



ALASKA CHAPTER

March 20, 2026

Monique Nelson
Forest Supervisor, Tongass National Forest
USDA Forest Service
Ketchikan, AK

RE: Alaska Chapter of The Wildlife Society Scoping Comments on the Tongass Land Management Plan Revision

Dear Ms. Nelson,

The Alaska Chapter of The Wildlife Society (TWS) is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. Our science-based mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

The proposed action is to revise the Tongass Land and Resource Management Plan (forest plan or plan) consistent with the 2012 Planning Rule. The TWS Alaska Chapter comments focus on science-based conservation and sustainability of habitat and wildlife resources.

There are a few overarching comments from the Alaska Chapter.

1. *No mention of climate change* – The six preliminary focus goals on the need to change the plan and the remainder of the federal register notice focus goals do not incorporate climate change. Research indicates climate change is affecting the ecosystem services of the Tongass and therefore climate change should be considered in the revised plan.
2. *Review of the Conservation Strategy* – Old Growth Habitat Areas (often termed old growth reserves) along with other forest prescriptions (e.g., beach buffers, stream buffers, other areas protected from timber harvest) in the general forest Land Use Designation should be subject to a science review. The overarching conservation strategy and the best available science are key to sustainability of fish and wildlife resources. In addition, this strategy has been vital to keeping unnecessary Endangered Species listings from occurring on the forest for species such as the Alexander Archipelago wolf and the Queen Charlotte goshawk.
3. *Ecological sustainability as a Preliminary Substantive Issue* – The Alaska Chapter concurs with this as a substantive issue. Expansion of ecological sustainability to include fish and wildlife should be considered. Presently, there is only mention of natural hazards such as flooding and landslides. Estimating ecological sustainability is a complex science-based task. As alternatives are developed for the NEPA review, sustainability of fish and wildlife resources should be built into the design, including Traditional Ecological Knowledge (TEK) and other scientific approaches.

The preliminary need for change to the Tongass forest plan (page 7426 federal register notice) mentions a “preliminary need to change focuses on the following six interrelated goals”. Below the Alaska Chapter comments on these six goals.

1. *Update and modernize the plan.* The Chapter supports this goal and recommends using the best available science.
2. *Prioritize local and regional prosperity.* Wildlife related tourism and recreation is an important economic driver in some communities across the Tongass. This is especially true for wildlife watching, resident and non-resident hunting, lodges, charter operators, and others. All of these wildlife-related activities depend on sustainable wildlife at a local, regional and Tongass-wide level.
3. *Incorporate strategies to address significant changes in recreation and tourism.* Recreation and tourism may have local impacts to wildlife and require careful mitigation and evaluation to maintain high quality visitor experiences.
4. *Encourage collaboration on shared stewardship.* This is an excellent opportunity to seek common ground among varied parties with an interest in forest management and the varied uses of Tongass forest lands.
5. *Consider needs for subsistence uses such as hunting, fishing, and gathering.* Subsistence uses of fish, wildlife, and gathering have a long history on the Tongass. There is a long and ample library documenting these uses and importance for residents. There has been significant funding allocated over the decades by the U.S. Forest Service, Alaska Department of Fish and Game – Subsistence Division, Alaska Tribes, and other Alaska Native groups to document these uses. Various social science and other traditional knowledge gathering methods have demonstrated high use. These extensive uses should be prioritized and considered.
6. *Consider indigenous knowledge related to land stewardship.* Traditional knowledge of these long standing uses should receive fair consideration with the appropriate validation provided through social science efforts.

Other Scoping Issues

Page 7427 Federal Register – Fish and wildlife direction. This section notes that species of conservation concern will be addressed in the plan. There has been little in-depth review of certain species and their status on the Tongass for over a decade. We recommend a thorough science review of key wildlife species and their habitats.

Page 7427 Federal Register – Old-growth habitat conservation strategy. When adopted in the 1997 forest plan this strategy was key to maintaining viability and sustainability of wildlife across the Tongass. There have been various reviews of the conservation strategy with subsequent plan revisions. We recommend a thorough review given the many adjustments to the sizes and shapes of the reserves and the land exchanges that have taken place.

Page 7427 General Forest – This paragraph mentions that “these areas are not set aside for conservation purposes ...”, which is not accurate. The conservation strategy includes standards and guidelines within the general forest that contribute to the overall plan. Examples include stream buffers, beach buffers and remaining stands of old growth that act as wildlife refugia and corridors. Review of these habitat and wildlife conservation measures in the general forest should be part of the plan review.

Thank you for your consideration of these scoping comments. We look forward to continuing to engage in this process as it moves forward and to providing our expertise.

On behalf of the Executive Board and membership of the Alaska Chapter of The Wildlife Society,

A handwritten signature in black ink, appearing to read "Ryan Mollnow", with a long horizontal flourish extending to the right.

Ryan Mollnow
President, Alaska Chapter of The Wildlife Society