



February 24, 2025

Dear Tongass National Forest Planners and team,

Thank you for this opportunity to comment on the Draft Assessment for the Tongass Forest Plan Revision.

The Juneau Audubon Society (JAS) is a non-profit organization with over 200 members whose mission is to conserve the natural ecosystems of Southeast Alaska, focusing on birds, and other wildlife and their habitats, for the benefit and enjoyment of current and future generations.

Focusing on birds, we make the following suggestions regarding the Species of Conservation Concern Assessment. It is important to review the Forest Service Handbook which states:

Species in the following categories should be considered:

- a. Species with status ranks of G/T3 or S1 or S2 on the NatureServe ranking system. See exhibit 01 for description of NatureServe Conservation Status Ranks.*
- b. Species listed as threatened or endangered by relevant States, federally recognized Tribes, or Alaska Native Corporations.*
- c. Species identified by federal and/or state agencies, federally recognized Tribes, or Alaska Native Corporations as a high priority for conservation.*
- d. Species identified as species of conservation concern in adjoining National Forest System plan areas (including plan areas across regional boundaries).*
- e. Species that have been petitioned for federal listing and for which a positive “90-day finding” has been made.*
- f. Species for which the best available scientific information indicates there is local conservation concern about the species' capability to persist over the long-term in the plan area due to:*
 - (1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat). These threats include climate change.*
 - (2) Declining trends in populations or habitat in the plan area.*

(3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).

(4) Low population numbers or restricted ecological conditions (habitat) within the plan area.

The list in the Draft Assessment appears to have missed species that should be considered according to key expert sources. We recommend a thorough review of the following publications (none of which were cited in the report's reference materials):

- **The State Wildlife Action Plan for Alaska**
In particular, note the section Species of Greatest Conservation Need.
<https://www.adfg.alaska.gov/index.cfm?adfg=wildlifediversity.swap>
- **The Bureau of Land Management (BLM) Alaska Special Status Species List – 2019**
https://www.blm.gov/sites/blm.gov/files/uploads/Alaska_Special-Status-Species-List_2019.pdf
- **The Boreal Partners in Flight (BPIF) - Alaska Landbird Conservation Plan 2.0**
Priority species lists for each Bird Conservation Region were compiled by avian specialists within Alaska, in consultation with expert groups nationwide comprised of federal, state, non-profit, and university biologists.
<https://www.usgs.gov/media/files/alaska-landbird-conservation-plan-version-2>
- **The Alaska Shorebird Conservation Plan Version III**
As in the BPIF plan, this document was authored by species specialists.
<https://www.shorebirdplan.org/wp-content/uploads/2019/05/AlaskaPlan2019.pdf>
- **The Audubon Alaska Watchlist 2017**
<https://ak.audubon.org/conservation/alaska-watchlist>
- **North American Waterbird Conservation Plan, Version 1**
<https://www.fws.gov/sites/default/files/documents/north-america-waterbird-conservation-plan.pdf>

We also recommend connecting with stakeholders in Southeast Alaska:

- Tribal entities within Southeast Alaska. While we could not locate any tribal priority species list published online, tribal biologists should be consulted. Species that may be of high cultural value may also appear on other watchlists. For example, the Rufous Hummingbird, listed as near threatened by the International Union for the Conservation of Nature (IUCN), is frequently seen in Tlingit totems and artwork.
- Hunters and subsistence users should be considered. Species that may have subsistence importance such as Sooty Grouse and Prince of Wales Spruce Grouse appear as priority species in the BPIF plan. The Vancouver Canada Goose appeared in previous forest plans. This resident subspecies, a target of research in past

decades, has a small population size and limited genetic interchange with other Canada Goose populations.

- Regional birdwatching checklists. Lists from reputable sources such as Audubon societies or eBird, as well as district biologists, should be consulted to understand the distribution of potential conservation species. The Draft Assessment mentioned two species, the American Coot and the Yellow-bellied Flycatcher, that are rare regionally and do not have known established populations.

Some species and subspecies that JAS considers of particularly high conservation concern are listed in Table 1 (attached), along with key reasons for concern, and known significant threats.

We also would like to underline the values of several unique habitat types within the Tongass:

- Productive unlogged old growth forest, particularly as habitat for Northern Goshawk and Marbled Murrelet.
- Large estuarine wetlands such as the Situk, Stikine, and Lace/Antler River deltas for shorebirds (including those mentioned in the Assessment).
- Large peat bog and fen complexes, important for Sandhill Crane as well as a separate suite of songbirds than the ones found in closed canopy conifer forest.
- Deciduous willow and cottonwood habitat, predominately found along mainland rivers and near glaciers, hosts a suite of boreal species not found elsewhere on the Tongass.

Finally, uses within or adjacent to Important Bird Areas as designated by Audubon Alaska should be examined for their outstanding wildlife values (<https://ak.audubon.org/important-bird-areas>).

As a stakeholder group, we are available to answer any questions you may have and to further assist you during this process.

Sincerely,



Nina Keller, President

Juneau Audubon Society