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The following are comments regarding the proposed Twin Mountain II Timber Sale Project.

A fundamental aspect of prudently considering and applying relevant knowledge to a complex process is considering the source (thus the credibility) of the information. As a member of the team of Pacific Northwest Research Station Scientists (recruited by the Pacific Northwest Research Station because of extensive experience and knowledge studying sensitive and vulnerable wildlife species) I was assigned to review and analyze all information used to address wildlife viability issues for the 1997 TLMP. As the wildlife viability expert, I contributed directly to the initial conceptual framework and subsequent species-specific elements that became the 1997 TLMP conservation strategy. Over the 10 years following the 1997 ROD, I designed, implemented, and oversaw experimental research funded by the U.S. Forest Service testing critical, underlying assumptions of the TLMP Conservation Strategy as a Principal Wildlife Scientist with the Pacific Northwest research Station because a comprehensive monitoring plan was not implemented to evaluate the expectations and outcomes of the experimental Wildlife Conservation Strategy. Still, despite not having any evidence to support (or even consider), the Tongass National Forest continued to assert that the Wildlife Conservation Strategy was working effectively as designed. For another 15 years I oversaw further research and analyses, the findings of which were presented at scientific conferences and published in numerous articles in national and international peer-reviewed journals. Recently, the science previously published in numerous journals that examined 4 essential assumptions of the TLMP wildlife conservation strategy was summarized in an attached review article (Smith and Flaherty 2023) in an effort to make the science conveniently available to the Forest Plan revision team. Furthermore, in September 2026 another review article was published that summarized over 2 decades of published research and analyses (Smith 2026) illustrating how and why the management of the Tongass National Forest has increased the extinction risk of island endemics, notably the Prince of Wales flying squirrel. Therefore, I submit that the following comments represent a unique understanding and perspective reflecting both the direct knowledge and experience gained through developing a landscape-scale wildlife conservation strategy and the comprehensive and credible science experience and knowledge from more than two decades of published research examining its assumptions, especially those related to Species of Conservation Concern.

Accompanying this document is a list of salient peer-reviewed publications that provide the scientific basis and support for my comments. I have also attached PDFs of the two most recent publication plus 2 additional publications that directly support the conclusion that the risk of extinction of an obligate late-seral forest island endemic and viability indicator species for the 1997 TLMP, the Prince of Wales flying squirrel (*Glaucomys sabrinus griseifrons*), has increased over a significant portion of its entire geographic range. Indeed, at least 40% of its primary habitat has been lost and remnant contiguous productive old-growth fragments that meet occupancy thresholds have been reduced by 58% (Smith 2026). The compelling evidence supports the Endangered Species Act's stipulation that a formal status review is required (Smith 2026).

Moreover, landscape context and ecological and evolutionary realities dictate environmental context (Smith et al. 2011). First, the Tongass National Forest is managed at inappropriate spatial scales, ignoring the vulnerabilities of island ecological communities, especially small population sizes and isolation that limits dispersal and genetic and demographic rescue (Smith and Flaherty 2023, Smith 2026). Consider that Prince of Wales Island (POW) is a biological diversity hotspot of southeastern Alaska, especially for the bird and mammal fauna, with multiple old-growth obligate, island endemics whose entire distributions are limited to POW and some barrier islands (Smith 2005). Below, I describe in detail two examples that were previously proposed for federal listing: the Queen Charlotte Goshawk, which was federally listed as an imperiled meta-population in which all breeding demes (subpopulations) are deemed critical, including the non-listed population on POW.

The second endemic, the POW flying squirrel, which was federally listed in 1974 and unjustifiably delisted in 1986, has experienced further degradation and loss of its primary habitat and undergone further analyses, the findings of which were published with an international ecological journal (Smith 2026). Further loss and fragmentation of the latter's habitat (such as that proposed for Twin Mountain II) and consequent reduced dispersal capabilities will likely result in reconsideration of its status under the Endangered Species ACT. Regardless of ownership, further logging of old-growth forest on POW will increase its risk of extinction because of local extirpations, greater isolation, and reduction of the overall population and genetic diversity, the latter of which is the lowest of all northern flying squirrel populations throughout the species' entire geographic range (Smith and Flaherty 2023; Smith 2026). Additional science supporting this conclusion is below and referenced publications are attached.

Therefore, I assert that if the Twin Mountain II Timber Sale is completed, the Tongass National Forest would be in violation of the following legal requirement: "The National Forest Management Act (NFMA; 36 CFR 219.19) requires that the Forest Service manage fish and wildlife habitat to maintain viable populations of existing native and desired non-native vertebrate species in the planning area and ensures that its actions do not contribute to trends toward federal listing (Smith 2026, USFS 2026). Also, the compelling evidence presented in the attached publications illustrate that the Wildlife Conservation Strategy has been and continues to be ineffective in meeting its legal requirements, the consequences of which have been and continue to be an increase in the extinction risk of island endemics. For the Prince of Wales flying squirrel, there has been a significant increase in extinction risk in a significant portion of its geographic distribution, thus meeting the Endangered Species Act criterion that requires a formal status review.