



February 16, 2021

USDA Forest Service

Submitted via <https://cara.ecosystem-management.org>

Re: Forest Products Modernization – Batch 2 #ORMS-2747, FSH 2409.19 Chapter 80—Good Neighbor Authority

To whom it may concern:

The State of Alaska, Department of Natural Resources, Division of Forestry offers the following comments on the new Forest Service Handbook 2409.19 Chapter 80 Good Neighbor Authority (GNA).

Working together as partners on GNA requires an intricate back-and-forth between the State and the Forest Service which is difficult to capture in the Handbook while also ensuring the direction is broadly applicable to a wide variety of situations. We recommend 82.21—NEPA Compliance for Sale of Timber clarify the process and timeline for Forest Service approvals related to implementation of NEPA decisions, including for special requirements or design features and mitigation measures. We understand the 81.1 Environmental Analysis provision which states that NEPA decisions remain the responsibility of the Forest Service responsible official. However, it becomes problematic when the interpretation of how NEPA decisions will be implemented occurs or changes after the State has entered into an agreement with a purchaser. In effect, the Forest Service then has a direct relationship with the purchaser in contrast to the provision in 81.52(3); the Forest Service is directing the purchaser's work, with the State merely relaying the directions.

Similarly, in order for the State to successfully bundle work items such as timber sales and reforestation as described in 81.41, it would be helpful for the Chapter to describe the process and timeline for Forest Service approval of restoration site plans and other items.

We recommend clarifying in 81.4—Examples of Restoration Services that while GNA can be used for any part of planning, preparation, execution, and monitoring, each supplemental project agreement must include implementation and cannot be for planning alone.

We noted that the Chapter details timber sale processes under GNA, but implementation of other methods of restoration are not detailed. Perhaps the supplemental project agreement templates for different types of projects provide more explanation, but the website link in the Chapter did not work.

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Thank you for the opportunity to review the new Chapter. GNA has become a useful tool for landscape restoration in Alaska and having a Forest Service Handbook chapter specific to GNA is helpful to efficiently implementing projects. If further clarification or collaboration is needed related to our comments, please contact Ashley List at (907) 269-8481.

Sincerely,

Tim Dabney
Acting State Forester