services challenges.

### **Anchorage Park Foundation**

This new outdoor recreation economy is going to take a long-term investment. We need to train the next generation of trail builders. We need to have waysides and cabins and hut to hut systems that Juneau is really perfecting right now. So many good things happening that just need a little help from our friends.

### **University of Idaho**

The Tongass provides many ecosystem services, including provisioning salmon, deer and other subsistence foods to rural residents and tribal members, providing timber products, and sequestering carbon in soils and trees. While these three categories of services are not necessarily in conflict, trade-offs likely exist that are important to understand as the Tongass transitions to sustainable management for a new "bundle" of multi-use goods and services.

### **Southeast Conference**

In April 2021, Southeast Conference released the Southeast Alaska 2025 Economic Plan, a five-year strategic, economic and resilience plan for the region. This is the regional Comprehensive Economic Development Strategy (CEDS). The membership worked together to develop an overall vision statement, more than 50 prioritized economic initiatives. More than 400 people representing small businesses, tribes, Alaska Native organizations, municipalities, and nonprofits were involved in various elements of the year-long planning process. The Southeast Conference board and membership kindly requests that this extensive local collaborate effort is incorporated into the Southeast Alaska Sustainability Strategy (SASS) and be the foundation to build upon.

### **Alaska Department of Fish and Game**

Alaska Department of Fish and Game supports investment in the fisheries and mariculture industries of Southeast Alaska.

#### *Investing in User-friendly Processes for Road Use Agreements*

The USDA's Southeast Alaska Sustainability Strategy includes "focusing resources to support forest restoration, recreation, climate resilience, and sustainable young-growth management." Creating a sustainable young growth industry in the Tongass will require a new Forest Service philosophy about road use agreements, because young-growth timber has a much lower profit margin than old growth. The road use agreement position of the Forest Service has long been a source of frustration to landowners in Southeast Alaska. Currently, the Forest Service requires a reimbursement fee per thousand board feet (MBF) of timber hauled to reimburse their initial capital investment (referred to as "investment cost sharing") in addition to a road maintenance fee per MBF. The DNR, Division of Forestry (DOF) believes that the road maintenance fee is sufficient for road use and the "investment cost sharing" fee should be eliminated. This change will be especially vital as the transition to young-growth harvest occurs, because young-growth stumpage values are far less than old-growth high-grade stumpage values. The Forest Service owns most of the forest management roads in Southeast Alaska. It may be that no other landowner can make a profit selling young growth after paying the current Forest Service required "investment cost sharing" and road maintenance fees. The Forest Service may become the only young-growth timber seller in Southeast Alaska, limiting economic opportunity in the region, unless its road use agreement policies are restructured to accommodate profitable and sustainable young-growth timber sales on all land ownerships in Southeast Alaska.

Division of Forestry recommends finalizing a formal written agreement to authorize the sharing of forest roads, across ownerships, to ensure long-term, coordinated access to young-growth forest resources and to facilitate young-growth management, resource restoration, and timber harvesting and manufacturing in the region. The agreement should specify road cost-sharing provisions, permitting, and maintenance responsibilities. This task should include an analysis to identify critically important mainline roads and explore ways of connecting isolated remote road systems.

#### *Investing in Balanced Approaches to Match Amounts for Partnership Agreements*

Maintaining the current 20% state funding match for partnership agreements will incentivize collaboration necessary for a more successful young-growth timber management program in Southeast Alaska. Previous partnership agreements, such as DNR, Division of Forestry's (DOF) contract with Terra Verde, required a 20% state match. The Forest Service has indicated that future agreements with private sector contracting will require a 50% state match. DOF needs to hire consultants to be able to plan young-growth timber sales that are financially viable, can support an industry, and offer employment to community members. A 50% match requirement will make this difficult, if not impossible. DOF requests the Forest Service hold the match requirement at 20% under the Southeast Alaska Sustainability Strategy.

