THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7th Avenue, Suite 1430
Anchorage, AK 99501-3561
Main: 907.269-8690

March 20, 2026

USDA Forest Service
Tongass National Forest
Monique Nelson, Forest Supervisor
648 Mission Street, Suite 110
Federal Building, Ketchikan, AK 99901

Submitted online at https://cara.fs2c.usda.gov/Public/CommentInput?Project=64039

Re: Tongass National Forest Land Management Plan Revision

Dear Ms. Nelson,

The State of Alaska (State) is a Cooperating Agency in the ongoing Tongass National Forest Plan (Plan) revision process. The State has reviewed the initiation of the development of a proposed plan revision and notice of intent (NOI) to prepare an environmental impact statement, as well as the related Assessment documents. The Tongass National Forest (Tongass) encompasses much of Southeast Alaska and is adjacent to, or interspersed with, state-managed lands. The State of Alaska manages these lands to meet its constitutional mandate to develop resources for maximum use consistent with the public interest[1]. Additionally, state authority of fish and game resources is established in the Statehood Act and confirmed in the Alaska National Interest Lands Conservation Act (ANILCA) Title V and Section 1314. Through the Alaska Department of Fish and Game (ADF&G), the State manages fish and wildlife resources to protect, maintain, and improve them in the best interest of the economy and the well-being of Alaskans, consistent with the sustained yield principle. While the State appreciates the opportunity to meaningfully participate in the Tongass Plan revision, there are some concerns about the intent and effectiveness of the plan revision process.

The current trajectory appears to mirror the 2016 Tongass Forest Plan, which failed to adequately balance the social, economic, and management realities of Southeast Alaska. In the 2016 plan revision process, analyses and changes made without appropriate agency input resulted in guidance that has complicated ADF&G's ability to carry out their management functions (e.g., research projects). Given that the one of the six goals identified in the NOI as preliminary need to change – "(2) Prioritize local and regional prosperity of Southeast Alaska by contributing to timber, minerals, tourism, recreation, and other important economic drivers", the revised plan needs to clearly document how it balances the economic and social needs of the State and Southeast communities.

[1] Alaska Constitution, Title VIII

The below comments incorporate input from the Department of Commerce, Community, and Economic Development (DCCED), Fish and Game (ADF&G), Transportation and Public Facilities (DOT&PF), and Natural Resources (DNR), including the Division of Forestry and Fire Protection (DFFP) and the Mental Health Trust Lands Office. The State looks forward to engaging through the Cooperating Agency role on the Plan Revision process and is offering this input in the interest of achieving a comprehensive, well-balanced management plan.

Update and Modernize the Plan.

The NOI identifies updating and modernizing the plan, consistent with the 2012 Planning Rule, as the first goal in the preliminary need to change the Forest Plan. Simplifying, clarifying, and reorganizing the plan will aid the Tongass in providing a framework that addresses the desires and needs of present and future generations of Alaskans and Americans.

We suggest the revised plan include a separate section/chapter for units designated under ANILCA. The Tongass has 19 conservation system units (CSUs); including these CSUs in the same management plan with several million acres of undesignated Forest Service lands often results in an inadequate recognition of key management provisions applicable to these ANILCA designated areas.

We also request the revised plan discuss overall harvest within the Forest as a separate subject, with unique sections for subsistence (state and federal), general hunting and fishing, and guided harvest as subsections. This approach aligns better with state management responsibilities for statewide fish and wildlife populations.

Prioritize local and regional prosperity of Southeast Alaska

The DCCED supports changes to the Tongass Land Management Plan that maximize all Alaskans' access to the national forest and increase the viability of the state's timber, fisheries, energy, mining, and tourism industries. The department supports any efforts that would increase economic development, ensure forest health through active management, and promote community and rural prosperity.

Historical management of the Tongass has been defined in large part by the intent to balance forest conservation with the economic necessities of the communities located throughout Southeast Alaska. These communities, which have historically relied upon the natural resources of the Tongass as economic drivers, still exist within the boundaries of the Tongass, but the industries that previously sustained these communities have been stymied or eliminated largely as a result of restrictive actions such as the 2001 Roadless Rule and the failure of contemporary Land Management Plans to recognize the importance of timber, minerals, and other commercial uses in the context of community prosperity and self-determination.

Recreation Management

The NOI indicates an intent to limit outfitters and guides in the Low Use Recreation Area. While the Forest Service needs to take a balanced approach to visitor use versus resource protection, the Draft Environmental Impact Statement (DEIS) should provide data documenting user conflicts or impacts to area resources prior to proposing limits on outfitters and guides. Limits on outfitters and guides in areas as remote as much of the Tongass can substantially impact on the public's ability to access the forest, effectively restricting public use.

The recent changes to the Code of Federal Regulations (CFR) at 7 CFR Part 1b—National Environment Policy Act, which identify several Categorical Exclusions that can be used by outfitter and guide operations, should be clearly included into the revised Plan. We request the inclusion of provisions in the Forest Plan where ADF&G is notified regarding potential issuance of outfitting and guiding permits for backcountry skiing, including those considered for a categorical exclusion. Mountain goats occur within the alpine and mountainous terrain of southeast Alaska; relative to other wildlife species, mountain goats are particularly sensitive to disturbance activities such as helicopter overflights.

We support the recognition in the Recreation Assessment that mountain goats are of particular concern regarding disturbances from aviation activities. Since the 2016 Plan was developed, additional research has been carried out on potential impacts to mountain goats from aviation, particularly helicopter disturbances. In accord with the Northern Wild Sheep and Goat Council recommendations, no aviation activities, including helicopter operations should occur within 1,500 meters (horizontal and vertical buffers) of known winter goat kidding and nursery areas. This is a change from the current Forest Plan which includes buffers of 1,500 feet.

The Recreation Assessment touches on peoples' desire for additional trails within the Tongass, the State supports improved and additional access to the Tongass through the creation of new trails. Additionally, we support trails that serve to conserve habitat and natural resources in an area. Additional access will promote dispersing users, and both reduce and concentrate impacts to habitat as well as help provide the experience that is desired by many.

The Recreation Assessment mentions user conflicts in both hunting and fishing. ADF&G advises the Forest Service to avoid inserting itself into user conflicts over fish and wildlife harvest issues. These issues are the purvey of the Alaska Boards of Fish and Game and the Federal Subsistence Board. Allocation issues should be left with them.

As we have mentioned in previous comments, the Primitive Recreation Opportunity Spectrum Class should be limited to designated wilderness areas.

Cooperative Management

An additional goal identified in the NOI is to include plan content that encourages collaboration and shared stewardship with a variety of partners, including the State.

