



NATIONAL DEER ASSOCIATION

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Keith Kelly, District Ranger
Cherokee National Forest
Watauga Ranger District
4400 Unicoi Drive
Unicoi, TN 37692

13 February, 2023

RE: Support for the Pond Mountain Project on the Cherokee National Forest, Watauga Ranger District

Dear Mr. Kelly:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Pond Mountain Project on the Cherokee National Forest, Watauga Ranger District. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA is supportive of the project proposals designed to enhance wildlife habitat, improve forest health through vegetation management and other treatments on approximately 8548 acres of National Forest System lands on the Cherokee National Forest in northeastern Carter County, TN. We're particularly supportive of the goals to:

- Provide early successional forest for wildlife species that utilize this successional stage;
- Release mast-producing trees in previously regenerated stands to ensure they continue to be a component of mature and maturing stands in the project area; and
- Improve species sustainability and promote stand vigor, e.g. forest health, within the project area to prevent loss of environmental assets due to insect and/or disease outbreaks; and
- Provide wildlife habitat components to sustain or promote viable populations of wildlife species within the project area, and increase wildlife viewing opportunities.

The NDA's mission – the future of wild deer, wildlife habitat, and hunting – relies on active forest management decisions founded in sound scientific principles. The Pond Mountain Project includes multiple management prescriptions from the Cherokee National Forest's Forest Plan (Plan) within the boundaries of the project area, and we support many of those specific prescriptions. Specifically, we support:

- The creation of 362 acres of proposed early successional habitat (6.25% of acreage), but we do strongly recommend bumping that acreage to the maximum of 8% prescribed in the Plan;
- The use of mechanical treatment methods on approximately 281 acres to select and provide for the release of mast-producing trees non-commercially;
- The reduction of stocking density of the understory and midstory on 1199 acres by about 25% using herbicides to promote the development of mast-producing species through increased sunlight and reduced competition for resources;
- The treatment of overly-competitive sprouts in previously treated stands through herbicide to control competition from red maple, yellow poplar and other species;

- The thinning of 501 acres targeting white pine, poplar and maple with residual basal area (BA) at 0-15 feet²/acre to create heterogenous food and cover for wildlife;
- The conducting of low-intensity prescribed burns on approximately 2558 acres in three burn blocks; and
- The grouping of prescriptive management practices on the same blocks to concentrate wildlife benefits.

The above prescriptions – particularly if implemented at the maximum values outlined in the Plan – will provide incredible benefits to the project area’s flora, fauna and users. Sustainable, active forest management perpetuates diverse, healthy, and climate resilient landscapes. We look forward to continuing to work with the Watauga Ranger District, USFS and conservation partners on issues surrounding forest and habitat management, wildlife and access, and we welcome any questions you may have regarding our position on this or similar projects.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Torin Miller', with a stylized, flowing script.

Torin Miller
Senior Director of Policy