

Nick Biemiller Ruffed Grouse Society & American Woodcock Society Southern Appalachian Forest Conservation Director Asheville, NC 28806 **XX, 2023**

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

Re: Pond Mountain Project On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS & AWS) and our members, I thank you for the opportunity to comment on the *Pond Mountain Project* (the Project) on the Cherokee National Forest (the Forest). At RGS & AWS, we envision landscapes of diverse, functioning ecosystems that provide homes for wildlife and opportunities for people to experience them. These same forests clean the air, filter water, and support local communities. Nowhere are these tenets truer, and the need greater, than the Cherokee National Forest. Our namesake, the ruffed grouse is a reliable indicator for healthy, diverse forests. A 2020 report from the Association of Fish and Wildlife Agencies highlighted that ruffed grouse declined 71% since 1989 in the Southern Appalachians.

This is near disappearance of a bellwether species within our lifetimes. The report, and many others, identify loss of forest diversity across large landscapes as the primary culprit. Urgent action is necessary at the landscape scale, the Forest Plan scale, to halt decline of ruffed grouse and associated wildlife before it is too late. This “urgent action” is not a mysterious enterprise. Rather, it is something we know well as forestry professionals and a guiding principle in Forest Plans – sustainable forest management.

Yet we are falling short. The Cherokee National Forest’s Biennial Monitoring Evaluation Report (2018-2019) reveals a forest diversity crisis. Unnaturally single-aged forests are persisting as the Forest meets objectives for mid to late successional conditions but fails to meet early successional forest objectives. The report highlighted an 83% reduction in timber harvest over the monitoring period.

Simply put, the lack of sustainable management is perpetuating a homogeneous landscape, one that falls short in diversity, forest health, and climate resilience.

Management Prescription | Forest Plan Objective: Early Successional | Current Conditions: Early Successional | Forest Plan Objective: Mid to Late Successional, and Old Forests | Current Conditions: Mid to Late Successional, and Old Forests

9.H | 4% to 10% | 2% | 70% | 83%

8.C | 4% to 8% | 8% | 85% | 80%

8.B | 10% to 17% | 0.5% | 30% | 82%

8.A | 4% to 10% | 0.3% | 70% | 87%

7.E.2 | 4% to 10% | 3.7% | 70% | 88%

7.C | 4% to 10% | 0.2% | 70% | 92%

Wildlife are telling the same story with dozens of imperiled species that depend on forest diversity rapidly declining on the Forest (Tennessee's State Wildlife Action Plan). We are deeply concerned by the lack of habitat diversity in the Forest and the declining trends of forest wildlife, including the bellwether, ruffed grouse. With the right sideboards, there is strong support to create early successional habitat and restore uncharacteristic forest stands among Cherokee National Forest stakeholders.

This is evident in the Cherokee National Forest Landscape Restoration Initiative's (CNFLRI) 2020 order of entry recommendations letter that suggested the Forest take a stacked approach to project planning for the North Zone of the Forest and included the following recommendations: 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. 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, despite broad support from stakeholders. Instead, we continue to see projects that are small-scale and at lower elevations. 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 high-elevations, RGS & AWS feel strongly that early successional forest needs to be maximized within the Pond Mountain Project's project area. (continued next page) We strongly support the project's intent and offer the following recommendations to improve the projects outputs and outcomes to forest health and wildlife populations: 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) do not provide the same habitat quality as large young forest patches (>1-2 acres) for ruffed grouse and other forest wildlife. Also, 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 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".

We thank you for the opportunity to comment and look forward to a decision that will more adequately support healthy forests and abundant wildlife on our public lands. Sincerely, Nick Biemiller, Forest Conservation Director, Southern Appalachian Region, Ruffed Grouse Society

For more information visit the RGS & AWS website at RuffedGrouseSociety.org. Follow us on Facebook and Instagram @RuffedGrouseSociety.

- Please read Nick Biemiller Forest Conservation Director, comments on the Pond Mountain Project on the Cherokee National Forest.