DFFP entered into a 20-year shared stewardship agreement with the Forest Service in February 2025 to coordinate forest management across ownership boundaries and support Alaska's forest products industry. This long-term cooperation aims to increase forest management capacity at the landscape scale to benefit forest resilience, communities, and Alaska's social and economic sustainability. DFFP has a Good Neighbor Authority (GNA) Master Agreement with the Alaska Region and has had two GNA projects on the Tongass to date, with a third in early stages. We recommend this collaborative relationship be reflected in the Plan's goals. Additionally, the Plan's standards and guidelines should be straightforward and clear to facilitate cooperative implementation of restoration, silvicultural treatments, timber harvest, and other mutual objectives. Particularly, the GNA context should be considered in the development of the Timber standards and guidelines.

ADF&G considers a collaborative relationship with the Forest Service essential for effective management of fish and wildlife populations in Southeast Alaska. Emphasizing this partnership will strengthen future planning efforts and increase awareness of how our agencies work

together. To meet this goal, the revised plan should include information strengthening the commitment to cooperate and consult with ADF&G on fish and wildlife issues by providing clear, actionable direction that ensures meaningful collaboration and integration of State priorities.

To fulfill its management responsibilities, ADF&G staff require regular access to land, water, and airspace. The department operates and charters small fixed-wing and rotary aircraft to conduct aerial surveys and inventories of public-trust wildlife species. These activities are critical in Southeast Alaska, where the Tongass comprises over 90 percent of the land base and more than one-third of the Forest is designated wilderness or Land Use Designation II (LUD II). It is therefore vital that ADF&G research and management activities—long recognized as agency functions—be allowed across Tongass lands.

The revised Tongass Land Management Plan needs to clearly outline how ADF&G research activities will be authorized and conducted on all Forest lands, including designated wilderness. Because Forest Plans provide enforceable standards, guidelines, and monitoring frameworks, it is appropriate that they address how state fish and wildlife management actions—such as stream surveys, wildlife collaring, and cabin maintenance—will occur. These activities are fundamental to sustaining fish and wildlife populations and supporting wilderness values, including research, education, and recreation. Wilderness has been an especially problematic area for ADF&G research activities, even though the research serves an administrative function that supports Forest Service goals and management actions.

Federal regulations require the Forest Service to cooperate with state agencies in wildlife management (36 C.F.R. §§ 241.1–241.2), and research supporting that cooperation should be facilitated through a consistent, transparent special-use permitting process where necessary. Special use permits should only be required when necessary to protect National Forest System lands and resources and to avoid conflict with National Forest System programs or operation. (36 C.F.R. § 251.50) Most ADF&G projects do not reach this threshold.

The plan should also clarify how research will be authorized in wilderness, following FSM 2323.37, which allows fish and wildlife research when impacts are minimized. The plan should recognize that ANILCA Section 1316 allows the use of motorized equipment in support of activities related to hunting and fishing on all public lands where the taking of fish and wildlife is permitted. The ANILCA definition of public lands includes designated wilderness areas.[2]

Requested wilderness plan direction:

1. Establish a uniform process for reviewing and authorizing state fish and wildlife research across the Tongass. Routine operations, for example most fish and wildlife surveys, could be covered by an initial programmatic Minimum Requirements Analysis; periodic updating meetings would be used to address any problems or concerns either agency identified.
2. Affirm that such research is generally appropriate when it supports cooperative wildlife management responsibilities.
3. Provide clear criteria for approving research in designated wilderness consistent with ANILCA and FSM 2323.37.

[2] ANILCA Section 102(3).

This approach ensures the Tongass Forest Plan fully integrates state-led scientific research as a foundational part of forest governance, not an add-on bureaucratic hurdle. It will also ensure consistent, science-based wildlife management and effective coordination between the Tongass and ADF&G.

Co-Stewardship/Co-Management

The *Tongass as an Indigenous Place Assessment* discusses potential co-stewardship and co-management opportunities with tribes whose members live within and have longstanding ties to the Tongass. ADF&G is particularly concerned in how the Forest Service intends to implement these agreements with tribes, especially where fish and wildlife management responsibilities intersect. Congress never authorized federal agencies to delegate their responsibilities to an outside entity for the purpose of fish and wildlife management.

The State holds primary authority for managing fish and wildlife populations, while the Forest Service manages the habitats that support those species. As such, ADF&G is finding it difficult to see how the Forest Service plans to execute these actions without violating the State's primacy. It is essential that ADF&G be consulted before the Forest Service moves forward on anything related to co-management of fish and wildlife resources on federal public land within the Tongass. ANILCA Section 805 requires the inclusion of local, rural residents through the regional advisory councils. The State recognizes that many local Tribes have expressed interest in participating in co-management, and having their voice being heard along with any other residents within the Tongass. ADF&G supports the incorporation of traditional and local knowledge and perspectives, though if used to close lands to hunting and fishing, decisions must be supported by "substantial evidence". The revised Plan must include information defining the term "substantial evidence". Under the provisions of ANILCA it is vital that non-indigenous local residents are not left out of any process that will impact them as well. ANILCA Title VIII prioritizes subsistence rights of **all rural Alaskans** – native and non-native – on federal public land.

We request additional detail on how the Forest Service plans to recognize State authorities that ensures coordinated, durable, and effective management of fish and wildlife across the Tongass.

The NOI appropriately states the revised plan will not include restrictions or allowances for subsistence uses, however, it indicates the plan can include direction for other uses with potential effects to access subsistence sites, or direction for hunting and fishing outfitter/guides.

Community Use Priority Areas

The NOI proposes to consider creating "Community Use Priority Areas." While additional information is needed to understand this proposal, we object to any plan components that attempt to protect subsistence resources or uses by local, rural residents by prohibiting or restricting use by non-local residents or the general public. Such limitations are established and implemented through the ANILCA Section 804 process via the Federal Subsistence Board. Any proposed Community Use Priority Areas would need to be specific, discrete, and well-defined, to avoid creating a de facto private local interest by broadly restricting general public use. Beyond limiting public access, this approach could effectively assume authority for fish and wildlife allocation through the targeted use of special recreation permit (SRP) authority. It would be inappropriate for the Forest Service to target SRP decisions rather than through a holistic management approach.

Existing Forest Service special-use permitting guidance requires the agency to prevent favoritism, improper influence, and unfair or unjust treatment of certain individuals or groups when implementing management direction.

Supporting the Timber Industry Through Planning

Since the implementation of the current Forest Plan, annual timber sale volume on the Tongass has typically been an order of magnitude lower than the allowable sale quantity. The revised plan should both determine an allowable sale quantity adequate to supply existing and reasonably foreseeable Alaska timber industry needs, and equally important, include a suite of plan decisions that, when taken together, make achieving an annual timber sale volume that approaches the allowable sale quantity a feasible and likely outcome. Stable and reliable long-term commitment is essential to attract investment in value-added wood manufacturing and forest product businesses.

The Tongass Young Growth Analysis will be an essential tool in developing this plan. For a thriving timber industry in Alaska, utilization of young growth timber needs to be increased. The revised plan should include young growth standards and guidelines that provide goals, objectives, and desired conditions compatible with managing for a variety of wood products, on a sustained-yield basis, to both domestic and foreign markets. The revised plan needs to acknowledge that the transition to young growth does not entirely remove the need to supply an appropriately scaled, reliable volume of old growth for specialty forest products. Product flexibility is important for the timber industry to weather market fluctuations.