#### *Investing in Reasonable Match Requirements for Partnership Agreements*

The Code of Federal Regulations (2 CFR § 200.306(b)(3)) clearly states that match can come at the "project or program" level. DOF requests that the required matching funds be permitted to come from the state timber sale program annually budgeted state general funds and designated general funds (timber sale program receipts).

#### *Investing in Forward-Looking Young-growth Timber Sale Planning*

The Forest Service has developed some plans for rolling out young-growth timber sales. DNR encourages the Forest Service to develop a comprehensive and specific plan for young growth timber harvesting on the Tongass National Forest. This plan should be coordinated with similar plans developed by DOF for State Lands.

#### *Investing in Sustainable Supplies of Mineral Resources*

The mineral industry is a critical part of a sustainable future for Southeast Alaska, and the USDA's sustainability strategy must reflect this fact.

#### *Investing in the Planning Done to Date - the Southeast Alaska 2025 Economic Plan*

Southeast Conference is the federally designated Regional Economic Development District and the state-designated Alaska Regional Development Organization for Southeast Alaska. In April 2021, Southeast Conference completed a year-long collaborative effort that culminated in release of their Southeast Alaska 2025 Economic Plan, which serves as the regional Comprehensive Economic Development Strategy. DNR recommends that the USDA fully incorporate the Southeast Alaska 2025 Economic Plan into its Southeast Alaska Sustainability Strategy.

### **First Things First Alaska Foundation**

Southeast Alaska cannot rely on its antiquated transportation system. Most mainline vessels are over fifty years old. Instead, the region must transition to a more environmentally friendly and cost-reducing land and sea network. Failure to plan for a more integrated transportation system will stagnate growth opportunities for fisheries, mariculture, tourism, recreation, and the region's economic functionality as a whole.

### **Tidelines Institute**

Established in 2013, the Institute is rapidly developing into a hub for place-based education and research, connecting people to the breathtaking wildlands of Glacier Bay and the Tongass National Forest. The market for educational tourism is growing regionally and around the world, and each year we receive far more interest in our courses and programs than we can accommodate. Our biggest barrier right now is lack of infrastructure to host such programs, and we are currently raising funds for a new educational building that will provide the necessary spaces: classrooms, presentation space, a dining hall, a library, and a teaching kitchen, among others.

### **Resource Development Council for Alaska, Inc.**

RDC shares much or many of these goals, however RDC opposes two of the four primary components of the strategy: ending large-scale, old-growth timber harvest, and restoring the 2001 Roadless Rule protections. RDC has long supported the sustainable harvesting of timber in the Tongass National Forest and has supported every effort to overturn the Roadless Rule. It is also important to point out that in your list of key opportunity categories one key category was missing: mining. Mining has long been a part of the history and economy of the Southeast region, and Alaska as a whole, and continues to provide family-wage jobs to numerous residents. The mining sector is also currently engaged with USDA on mineral exploration projects across the region which makes collaboration and inclusion in this strategy deeply critical.

### **Private Citizen**

The relevant agencies should act to conserve herring in Southeast Alaska, as a way to accomplish the mission of feeding the world. Pacific Herring, as a forage fish, are foundational to the marine ecosystem of southeast Alaska. Marine mammals, sea birds, pelagic fish, and salmon all depend on a strong herring return...The stability and profitability of most regional commercial fisheries are directly tied to the strength of the herring population. For Tlingit people, herring are a vital subsistence food. Harvesting, processing, and celebrating the herring is a cornerstone of Tlingit ceremony and sovereignty. USDA should offer technical and financial support to the effort to herring conservation.

### **US Fish and Wildlife Service**

USFWS has a strong interest in continuing to support capacity building among our Alaska Native partners. Through the Southeast Alaska Watershed Coalition, we have invested resources into developing tribal work crews on Prince of Wales Island. These work crews have done an admirable job enacting stewardship over their lands by implementing habitat restoration projects in the Klawock Lake Watershed. Expanding this model across Southeast through additional capacity building and training in local communities would be an excellent investment for the SASS.

