



February 13, 2023

USDA Forest Service
ATTN: Keith Kelley District Ranger
Watauga Ranger District
4400 Unicoi Drive
Unicoi, TN 37692

Re: Pond Mountain Project

Submitted via email: SM.FS.r8cherwatcom@usda.gov

Dear Mr. Kelley:

The Tennessee Wildlife Federation appreciates an opportunity to comment on the Pond Mountain Project (the Project) on the Cherokee National Forest (the Forest).

At the Federation, we're dedicated to conserving Tennessee's wildlife, water, and wild places. We know that long-term, effective wildlife conservation begins with habitat. Our habitat and conservation work has included projects, in partnership with the Ruffed Grouse Society/American Woodcock Society, and others to enhance more than 6,800 acres of wildlife habitat in Tennessee and Kentucky on the Cumberland Plateau, to improve forest structure and health to benefit a suite of wildlife species that require mixed-aged forests.

The Federation supports the critical need to urgently address sustainable forest management at the Cherokee National Forest. The ruffed grouse is a reliable indicator for healthy, diverse forests, and is a declining species at risk of disappearing. A 2020 report from the Association of Fish and Wildlife Agencies highlighted that ruffed grouse declined 71% since 1989 in the Southern Appalachians. The report, and many others, identify loss of forest diversity across large landscapes as the primary culprit. Urgent action, through sustainable forest management, is necessary at the landscape scale and the Forest Plan scale, to halt decline of ruffed grouse and associated wildlife before it is too late.

We believe that more needs to be done to address the forest diversity crisis as identified in the Cherokee National Forest's Biennial Monitoring Evaluation Report (2018-2019). In particular, this includes meeting early successional forest objectives. The report highlighted an 83% reduction in timber harvest over the monitoring period. The lack of sustainable management is perpetuating a homogeneous landscape, and creating shortfalls for diversity, forest health, and climate resilience. The Tennessee State Wildlife Action Plan, details dozens of imperiled species that depend on forest diversity rapidly declining on the Forest. There is a concerning lack of habitat diversity in the Forest and declining trends of forest wildlife, including the bellwether, ruffed grouse.

To address this, there is strong support to create early successional habitat and restore uncharacteristic forest stands among Cherokee National Forest stakeholders. The Cherokee National Forest Landscape Restoration Initiative's (CNFLRI) 2020 order of entry recommendations letter suggested the Forest take a stacked approach to project planning for the North Zone of the Forest and included the following recommendations:

1. Create a programmatic or landscape Environmental Assessment for restoration treatments that address habitat needs for mid- to high-elevation birds associated with early seral habitats.
2. Focus the next watershed Environmental Assessment at higher elevations in more mesic locations. Specifically, the CNFLRI recommended that the Forest focus on the Beaverdam Creek and Pond Mountain and Laurel Rock watersheds. An additional watershed Environmental Assessment was recommended sequentially at the South Indian Creek and Rock Fork watershed. These recommendations have not been fully implemented, with small-scale, lower elevation projects pursued instead.
3. The Project area includes management prescriptions 4.A, 4.F, and 8.C within its boundaries. Prescription 8.C has an objective to achieve 4% to 8% early successional forest conditions. This Project proposes the creation of 6.2% early successional forest. Due to the lack of habitat diversity on the Forest, especially on the North Zone and at mid-to to high-elevations, the Federation strongly supports the maximization of early successional forest within the Pond Mountain Project's project area.

To improve the projects outputs and outcomes to forest health and wildlife populations, the Federation strongly support the project's intent, and offers the following recommendations:

- Due to the deficit of early successional forest across the North Zone, we strongly recommend maximizing the amount of early successional forest created within the project area. There is strong support among stakeholders to create early successional habitat in the right places. If the Forest is going to realize the early successional habitat objectives from its Forest Plan, it is imperative that treatments that restore early successional forests are prioritized.
- We recommend that active forest management (i.e., regeneration treatments through commercial timber harvesting) are implemented in this project to create

8% early successional forest in management prescription 8.C and that the maximum amount of early successional habitat allowed in management prescription 4.A and 4.F as outlined as objectives in the Forest Plan.

- The evidence suggests that small young forest patches (1-2 acres) for ruffed grouse and other forest wildlife is highly beneficial, and the arrangement, interspersion, and juxtaposition of young forest habitat in term of its utility to wildlife is important. For example, a 1-acre patch that is isolated among a closed-canopy forest will not provide the same quality habitat as a clustering of patches across a significant portion of a forest stand.
- The Project's proposed actions include 100 acres of early successional forest created through a group selection timber harvest, with groups up to two-acres in size, and with no specifications on the quantity and interspersion of group cuts. For the treatment to create functional young forest habitat for wildlife, the group openings must be at least 1-2 acres in size, at a significant quantity, and well-interspersed across the stand.
- The Project should commit to creating group or patch openings that are 2-5-acres in size across 20-25% of each stand's area. In doing so, "patch selection" might be a more appropriate silvicultural term than "group selection".

The Federation thanks you for an opportunity to comment. We support what we hope will be the USDA Forest Service's decision to best support healthy forests and abundant wildlife at the Cherokee National Forest, an ecological gem and Tennessee's largest tract of public land.

Sincerely,



Mike Butler
CEO