The NOI mentions a new "long-term timber demand analysis" underway at the Pacific Northwest Research Station. This analysis is intended to inform the sustained yield limit and projected timber sale quantity for the plan revision. However, the State has not been involved in developing this analysis. It is unknown if the Forest Service has considered the level of industry that Southeast Alaska needs to support regional economies, meet more of the region's demand for forest products, or work to provide additional opportunities to new industry participants. If the analysis relies only on the current level of industry on the Tongass, the State believes it would not provide an adequate or accurate assessment. The revised plan should fully evaluate the legislatively available lands when determining the lands suitable for timber production. Various areas have been excluded from suitability during past planning efforts based on administrative decisions which are not necessarily durable over the life of the management plan. In determining lands suitable for timber production, the revised plan should especially consider the previously roaded areas of the Forest; in 1999, there were over 4,500 miles of Forest roads on the Tongass. We encourage the Forest Service to include desired conditions that reflect actively managing an adequate acreage of working forest.

Access for forest management

The State strongly suggests a standalone "Access" Section in the revised Plan, to consolidate allowances and constraints under ANILCA, as well as to provide clear, programmatic directions for maintaining and expanding access for fish and wildlife harvest, timber, minerals, and state management activities**.** The Tongass NF covers about 80 percent of the Southeast Alaska panhandle, largely accessible only by air or boat due to the lack of a road system.

The revised plan should support long-term access for timber harvest and forest management. The Standards and Guidelines should facilitate access to State lands and other non-Forest lands, both when using Forest transportation facilities as well as when considering development of new

access over Forest lands. The direction in the Plan should support a road use agreement in Southeast Alaska that makes economic sense given young growth management objectives.

Designated Areas

The Designated Areas Assessment document created as part of the first phase of the plan revision process outlines nine different types of Designated Areas (e.g., wilderness, LUD II areas, etc.), each with unique access constraints. Given the access allowances guaranteed under ANILCA, especially within conservation system units, consolidating both allowances and constraints in one section will greatly improve clarity and usefulness. It must also include a "no net loss" policy to ensure road closures or decommissioning do not hinder the State's ability to manage its resources or provide for its citizens' needs. The importance of this can be found in the Recreation Assessment where language indicates that prior to allowing snow machine use, the Forest Service is required to conduct a travel management process complying with the 2012 Travel Management Rule (36 CFR 212). The revised plan needs to clarify that in designated wilderness areas, which qualify as CSUs under ANILCA, both ANILCA sections 811 and 1110(a) direct the Secretary to allow motorized and non-motorized methods of access subject to "reasonable regulation." The Forest Service has the authority to manage these methods of access where existing or reasonably likely impacts warrant site specific closures or restrictions, providing a meaningful public process, including adequate notice and hearing, and in the case of access authorized in Section 1110(a), a subsequent finding that the use would be detrimental to the resource values of the unit or area. Restrictions and closures made in the context of a planning document on the basis of administrative designations or generalized "potential" impacts does not suffice as justification, i.e., "reasonable regulation," for restricting these statutorily authorized methods of access

This change will align with the direction in the June 30, 2025, Forest Service Handbook 1909.12, Chapter 10 (11.1)– Assessments to consider the characteristics of public access to plan area resources or uses in determining the special scales for an Assessment.

Roadless Rule Evaluation

Either in an Access section or another section of the revised Plan, the Forest Service should clearly explain how any changes to the Roadless Rule will be considered by the revised Plan. On August 29, 2025, the USDA published a notice of its intent to prepare an environmental impact statement and rulemaking to rescind the 2001 Roadless Rule. Given the potential major changes that could occur to available lands and infrastructure on the Tongass if the Roadless Rule is rescinded, it is reasonable for the revised Plan to consider the appropriate management structure that would apply. This would serve to protect the Forest Service from having to re-open and re-evaluate Plan policies if the Roadless Rule is rescinded. The development of industries including timber, mining, and recreation are all impacted by the presence or absence of the Roadless Rule, and the Plan should explain what management guidelines would occur if the Roadless Rule is repealed or left in place.

Adherence to ANILCA

Management Plans developed and implemented by the Forest Service in Alaska have included wilderness studies for the purpose of forwarding recommendations to Congress for new designations of wilderness and wild and scenic rivers. The NOI indicates these studies are a requirement of the 2012 Planning Rule. This requirement does not apply in Alaska, where federal land management is overlain by the provisions of ANILCA.

Three separate provisions of ANILCA (Sections 101(d), 708(4), and 1326(b)) override this planning rule with specific language restricting further wilderness designation of Conservation System Units in Alaska. The State asks that the Forest Service revoke the current planning rule requiring national forests in Alaska to develop wilderness and wild and scenic river designation recommendations as part of the forest management planning process.

As noted in comment letters on the Wild and Scenic Rivers Eligibility Study (May 15, 2024) scoping and on the Wilderness Inventory scoping (September 13, 2024), the State does not support further reviews or recommendations for these designations. The 2012 Planning Rule requires consideration of new areas for wilderness, however, the Planning Pule does not override ANILCA or the Code of Federal Regulations at 26 CFR 2191 which states: "Plans must comply with all applicable laws and regulations."

Instead, management must strictly adhere to ANILCA's "No More" clauses[3] and the consensus points established between the State and Federal government. Given that the 2016 Tongass Forest Plan Amendment conducted and documented an inventory of the rivers in the Tongass National Forest, despite Congressional direction, the planning standard at 36 CFR 219.7(c)(2)(vi)[4] also directs this Forest Plan Revision should not include a WSR inventory and changed circumstances warrant additional review. Lastly, the Wild and Scenic Rivers Act explicitly defines interim protections as tied to the submission event, not an open-ended status. By failing to submit the rivers determined suitable in 2016, the Forest Service is contravening the statutory sequence Congress laid out, which expects submission to trigger the defined study period and eventual Congress/Secretary decision. No additional WSR studies should occur in the Tongass until the existing 32 study rivers have been submitted to Congress.

The State agrees with the decision identified in the NOI that there will not be any boundary changes to Congressionally designated wilderness areas, LUD IIs established by statute in 1990 and 2014 to be managed in a roadless state to maintain their wildland character), Research Natural Areas (RNAs), or existing roads or trails. These decisions are in line with the provisions found in ANILCA.

The revised plan must acknowledge the unique allowances from ANILCA within designated Wilderness. As an example, ANILCA Section 1316 provides the legal authority to use motorized equipment in wilderness. While ANILCA establishes that these activities are allowed, a Minimum Requirements Analysis ensures they are conducted in the least impactful manner consistent with wilderness stewardship principles.

