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Submitted Electronically

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=60639>

Francis Sherman
Reviewing Officer
Tongass National Forest
Federal Building
648 Mission Street, Suite No. 110
Ketchikan, KA 99901-6591

**Re: Alaska Forest Association Objections to U.S. Forest Service's Draft Decision
Notice for the Thomas Bay Young-Growth Timber Sale**

Mr. Sherman,

Pursuant to 36 C.F.R. Part 218, subparts A and B, the Alaska Forest Association (AFA) hereby objects to the proposed decision of the U.S. Forest Service, Tongass National Forest, Petersburg Ranger District, as set forth in the Thomas Bay Young-Growth Timber Sale Environmental Assessment (EA), Finding of No Significant Impact (FONSI) and Draft Decision Notice (Draft DN), for which the Responsible Official is Vernon (Ray) Born, District Ranger.

Objector:

Alaska Forest Association (AFA)
432 Carlanna Lake Road
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(907) 225-6114

Objector's Interests

The AFA is one of the oldest trade associations in the State of Alaska. Its members share an interest in all facets of the timber industry and in the health of the public forest lands in Alaska. More information about the AFA is available on its website at <https://akforest.org/about/>.



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The AFA commented on the EA and FONSI for the Thomas Bay Young-Growth Timber Sale in a letter dated May 8, 2023 (AFA Comment Letter). The AFA Comment Letter is incorporated herein by reference pursuant to 36 C.F.R. § 218.8(b)(4), and the AFA's objections are based upon its prior written comments in the AFA Comment Letter. Although the AFA agreed with the Forest Service's determination that the implementation of the Thomas Bay Young-Growth Timber Sale would not have a significant impact on the quality of the human environment, the AFA found fault with the EA as set forth in its comments. The Forest Service's September 2023 Response to Comments on the Thomas Bay Young-Growth Timber Sale EA and FONSI (Response to Comments), which inadequately responded to the AFA's comments, is attached hereto as Exhibit A and made a part of these objections. The AFA continues to find fault with the project and now finds fault with the Draft DN, as detailed below.

Objections

Objections 1 and 2

First, the purpose and need statement for the Thomas Bay project is unreasonably narrow because it rests on the Forest Service's abandonment of its old-growth bridge timber transition obligations in the 2016 Tongass Land and Resource Management Plan (2016 Forest Plan) and Record of Decision (ROD). The 2016 Forest Plan and ROD's transition to young-growth timber harvesting on the Tongass is based on a mix of two components, a young-growth timber component and an old-growth bridge timber component. The Forest Service has abandoned the latter component and therefore abandoned the young-growth timber strategy's foundation of a *mix* of young-growth and old-growth bridge timber offerings. The Forest Service therefore committed a clear error of judgment bearing on the substance of the draft DN.

Second, and relatedly, the Forest Service denies that it has abandoned the old-growth bridge timber component of its transition obligations. The agency's denial, which is controverted by the evidence, violates the agency's obligation to ensure that accurate environmental information is made publicly available before the Forest Service makes a decision.

As explained in the AFA Comment Letter at pages 1-3, the Forest Service violated the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq., by having an unreasonably narrow purpose and need statement for the Thomas Bay project. The purpose and need statement is unreasonably narrow because it erroneously presumes the Forest Service does not have an obligation to offer for sale a mix of young-growth and old-



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growth bridge timber offerings as part of the young growth transition. An agency cannot define its objectives in unreasonably narrow terms because doing so unreasonably constrains the range of project alternatives and effectively preordains the outcome in contravention of NEPA. The Forest Service referred to this comment as AFA 1 in its Response to Comments at page 9.

Relatedly, as explained in the AFA Comment Letter at pages 3-4, the Forest Service misrepresented to the public in violation of NEPA that it *is* complying with its young-growth transition obligations, when in fact it is not. The Forest Service referred to this comment as AFA 2 in its Response to Comments at page 9.

