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First name: Crook County

Last name: Commission

Organization: Crook County

Title:

Comments: [Emailed letter; transcribed by Ella Rowan, USDA Forest Service NEPA Planner; see attachment for original]March 20, 2024USDA FS- Ochoco National Forest and Crooked River National Grassland3160 NE 3rd StreetPrineville, OR 97754RE: Indaziflam Forest Plan Amendment (ONF-CRNG) #65406Dear USDA FS-Ochoco National Forest;The Crook County Commission is in full support of the Indaziflam Forest Plan Amendment(ONF-CRNG) #65406 as submitted to add Indaziflam to the Forest Plans. This modification will benefit sage-steppe and grassland communities that are becoming dominated by invasive annual grasses (medusahead rye, cheatgrass, and ventenata) and creating conditions for intense wildfires. The actions proposed by the USDA Forest Service Ochoco Nat'l Forest and Crooked River Nat'l Grasslands are consistent with regional and local plans.Within Crook County, the Crooked River Weed management area, the Crook County Soil and Water Conservation District and the Crooked River Watershed Council among others have has been working with private landowners over the years to reduce invasive annual grasses, using the best available science and technology. Landowners have shown a strong desire to make lasting changes to resource conditions on their property, including sage grouse habitat. Last year, these groups worked with both private landowners and the USDA FS Ochoco NF treating invasive annual grasses, adjacent to each other within the Beaver Creek area in Crook County. In this Cross Boundary project (23-PA-11060700-006), annual grass treatments included the use of Indaziflam on private lands only, which has shown to be a new tool, having seed control for up to 4 years without another application, thus less pesticides used.Listed here is a few peer-review papers on the efficacy and the increase in native species biomass from invasive annual grass treatments with indaziflam herbicide.<https://www.sciencedirect.com/science/article/abs/pii/S1550742415001517><https://besjournals.onlinelibrary.wiley.com/doi/full/10.1002/2688-8319.12049>[https://www.cambridge.org/core/journals/invasive-plant-science-and-management/article/abs/effect-of-indaziflam-on-native-species-in-natural-areas-andshy\)rangeland/3FD2EA4502D93E7ED%20F9C179B%205EBAD%20F2B](https://www.cambridge.org/core/journals/invasive-plant-science-and-management/article/abs/effect-of-indaziflam-on-native-species-in-natural-areas-andshy)rangeland/3FD2EA4502D93E7ED%20F9C179B%205EBAD%20F2B)[https://www.cambridge.org/core/journals/invasive-plant-science-andshy\)management/article/abs/preemergence-control-of-six-invasive-winter-annual-grasses-withshy\)imazapic-and-indaziflam/D58A5EB172E99FB8535EBE788DB23C13](https://www.cambridge.org/core/journals/invasive-plant-science-and-management/article/abs/evaluating-winter-annual-grass-control-and-native-speciesshy)establishment-following-applications-of-indaziflam-onshy)rangeland/5552D5E60F2AAF931BA353ACF3%20o%20BEF12)If this decision to add Indaziflam to the Forest Plan, it is the hope of Crook County that you will soon consider amending the Forest Plan also to allow the application of this product, and others as appropriate via aerial application. Aerial application allows for the safe placement of product (able to meet all set back requirements for sensitive habitats) while optimizing use because application rates are usually less per acre when done aerially. Also aerial applications can reduce overall treatment costs and allow treatment to occur in geographically challenging landscapes where these annual grasses thrive. With today's technology, aerial application includes the use of airplanes, helicopters and now drones.In closing, again the Crook County Commission is in full support for adding this herbicide, Indaziflam as a Forest Plan Amendment. Increasing the pace and scale of restoration work is essential to meeting many of our shared goals for fish and wildlife habitat, improved water quality, and resilient ecosystems. The success of invasive annual grass treatments means finding new solutions in an ever changing climate to maintain healthy, resilient, and productive forests and grasslands which result in long-term sustainability.Thank you.Sincerely,Seth Crawford, Brian Barney, Susan Hemreck (County Commissioners)