The revised plan should acknowledge Section 1326(a) of ANILCA, which prohibits the federal government from withdrawing more than five thousand acres in aggregate unless acted on by Congress. In 2022, the Forest Service withdrew 4,560 acres of federally managed lands at Mendenhall Lake adjacent to an existing withdrawal at the Mendenhall Glacier Recreation Area (Public Land Order (PLO) 829), thereby circumventing ANILCA 1326(a). The State maintains that ANILCA 1326(a) applies to this situation and to any future withdrawals, and that allowing

[3] ANILCA Section 1326 [16 USC 3213]

[4] *Identify the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System,* ***unless a systematic inventory has been previously completed and documented and there are no changed circumstances that warrant additional review****.* [Emphasis added]

incremental additions to withdrawals for slightly different purposes is contrary to the intent of ANILCA.

The following sections of ANILCA need to be addressed in the revised forest plan.

ANILCA Title VII
Regarding wilderness areas, Section 707 of ANILCA states "**Except as otherwise expressly provided for in this Act** [emphasis added], wilderness designated by this Act shall be administered in accordance with the applicable provisions of the Wilderness Act..." The allowances for motorized use Sections 1110, 1316, etc. in designated wilderness are expressly the type of exceptions referenced in Section 707.

Title VIII
The Revised Plan must recognize that ANILCA Section 811 ensures that rural residents engaged in subsistence uses shall have reasonable access to subsistence resources, including via snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulations.

ANILCA Title XI
In CSUs, ANILCA Section 1110(a) provides for the continuation of the use of motorboats, airplanes, and non-motorized surface transportation for traditional activities. While such use is subject to reasonable regulations by the Secretary to protect the natural and other values of the CSU, any restrictions to ANILCA-protected access in designated wilderness, including group size limits, must be implemented by formal closure regulation. If a closure is warranted, the plan should provide the supporting data and discuss the required closure process.

The level of use allowed depends upon whether there are quantifiable impacts to resource values. Any restrictions on public motorized use must be reasonable (i.e., not overly broad as well as justified), the result of a detrimental effect to resource values, and implemented through regulation after notice and hearing in the local area per ANILCA 1110(a).

Mental Health Trust Interests
The Alaska Mental Health Trust (Trust) owns 43,000 acres of commercial timbered property in Southeast Alaska. The Trust has been harvesting timber on a large scale since 1995. This revenue has been a large part of the revenue supporting Trust beneficiary programs for the most vulnerable Alaskans. The Trust has invested significantly, both financially and with staff time, in finalizing a land exchange with the Forest Service to ensure that timber remains a significant asset in its revenue portfolio. The Forest Service has stated the land exchange with the Trust is meant to serve as a bridge timber program to maintain the timber industry while Forest Service young growth stands mature. The Trust plans to continue harvesting timber into the future for as long as there is a market and the timber industry infrastructure to harvest and market our timber into the domestic and international marketplace. This is uncertain due to a lack of timber supply for the next 30 years as the Forest Service has not provided timber sales according to the 2016 plan to support the continuation of the timber industry. The Trust will experience significant adverse impacts caused by the loss of a timber industry as a component of the Southeast Alaska economy and thereby drives down the timber resource value on Trust land. The gross extent of this harm and statewide impact must be considered when evaluating this action. If the timber industry collapses due to lack of available timber sales, this has and will greatly harm the Trust ability to provide revenue for its beneficiaries in the future.

State of Alaska Lands and Interests

The State of Alaska has long sought acknowledgement of state interests, including but not limited to the ownership of submerged lands beneath navigable and tidal waters, management authority of flowing waters above state-owned submerged lands, and management authority of state-owned Revised Statute (RS) 2477 rights-of-way[5]. Explicit acknowledgement of state lands and interests in the revised plan would improve state and federal relations and add clarity to land management issues on lands within or adjacent to the Tongass.

The State of Alaska owns the submerged lands beneath all navigable-in-fact and tidally influenced waters within the Tongass pursuant to the Equal Footing Doctrine of the United States Constitution, the Federal Submerged Lands Act, and the Alaska Statehood Act. However, the Forest Service has actively resisted acknowledging state ownership, management and control of waters within these and other federal areas. The revised plan should specifically acknowledge state ownership and management authority over all navigable-in-fact and tidal waters within the Tongass and include a table enumerating the water bodies that meet this legal threshold. DNR can provide a list of these water bodies upon request, including the specific reaches in which they are navigable and/or tidally influenced.

The State of Alaska also owns and manages a network of RS 2477 rights-of-way that are located within the Tongass. These routes represent vital public access for all Alaskans for diverse purposes and are often the only land-based access corridors by which Alaskans can reach their destinations. Forest Service land managers have frequently limited and restricted uses of state-owned RS 2477 rights-of-way far beyond the generally allowed uses allowed by law.

Secondary uses of RS 2477s, including broadband and other utility uses, in locations such as federal areas, could be a simple solution for balancing competing priorities such as conservation and infrastructure development (e.g. broadband cables). Efforts to explore the idea of using RS 2477 routes for secondary purposes have been rebuffed by federal land managers that seek to broadly prohibit secondary uses of state-owned RS 2477 rights-of-way in federal areas. DNR recommends that the scoping period for the plan revision include a dialogue between state and federal land managers regarding the use of RS 2477 rights-of-way on federally managed lands for secondary purposes.

The revised plan should also specifically acknowledge state ownership and management authority over all RS 2477s rights-of-way in the Tongass, and should include a table or list of documented routes to include the following:

RST 451: Golden Fleece Mine Trail
RST 1851: Keystone Trail
RST 337: Copper Mountain
RST 521: Sulzer Portage Trail
RST 556: Green Monster Mine Trail
RST 475: Hetta Inlet-Jumbo Basin
RST 272 Khayyam Mine Trail
RST 519: May-Be-So Creek Trail
RST 520: Karta River Trail
RST 526: Hadley-Kasaan Bay Trail

[5] RS 2477 is found in section 8 of the Mining Law of 1866.

RST 14: Unuk River Road
RST 408: Groundhog Basin
RST 568: Chuck River Trail
RST 567: Windham Bay Trail
RST 569: Sumdum Mines Trail
RST 1137: Snettisham-Mines
RST 279: Young Bay Trail
RST 1711: Gustavus Rink Trail
RST 1700: Nevada Creek Trail
RST 599: Sheep Creek Trail
RST 1169: Treadwell Ditch Trail
*RST 597: Perserverance Trail [sic]
RST 601: Lemon Creek Trail
RST 602: Nugget Creek Trail (Juneau quad)
RST 603: Spaulding Meadows Ski Circuit Trail
RST 604: Peterson Lake Trail
RST 309: Montana Creek Trail (Juneau quad)
RST 606: Eagle River Trail
RST 1713: Mitchell-McPherson Mine Trail
RST 607: Yankee Basin Trail
RST 4: Jualin Mine Road
RST 420: Slate Creek-Johnson Creek
*RST 298: Dewey Lake Trail
RST 186: Skagway-Glacier
*RST 592: Chilkoot Trail
*RST 1705: Walls Creek-Clear Creek
*RST 1225: Dalton Trail
*RST 1704: Nugget Creek-Porcupine Creek

*denotes trails that are adjacent to the Tongass but do not appear to intersect the boundaries of the national forest at this time.

