

**• Defenders of Wildlife • Alaska Wildlife Alliance • Earth Justice •
• Center for Biological Diversity •**

May 6, 2026

Submitted via the Tongass Plan Revision Site and email

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**Comments re: Tongass National Forest Plan Revision SCC Identification Process
#64039**

Dear Ms. Matthews:

On behalf of Defenders of Wildlife, Alaska Wildlife Alliance, Earth Justice, Center for Biological Diversity, and our many millions of members and supporters in Alaska and nationwide, we submit the following comments on the proposed Species of Conversation Concern (SCC) for the Tongass National Forest under the Forest Plan Revision process. SCCs are native species that occur on the Tongass and for which the best available scientific information indicates substantial concern about their long-term persistence. This designation ensures that the Forest Plan supports biodiversity and ecosystem integrity.

We support the proposed list of SCCs and the considerations that their varied ecological condition requirements will receive in the revised plan. Yet, the Alexander Archipelago (AA) wolf, which plays a crucial role in Tongass ecosystem health, is notably missing from the SCC species list.

Best available scientific information demonstrates substantial concern for the long-term persistence of AA wolves in the plan area. AA wolves currently range from Southeast Alaska through British Columbia. Roughly 55% of their total population lives on the U.S. side of the border and the Tongass provides most of their habitat.¹ Old-growth forests, which Alexander Archipelago wolves select for, make up a majority of home range areas.² The primary threats affecting the AA wolf's biological status include timber harvest and associated road

¹ Person, D.K., Ingle, M.A., Kirchhoff, R. and Bowyer, R.T., 1996. The status and conservation of the Alexander Archipelago wolf in southeastern Alaska. In *Proceedings of Defenders of Wildlife Wolves of America Conference. Defenders of Wildlife, Washington, DC* (pp. 87-94).

² US Fish and Wildlife Service, 2023. Endangered and Threatened Species: Nine Species Not Warranted for Listing as Endangered or Threatened Species. 88 Fed. Reg. 57388, 57390 (August 23, 2023).

development, harvest of wolves, and genetic inbreeding.³ A combination of habitat and prey loss, climate change, human-caused mortality, and inbreeding depression threaten the long-term persistence of the AA wolf population in the plan area. Thus, there is a serious conservation concern for wolves driven by habitat loss from historic old growth logging that will likely persist well into the future, and certainly last longer than the typical 15-year forest plan lifespan. Until old-growth logging stops and the forest can overcome the ecological effects of mid-century clearcut logging practices and impacted landscapes can return to old-growth conditions, AA wolves will likely continue to have a substantial level of conservation concern.

ESA Listing Decision

In 2023, the U.S. Fish and Wildlife Service (FWS) determined that Alaska's AA wolves comprise a Distinct Population Segment (DPS) of the overall population.⁴ The agency found that the Alaska DPS is not in danger of extinction throughout all of its range but is at risk of extirpation within the Prince of Wales Island (POW) complex.⁵ That area is the single most heavily logged landscape in the Tongass National Forest.

There, high levels of inbreeding have been documented, and main prey (Sitka black-tailed deer) is limited compared to the rest of the range. These characteristics limit the future adaptive capacity of wolves on POW island.⁶ FWS foresees extirpation for wolves on the Prince of Wales Island complex within 30 years under one of three foreseeable scenarios in that timeframe.⁷ Also, together with FWS and the Alaska Department of Fish and Game, the Forest Service found a mortality concern for wolves in the POW complex and therefore developed a Wolf Habitat Management Program pursuant to the Forest Plan.