The AFA's comments explained that the agency defined its objectives for the Thomas Bay project in unreasonably narrow terms by focusing solely on young-growth timber harvest purportedly to "support the transition from predominantly harvesting old-growth timber to predominantly managing young-growth as directed by the [ROD and 2016 Forest Plan]." EA pg. 1. The AFA further explained that the project is incapable of supporting the transition to young-growth timber harvesting per the ROD and 2016 Forest Plan because those legally binding documents require the Forest Service to offer a *mix* of young-growth timber and old-growth bridge timber to facilitate the transition to primarily young-growth timber harvesting over a period of about 15 years. That time period has not yet run, and will not do so for about another decade. Thus, the Forest Service unreasonably narrowed the project's purpose and need by arbitrarily deciding to contravene its obligations in the ROD and 2016 Forest Plan by excluding any old-growth timber harvest from the project based on the Southeast Alaska Sustainability Strategy (SASS), even though the project area contains ample productive old-growth. See, e.g., EA pg. 34.¹ And despite the Forest Service acting in direct contravention of its old-growth bridge timber transition obligations in the ROD and 2016 Forest Plan, the agency misrepresented to the public in the EA that the project was needed to "support the transition," EA pg. 1, which the project is not (and is incapable of) doing. See *also* EA pg. 24 (making misleading statements such as "at this critical time during the Tongass' transition to a predominantly young-growth management

¹ The Thomas Bay timber previously was included in the NEPA analysis for the Central Tongass environmental impact statement, where it included both young-growth and old-growth timber volume components. Before the Forest Service arbitrarily abandoned the Central Tongass project in connection with its abandonment of the agency's old-growth bridge timber obligations in the ROD and 2016 Forest Plan, the old-growth timber component of the Thomas Bay lands was about 20 MMBF, which confirms that the Forest Service could have offered old-growth bridge timber as part of this project to comply with its transition obligations in the ROD and 2016 Forest Plan.



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program," which implies the Forest Service is complying with its young-growth transition obligations when it is not).

The Forest Service's response to AFA 1 stated – misleadingly at best and deceptively at worst – that "[t]hough old-growth timber harvest is not a part of the proposed action, this does not preclude the Forest Service from developing future projects which have an old-growth harvest component." Response to Comments at 9. Similarly, the Forest Service's response to AFA 2 stated that the Thomas Bay project will "support the transition from predominantly harvesting old-growth timber to predominantly managing young-growth" consistent with the ROD and 2016 Forest Plan. *Id.* In reality, since adopting the 2016 Forest Plan and ROD, the Forest Service has failed to comply with its obligation to offer a mix of young-growth and old-growth timber volume as specified in the ROD and 2016 Forest Plan, including in contravention of timber objectives O-TIM-01 and O-TIM-02. 2016 Forest Plan at 5-13, 5-14. And in 2021, the Forest Service arbitrarily and capriciously reversed course without explanation by announcing its decision to *immediately* end the harvest of old-growth bridge timber as part of the SASS. Because the Forest Service has arbitrarily and capriciously abandoned its obligation to provide for the harvest of old-growth bridge timber during the young-growth transition period, it is equally arbitrary and capricious for the agency to respond to AFA 1 by asserting that it will provide for the harvest of old-growth bridge timber in some unspecified future timber sale project. For the same reason, it is arbitrary and capricious for the Forest Service to respond to AFA 2 by misrepresenting that the Thomas Bay project is supporting the transition away from predominantly harvesting old-growth timber and toward predominantly harvesting young-growth timber – the reality is that in 2021, the agency abruptly terminated the harvest of old-growth bridge timber that was an integral component of the young-growth transition strategy. The Forest Service cannot reasonably deny that fact.