The State also requests acknowledgement and inclusion of Section 4407 easements, which are reciprocal rights-of-way established under Section 4407 of Public Law 109-59 (SAFETEA-LU). Section 4407 provides explicit statutory authority for these easements, stating "Notwithstanding any other provision of law, the reciprocal rights-of-way and easements identified on the map #92337 and dated June 15, 2005, are hereby enacted into law." These designated easements preserve the State's ability to develop transportation and utility corridors regardless of protections under the Tongass National Forest Roadless Rule. At the time of designation, the Forest Service also received reciprocal easements over state-owned tidelands to support federal-owned facilities including docks, floats, boat ramps, breakwaters, and log transfer facilities. While the draft documents reference these easements in connection with marine facilities (Infrastructure Assessment, page 6), they do not adequately address the upland easements that authorize transportation and utility infrastructure. These upland easements should be fully incorporated into the Plan documents, as they are essential to supporting economic development and public use of forest lands.

Transportation Planning
The 2012 Planning Rule requires revised forest plans to consider public transportation plans and to address infrastructure, transportation and utility corridors, and access patterns. The State appreciates that the pre-plan materials acknowledge the need for transportation infrastructure design, location, and maintenance to support watershed function and reduce impacts from natural catastrophic events. However, given the frequency and severity of natural hazards affecting Southeast Alaska—landslides, debris flows, flooding, coastal storm surge, and avalanche activity—DOT&PF requests that the revised plan more explicitly guide management so that natural systems and built infrastructure function together to reduce risk to the traveling public and to critical transportation assets.

To meet this need, the plan should include clear provisions for periodic review of Forest Service roads, trails, and facilities to identify damage trends, emerging vulnerabilities, and opportunities to adapt design or maintenance strategies. Standards and guidelines should ensure that Forest Service transportation infrastructure is engineered and maintained to withstand predictable natural hazards by incorporating watershed stability, slope processes, hydrologic impacts, and climate-related stressors into siting, design, and operational decisions.

These recommendations are grounded in the requirements of the 2012 Planning Rule (36 CFR Part 219). The Rule directs the Forest Service to maintain or restore watershed health, soil stability, and hydrologic function and to account for natural disturbance processes and ecosystem resilience. It further requires consideration of infrastructure, transportation and utility corridors, and access patterns in plan development. The Rule also mandates early and ongoing coordination with State agencies and the sharing of relevant information throughout the planning process, supported by assessments of existing conditions, risks, and stressors and a monitoring framework that evaluates trends and informs adaptive management. Together, these provisions establish a clear regulatory basis for incorporating hazard-resilient transportation infrastructure, periodic vulnerability review, and structured interagency coordination into the revised Tongass Plan.

Alaska DOT&PF requests the inclusion of a plan goal stating: “The Forest Service will conduct early and ongoing coordination with Alaska DOT&PF and local partners when forest management activities could influence slope stability, hydrology, or avalanche conditions affecting public transportation corridors. This coordination will improve data sharing to support joint hazard mitigation and long-term infrastructure resilience.”

State Area Planning and Management Continuity
The Forest Service should consider the importance of continuity of public land management across ownership boundaries, and the potential of the revised plan to proactively address potential land use conflicts. The Forest Service can find comprehensive information related to the management intent of state lands in the DNR Area Plans that are available at: https://dnr.alaska.gov/mlw/planning/areaplans/.

State of Alaska Area Plans describe DNR’s regional management intent, resource management objectives, and resource use information for land managers. The management intent of specific state lands is based on resource and use inventories, the review of existing and potential economic trends, state authorizations, existing plans and similar resource management documents, agency review and comment, and public participation.

Two specific topics that will require coordination between DNR and the Forest Service to achieve management continuity will include 1) management of surface access routes and facilities, and 2) permitting of activities on state lands that border Forest Service uplands. On access routes that traverse both state and federal lands, joint use and consolidation of surface access routes and facilities is encouraged where appropriate, however, there are instances where access routes should not be considered due to their purposes being at odds with the management intent of the region. Coordinated management of access routes would facilitate more efficient use of limited resources over a broad landscape to better meet the needs of local residents and industries.

Regarding permitting of activities on state land, one example demonstrating the need for improved management continuity in the revised plan is the large number of floathomes in the Stikine River adjacent to the Forest Service uplands known as the Stikine Leconte Wilderness. Because floathomes are not allowed adjacent to uplands designated as Wilderness, DNR cannot obtain approval of the upland owner that would be necessary to bring these floathomes into compliance. If the revised plan would allow the Forest Service to approve floathomes in waters adjacent to Wilderness areas, the DNR Division of Mining, Land and Water could work with the Forest Service to potentially bring the floathomes in this area into compliance and thus provide opportunities for more direct management.

These specific examples highlight the need for continuity between the revised Tongass plan and state area plans and demonstrate the potential benefits that can be achieved through coordination and management continuity.

Importance of Mining Industry

The mineral industry is a critical part of a sustainable future for Southeast Alaska, and the revised plan must reflect this fact. Mineral resources existing within the boundaries of the Tongass include gold, silver, molybdenum, and uranium, and nationally designated "strategic" and "critical" minerals such as lead, zinc, copper, tungsten, and platinum group metals. The Forest Service recognizes that minerals are fundamental to the Nation's well-being and, as policy, encourages the exploration and development of the mineral resources it manages. The Secretary of Agriculture has provided regulations (36 CFR 228) to ensure surface resource protection, while encouraging the orderly development of mineral resources on National Forest System lands. The 2008 Forest Plan Amendment provides a summary of Mineral Resource Inventory and Development potential on the Tongass including identified mineral resources and undiscovered resources. There has been no update to mineral inventories since that time. Going forward, the production of these minerals will be increasingly important to the regional economy of Southeast Alaska and to the national supply chains needed to supply the advanced technology and renewable energy needs of the United States. Inventories that identify these resources, as well as the permitting and authorization processes that allow existing mines to continue and expand operations and new prospects to advance their developments, will be increasingly critical for the region and the nation.

The identified mineral resources on the Tongass were described by the U.S. Bureau of Mines, Alaska Field Operations Center, in *An Economic Analysis, Tongass Land Management Plan, Mineral Resource Inventory* (Mineral Resource Inventory), which is the most recent comprehensive study of mineral resources for the Tongass. The gross metal value of the identified mineral resources within the boundaries of the Tongass was estimated at $37.1 billion

(expressed as 1988 dollars) in the Mineral Resource Inventory[6]. Highest among the individual minerals were molybdenum ($l4.4 billion) and iron ($12.7 billion), with gold third at $2.26 billion.[7] These data show the significant economic potential mineral resources present in the Tongass. These data will need to be updated based on current mineral market conditions, known geology, and adjusted for inflation, but they still underscore the economic potential that can be realized by a revised plan which incorporates mineral extraction activities, particularly rescission of the 2001 Roadless Rule and should therefore be considered in the planning process.

