



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Natural Resources**  
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7<sup>th</sup> Avenue, Suite 1430  
Anchorage, AK 99501-3561  
Main: 907.269-8690  
Fax: 907-269-5673

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U.S. Department of Agriculture  
Attention: Brooke Rollins  
Secretary of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Submitted via email to [reorganization@usda.gov](mailto:reorganization@usda.gov)

Re: U.S. Department of Agriculture Reorganization Plan

Dear Ms. Rollins,

The State of Alaska (State) reviewed the Secretary Memorandum (SM) SM 1078-015, Department of Agriculture Reorganization Plan. The plan proposes to eliminate numerous area offices and regional hubs for several components of the U.S. Department of Agriculture (USDA). This includes some Agricultural Research Service, National Agricultural Statistics Service, Food and Nutrition Service, and Forest Service offices. The plan also outlines efforts to reduce and streamline staffing levels and consolidate various support functions for the USDA.

The State appreciates the USDA's efforts to move decision-making authority closer to those impacted by its policies, streamline operations, and enhance efficiency within its bureaus, however, the State has concerns regarding the proposed reorganization, particularly its potential impact on operations in Alaska.

The State has responsibility for agricultural, timber, mining, and other resource development as well as for maintaining sustainable fish and wildlife populations. State staff frequently collaborate with USDA staff on a variety of management issues for both development and conservation. The State acknowledges that the USDA likewise has broad responsibilities and should operate sensibly. The reorganization plan by USDA has both favorable and concerning implications to land and resource management in Alaska. The comments below incorporate input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

**Reorganization impacts to Alaska**

In Alaska, the USDA's role is primarily related to forest management by the Forest Service, and the State's concerns relate solely to the elimination of the Forest Service's Alaska region office (Region 10). While phasing out the nine regional Forest Service offices is intended to improve efficiency while achieving savings for the American taxpayer, Alaska is different enough in its management needs that directing from Lower 48 offices will likely result in a greater disconnect between the federal Forest Service management and the on-the-ground needs of Alaskan forests, wildlife, and the communities that depend on National Forest resources.

SM 1078-015 outlines the USDA's four core missions, all focused on agriculture, which is a small part of USDA's role in Alaska. Alaska is currently trying to grow its in-state agriculture program but is currently limited to roughly 1,200 farmers.

Region 10 was created to ensure Alaskan forests were managed in a way that sustains the health and maximizes the productivity of Alaska's forests – which include two of the largest National Forests in the United States. Alaska forest resources are wholly different from those in the other states and territories. The spruce-hemlock forests of the coast and the boreal forests of the interior have no counterpart in other areas. The dissolution of the Forest Service Region 10 office in Alaska takes the local knowledge and connection with federal decision makers farther from the operators and users of the forest lands.

Another unique consideration for forest management in Alaska is the Alaska National Interest Lands Conservation Act (ANILCA) of 1980. ANILCA expanded both Tongass and Chugach National Forests and identified that logging and mining activities were to continue, as was the continued take of fish and wildlife for both general and subsistence needs. Conserving fish and wildlife and their habitats and increasing recreational access were also specifically identified as forest uses. ANILCA's unique management provisions present administration challenges in Alaska compared to other areas of the country and require a staff with specialized knowledge in the differences. A regional office in Alaska is a logical step to ensure that specific issues—from ANILCA implementation to revocation of the Roadless Rule—are handled by people with direct knowledge of Alaska.

For these reasons, **the State suggests the USDA reconsider the dissolution of the Forest Service Alaska region office (Region 10).** If the dissolution of the regions is required, perhaps a “State Director” model, similar to the Bureau of Land Management and Natural Resources Conservation Service could meet the need of the Forest Service. This would still maintain a singular point of contact for programs and enhance cooperation between the State and the Forest Service.

#### Alaska DOF Concerns

The Division of Forestry and Fire Protection (DOF) appreciates the move to streamline operations and enhance efficiency within the Forest Service. The State is encouraged by the opportunity to collaborate with an agency that has a clear mission, prioritizes results, and values partnerships with state agencies to serve the needs of citizens, businesses, and forests.

However, the State has concerns regarding the proposed reorganization, particularly its potential impact on operations in Alaska. While phasing out the nine regional Forest Service offices is intended to improve efficiency and reduce costs to taxpayers, it is unclear why a location within the Pacific Northwest was not selected to serve as a hub for the Forest Service. This region plays a vital role in the nation's timber production, supporting both domestic and export markets.

Additionally, the future responsibilities of the downsized state office in Juneau are uncertain. Historically, state, private, and tribal forestry functions have been managed through the regional office, and these functions should remain under the purview of the state office to ensure continuity and effectiveness.