The Forest Service cannot rely on erroneous information, as it did here in the Thomas Bay EA and now the Response to Comments, regarding the project's consistency with the ROD and 2016 Forest Plan's requirements for transitioning to a primarily young-growth timber program by offering a mix of young-growth and old-growth timber for harvest. *Nat. Res. Def. Council v. U.S. Forest Serv.*, 421 F.3d 797, 802 (9th Cir. 2005) (*NRDC*). In *NRDC*, the Forest Service was held to have acted arbitrarily and capriciously in violation of the Administrative Procedure Act (APA) when it based a revision to the Tongass Forest Plan on an overstated projection of market demand for timber. The Forest Service's misrepresented estimate of timber demand fatally infected its forest management decision for the Tongass. *Id.* at 809 ("[T]he Forest Service committed a clear error of judgment, and the Forest Service has not met its burden to show that its error 'clearly had no bearing . . . on the substance of the decision reached.'") (citation omitted).



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The Forest Service's misrepresentations in this case similarly undermine the draft DN. The agency's representation that the Thomas Bay project is needed to further the agency's transition to a primarily young-growth timber program on the Tongass is untrue, and the agency has failed to show that its error did not fatally affect the proposed decision in the draft DN. The transition to young-growth timber harvesting is based on a mix of two components, a young-growth timber component and an old-growth bridge timber component. The Forest Service has abandoned the latter component and therefore abandoned the young-growth timber strategy's foundation of a mix of young-growth and old-growth bridge timber offerings. Yet it denies having done so. Response to Comments at 9. Under NEPA, the public is entitled to be accurately informed of the purpose and need for a project and the project's compliance with (or in this case contravention of) the Forest Service's legal obligations. *WildEarth Guardians v. Provencio*, 923 F.3d 655, 668 (9th Cir. 2019) (stating that an agency must ensure that accurate "environmental information is available to public officials and citizens before decisions are made and before actions are taken") (citation omitted). The Forest Service thus has not made available accurate environmental information in violation of NEPA.

The AFA will not repeat the entirety of its earlier comments reminding the Forest Service how the Forest Service's transition obligations came to be in the ROD and 2016 Forest Plan. See AFA Comment Letter at 2-3. But importantly, the ROD stated that to "maintain a viable timber industry, this Amendment includes plan components to provide for a sufficient amount of old-growth 'bridge timber' to allow industry to re-tool for processing young growth." ROD at 30. *See also id.* ("The PTSQ consists of old-growth and young-growth harvest . . ."). The ROD further stated that the Forest Service "expects to sell an average of about 12 MMBF of young growth and 34 MMBF of old growth per year during the first 10 years. From Year 11 through Year 15, it expects to sell an average of 28 MMBF of young growth and 18 MMBF of old growth per year." ROD at 7. Full transition to young-growth harvest was anticipated by "about Year 16," with about 5 MMBF of old growth timber offered for sale each year thereafter. *Id.* The 2016 Forest Plan thus included timber objective O-TIM-01, stating that the Forest Service would "offer an average of 46 MMBF annually in a combination of old growth and young growth. When young-growth offered is less than 41 MMBF, provide old growth to make up the difference and achieve the average annual projected timber sale quantify of 46 MMBF." 2016 Forest Plan at 5-13. A second timber objective, O-TIM-02, stated that the "volume of young growth as part of the yearly offer will increase from an average of 9.2 MMBF annually in the first decade to an average of 25 MMBF annually in years 11-15 . . ." *Id.* at 5-14. The Forest Service thus plainly acknowledged (and represented to the public) that the transition to young-growth timber harvesting includes both a young-growth timber component and an old-growth bridge timber component. The Forest Service cannot abandon the latter component of the



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transition and deny having done so without running afoul of its Forest Plan obligations in violation of both NEPA and the National Forest Management Act, 16 U.S.C. § 1604(i).