We also recognize the continued need to address aquatic connectivity at the landscape scale given the diverse suite of landownership types and fragmented geography across Southeast. This will require coordinated collaboration and engagement across landowners. We encourage the use of the SASS to develop additional capacity building to help foster this engagement and to improve our collective ability to efficiently and cost effectively identify, produce, and implement high quality restoration projects.

## **Defenders of Wildlife**

In quantifying the wildlife benefits of a restoration program or of individual projects, we encourage you to explicitly consider the habitat needs of specific wildlife species in identifying the most strategic areas to restore, sizes and locations of areas treated, and the applicable prescriptions for individual projects. The presence or absence of adjacent old-growth forest areas, provision of landscape connectivity, and home ranges of affected species are a few examples of considerations that should be made transparently in support of specific projects and the restoration program generally to ensure that wildlife benefits are maximized.

## **Southeast Alaska Conservation Council**

We eagerly welcome a new vision for and chapter of forest management for the Tongass. SEACC's staff, board, and members have pushed for an end to old-growth clearcut logging of the Tongass for decades, and we strongly endorse the vision and intention informing this commitment. We will continue to do our part to ensure this new vision is enacted throughout the Tongass National Forest. It is encouraging to see that, rather than simply stating what will *not* happen in future, in the Southeast Alaska Sustainability Strategy the USDA has clearly outlined clearly what the management focus *will* be going forward. SEACC sees numerous and diverse economic, cultural, and ecological opportunities inherent in a new Tongass focus on promoting recreation, forest restoration, climate resilience and a young-growth timber industry that is limited, hyper-local, and sustainable.

While we are inspired by the vision the USDA lays out in the SASS, we have some concerns that rank and file Forest Service employees in the region may not yet have fully absorbed and embraced this important new guidance. For implementation of the Southeast Alaska Sustainability Strategy to succeed, Forest Service and USDA leadership must work to ensure that the transition of Tongass management priorities will be embraced and will be proactively implemented by the Forest Service.

## **Private Citizen**

The biggest challenge to initiating an integrated young growth industry will be determining what markets can be developed that will support this effort. I know there are many who believe and advocate for a modestly large mill to initiate this effort. At this point I don't know where a market for 20, 30 or 50 million board feet of product can be developed. I'd suggest looking at this from the bottom up. Figure out some prospective markets to test various YG products, then work with one or more of the interested small mills to produce product that can be integrated into local markets.

## **City of Pelican**

- Due to limited land available in remote rural areas, partner the USDA RD program with EPA Stag Fund – State/Tribal Assistance Grant funds, with Alaska DEC Brownsfield program clean-up for reuse of fish processing properties.
- Partner USDA RD program with US Army Corps of Engineers and USFWS Boating Infrastructure Grant (BIG) Program to provide technical assistance and funding for rural remote communities, specifically Pelican, Alaska, for harbor improvements and harbor dredging projects. Dredge spoils used to fill in a boat launch ramp area.
- Pelican, Alaska experiences seasonal influx of high-income transient population the masks the year-round population with a low to moderate income feature. The Community Development Block Grant (CDBG) program requires low to moderate designation to meet grant application criteria. The true year-round population is interrupted from being eligible to apply. This prevents rural remote communities from improving local capacity to service the seasonal population, many of whom are out recreating on the Tongass National Forest, accessing many of the location by water, or a combination of air and water.
- For rural remote communities, the expense of a feasibility study to prove up for federal grant programs is a significant deterrent to applying for federal funding. These smaller communities are the most in need of community planning efforts.
- The Federal Energy Regulatory Agency governs Hydroelectric regulations that impact small hydroelectric facilities in rural remote areas. Better coordination with this agency is needed to streamline the permitting

regulations that are onerous for small coastal communities who need the renewable energy to meet the seasonal influx of regional visitors who are recreating in the Tongass National Forest.

- The USDA outreach to some communities in SE should be replicated to include rural remote communities. Much like the biomass/hoophouse initiatives with technical assistance with incentive grants very much improved food security with the region. Continue building local capacity for local grown agriculture activities.