The methods used by the U.S. Geological Survey, Branch of Alaskan Geology to identify "undiscovered" locatable mineral resources are detailed in their report, *Undiscovered Locatable Mineral Resources of the Tongass National Forest and Adjacent Lands, Southeastern Alaska*.[8] That report included estimation of the gross metal value of undiscovered mineral resources for the Tongass. In 1990, this value was $28.3 billion (expressed as 1988 dollars). Highest among the individual minerals were copper ($6.8 billion), iron ($4.6 billion), molybdenum ($4.35 billion), and tin ($3.4 billion). These totals cover the entire Tongass, and thus include areas currently withdrawn from mineral activity.[9] Similarly, updates to these data would further inform the Forest Service and the public about economic opportunities in the region.

Riparian Buffers

ADF&G appreciates recognition of the Tongass Timber Reform Act and its requirements for buffers referenced in the NOI. Riparian areas are important for both fish and wildlife habitat and timber harvest. ADF&G requests a discussion during the Cooperative Agency planning process on any proposed reduction or expansion of riparian buffers.

Species of Greatest Conservation Need (SGCN)

The 2025 State Wildlife Action Plan (SWAP) identifies “species of greatest conservation need” (SGCN) to provide a voluntary, nonregulatory alternative to the federal listing process under the Endangered Species Act (ESA). ADF&G designates SGCN with the aim of addressing population declines early, avoiding the need for future listings under the ESA. By managing species before they become imperiled, ADF&G helps ensure that natural resource use continues to benefit Alaskans without interruption or need for additional federal regulation. The information provided below will help inform the need for change identified by the Forest Service for species diversity (SPDV), to maintain and restore diversity of ecosystems and habitat types throughout the Tongass and support at-risk and other important species. We recommend that all SGCN identified within the Tongass be added to the revised Tongass Plan *List of Species to Consider*, if they have not been already. **At a minimum, we recommend that the Forest Service consider the SGCN listed in Table 1 of the attached Appendix A, which we have identified as having known or suspected population declines and high value habitats in the**

---

[6] USDA/USFS (2016). Tongass Land and Resource Management Plan, Final Environmental Impact Statement, Plan Amendment. (June 2016). R10-MB-769e, f. P. 3-351 to 3-353.

[7] USDA/USFS (2008). Tongass Land and Resource Management Plan, Final Environmental Impact Statement, Plan Amendment. (January 2008). R10-MB-603c. P 3-356.

[8] Brew, D.A., L.J. Drew, L.M. Schmidt, D.H. Root, and D.F. Huber. 1991. Undiscovered Locatable Mineral Resources of the Tongass National Forest and Adjacent Areas, Southeastern Alaska. USGS Open-file Report 91-10. P. 370., 16 maps, 11 figures.

[9] USDA/USFS (2008). Tongass Land and Resource Management Plan, Final Environmental Impact Statement, Plan Amendment. (January 2008). R10-MB-603c. p. 3-359.

Tongass. We recommend that any SGCN that do not meet the criteria for the *Species of Conservation Concern* list, be identified as species of interest (SPIN), due to their ecological, cultural, or economic importance.

Within Appendix A of the SWAP cited above is a complete list of vertebrate SGCN associated with the habitat types identified within the Tongass, including many vertebrate species on the Tongass Plan Revision *List of Species to Consider* and *List of Species Under Review*. This information should be incorporated into the revised Tongass plan.

The State has a habitat spatial layer that can be used to identify probable areas of high biological importance for SGCN within the Tongass, which can be provided upon request. This habitat layer is derived from the National Vegetation Classification system with improvements made by the Alaska Center for Conservation Science (ACCS). The layer includes habitat ranks for SGCN in southeast Alaska on a scale of 0-3.

- High- value habitats (rank = 3) support key breeding, migratory, feeding or non-breeding activities of SGCN.
- Moderate-value habitats (rank = 2) may be used regularly as travel corridors, or for feeding and non-breeding activities, but are unlikely to support breeding.
- Low-value habitats (rank = 1) are expected to see little use by the species.
- Habitats of negligible value (rank = 0) are expected to have rare to no occurrence by the species.

The ranked species-habitat data are predictive of habitat types and spatial locations that may be of high value (e.g., for multiple SGCN). Ranked habitats within the Tongass area occur within the species range of each SGCN. However, further surveys would be needed to verify occurrence or document population size. Currently ADF&G does not have fine scale spatial information for most SGCN throughout Alaska.

Additional SGCN tables are included at Attachment A to this letter, which outline species considered to be "at risk" an habitat types within the Tongass which are ranked as high-value habitat for one or more at-risk SGCN. See Attachment A for more detail.

For more information or questions about the SGCN and habitat data provided, contact Julie Hagelin with the ADF&G Threatened, Endangered, and Diversity (TED) Program (ADF&G email contact: julie.hagelin@alaska.gov).

Marine Mammals

The ADF&G Marine Mammal Program and TED Program suggest the Forest Service add harbor seals to the List of Species to Consider for Species of Conservation Concern in the revised Tongass Plan. Harbor seals are listed as a SGCN in the 2025 SWAP and the Tongass coast supports numerous harbor seal haulouts. The map linked below shows both key and non-key harbor seal haulouts throughout Alaska, including the Tongass area. Key haulouts are those with over 50 animals and are typically biologically important to support reproduction, pup rearing and access to resources.

See map for harbor seal haulouts:
https://noaa.hub.arcgis.com/datasets/2c6ca3e595024d3990127bfe061d7ed3_0/explore?location=52.170927%2C-132.516317%2C4&showTable=true

Aleutian Tern
While we do not have habitat rank information available for Aleutian terns, there are numerous Aleutian tern colonies in the Tongass based on recent U.S. Fish and Wildlife Service and Forest Service surveys and long-term historical data. While exact colony locations may shift over time, areas with known colonies include:

- The shoreline and islands of the Alsek River including a persistent colony along the southern shore of the oxbow by McSpaden Trail.
- The shoreline of the Yakutat Forelands including at the Italio, Dangerous, and Situk Rivers. **The largest known persistent colony in Alaska is located in this area at Black Sand Spit; preliminary Forest Service survey results from June 2023 estimate nearly 700 terns (Aleutian and arctic) at this colony.**
- Spits and islands near Yakutat including a colony on Turner's Point which has been recently surveyed.

Pacific Marten
We request that the Forest Service remove, from the Tongass Species Evaluations, the rationale asserting that low Pacific marten (*Martes caurina*) densities are attributable in part to trapping pressure. ADF&G does not agree with this conclusion. As documented within the Species Evaluation, reduced marten densities have been observed only on Kuiu Island, where all state marten trapping has been closed since 2012 (federal subsistence trapping is open November 1 to March 15, with no harvest limit). Language regarding the federal subsistence season should be corrected. We request the Forest Service submit a proposal to the Federal Subsistence Board to repeal the federal trapping regulations and then, only if necessary, submit proposals considering closures/restrictions to state trapping regulations for the reasons laid out in Title VIII of ANILCA.