The ROD acknowledged that the Forest Service could not suddenly and prematurely prohibit the harvest of old-growth bridge timber during the transition period. Yet that is exactly what the Forest Service has done. The alternatives considered but not analyzed in detail in the environmental impact statement for the 2016 Forest Plan included: (1) an immediate end to old growth logging, which was eliminated from detailed consideration because it “would not meet the need for maintaining a viable timber industry that provides jobs and opportunities for Southeast Alaska residents,” and (2) a transition to limited old-growth logging in five years, which was rejected because it was inconsistent with the “10- to 15-year period for the transition” and “would not allow the Forest Service sufficient time to offer economic young-growth volume,” including because harvesting immature second growth trees in that timeframe was neither practical nor economic for a variety of reasons. ROD at 12. More recently, the Forest Service reaffirmed in an internal April 13, 2022 briefing paper that there is, and will be for about a decade, “limited commercial young-growth timber available for harvest, scattered geographically across the Tongass.” NRE/Forest Service Briefing Paper (attached hereto as Exhibit B and made a part of these objections) at 2. In other words, the old-growth bridge timber component of the ROD and 2016 Forest Plan is as vitally important today as it was when adopted in 2016. And absent compliance with the old-growth bridge timber component of the ROD and 2016 Forest Plan, the Forest Service cannot comply with Congress’s “seek to meet” market demand directive for the Tongass in the Tongass Timber Reform Act (TTRA), 16 U.S.C. § 539d(a). The TTRA overlay on the Tongass prohibits the Forest Service from sabotaging its ability to seek to meet market demand for Tongass timber when managing forest resources. *NRDC*, 421 F.3d at 808 n.22.

For all of these reasons, the AFA objects to the Thomas Bay project and its draft DN, which is an illegal outgrowth of the EA’s unreasonably narrow purpose and need statement and rests on the agency’s repeated misrepresentations that the Forest Service is complying with its young-growth transition obligations in the ROD and 2016 Forest Plan. The Thomas Bay project’s flawed purpose and need statement rests on the Forest Service’s illegal abandonment of its transition obligations in the ROD and 2016 Forest Plan, obligations that the Southeast Alaska timber industry relied on for the transition over time to a primarily young-growth timber program on the Tongass. As a result of the agency’s errors, the Forest Service committed a clear error of judgment bearing on the substance of the draft DN, and it also failed to provide the public with accurate environmental information before making a final decision on the Thomas Bay project. The Thomas Bay project and draft DN thus are arbitrary and capricious in violation of the APA.



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Objection 3

Third, prioritizing the application of management components of the SASS over the directions listed in the Priority of Direction portion of Chapter One of the 2016 Forest Plan violates the 2016 Forest Plan. See AFA Comment Letter at 4 (making this point). The Forest Service referred to this comment as AFA 3 in its Response to Comments at page 9-10, stating that:

The application of the management components of SASS, such as maintaining an old-growth timber program focused on small sales and microsales and continuing to develop a young-growth timber program based on the collaboratively developed 2016 Forest Plan Amendment, is within the bounds of the 2016 Forest Plan and therefore does not conflict with the *Priority of Direction*.

The 2016 Forest Plan and ROD do not support the Forest Service's response to AFA 3. The ROD stated that to "maintain a viable timber industry, this Amendment includes plan components to provide for a sufficient amount of old-growth 'bridge timber' to allow industry to re-tool for processing young growth." ROD at 30. Regarding that old-growth bridge timber, which is not fairly equated with "small sales and microsales," Response to Comments at 9, the Forest Service stated in the 2016 Forest Plan and ROD that:

- the agency "expects to sell an average of about 12 MMBF of young growth and 34 MMBF of old growth per year during the first 10 years. From Year 11 through Year 15, it expects to sell an average of 28 MMBF of young growth and 18 MMBF of old growth per year." ROD at 7;
- the agency anticipates full transition to young-growth harvest by "about Year 16," with about 5 MMBF of old growth timber offered for sale each year thereafter. *Id.*;
- consistent with timber objective O-TIM-01, the Forest Service would "offer an average of 46 MMBF annually in a combination of old growth and young growth. When young-growth offered is less than 41 MMBF, provide old growth to make up the difference and achieve the average annual projected timber sale quantify of 46 MMBF." 2016 Forest Plan at 5-13; and
- consistent with timber objective O-TIM-02, the "volume of young growth as part of the yearly offer will increase from an average of 9.2 MMBF annually in the first decade to an average of 25 MMBF annually in years 11-15 . . ." *Id.* at 5-14.