### **Private Citizen**

There should be an inventory taken of remaining high quality red cedar and spruce in the region. These are very important for cultural pursuits of tribal people and have become extremely hard to find. I recommend putting \$4,000,000 researching the best way to grow old-growth quality timber and implement a new forest management plan accordingly.

### **Armstrong-Keta, Inc.**

There is an acute shortage of trained workers in both salmon culture and mariculture. This is a state-wide issue that predates the Covid-induced national labor shortages by several years. Additional education and training for local Alaskans in this field could pay significant benefits for both the hatcheries/growing sites and the young local population seeking well-paying jobs in interesting and thriving industries.

### **Earth Justice**

We hope that the Department will make this Strategy a permanent change in its approach to managing the Tongass National Forest, not a short-term shift. To ensure that the change is lasting, the Department should not only shift metrics and funding focus, but also move staff away from the timber program and build expertise and capacity in the restoration, resilience, habitat, and recreation work central to the Strategy. This includes staff dedicated to engaging with Tribes, communities, and other partners to identify and prioritize projects focused on these peoples and goals.

### **Southeast Alaska Fishermen's Alliance**

Investment in stream restoration, with a focus on high value salmon streams with failed culverts or other logging/road building damage, will return long term ecological and economic benefits. Determination of high value salmon streams should be done in conjunction with Alaska Department of Fish and Game as well as extending the current inventory of stream damage (LIDAR) to Central Southeast Alaska.

### **Sealaska**

Sealaska Corporation is the Alaska Native Regional Corporation for Southeast Alaska, representing our traditional communities and over 23,000 shareholders of predominantly Tlingit, Haida and Tsimshian descent.

1. *Young Growth Management and Habitat Restoration* Sealaska has consistently prioritized the management of youth growth stands, to ensure the restoration of wildlife habitat and healthy forest stands that could be utilized by future generations. We would very much like to see dedication of USDA resources to young growth management and restoration efforts, including continued support of the Natural Resources Conservation Service (NRCS) that help to fund our restoration and thinning efforts on Sealaska and Village Corporations lands in the region.
2. *Stream and Fisheries Restoration* Throughout our history of timber development, Sealaska activities have always been mindful of the importance of anadromous streams and waterways and protecting our important fisheries resources. In addition to habitat restoration activities on young growth stands, we would like to see dedicated USDA resources to the restoration of any impacted or critical streams. This should include a road and culvert inventory analysis, and the creation of a stream restoration priority project list. As a component of this, we would like to see workforce development and contracting opportunities for our tribes and our Alaska Native Corporations in the region, for example, at the Cube Cove Restoration Project.
3. *Workforce Development and Training Opportunities* Related, in part, to the first two priorities above is the priority for workforce development and training opportunities for Sealaska shareholders and residents in our traditional villages. Sealaska would like to see training and workforce development opportunities that allow our shareholders and local residents to gain skills in land and water management, monitoring and related activities. The ultimate goal would be the



ability of our shareholders to live and work within our traditional villages and our region. We believe that the challenge cost share agreement was successful in offering natural resources field training, and this should be expanded to include young growth workforce training, including heavy equipment operation and maintenance.

4. *Youth Development* Another important component of the Workforce Development and Training priority should be Youth Development. While we could have simply included in the previous paragraph, it is important enough to warrant a separate priority listing. Sealaska has identified youth education and development as an important long-term priority, to ensure that we have developed our youth and shareholders to live and work in our traditional communities, our region, and in entities and agencies that impact Alaska Native lives. We have collaborated with other stakeholders on the TRAYLS/AYS program, our internship programs, STEM education, and other opportunities, but would like to see continued investment by our partners in this important priority area. Specifically, Forest Service staff should support avenues for TRAYLS/AYS alumni to work on trail infrastructure throughout the Tongass. Appropriate priority should be placed on utilizing tribal or village corporation contractors, whereby a Tribe or village corporation could stand up a trail infrastructure and maintenance crew that would extend the opportunity for youth within the TRAYLS/AYS program to move into full-time trail work.

