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Comments: Thank you for the opportunity to provide input on the Tie Project within the Willamette National Forest. ODFW appreciates and support the overall goals and direction of the project, including improving forest health, reducing wildfire risk, and enhancing structural diversity through variable density thinning and the "skips and gaps" approach. These objectives align well with long-term ecosystem resilience and wildlife habitat needs.

As part of this effort, ODFW recommends incorporating larger forest gaps within thinning units to better support habitat needs for black-tailed deer (*Odocoileus hemionus columbianus*), Roosevelt elk (*Cervus canadensis roosevelti*), and other species identified in Oregon's State Wildlife Action Plan. These ungulates rely on a mosaic of cover and forage, which is often limited in dense, closed-canopy stands. Larger gaps can provide:

- *Improved Forage Availability: Increased sunlight promotes growth of shrubs, forbs, and grasses critical for deer and elk nutrition.

- *Enhanced Habitat Diversity: Larger openings mimic natural disturbance patterns, benefiting early-seral species and pollinators while maintaining adjacent cover for security.

- *Support for Species of Greatest Conservation Need: Many species of concern-such as western bluebird, olive-sided flycatcher, and certain pollinators-depend on open habitats interspersed with forest cover.

- *Landscape Connectivity: Larger gaps strategically placed can create movement corridors for wide-ranging species while maintaining overall forest resilience.

Current gap sizes often approximate small-scale disturbances: however, research and field observations suggest that expanding gap dimensions beyond the minimum (e.g., >0.5 acre, with some up to 1-2 acres where feasible) can significantly improve forage production and structural heterogeneity without compromising project objectives.

Integrating these larger gaps into the Tie Project design will help achieve multiple goals: sustaining local wildlife populations, meeting State Wildlife Action Plan priorities, and enhancing ecosystem resilience under changing climate and disturbance regimes.

Thank you for considering this recommendation. I would be happy to provide additional information or collaborate on identifying suitable locations for these habitat enhancements.