Another concern involves the Forest Inventory and Analysis (FIA) program's proposed shift under the National Forest System. This change may reduce emphasis on FIA plots located on

non-federal lands. While the Coastal FIA program has been active for years, the Interior program has only recently begun installing FIA plots across the rest of Alaska—making Alaska the final state in the nation to do so. These plots represent 15% of the total forest land in the United States. The Forest Service and DOF have worked together to establish these plots, and it is essential to maintain this partnership to monitor forest health and changes in the American boreal forest. If funding for FIA plots in Alaska is reduced, the State urges the Forest Service to work with DOF to jointly develop a plan to continue monitoring efforts using remote sensing technologies such as Goddard's LiDAR, Hyperspectral & Thermal Imager (G-LiHT).

Additionally, the State is concerned about the future of the Alaska Forest Science Lab in Juneau. While the State supports the Forest Service's focus on applied forestry research, maintaining a research presence in Alaska is vital to the long-term success of the forest industry. The State would support a more applied focus from the Alaska Forest Science Lab.

#### ADF&G Concerns

The USDA plan to phase out the Region 10 office of the Forest Service will negatively impact Alaska's fish and wildlife management due to the shift in regional control and the potential for a different management philosophy. Specifically, eliminating the Alaska Regional office and shifting its duties to an office in the Lower 48 would centralize decision-making away from local Alaskan expertise and is a concern for several reasons:

- **Loss of Local Knowledge:** Alaska has unique ecological and wildlife challenges that differ greatly from those in the Lower 48 as Alaska primarily has intact ecosystems, with little road access to the majority of the lands. Having a regional office located in the Lower 48, where agency staff have different management priorities due to different conservation needs, would lead to less effective management of Alaska's resources.
- **Differing Management Concerns:** The location of a new planning office in an urban area like the five hubs identified in the Secretary's memo will likely lead to a talent pool skewed toward a preservationist mindset. This is a significant concern because Alaska's resource managers often have a deep understanding of the reliance of rural and nearby communities on natural resources for their livelihood. Federal staff outside of Alaska may not possess the necessary familiarity with ANILCA or appreciation for the cultural and economic realities of Alaska's residents, where maintaining opportunities for rural residents to continue their subsistence lifestyle is a critical component of land management. An example that demonstrates the fundamental differences in wildlife management and philosophy is the differences in wolf management practices – Alaska manages a healthy, harvestable population utilized by both hunters and trappers, while Colorado focuses on reintroduction. This type of cultural disconnect will likely lead to decisions that harm rural Alaskan communities and the people who rely on the resources within Forest Service lands in Alaska.
- **Different Priorities:** The sustained-yield principle governs Alaska's fish and wildlife management. This principle, enshrined in the state's constitution, aims to balance conservation with the use of natural resources for the benefit of Alaskans. Similarly, the Forest Service must follow the Multiple Use Sustained-Yield Act of 1960 and the National Forest Management Act to manage Forest Service lands for current and future generations of the United States. The difference in application between Alaska and the

Lower 48 is managers in the Lower 48 are focused on ways to restore ecosystems and maintain grasslands and forest health; in Alaska, the challenge is to maintain ecosystems and sustainable take of fish and wildlife in forests while allowing for sustainable development of both forest products and mineral development.

- Operational Delays: Moving Forest Service regional staff out of Alaska can lead to operational and management delays. Permitting for ADF&G brown bear survey work on the Tongass Forest is currently being delayed because in-state staff are required to send the Minimum Requirements Analysis Framework (MRAF) to reviewers outside of Alaska. The State notes that Forest Service agency staff outside of Alaska who do not understand the size and scale of Alaska lands, nor the unique provisions for land management in Alaska, insert stipulations and requirements that hinder the State's ability to carry out fish and game management actions. This is a tangible example of how this regional shift can hinder critical management and research activities. Such delays are impacting the timely collection of data needed to make informed decisions about hunting seasons, bag limits, and other regulations, ultimately affecting opportunities for hunters.

As stated previously, the State suggests the USDA reconsider the dissolution of the Forest Service Alaska region office (Region 10). If the dissolution of the region is required, perhaps a "State Director" model, similar to the Bureau of Land Management and Natural Resources Conservation Service, could meet the need of the Forest Service. This would still maintain a singular point of contact for programs and enhance cooperation between the State and the Forest Service.


#### Agriculture Services

With regards to the non-forest agricultural responsibilities of the USDA, the Division of Agriculture is appreciative of the anticipated improvement in access to USDA staff, as the closer proximity to western-state farmers and producers should benefit communication by reducing the time differential to federal decision-makers. Relocation of USDA staff out of the National Capital Region to western lands where more agricultural activities occur is logical and should ensure that USDA staff are closer to the farmers and producers they serve.

#### **Closing**

Thank you for the opportunity to review and comment on this proposed plan. Please contact me at (907)269-0880 or by email at [catherine.heroy@alaska.gov](mailto:catherine.heroy@alaska.gov) to coordinate any follow up discussions.

Sincerely,



Catherine Heroy  
Federal Program Manager

Email cc: Bryan Scoresby, Director, Division of Agriculture  
Jeremy Douse, Director, Division of Forestry and Fire Protection