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Again, these young-growth transition obligations in the 2016 Forest Plan and ROD, which include an old-growth bridge timber component, are not fairly equated with the “small sales and microsales” that the Forest Service represents it will offer pursuant to SASS. The Forest Service therefore failed to respond to the AFA’s comment (AFA 3), and the AFA objects to the Thomas Bay project and its draft DN on the grounds that the Forest Service has prioritized the SASS – a policy pronouncement – over the governing 2016 Forest Plan and ROD.

Objection 4

Fourth, the AFA commented (referred to by the Forest Service as AFA 4, Response to Comments at 10), that there was no need for the Forest Service to develop additional alternatives for the Thomas Bay project beyond those scoped in August 2021. The AFA made this comment because:

- (1) the Forest Service framed the project’s purpose as being “to provide an economic supply of young-growth timber while also addressing restoration needs in the area.” EA pg. 1; and
- (2) Alternative 2, the original action alternative, “was designed to meet the project’s purpose and need in the most efficient and economical manner by proposing even-aged management for timber harvest.” EA pg. 2.

Inexplicably, the Forest Service decided to develop a new alternative – Alternative 3, now the Preferred Alternative that the Forest Service plans to adopt, draft DN at 1 – that incorporates wildlife objectives and truncates the project’s projected timber harvest volume substantially, from about 19.3 MMBF, EA pg. 2, to 12.6 MMBF, EA pg. 3.

In response to the AFA’s comment, the Forest Service referred the AFA to the agency’s response to ARD 2, Response to Comments at 10. That comment by the Alaska Rainforest Defenders asked the Forest Service “to accommodate non-timber forest resource values and downscale[] the proposed volume” from the project. Response to Comments at 2. The AFA fails to understand how the agency’s response to ARD 2, which directly contradicts the AFA’s comment, is (or could possibly be) responsive to AFA 4. Essentially, the Forest Service failed to respond to the AFA’s comment.



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The AFA objects to the Forest Service's proposal to select Alternative 3 for the Thomas Bay project. Draft DN at 1. Given that the Forest Service has abandoned its obligation to "offer an average of 46 MMBF annually *in a combination of old growth and young growth*," and, when "young-growth offered is less than 41 MMBF, [to] provide old growth to make up the difference," 2016 Forest Plan at 5-13, the Forest Service at the very least should adopt Alternative 2 because it provides the timber industry the best chance of transitioning to young-growth timber harvest and the best chance for survival.²

On that last point, the Forest Service's actions suggest that the agency's ultimate objective may not be the survival of the Southeast Alaska timber industry, which is short-sighted given the AFA's historical and ongoing efforts to partner with and offer its substantial expertise to the agency, including on forest health projects. Indeed, the Challenge Cost Share Agreement between the AFA and the agency (Forest Service agreement # 23-CS-11100500-001) states on page 2 that the Forest Service and the AFA "agree that maintaining a viable forest products industry is critical for maintaining a healthy regional economy," and that the AFA's "unique understanding of industry's operating needs in southeast Alaska can provide valuable input to the U.S. Forest Service, including current markets and future trends, logging and processing costs and other factors shaping industry decision making." Those statements are true and correct. The AFA remains committed to fulfilling its obligations and asks the Forest Service to do the same with respect to its timber supply obligations under the 2016 Forest Plan and ROD.

Objection 5

Fifth, the draft DN, which states the agency intends to select Alternative 3, draft DN at 1, will prevent the Forest Service from meeting its TTRA obligation to "seek to meet" the demand for Tongass timber. See AFA Comment Letter at 4-5; Response to Comments at 11 (referring to the AFA's comment as AFA 7).