Genetics

The SCC assessment incorrectly assumes that in part because of a high breeding rate, significant threats to the population will not have significant impacts on wolves' ability to persist in the plan area. It appears to be leaning on outdated analyses from the 2016 TLMP amendment, which states that "significant threats to Alexander Archipelago wolf have been identified, including climate change (loss of suitable habitat, loss of prey availability, inbreeding depression risk) and disjunct habitat corridors resulting from increasing road densities. However, the high breeding rate and relatively common abundance of the wolf suggest these threats will not have significant

³ *Id.*; see also Zarn, K.E., 2019. Genomic Inference of Inbreeding in Alexander Archipelago Wolves (*Canis lupus ligoni*) on Prince of Wales Island, Southeast Alaska; Hasbrouck, T. R. 2022. Wolf management report and plan, Game Management Unit 2: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-9, Juneau. p 12.

⁴ US Fish and Wildlife Service, 2022. Endangered and threatened wildlife and plants; three species not warranted for listing as endangered or threatened species. Fed Register, 87, pp.14227-14232.

⁵ *Id.*

⁶ 88 Fed. Reg. at 57391.

⁷ *Id.*

impacts on the species or its ability to persist in the plan area at this time.”⁸ Best available scientific information must be brought to bear in determining whether there is a substantial concern about the species’ capability to persist over the long term in the plan area.⁹ More recently, in a 2026 presentation to the Board of Game, ADFG’s wolf research biologist G. Roffler states that AA wolves have consistently demonstrated a low population size that has been declining in Southeast Alaska, as compared to other gray wolf populations statewide.¹⁰ According to genetic research of AA wolves, three distinct genetic populations exist for AA wolves that have been formed by the biogeography of the region’s islands, mountains, and large fjords.¹¹

- Prince of Wales (POW island complex)
- Southeast Population (connected islands and mainland)
- Northwest Population (Northern mainland and Yukon)

Multiple studies have confirmed the long-term population decline that all three populations have experienced, compounded by a genetic bottleneck event that has been occurring since the 1970s (the past 10 wolf generations).¹² Of the three, the Prince of Wales population is the only isolated population and thus unsurprisingly has the highest levels of genetic bottlenecking. Detailed genetic analyses and GPS collar data both confirm that only *one* emigrant has been detected on POW, indicating extremely rare gene flow.¹³ Further, the SCC analysis does not incorporate the improved estimates for habitat selection and den use using genetic methods and instead relies on dated studies using less explicit data from VHF collars to incorrectly conclude that more emigration is likely occurring than has been recently studied using genetic testing.

The measured low genetic diversity, high inbreeding coefficients, and declining population sizes are cause for conservation concern. This reduction in genetic quality has the serious potential to manifest by reducing litter sizes, reproductive success, and ultimately survival. The SCC assessment assumes that the high breeding rate will persist in the population over time, not accounting for the accumulation of deleterious effects of genetic bottlenecking that is being documented in the population.

⁸ U.S. Forest Service. (2016). Tongass National Forest Land and Resource Management Plan Revision: Final Environmental Impact Statement. Appendix C – Species of Conservation Concern p. 166.

⁹ FSH 1909.12, Ch. 20, sec. 21.22a; also see 36 CFR § 219.3.

¹⁰ Alaska Board of Game. Wrangell Southeast Alaska Meeting, January 23, 2026.

<https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2025-2026/se/index.html?mediaBasePath=/Meeting%2001-23-26%20%28Jan-23-26%205-23-16%20PM%29>

¹¹ Zarn, K.E., 2019. Genomic Inference of Inbreeding in Alexander Archipelago Wolves (*Canis lupus ligoni*) on Prince of Wales Island, Southeast Alaska; Hasbrouck, T. R. 2022. Wolf management report and plan, Game Management Unit 2: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-9, Juneau.

¹² *Id.* and Zarn, K. E., Roffler, G. H., Kardos, M., Good, J. M., Vanderpool, D., Wilcox, T., & Schwartz, M. K. 2025. Genomic Analysis Reveals Inbreeding in an Island Population of Alexander Archipelago Wolves. *Evolutionary Applications*, 18(8), e70144. and BOG presentation on Jan 23, 2026

¹³ Alaska Board of Game. Wrangell Southeast Alaska Meeting, January 23, 2026.