Considering these facts, we request the removal of any statements implying that trapping pressure is a causal factor in low Pacific marten densities within the Tongass National Forest, except, potentially for Kuiu Island and clarification in the evaluation and the draft plan/EIS that it is federal regulations that are the Forest Service's concern.

Alexander archipelago wolf (Canis lupus ligoni)
We note the Forest Service has determined in the Species for Conservation Concern Final Assessment that threats to the Alexander archipelago wolf do not appear to be substantial.

We recommend inclusion of the following management practices in the draft Forest Plan/EIS.

- We recommend, in accordance with the direction in 36 CFR 219.14, using the best available scientific information to inform plan components, content, and the plan monitoring program. Because of its apparent isolation from other wolf populations, management issues generally focus on the Game Management Unit 2 (GMU 2) wolf population. ADF&G has developed a science-based management strategy for that population which includes annual population monitoring and takes into consideration views of affected stakeholders. The Board of Game has established a fall population objective for wolves in GMU 2. ADF&G also supports a robust research effort to inform wolf management. The Forest Service assists with annual wolf monitoring in GMU 2, but as a land management agency its role is to manage habitat that supports wolves and their primary prey (deer) and roads that enable access for hunting and trapping. When

developing the revised Forest Plan, the Forest Service should consider recent research and closely coordinate with ADF&G's wolf and deer managers and researchers.

- During wolf denning season 15 March – 15 July, we recommend seasonal restrictions to include no timber harvest or commercial or recreational activity within 734m of known wolf den sites. High-quality wolf denning habitat is generally characterized by low elevation, flat terrain, old-growth forest, near fresh water, and farther away from open roads (Roffler and Gregovich 2018).
- Continue to consider additional ways to minimize unreported human-caused mortality of wolves in GMU 2.

Forest Management Practices for Wildlife

The 2025 SWAP emphasizes the importance of timber management and sustainable timber harvest to maintain diverse forest and scrub habitats that support SGCN. We suggest the Forest Service considers management practices that are mutually beneficial to timber and SGCN into the Tongass Plan revision, such as the examples below described in the 2025 SWAP (p. 216):

1. Maintaining forest features, such as cavity trees or snags, which provide important nesting, feeding, or roosting sites for many SGCN, including bats, small insectivorous birds, woodpeckers, and raptors. These SGCN can benefit the forest by keeping irruptive populations of potentially damaging herbivores in check.
2. Management of coarse wood debris can benefit small mammal SGCN. Small mammals consume, disperse, and inoculate soils with mycorrhizal fungi that are only essential for tree regeneration, but can also make mature trees more resilient to environmental changes.

Work in Anadromous Water Bodies and Ensuring Fish Passage

In addition to fish and wildlife management, ADF&G holds responsibility for reviewing and approving all "proposed construction, work or use" within anadromous waterbodies unless the department "finds the plans and specifications insufficient for the proper protection of fish and game (Alaska Statute (AS) 16.05.871)." ADF&G must also ensure that any obstruction built across or in a stream frequented by fish shall be provided with a durable and efficient fishway that "shall be kept open, unobstructed, and supplied with a sufficient quantity of water to admit freely the passage of fish through it (AS 16.05.841)."

Closing

A revised plan that does not adequately address the issues raised in this letter will repeat the mistakes of previous plans and in doing so will fail to meet the fundamental needs of Southeast Alaskan communities and industries. Alternatively, a revised plan that works in equal partnership with state and private cooperators is capable of meeting economic needs of Southeast Alaskan communities while also fulfilling the Forest Service's mission of long-term forest stewardship.

The Forest Service must prioritize the social and economic well-being of Southeast Alaska by 1) recognizing the intent of ANILCA to balance environmental, social, and economic interests, 2) supporting the timber industry through planning and access 3) acknowledging State of Alaska lands and interests, 4) considering the importance of continuity in public land management across ownership boundaries, and 5) acknowledging the importance of mineral resources in Southeast Alaska.

The State is committed to a meaningful collaboration with the Forest Service on the revised plan to ensure sound management goals, maintain infrastructure, and support the varied regional interests such as restoration projects, mining, recreation, cultural resources, and fish and game harvests, for the benefit of the Tongass and the Alaskans who live there.

Please contact me at (907) 269-0880 or by email at catherine.heroy@alaska.gov to coordinate any follow up discussions.

Sincerely,

Catherine Heroy
Federal Program Manager

Attachment: Attachment A, Species of Greatest Conservation Need

Attachment A –Species of Greatest Conservation Need

Table 1, below, lists a subset of species of greatest conservation need (SGCN) considered to be "at risk," meaning they have known or suspected population declines and are also likely to have high-value habitats within the Tongass National Forest. The SGCN list in Table 1 was created using the best available scientific information to date, however it is possible that SGCN species that are not listed could also have high-value habitat within the project area.

"At-risk" SGCN identified in the 2025 State Wildlife Action Plan also have "high-value" habitats within the Tongass National Forest. High-value habitats support key breeding, migratory, feeding or non-breeding activities of SGCN. SGCN are listed from greatest to least number of high-valued habitat types identified within the Tongass National Forest. Please contact ADF&G for an excel file that lists the specific habitat types of high value associated with each SGCN. Table 1 does not consider species-habitat relationships of negligible, low or moderate value. The State has a habitat spatial layer that can be used to identify probable areas of high biological importance for SGCN within the Tongass, which can be provided upon request.

Table 2, below, lists habitat types identified within the Tongass National Forest according to the State's vegetation classification data that are ranked as high-value habitat for one or more at-risk SGCN. Please contact ADF&G for an excel file for information on the specific SGCN and habitat ranks for each habitat type.

"High-value" habitat types within Tongass National Forest associated with "at-risk" SGCN are ordered by richness of at-risk SGCN. Table 2 does not consider species-habitat relationships of negligible, low or moderate value.

Table 1. SGCN Species and Habitats in the Tongass.

Species	Scientific Name	Number of high-value habitat types
SGCN that are NOT included on the *List of Species to Consider* or the list of *Species Under Review* in the Tongass Plan Revision		
Greater Yellowlegs	*Tringa melanoleuca*	10
Lesser Yellowlegs	*Tringa flavipes*	10
Short-Billed Gull	*Larus brachyrhynchus*	9
Red-breasted Sapsucker	*Sphyrapicus ruber*	8
Savannah Sparrow	*Passerculus sandwichensis*	8
Varied Thrush	*Ixoreus naevius*	8
Golden-Crowned Kinglet	*Regulus satrapa*	7
Pine Grosbeak	*Pinicola enucleator*	7
Townsend's Warbler	*Setophaga townsendi*	7
Northern Shrike	*Lanius borealis*	6
Orange-Crowned Warbler	*Leiothlypis celata*	6
Redpoll	*Acanthis flammea*	6
Alder Flycatcher	*Empidonax alnorum*	5
Chestnut-Backed Chickadee	*Poecile rufescens*	5
Fox Sparrow (all sooty subspecies)	*Passerella iliaca*	5
Gray-Cheeked Thrush	*Catharus minimus*	5
Northern Pintail	*Anas acuta*	5
Pacific Wren	*Troglodytes pacificus*	5
Pine Siskin	*Spinus pinus*	5
Song Sparrow	*Melospiza melodia*	5
Wilson’s Warbler	*Cardellina pusilla*	5
Dark-Eyed Junco	*Junco hyemalis*	4
Golden-Crowned Sparrow	*Zonotrichia atricapilla*	4
Killdeer	*Charadrius vociferus*	4
Lincoln's Sparrow	*Melospiza lincolnii*	4
White-Crowned Sparrow	*Zonotrichia leucophrys*	4
American Tree Sparrow	*Spizelloides arborea*	3
Horned Grebe	*Podiceps auritus*	3
Least Sandpiper	*Calidris minutilla*	3

