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Tongass National Forest Supervisor's Office  
Attn: Erin Mathews, Plan Revision Coordinator  
Tongass National Forest  
[Erin.Mathews@usda.gov](mailto:Erin.Mathews@usda.gov)  
[SM.FS.TNFRevision@usda.gov](mailto:SM.FS.TNFRevision@usda.gov)

Re: Tongass Draft Assessment

February 24, 2025

VIA EMAIL

Dear Ms. Mathews,

Defenders of Wildlife is a national nonprofit conservation organization dedicated to the protection of flora and fauna in its native habitat. Established in 1947, Defenders has nearly 2.2 million members and supporters, including over 6000 in Alaska. We maintain a field program in Alaska and have long advocated for the conservation of wildlife and habitat on Alaska's public lands, including the Tongass National Forest. We appreciate the opportunity to comment on the Draft Assessment.

We earlier sought an extension of this public comment period. The Forest Service denied this request, noting that it would "continue to collect feedback and comments throughout the revision process. Any comments that come in after the February 24th date will still be considered during the subsequent phases of the revision and will inform development of the revised plan."<sup>1</sup> We understand that Draft Assessments themselves have no defined comment period and that the important part is that the agency provide the analyses and underlying best available scientific information (BASI), and provide adequate opportunity for public input thereon. As such, we look forward to continued participation in the Assessment process as it moves forward.

Overall, our reaction to the Draft Assessment is that, while it presents a wide range of information about the forest, it mostly fails to assess the degree to which the current Tongass Land Management Plan (forest plan) is achieving its desired results for the various resources discussed. Many draft sections describe resources but do not evaluate conditions and trends or their relationship to the forest plan as required by the Forest Planning Rule.<sup>2</sup> Because Assessments are to be used during plan revision to define the need to change the existing plan and to inform the development of plan components and other plan content, it is essential that the Assessment provide the basis to take

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<sup>1</sup> Letter from Barbara Miranda re comment deadline extension request, January 31, 2025.

<sup>2</sup> 36 C.F.R. § 219.5(a)(1).

those key steps in the revision process.<sup>3</sup> The draft sections generally need to be revised so that they can better inform the need to change the plan and the development of new plan content.

Of particular importance to Defenders, the Species of Conservation Concern (SCC) section is incomplete and inadequate to support meaningful public comment. Many species have reviews that are still in progress; for species for which initial determinations have been made, there is no rationale or analysis provided and no discussion of BASI to support the conclusions. In some cases, species with documented conservation concerns are not recommended for the SCC list, again with no analysis provided.

We understand from our recent communications that the Forest Service is only at the very beginning stages of the process of identifying SCCs, and that the timeline for publishing the list of potential SCCs and underlying species evaluations and related BASI has not been identified but is anticipated to occur sometime before early 2026, when the assessment would be finalized. We request further clarification of that timeline so that adequate time for public review and comment on the species evaluations and BASI is assured.

To allow for adequate public input on the SCC assessment process, including the identified potential SCCs, we encourage the Forest Service to provide notice (e.g., via the Project webpage and mailing list) when species assessments have been completed and are available for public review. The public should have ample time to review and provide comment on the analysis and underlying BASI identified for all species evaluated. Especially since the Draft Assessment comment period is already closing and there is no SCC evaluation information or analysis on which to comment, going forward it would be helpful to publish evaluations on a rolling basis when finalized.

This approach would help ensure compliance with the 2012 Planning Rule<sup>4</sup> and Forest Service Handbook (FSH) SCC provisions. The FSH directs the agency to

- Leverage expertise of the public, including local, State, Tribal, and other Federal natural resource agencies, for identifying species of conservation concern.
- Engage the public and consider public input on the assessment including the identified potential species of conservation concern.<sup>5</sup>

We encourage the agency to adopt and publish a timeline for identifying SCCs that ensures adequate time for public review and comment on the potential SCC list and related analyses, and in turn for the agency to incorporate public comments as appropriate in finalizing the SCC list.

Thank you for your consideration of these initial comments. Because many sections of the Draft Assessment do not currently provide sufficient information for public comment, we look forward to further engagement to better define the efficacy of current forest plan direction and components in achieving goals for the various Assessment resources. That improved definition can in turn support better-informed public comments regarding the Assessment, the need to change the forest plan, and appropriate plan components for consideration.

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<sup>3</sup> 36 C.F.R. § 219.7(c)(2).

<sup>4</sup> 36 C.F.R. § 219.6(a)(2).

<sup>5</sup> FSH 1909.12 chapter 10, § 12.52a.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christi Heun".

Christi Heun  
Alaska Senior Representative  
Defenders of Wildlife