Data Submitted (UTC 11): 12/27/2025 1:00:48 AM
First name: David
Last name: Wiley
Organization:
Title:
Comments: Subject: Tie GNA Project - Scoping Comments

The purpose of this letter is to submit my scoping comments for the McKenzie District's proposed Tie GNA Project as defined in the USFS's 11/21/2025 letter seeking comment on the project.

I am very familiar with the area of the proposed project. In my judgement the project area needs active forest management as the USFS indicates by this project proposal. I view the project area with the eye of an old dirt forester and lifelong hunter and fisherman. The USFS can and should increase project effectiveness in both forest health and wildfire resiliency by increasing the amount of thinning and adding some regeneration harvest.

The Tie GNA project area has received limited active forest management over the last 30 years or so due to the NW Forest Plan's regulation and agency forest fire management. Therefore, the forest's seral vegetations classes are nowhere near their historical prevalence on the landscape. Of particular concern should be restoring, through the Tie GNA project, the early seral class of vegetation to within its HRV throughout the project area. Early seral vegetation has more wildlife species obligates than any other seral class; it is particularly important to elk and deer and other wildlife for its forage. The quantity and quality of forage present regulate the number of animals the land can support.

The Tie GNA Project lays within the Oregon Department of Fish and Wildlife's McKenzie Wildlife Management Unit, the far NE corner of it. The elk population is shown by ODFW.s annual survey to be more or less 54% of Management Objective population and the blacktail dee population is very low too. A severe shortage of forage and browse, both in quantity and quality, is given as a contributing cause for population decline. The Tie GNA project can significantly increase forage and browse through its selection of silvicultural treatments.

Elk and deer are designated by the Willamette National Forest Land and Resource Management Plan as Management Indicator Species and accorded Standards and guidelines for management of their habitat. The Forest Plan designates an overlay map of Big Game Empasis Areas with attendant Standards and Guides which, I trust, will be addressed in the project's EA

Comments:
1.Determine the Historical Range of Variability for early seral vegetation class for the project area and determine an active forest management prescription which will achieve a prevalence of early seral equal thereto.
2.Where commercial thinning the overstory is prescribed, thin the overstory canopy to approximately 35% crown closure to maximize solar radiation reaching the understory and reduce competition for resources within the residual tree stand.
3.Plan to use large gaps, up to 3 acres in size, to enhance the amount of early seral and provide it for a substantial period.
4.In the road analysis, ensure that any roads administratively closed or ordered decommissioned in any prior project are in in fact closed or decommissioned, and if not then plan their conclusion into the Tie GNA Project.
5.Identity all meadow habitat and plan the removal of encroaching conifers to it increase wildlife forage and pollinator habitat,
6.Prescribe all disturbed soil along roads and skid trails, within landings and including decommissioned roads is reseeded with native seed mix of high forage value for elk and deer.
7.Plan a noxious weed survey and execute an eradication treatment activity within the project.
8.Utilize the Westside Elk Nutrition and Habitat Utilization Model to analyze and compare elk and deer impacts of any alternative actions identified for analysis and documentation within the analysis process.

9.Seek to collaborate and cooperate with the ODFW District Wildlife Biologist in whose district the Tie GNA Project lays. I believe the Wildlife Bio office is in Springfield, Oregon. I believe he could serve on the Interdisciplinary Team.

Thanks for the opportunity to offer comments.

Sincerely,

Dave Wiley