The parties agree that the 2022 demand analysis conducted by the Forest Service per the requirements of the TTRA shows an expected timber purchase amount for FY22 as 40 MMBF. The same report states that to meet the volume under contract objective, the agency needs to offer 54.1 MMBF during FY22. And the EA states that the annual demand

² By asking the Forest Service to at least select Alternative 2 rather than Alternative 3 in the final DN, the AFA does not waive any of its objections herein to the Thomas Bay project and draft DN. Alternative 2 best meets the Thomas Bay project's purpose and need, even though that purpose and need is flawed. And the Southeast Alaska timber industry is starving for timber volume because of the Forest Service's steadfast refusal to comply with the 2016 Forest Plan and ROD.



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for young-growth timber is between 9-10 MMBF and will remain that amount until 2026.
EA pg. 16.

The AFA understands that the Thomas Bay project “was not designed to meet the entire market demand.” Response to Comments at 11. But the Forest Service fails to acknowledge that during the young-growth transition period, seeking to meet demand on the Tongass requires, per the 2016 Forest Plan and ROD, a *mix* of young-growth and old-growth bridge timber offerings. See, e.g., 2016 Forest Plan at 5-13 (stating that consistent with timber objective O-TIM-01, the Forest Service will “offer an average of 46 MMBF annually *in a combination of old growth and young growth*. When young-growth offered is less than 41 MMBF, provide old growth to make up the difference and achieve the average annual projected timber sale quantify of 46 MMBF”) (emphasis added). As discussed above, the Forest Service has abandoned the old-growth bridge timber component of the mix, even though the project area contains ample productive old-growth timber. See *supra* note 1.

Because the Forest Service has arbitrarily abandoned its obligation to offer a sufficient supply of timber to meet demand “in a combination of old growth and young growth,” 2016 Forest Plan at 5-13, the Thomas Bay project will not further the Forest Service’s TTRA obligation to “seek to meet” the demand for Tongass timber. Keeping in mind that this project is one of only a handful of NEPA-cleared timber volume offerings needed to supply a starving Southeast Alaska timber industry since issuance of the ROD and 2016 Forest Plan and the Forest Service’s subsequent elevation of the SASS over those legally-binding documents, the Forest Service should at the very least select Alternative 2, not Alternative 3, in the final DN.³

Objection 6

Sixth, under the National Forest Management Act (NFMA), forest plan amendments that result in a “significant change” require the Forest Service to prepare an environmental impact statement. 16 U.S.C. § 1604(f). See AFA Comment Letter at 5 (making this point). The Forest Service referred to this comment as AFA 8 in its Response to Comments at page 11, which simply referred the AFA to the agency’s earlier Response to Comments at pages 9-10. *Id.* at 11 (referring the AFA to the agency’s prior responses to AFA 1 and AFA 3).

³ By asking the Forest Service to at least select Alternative 2 rather than Alternative 3 in the final DN, the AFA does not waive any of its objections herein to the Thomas Bay project and draft DN. See *supra* note 2.

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The Forest Service's abrupt and unexplained abandonment of its transition and old-growth bridge timber obligations in the ROD and 2016 Forest Plan are significant changes, yet the Forest Service has abandoned those legal obligations without amending the 2016 Forest Plan. The Thomas Bay project therefore fails to comply with the ROD and 2016 Forest Plan as written, in violation of the NFMA. The draft DN suffers from the same fatal infirmity. And the Forest Service's responses to AFA 1 and AFA 3 in no way cure that infirmity, as was discussed above.

Resolution Meeting Requested

Pursuant to 36 C.F.R. § 218.11(a), the AFA requests a meeting to discuss the issues raised in this objection letter and potential resolution. The AFA seeks to be a partner to the Forest Service on the Tongass, including on forest health projects. Yet the Forest Service seems intent on driving AFA members out of business. The AFA looks forward to discussing these issues in a forthcoming resolution meeting.

Conclusion

Thank you for your consideration of the AFA's objections. We look forward to meeting with you. If you have any questions in the meantime, please do not hesitate to contact us at 907.225.6114 or tessa@akforest.org.

Sincerely,

Tessa Axelson
Executive Director