5. *All Landowners – Continued Collaboration and Partnerships* Sealaska, the Forest Service, the State of Alaska, and others, have met regularly in recent years to maintain communication and find opportunities for collaboration on land management, restoration, and development activities. Sealaska would like this to continue to be a priority of the USDA as the agency implements the Sustainability Strategy. Related to this priority is the importance of Community Forest Partnerships. The Hoonah Native Forest Partnership and the Keex' Kwaan Community Forest Partnership have been tremendous examples of the positive activities and opportunities that can come out of collaboration of stakeholders. We hope to see additional community partnerships and stakeholder collaboration under the Sustainability Strategy. We specifically support the USDA enhancing the Tribal Conservation District structure to offer greater access to federal programs and an avenue for Tribes to be part of all landowners work within their tribal territories.

6. *Cultural Art Logs* Sealaska has been the primary supplier of cultural art logs for our artists and for various important cultural projects in our communities, despite our limited land base within the region. We would like to see the USDA prioritize a portion of the Sustainability Strategy funds for the provision of cultural art logs within our region for various cultural projects and priorities. This could include identification and storage of logs for this purpose, as well as collaboration and support for transport of such logs to the appropriate locations. The types of logs needed for these cultural purposes are limited and in high demand, but it is so important to cultural preservation and maintaining our identity as Native people. Sealaska is willing to partner closely with the Forest Service to create a cost-effective program to get totem and other art quality trees out of the forests, while also offering secure storage on Sealaska land that has access to heavy equipment for transportation needs. It will be necessary to design a cost-effective identification and location program, as well as a cost-effective helicopter harvest program for up to 20 totem quality logs annually. Sealaska Heritage Institute, Sealaska and our Natural Resources field team are willing resources that can be used for this critical effort. We collectively stand ready to support our Tribes in any and all requests they have in regard to sustainable supply of this significant cultural resource.

7. *Interagency collaboration to bring any and all federal programs and efforts to support USDA's Sustainability Strategy* Presidential executive orders and interagency efforts offer amazing opportunities to make the USDA's Sustainability Strategy successful and impactful to our communities. The President's Executive Order, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, cites: *"It is therefore the policy of my Administration that the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government. Because advancing equity requires a systematic approach to embedding fairness in decision-making processes, executive departments and agencies (agencies) must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity."*

Also, the interagency (DOI, USDA, DOC, Council on Environmental Quality) approach taken within the report, *Conserving and Restoring America the Beautiful 2021*, has a philosophical guiding framework that must be a cornerstone for the USDA's Southeast Sustainability Strategy:

*"The President's challenge is a call to action to support locally led conservation and restoration efforts of all kinds and all over America, wherever communities wish to safeguard the lands and waters they know and love. Doing so will not only protect our lands and waters but also boost our economy and support jobs nationwide. The central recommendation of this report, which we submit to the National Climate Task Force, is that the pursuit of a decade-long national conservation effort be faithful to eight core principles. These principles—which include a commitment to collaboration, support for voluntary and locally led conservation, and honoring of Tribal sovereignty and private property rights.*

*Principle 1: Pursue a Collaborative and Inclusive Approach to Conservation*

*Principle 2: Conserve America's Lands and Waters for the Benefit of All People*

*Principle 3: Support Locally Led and Locally Designed Conservation Efforts*

*Principle 4: Honor Tribal Sovereignty and Support the Priorities of Tribal Nations*

*Principle 5: Pursue Conservation and Restoration Approaches that Create Jobs and Support Healthy Communities*

*Principle 6: Honor Private Property Rights and Support the Voluntary Stewardship Efforts of Private Landowners and Fishers*

*Principle 7: Use Science as a Guide*

*Principle 8: Build on Existing Tools and Strategies with an Emphasis on Flexibility and Adaptive Approaches"*

Sealaska believes following this framework, along with broad agency collaboration, will achieve the Administration's priorities of creating inclusive growth, achieving social justice for underserved communities, prioritize tribal communities, and achieve positive environmental outcomes that address climate change.

