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First name: Patrick

Last name: Tierney

Organization:

Title:

Official Representative/Member Indicator:

Address1: PO Box 19484

Address2: 920 Rainy Lane

City: Thorne Bay

State: AK

Province/Region:

Zip/Postal Code: 99919

Country: United States

Email: akcf13@gmail.com

Phone: 9078-828-3992

Comments:

Patrick J Tierney, Retired Tongass Silviculturist

PO Box 19484 \* 920 Rainy Lane

Thorne Bay, Alaska 99919

907-828-3992

At Large Participant, POWLLAT

Representing at large Professional NRM and Society of American Foresters

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Re: Comments to Draft EIS, POWLLA

First I would like to applaud the USFS for its efforts in pursuing comments from a wide array of participants on Prince of Wales Island during the initial scoping and draft alternative development through the Prince of Wales Landscape Level Assessment Team or POWLLAT.

During this process, an issue was brought forth dealing with the availability of native plants (seed and planting stock) for use in cut bank stabilization, erosion control, wildlife habitat rehabilitation and improvement, watershed rehabilitation and improvement and reforestation. While there has been a long recognized need for native seed for erosion control and road construction activities, the need for other plant materials such as cornus, bramble, reforestation stock and other plants has largely gone ignored. This issue is now at the forefront, with a strategy for the conservation and management of yellow-cedar published that cannot be implemented without yellow-cedar planting stock which is in critically short supply for non-FS landowners.

Most reforestation stock (tree seedling) is easily produced at commercial nurseries when seed inventories are available. While the USFS has sufficient reserves of most forest tree seed, industry does not. Yellow-cedar (cypress) seed is in critically short supply in both the US and Canada. Contrary to other conifers native to the area, yellow-cedar produces seed infrequently. Seed cone is not usually abundant and is difficult and expensive to collect. On average, seed cone crops of sufficient abundance for collection only occur for yellow-cedar every seven years. Alternative methods of producing planting stock exist. Vegetative propagation of yellow-cedar is possible but is labor intensive and requires the build-up and maintenance of a 'cutting orchard' to provide cuttings for rooting.

Current efforts on Prince of Wales Island, funded by Sealaska Corporation, include investigation into the production of yellow-cedar by rooted cuttings called stecklings began in 2016 after several years of unsuccessfully searching for a collectible cone crop. The process was brought to the local schools with the intent of teaching this propagation method and providing ecosystem and environmental awareness and education. We now have the beginnings of a cutting orchard - a result of these efforts - housed at the Thorne Bay Public Library public garden area and at Southeast Island School District, Thorne Bay School greenhouse. There are over 50 plants being cultivated as cutting donors for the future production of yellow-cedar stecklings and more will be added as the education and outreach efforts continue. To date, projects that lead to the establishment of a Native Plant facility capable of producing yellow-cedar stecklings, have support from two communities, Kasaan and Thorne Bay, in the form of Council Resolutions, with support from additional communities and organizations expected in the near future.

During the POWLLAT planning process, it was recognized that yellow-cedar has been petitioned for listing under ESA. Although a decision is due sometime this month (June, 2018), the petition itself illustrates concern over the species. Harvesting, combined with ecological factors, have reduced the yellow-cedar component in our forests from about 5% to less than 1%. This can be corrected through management actions that include planting of yellow-cedar and where appropriate, favoring the species during cultural treatments.

Yellow-cedar is also experiencing a climate related decline. There is a management approach to mitigate the effects of yellow-cedar decline, outlined in PNW-GTR-917, January 2016, A Climate Adaptation Strategy for Conservation and Management of Yellow-Cedar in Alaska. The conservation and management strategy calls for, among other things, planting of yellow-cedar on sites where it is expected to thrive in view of current climate change predictions. This cannot be accomplished without suitable planting stock which is in very short supply. There is no seed, seedlings or rooted cutting supply readily available on the open market and successful seed collections are infrequent due to the factors previously mentioned.

In situations like this, NRCS Plant Materials Centers often help fill such voids in collection, supply and production of plant materials used in conservation efforts. The existing PMC in Palmer, Alaska is a collaborative effort between the State of Alaska and NRCS. Unfortunately, the Palmer PMC does not handle species native to Southern Southeast Alaska and has no yellow-cedar program. Therefore, it has been proposed that the USFS encourage and support efforts to establish a nursery facility capable of producing native plant materials specific to local needs, beginning with yellow-cedar. The Corrected Notice of Intent published July 06, 2017 states "The projects and management strategies fell within four broad categories: Vegetation management, watershed improvement and restoration, sustainable recreation management, and associated actions." The Corrected NOI further states "The Forest Service would consider establishing or encouraging native plant nurseries that can produce seedlings and other native plant materials for reforestation, reclamation, and habitat improvement projects." There is no mention or consideration for establishment or encouragement of native plant nurseries in the draft document. This is a serious oversight and can jeopardize the future of yellow-cedar management on non-FS lands along with efficient and productive habitat rehabilitation and enhancement projects on all ownerships. Support and encouragement for the development of a Native Plant Materials Center to help supply vegetative needs for such projects along with the conservation and management of yellow-cedar should be included in the Draft and Final EIS documents - not just in the planning record.

During the POWLLAT project development, there was no specific location for a Native Plant Nursery/Materials Center identified. Since, that time it has come to light that the USFS plans to release a portion of the Thorne Bay Administrative site, which would be a prime location for such a facility. Work is proceeding in conjunction with the Forest Service and the City of Thorne Bay, in planning for the release of this land. The City focus is economic development. Proximity to existing utility infrastructure, roads and workforce make this location ideally suited for use as a plant production and seed storage facility.

Specific places in the document where such support can be expressed along with suggested language follows.

Last paragraph on page 326, under the heading Yellow-cedar Management, suggest adding the following sentence: For management of yellow-cedar on non-FS lands, the establishment of a nursery operation or plant materials center would help supply yellow-cedar planting stock which is in critically short supply.

Page 343, second to last paragraph, under the heading Commercial Harvest on All Land Ownerships beginning on the previous page, suggest adding the following language to the second to last paragraph dealing with stands heavily affected by yellow-cedar decline: The establishment of a nursery or plant materials center on Prince of Wales Island would assist other landowners in implementing conservation and management recommendations for yellow-cedar by contributing to the supply of available planting stock which is in critically short supply and unavailable on the open market.

Overall ecosystem benefits of native plants that are currently in short supply, such as yellow-cedar cannot be understated and we are just now seeing research to that effect. Rapid results for wildlife habitat rehabilitation and improvement projects could be achieved if native forage plants were available for these vegetative management projects.

I would also highly recommend that when prescribing uneven-aged management and commercial thinning,

removals be limited to 30% of the stand or less. Based on personal discussions with Bill Farr along with published research from Mr. Farr, the dominant ecosystem driver is wind and few stands if any can withstand removals greater than 30%, and still remain wind firm. Leaving other than dominant and co-dominant stems will result in wind throw, stem snap from winter weather and noodling of stems that were in the intermediate and suppressed crown positions within the stand prior to treatment.

There are other places within the document where it would make sense to mention this needed resource. A native plant supply could assist with combating invasive plants on the Island by providing a supply of native plants for landscaping, homes and gardens. Programs and public education on invasive plants and personal choices for homes and landscaping could be conducted. Most importantly, washing of heavy equipment should be required to prevent the introduction and/or spread of invasive populations.

I appreciate the opportunity to comment on this draft document that outlines Forest Service land management direction Prince of Wales Island for the next 10 to 15 years.

Respectfully,

/s/ Patrick J Tierney