July 25, 2024

To Rebecca Brooke, Forest Supervisor, Siuslaw National Forest:

The Oregon Dunes Restoration Collaborative has been a partner with the Siuslaw National Forest since 2014. We have worked with the Forest and other government agencies in removing invasive plants and have provided information to the public about invasive plant issues at the Oregon dunes since 2015. The Oregon Dunes Restoration Collaborative’s mission is to collaboratively support, guide, and promote Oregon dunes restoration and preservation of the open sand, unique habitats, and dunes processes that benefit the plants, animals, and people that live and play in this special place. We developed a three-part strategy for the restoration of open sand at the Oregon dunes, (1) Protect the Best, (2) Restore site-specific areas and natural processes, and (3) Restore landscape-scale natural processes.

Thank you for the opportunity to comment on the Siuslaw’s Integrated Invasive Species Project proposal. ODRC supports the proposal and all of the different methods listed in the Draft Proposed Action. The acreage amounts seem appropriate as well.

The Forest, in the past, used prescribed fire to burn European beach grass on the foredunes. It seems in recent years (decade or more) this method hasn’t been used much. It is good to see it listed as one of the methods, because it could be used in most areas of the foredunes and upland dunes. We support using prescribed fire to remove the biomass of the beachgrass, and follow-up with herbicide treatment as the beachgrass re-sprouts. This would use less herbicide than spraying the entire mature beachgrass plant.

Concerning mowing or cutting with a hand-held string or blade trimmer, we suggest dropping “gas-powered,” because there are also battery-powered string and blade trimmers. It would be good to be able to use both types. In the future, hopefully batteries will hold longer charges and someday they may be as effective as gas-powered machines.

One area the Forest may consider using the drone application is in the National Forest portion of Section 10, north of Baker Beach. This area between Highway 101 and the ocean are cliffs filled with gorse plants. There is no way to treat the gorse manually, so the UAV seems like the appropriate tool. Care will have to be taken not to distract drivers on Highway 101, so perhaps flying below road level where drivers wouldn’t notice the drone is one idea.

The Environmental Assessment and Decision Notice for the Oregon Dunes Restoration Project (2020) contained a number of mitigation measures for the Pacific or coastal marten, listed as threatened. In addition, large areas were dropped from consideration for treatment in the EA, because they were marten habitat or potential marten habitat. Since the deflation plane is marten habitat, places where landscape-scale natural processes can be restored is extremely limited. Now that the Forest has had a few years of treatments completed with the marten mitigation measures, we believe the Forest Service specialists should review the mitigation measures and drop any that are not necessary to protect the marten and would be beneficial for removing plant populations and restoring the natural processes of the dunes.

Thank you for the opportunity to comment on the draft proposed action.

Sincerely,

/s/ Bill Blackwell

Bill Blackwell

ODRC Steering Committee Member

USFS Retiree

/s/ Andy Vobora

Andy Vobora

ODRC Steering Committee Member

Vice President of Stakeholder Relations, Travel Lane County

/s/ Dina Pavlis

Dina Pavlis

ODRC Steering Committee Member

Author, “Secrets of the Oregon Dunes”