*8. Support for the Sustainable Southeast Partnership and other Collaborative Efforts that are in Process* We recommend that the USDA enter into a public-private partnership agreement with the Sustainable Southeast Partnership (SSP) to further develop and support the USDA Strategy and the allocation of resources for this Strategy, because the Strategy is in alignment with much of what SSP is all about. Sealaska is a strong supporter of projects already underway, including the Indigenous Guardians Network, the Seacoast Trust initiative and all SSP community and policy-based initiatives. The Guardians Network could ensure that we have two Guardian positions in each community within the Tongass National Forest, to monitor land use activities and ensure better dialogue between the communities, the Forest Service, and other landowners. The Seacoast Trust is a multimillion-dollar endowment that is dedicated to the implementation of sustainable economic development in Southeast Alaska. The SSP is working on tourism development in our rural communities that can be enhanced by USDA recreation support tied to increased visitor use and tourism opportunities for our rural communities who have very little access to tourism opportunities in comparison to other Southeast communities. With all USDA programs, existing and new, a close analysis of the concept of inclusive growth and inclusive access to USDA and other federal agency programs needs to be applied to our rural Tribal communities. Sealaska has committed its own resources, financial and otherwise, to these important initiatives. We hope that the USDA, through the Forest Service, NRCS and Rural Development, can also be a part of these important efforts. These efforts, alone, will contribute to workforce development, economic development opportunities, community sustainability, landowner collaboration, and ultimately positive environmental outcomes.

#### *9. Support for Community and Tribally Led Local Management Structures*

Our Tribes and community entities often have too little decision-making authority around land management efforts, including conservation or preservation decisions, within their traditional homelands. New management structures should be created to allow for tribal and community priorities to lead land management and USDA efforts within the Tongass. Communities and Tribes should be able to have subsistence harvesting priorities and concerns addressed by USDA, have clear decision-making input into natural resource development occurring in their homelands, while also

expressing land management and development priorities for their economy and access to renewable energy. A true local management structure will allow this to occur within the Tongass Forest districts, as each community and Tribe has their own priorities for their homelands. Working closely with Tribes to design these local management structures could lead to coordinated efforts that offer cost savings to the Forest Service and enhanced contracting opportunities to local entities. Our Tribes have the capacity, ancestral wisdom, and vision for healthy ecosystems that can add meaningful benefit to the Forest Service management of the Tongass, where our people, the Tlingit, Haida and Tsimshian have lived for over 10,000 years.

Conservation or preservation-minded activities should not be focused on “locking up” lands or “locking out” local users. A better approach is to define a local and tribal co-management stewardship structure that ties to indigenous stewardship, which has been proven to create both positive economic and environmental outcomes that allows for the majority of the Tongass to be counted within the 30 X 30 conservation goal under this sustainable, collaborative management structure. Sealaska is willing to work alongside our local tribes and partners to define and structure an indigenous stewardship, local and tribal collaborative management structure.

*10. Protecting our Traditional Way of Life – Subsistence* Our communities, tribal citizens and shareholders within the region depend heavily on our traditional way of life, also known in the law as Subsistence. Sustainability within the region is not possible without prioritizing or emphasizing the importance of subsistence to our communities. The USDA has a seat on the Federal Subsistence Board and must ensure that the local voices and priorities are heard and acted upon to create the needed enhancements to regulations; allow access and management that addresses the increasing costs of in rural communities; and to address any potential diminishing access to traditional harvesting. To honor the philosophy of inclusive growth, social justice, along with a priority on tribal communities, the Forest Service should be willing to work with local tribal communities to define prioritized harvesting plans for local users. The difficult prospect of creating local priority use only serves to highlight that inclusive growth and social justice are hard to achieve. This will take significant understanding about shortfalls by the federal government; limited capacity of our underserved communities to work with the federal government; and where trust and relationships need to be solidified. Without this level of understanding and effort, combined with a problem solving, solution-oriented process, the goals of the federal administration will not be met. Additionally, the Forest Service should be mindful of the importance of managing and preserving subsistence resources on Forest Service lands, by enhancing access for local users, while working with other agencies to enhance their own recognition of the subsistence priority in Southeast Alaska.