Red-Necked Phalarope	*Phalaropus lobatus*	3
Snow Bunting	*Plectrophenax nivalis*	3
Vaux's Swift	*Chaetura vauxi*	3
Willow Ptarmigan	*Lagopus lagopus*	3
American Pipit	*Anthus rubescens*	2
Black Turnstone	*Arenaria melanocephala*	2
Black-Bellied Plover	*Pluvialis squatarola*	2
Black-Legged Kittiwake	*Rissa tridactyla*	2
Cassin's Auklet	*Ptychoramphus aleuticus*	2
Dunlin	*Calidris alpina*	2
Pectoral Sandpiper	*Calidris melanotos*	2
Pelagic Cormorant	*Urile pelagicus*	2
Pigeon Guillemot	*Cepphus columba*	2
Red-Winged Blackbird	*Agelaius phoeniceus*	2
Rock Ptarmigan	*Lagopus muta*	2
Sanderling	*Calidris alba*	2
Short-Billed Dowitcher	*Limnodromus griseus*	2
Tufted Puffin	*Fratercula cirrhata*	2
Wandering Tattler	*Tringa incana*	2
Western Sandpiper	*Calidris mauri*	2
Black Scoter	*Melanitta americana*	1
Golden Eagle	*Aquila chrysaetos*	1
Long-Tailed Duck	*Clangula hyemalis*	1
Merlin (*suckleyi*)	*Falco columbarius suckleyi*	1
Short-Eared Owl	*Asio flammeus*	1
Spotted Sandpiper	*Actitis macularius*	1
Surf Scoter	*Melanitta perspicillata*	1
Western Grebe	*Aechmophorus occidentalis*	1
Western Wood-Pewee	*Contopus sordidulus*	1
SGCN that ARE included on *List of Species to Consider* or the list of *Species Under Review* in the Tongass Plan Revision		
Columbia spotted frog[1]	*Rana luteiventris*	10

[1] Species may be declining on the northern end of Mitkof Island. Ream, J. T. 2016. Local herpetological knowledge in the north. PhD thesis, University of Alaska Fairbanks, AK, USA.

Northern bog lemming	*Synaptomys borealis*	7
Sooty Grouse	*Dendragapus fuliginosus*	7
Queen Charlotte Goshawk	*Accipiter gentilis laingi*	6
Olive-Sided Flycatcher	*Contopus cooperi*	5
Little Brown myotis	*Myotis lucifugus*	4
Marbled Murrelet	*Brachyramphus marmoratus*	4
Rufous Hummingbird	*Selasphorus rufus*	4
Kittlitz's Murrelet	*Brachyramphus brevirostris*	3
Peregrine Falcon	*Falco peregrinus*	3
Rock Sandpiper	*Calidris ptilocnemis*	3
Rusty Blackbird	*Euphagus carolinus*	3
Spruce Grouse	*Canachites canadensis*	3
Surfbird	*Calidris virgata*	2
Western Screech-Owl	*Megascops kennicottii*	2
Black Oystercatcher	*Haematopus bachmani*	1
Black Swift	*Cypseloides niger*	1
Yellow-Billed Loon	*Gavia adamsii*	1
Aleutian Tern	*Onychoprion aleuticus*	Habitat rank information not available, but see *Aleutian Tern* subheader in text above.
Pacific marten	*Martes caurina*	Habitat rank information not available

Table 2. Number of at-risk SGCN that rank this habitat type as high value.

Habitat Type	Number of at-risk SGCN that rank this habitat type as high value
Open Water	17
Alaskan Pacific Maritime Western Hemlock Forest	14
Alaskan Pacific Mesic Western Hemlock-Yellow-cedar Forest	14
Temperate Pacific Intertidal Flat	14
North Pacific Shrub Swamp	13
Alaskan Pacific Maritime Avalanche Slope Shrubland	12
Alaskan Pacific Sitka Spruce Forest and Beach Ridge	12
Temperate Pacific Tidal Salt and Brackish Marsh	12
Western North American Boreal Shrub Swamp	12
Alaska Sub-boreal Mesic Subalpine Alder Shrubland	11
Alaskan Pacific-Aleutian Alder-Salmonberry-Copperbush Shrubland	11
Alaskan Pacific-Aleutian Rocky Coastline and Sea Cliff	11
Western North American Boreal Mesic White Spruce-Hardwood Forest	11
Alaskan Pacific Mountain Hemlock Forest and Subalpine Woodland	10
Western North American Boreal Freshwater Emergent Marsh	10
North Pacific Hypermaritime Western Red-cedar-Western Hemlock Forest	9
Alaska Sub-boreal White-Lutz Spruce-Hardwood Forest and Woodland	8
Temperate Pacific Freshwater Emergent Marsh	8
Western North American Boreal Mesic-Wet Black Spruce Forest and Woodland	7
Alaskan Pacific-Aleutian Fen and Wet Meadow	6
Western North American Boreal Mesic Birch-Aspen Forest	6
Western North American Boreal Wet Meadow	6
Alaskan Pacific Maritime Coastal Meadow and Slough-Levee	5
Alaskan Pacific Poorly Drained Conifer Woodland	5
North Pacific Montane Massive Bedrock, Cliff, and Talus	5
Western North American Boreal Shrub-Sedge Bog and Acidic Fen	5
Western North American Boreal Treeline White Spruce-Hardwood Woodland	5
Alaskan Pacific Acidic Shrub-Sedge Peatland	4
Western North American Boreal Alpine Dwarf-shrubland	4
Alaskan Pacific Alpine-Subalpine Dwarf-shrubland and Heath	3
North American Glacial Outwash	3
Alaskan Pacific-Aleutian Coastal Dune, Beach, and Beach Meadow	2
Alaskan Pacific Maritime Mesic Herbaceous Meadow	2
Recently Disturbed Other-Herb and Grass Cover	2
Western North American Boreal Mesic Bluejoint-Forb Meadow	2
Western North American Boreal Wet Black Spruce-Tussock Woodland	2

Alaska Sub-boreal and Maritime Alpine Mesic Herbaceous Meadow	1
Developed-Low Intensity	1
Developed-Open Space	1
Quarries-Strip Mines-Gravel Pits-Well and Wind Pads	1
Recently Logged-Herb and Grass Cover	1