<https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2025-2026/se/index.html?mediaBasePath=/Meeting%2001-23-26%20%28Jan-23-26%205-23-16%20PM%29>

It is notably difficult to observe these effects in the Tongass due to the accessibility of wolves across the archipelago, but staff biologists have proposed a research project to measure the genetic load (or accumulation of these deleterious genes).¹⁴ However, the ability of biologists to conduct such an experiment may be hampered due to the anticipated closure of 57 of the 77 Forest Service research stations.¹⁵ ADFG has partnered with the Genomics Center to conduct genetic analyses of AA wolf data, but as a result of the new consolidation of the Forest Service and its closure of research stations across the nation, the ability to analyze these data may be limited or unavailable.¹⁶

Current Management Direction

The Trump administration has issued several directives that directly increase the risks of AA wolf long-term persistence in the plan. On January 20, 2025, Executive Order 14153 was issued, “Unleashing Alaska’s Extraordinary Resource Potential,” which instructs the Secretary of Agriculture to “place a temporary moratorium on all activities and privileges” pertaining to roadless protections on the Tongass National Forest and instructs the Secretary to reinstate the earlier Trump-era rule exempting the Tongass from the Roadless Rule.¹⁷

On March 1, 2025 Executive Order 14225 titled “Immediate Expansion of American Timber Production” instructs the US Forest Service and other federal entities “to facilitate increased timber production.”¹⁸ As noted above, the primary threats affecting the Alexander Archipelago wolf’s biological status include timber harvest and associated road development, harvest of wolves, and genetic inbreeding. Especially considering the current administration’s directives, AA wolves are now at increasing risks of population and habitat loss, cementing their qualification for SCC status.

Following Executive Order 14153, the USDA has proposed a rule that would rescind the 2001 Roadless Area Conservation Rule, which prohibits road construction, road reconstruction, and timber harvesting in inventoried roadless areas, with limited exceptions. This proposed rule expressly excludes the Tongass National Forest from the 2001 Roadless Rule. The SCC analysis needs to consider the impacts of the proposed rule rescission on AA wolves.¹⁹

Conclusion

¹⁴ *Id.*

¹⁵ U.S. Department of Agriculture. 2026. *Organizational realignment factsheet*.
<https://www.fs.usda.gov/sites/default/files/organizational-realignment-factsheet.pdf>

¹⁶ Alaska Board of Game. Wrangell Southeast Alaska Meeting, January 23, 2026.
<https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2025-2026/se/index.html?mediaBasePath=/Meeting%2001-23-26%20%28Jan-23-26%205-23-16%20PM%29>

¹⁷ 85 Fed. Reg. 68688 (October 29, 2020).

¹⁸ <https://www.whitehouse.gov/presidential-actions/2025/03/immediate-expansion-of-american-timber-production/> Accessed May 25, 2025.

¹⁹ Fed Reg Published Document: 2025-16581 (90 FR 42179) [linked](#)

Findings by the Forest Service and others (e.g., USFWS) already demonstrate that AA wolves meet the SCC definition in the Tongass because their persistence throughout the plan area is at risk. The Alaska Department of Fish and Game and Board of Game concluded this year that a “more conservative management approach is warranted to maintain a sustainable population” for AA wolves.²⁰ However, the SCC assessment ultimately concludes that “the species is secure and its continued long-term persistence in the plan area is not at risk based on knowledge of its abundance, distribution, lack of threats to populations and/or habitats, and stable or increasing habitat and/or population trends.”²¹ This conclusion is contrary to the evidence before the agency.

Sincerely,

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²⁰ Alaska Department of Fish and Game. 2026. *Staff comments for Proposals 5, 48, and 52: Southeast Region regulations proposals, Alaska Board of Game meeting, Wrangell, Alaska, January 23–27, 2026.*

²¹ Species Evaluations for the Tongass Forest Plan Revision – p64