### **The Nature Conservancy**

The \$25 million the administration has committed to implementation of the new Strategy is not enough for long-term success and a just transition away from old-growth timber extraction and many elements for the ultimate success of the new Strategy are beyond the purview of USDA. Healing within Indigenous communities from the traumas of colonization, as one example, is essential. Fortunately, a decade ago, an initiative was begun with intent to support this just transition – the Sustainable Southeast Partnership (SSP) – and it has attracted the attention and broad support of many of the leading stakeholders of the region. We believe that SSP represents a model and ensures a participatory governance structure to allow for the USDA to more effectively support a cohesive Strategy that drives for community priorities at the center. The SSP also recently secured \$17M in commitments from Sealaska Native Corporation and The Nature Conservancy as part of the development of the Seacoast Trust, a permanent funding mechanism for the SSP. This represents significant funding that can be leveraged if there is an opportunity to utilize that investment in parallel with the funds allocated to the USDA Sustainability Strategy.

...this initiative represents an opportunity to simultaneously support the capacity of community partners and tribes AND an opportunity to build internal capacity within the agencies. We think both are needed to see this initiative be successful. We hope this funding offers both an opportunity to improve agency capacity through increased staff availability and skills, project implementation funding, and cross-department communication as well as providing resources to existing locally driven initiatives.

We believe tribal co-management and priority on traditional uses should be front and center for implementation. This can be modeled in the process but also in the chosen projects and policy improvements.

Increase USFS and NRCS engagement in the Sustainable Southeast Partnership to collaborate and identify areas of mutual interest with regional partners. Increased local engagement with the network will help our region retain more institutional knowledge as the agencies experience frequent turnover.

NRCS should return to the first iteration of the RCPP where the "program implementation guidelines" allowed for technical assistance (TA) funding that dedicates resources to the workforce development component that is critical in rural communities.

Adjust USDA Rural Development loans to increase feasibility of renewable energy projects. Renewable energy projects, particularly hydropower, would improve rural economies and benefit households across the region. Financing assistance would make the establishment of these renewable infrastructure projects more feasible.

Partner with the USFS Pacific Northwest Forest Research Station on developing new management and monitoring strategies that consider carbon as an important resource and metric to incorporate into land management planning and monitoring.

Change procurement policies within the agencies, particularly USFS, to require a percentage of materials used in construction of new federal facilities be sourced from local suppliers in order to incentivize a local market.

Increase staffing within resource areas related to restoration (wildlife, hydrology, fisheries, archaeology, engineering) in order to reduce project bottlenecks and increase the pace and scale of restoration and PCT work across the forest. Higher staff capacity would aid not only in project implementation, but also in the assessments and design necessary for keeping a steady supply of projects into the NEPA pipeline.

### **Central Council Tlingit Haida Indian Tribes of Alaska**

- President Biden's executive orders and interagency efforts offer opportunities to make the USDA's Sustainable Strategy successful and impactful to tribes and our communities. The President's EO, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, cites:  
*"It is therefore the policy of my Administration that the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government. Because advancing equity requires a systematic approach to embedding fairness in decision-making processes, executive departments and agencies (agencies) must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity."*
- Tlingit & Haida recommends supporting local food security efforts in the face of a rapidly changing climate and global pandemic supply-chain "last mile" disruptions. Local capacity needs to be organically created in Agriculture, Aquaculture, and Mariculture programs. These are ideas to be explored, keeping balance in mind with local and traditional customary use.
- Due to the loss of generational traditional knowledge, it is even more critical for youth to be supported and encouraged to participate in decision making processes that have potential or direct effect on traditional way of life.
- Tribally Led Management Structures:

Tribes have little decision-making authority around land management efforts within their traditional homelands. New management structures should be created to allow for tribal priorities to lead land management USDA efforts within the Tongass. Tribes should be able to have subsistence harvesting priorities and concerns addressed by USDA, have clear decision-making input into natural resource development occurring in their homeland, while also expressing land management and development priorities for their economy and access to renewable energy.

