



SIERRA PACIFIC INDUSTRIES

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August 7, 2024

Siuslaw National Forest
3200 Jefferson Way
Corvallis, OR 97331
Att: Katie Isacksen

Re: Sierra Pacific Industries Feedback on USDA Forest Service Integrated Invasive Species Project Draft
Ms. Isacksen, Ms. Monks, and Forest Service Staff:

Thank you for the opportunity to comment on the Siuslaw National Forest's Integrated Invasive Species Project.

I am writing on behalf of Sierra Pacific Industries, a third generation, family-owned forest products company. We are a leader in the sustainable management of over 2.4 million acres of SFI certified forestland across the West Coast, including areas within the vicinity of the Siuslaw National Forest. In addition to the lands which we own and sustainably manage, we are significant purchasers of both private and publicly owned timber.

Noxious weeds are among the greatest threats to our native ecosystems and, when left untreated, can be detrimental to many native plant and animal species. We are pleased to see the efforts being made to control and prevent the spread of invasive species on the Siuslaw National Forest.

Like the Siuslaw National Forest, we have also faced challenges with these invasive species on our lands. We have implemented various methods of prevention and control, similar to those addressed in the Siuslaw project, and understand the complexities involved. Our experience indicates that repeated treatments are often necessary in areas heavily impacted by invasive species. For example, Scotch broom, a prolific seeder, requires multiple follow-up treatments over consecutive years to control its spread and minimize ecosystem damage. Given the Siuslaw's project area of 2,000 acres, we believe that expanding the project scope is essential for effective control over the invasive issues. With the Siuslaw National Forest covering 630,000 acres the current project area, representing only 0.3% of the forest, may be insufficient to manage the widespread invasive species effectively. A larger treatment area would reduce risk of further spread or regrowth in surrounding areas.

Many mechanical control methods listed in the project scope, such as mowing, cutting, steaming, scraping, and power raking, have proven ineffective, cost-prohibitive, and lack long-term efficacy. Given the project's small scale, the most environmentally and cost-effective treatments for the greatest number of acres should be prioritized. Our experience has shown the careful use of herbicides is the most effective long-term treatment for land health and resiliency. While the Siuslaw project identifies several herbicide application techniques, which are all effective in the right situation, we note the

absence of roadside spraying and strongly recommend its inclusion. Untreated roadsides serve as primary conduits for the spread of invasive species, initially establishing within the road area and then spreading to adjacent forest. Roadside spray applications are the most effective and cost-efficient method for controlling invasive species within travel corridors.

In reviewing the list of active ingredients in the identified herbicides, we noticed the omission of Triclopyr, triethylamine salt (Milestone VM). Triclopyr is effective in preventing ungerminated Scotch broom seeds from germinating. Treating only the above-ground plant can result in a new crop of Scotch broom will the following growing season. Given the prolific seeding nature of Scotch broom, being that a single seed crop can inundate the soil, using Triclopyr is most effective at reducing the need for future follow up applications and limiting spread.

We understand the magnitude of the invasive species issues faced on the Siuslaw Forest and hope our comments will positively contribute to the final drafting of the project plan and long-term health of the landscape. Please do not hesitate to reach out with any questions at (360)-736-5417.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew D. Moses', with a long horizontal flourish extending to the right.

Matthew D. Moses

Regional Timberlands Manager OR/WA