Capacity development

- Policy Analysis
- Government to Government Specialists
- Para Archeology Program to share stewardship with Federal and State management for monitoring of sacred and heritage sites

Tribal Conservation Districts

Tribes are federally funded, and it does not make sense to require non-federally funded match sources for tribal nations.

It is important to remove barriers such as match requirements and business tools which are not in alignment with tribal protocols and capacity.

638 Contract/Compact Agreements to administer USDA Programs.

Co-management/governance of the Mendenhall Glacier.

Working closely with other Tribes, ANCSA Corporations and other organizations to design these local management structures could lead to coordinated efforts that offer cost savings to the USFS and enhanced opportunities to local entities. We have the capacity, ancestral wisdom, and vision for healthy ecosystems that can add meaningful benefit to the USFS management of the Tongass, the Tlingit, and Haida people that lived here for over 10,000 years

### **National Forest Foundation**

As the congressionally chartered nonprofit to the U.S. Forest Service, our mission is to engage communities in the restoration and enjoyment of national forests and grasslands. Per our charter, the NFF does not engage in policy or political advocacy. Since 2004 the NFF has invested **\$3,906,264** in the communities of Southeast Alaska and the Tongass National Forest. The NFF programs for investing these funds included:

- Community Capacity and Land Stewardship Program (2012 – 2021): \$886,585
- Alaska Forest Fund (2015 – 2021): \$1,292,113
- Tongass Treasured Landscape Initiative (2012-2015): \$541,072
- Nationally Competitive On-the-ground Stewardship Grants (2004-2018): \$451,936
- Other Collaborative Capacity Building (2007-2014) \$734,557.

Through these programs the NFF has been able to leverage an **additional \$4 million** in grantee match and in-kind contributions. Some highlighted outcomes of these programs include:

- Increasing the capacity and engagement of stakeholders on the Tongass Transition from old growth to young growth management,
- Feasibility of biomass utilization for the Hoonah Indian Association,
- Investments in recreation infrastructure including cabins, trails, and new courtesy boats, and
- Grants for the Alaskan Youth Stewards, to hire Alaska Native and rural youth to improve recreation areas and natural resources and provide career training pathways.

The SASS has outlined desired approaches for investment including a focus on infrastructure, natural resources, capacity and Tribal and Indigenous Interests. *We believe that our role as a grantor, fundraiser, and project implementer, the NFF can assist with meeting many of these approaches.*

### **Southeast Alaska Cluster Initiative**

Tourism has become a major economic driver for southeast Alaska. Prior to disruptions caused by the pandemic, tourism was the leading private employer with an estimated 35,000 jobs and \$2.79 billion dollars contributed to Alaska's

economy in 2019. However, Forest Service investments and engagement with the visitor industry have lagged drastically behind this growth. While tourism has grown, businesses continue to encounter obstacles to growing their businesses on the National Forest. The Sustainability Strategy is an opportunity to assist the Forest Service in examining how they can be more adaptive and innovative in responding to growth in demand.

### **Alaska Forestry Association**

- Federal agencies and their State, Tribal and non-profit and philanthropic partners have invested millions of dollars in robust planning and economic development processes and documents in SE AK. Ensure that these investments are utilized and are referred to in the application and selection process.
- USDA has an array of funding mechanisms at its disposal; be creative. Grant where it makes sense, but also consider utilizing tools such as Challenge Cost Share agreements, inter agency transfers, Memorandum of Agreement (MOUs) between the family of federal agencies in AK, and the resources of other agencies such as the Denali Commission to efficiently and effectively move money quickly and in ways that best suit the program and the recipient(s).
- Look for partnerships with economic development organizations, industry associations, Tribal non-profits, and other municipal and non-profit organizations. Require dialogue and consider reforming some of the prior regional roundtables, committees, and groups with diverse membership to discuss issues that are controversial but require collaboration for a sustainable economy.
- Focus funding on opportunities that will continue to ensure the diversification of the SE economy.