

Inland Empire Task Force



March 2, 2024



To: Kevin Knauth, District Ranger, Bonners Ferry Ranger District

Re: Katkee Fuels Scoping Notice Comments.

Introduction

These Scoping Notice Comments are for the Katkee Fuels EA on the Bonners Ferry Ranger District, IPNF from the Inland Empire Task Force and the Alliance for the Wild Rockies. We incorporate already submitted comments authored by the Alliance for the Wild Rockies and Native Ecosystems Council. These comments cover both US Forest Service and Bureau of Land Management property of the citizens of the United States.

The Scoping Notice and associated documents do not provide sufficient information to develop substantive site specific comments.

NEPA does not require maintaining the order and directing comments to specific units or areas in comments for a Scoping Notice as suggested by the District.

""
habitat etc. Please use the maps and tables on the website to identify and comment on specific proposed units, roads, or activities. Your comments should be specific to the proposed activities and potential environmental impacts. Comments that we receive, (Katkee Fuels Scoping Letter).""

There are several reasons why the information presented is incomplete and handicapping the ability to provide substantive comments including:

- Stream surveys and watershed assessments from IDEQ are missing.
- The status of core, OMRD and TMRD for the Boulder Grizzly Bear Unit is missing. The commentors have requested this GIS data through a FOIA and the Idaho Panhandle has not been forthcoming with the information in a timely manner.
- Site specific wildlife and sensitive plant data is not presented, including the status of

TE&S species and any habitat analysis to enable comparison with the proposed action.
E. effects to winter range, elk habitat security, openings, devastating effects to the mustelids, pine marten and fisher.

- Potential new old growth recruitment stand locations are missing.
- Information on the results of raptor and sensitive plant surveys is missing from the SN.

We have consistently asked for a detailed analysis of the existing condition of all issues in Scoping Notices so that the commentors can make substantive evaluations of the proposed project.

GIS data not readily available

Commentors had to request gis data for the project through a FOIA, the IPNF responded by posting an ArcMap package of the proposed action but no additional information such as the cumulative effects model for grizzly bears. We have not received the FOIA data as of the end of the Scoping period. This was purposefully done to handicap the involvement of the commentors and thwart substantive comments that may be counter to the aggressive logging proposed in this project.

Long Time to Completion is Contradictory to Emergency Designation

Considering the project is an "emergency", the 10 to 15 year time frame for project completion is based on producing logs for timber industry and is not responsive to the unnecessary need to reduce "fuels".

"Due to the size of the project, phased activities such as storing some roads to construct other temporary ones, and the need for the right environmental conditions to be met for prescribed burning, we anticipate it could take 10-15 years to complete all of the work." SN p 16.

The SN links to a crude map showing that the relative risk to homes is "moderate" without defining what moderate means. This map also points to an area with low home densities. The money for this project would be better spent making homes and surroundings fire safe then destroying carbon fixing landscapes.

<https://wildfirerisk.org/explore/overview/16/16021/1600009370/>

Significant impacts to the Katka IRA

The proposed action purposely obfuscates the extensive logging and burning proposed in the

IRA by not mentioning the logging and burning in the Katka Roadless Area. There are over 1228 acres to be impacted by logging in the IRA. Some of the helicopter units extend 0.8 miles into the IRA. The incursion into the IRA was not mentioned in the Scoping Notice. Furthermore a portion of the Katka IRA has been opened up for logging by the Idaho Roadless Rule and or the IPNF Forest Plan. There are 747 acres proposed to be logged in this area and an additional 481 acres in the rest of the IRA. These unmentioned incursions are quantified in the following table and shown in Map1 in the appendix.

ROADLESSAREANAME	MGMTCLASSIFICATION	RX	FREQUENCY	SUM_AcresInRdls
Katka Peak	Backcountry Restoration	Fuels	3	22.604752
Katka Peak	Backcountry Restoration	Regeneration	13	458.26241
Katka Peak	General Forest, Rangeland, and Grassland	Fuels	8	286.939916
Katka Peak	General Forest, Rangeland, and Grassland	Intermediate	2	59.765702
Katka Peak	General Forest, Rangeland, and Grassland	PCT	1	0.428922
Katka Peak	General Forest, Rangeland, and Grassland	Regeneration	10	399.598165

GOAL-IRA-01. Inventoried roadless areas will be managed to protect values and benefits of roadless areas.

The project will negatively affect the Katka IRA which is unacceptable and against the goals for IRA's in the IPNF Forest Plan.

- Discuss in detail the effects of logging and burning to this IRA.

We request that the this project stay out of both designations of the Katka IRA.

IRA's and the Roadless Expanse

Please identify the roadless expanses adjacent to existing IRA's. These areas should be appended to the inaccurately mapped IRA boundaries. Existing mapping is historic and needs to be updated. The carelessly drawn IRA boundaries illustrates the dated mapping. and arbitrary and capricious IRA boundaries are sloppily done (see Map 1 in the appendix) . The value of IRA's to wildlife and humans is unquestioned by most. The revulsion that the IPNF has with marinating wilderness character and the roadless expanse is characterized by Bilodeau and McFarlane (2020),

"In conclusion, both RACR and the Idaho Roadless Rule have facilitated a gradual erosion of the roadless system. Neither rule effectively protects roadless areas from logging, but rather provides exceptions for logging and roadbuilding

to various degrees, which the Forest Service is exploiting. The Forest Service's environmental analyses have shifted to justify utilizing the exceptions in an unchecked manner, and because the Forest Service does not update roadless boundaries, wildlands overlooked from the initial inventories remain unprotected while there is a growing number of "inventoried roadless areas" that no longer have roadless and wilderness characteristics. Given these rules are not as protective as assumed, we need a substantive review of both rules and an accounting of the remaining roadless areas in the United States." Bilodeau and McFarlane (2020).

Please follow the guidelines in the document titled "Idaho Roadless Rule and 2001 Roadless Rule. Northern and Intermountain Region Guidance," March 2019. Brian Riggers, Roadless Coordinator. Although the guidelines for roadless expanse delineation are arbitrary, at least they are at start.

"Based on court projects on unroaded lands contiguous to Inventoried Roadless Areas (IRAs) it is recommended units analyze the environmental consequences, including irreversible and irretrievable commitment of resources on Roadless Area Characteristics, and the effects for potential designation as wilderness under the Wilderness Act of 1964. This analysis considers the effects to the entire roadless expanse IRAs should not be considered in isolation from contiguous unroaded lands. Actions occurring in one or the other (unroaded or inventoried roadless lands) may affect the surrounding areas ability to support roadless area characteristics." Riggers, 2019.

We request that the IPNF:

- Map the roadless expanses adjacent to existing IRA's
- Adjust the boundaries of the IRA's to include the roadless expanse.
- Initiate Idaho State roadless committee action to designate the expanses as roadless.
- Do no logging in the roadless expanse and IRA's.
- Disclose detailed analysis of areas that should be included in the roadless expanse and IRA's following Riggers guidelines.
 - "5. For each unroaded area adjacent to an IRA, document why the area will either be considered as part of the roadless expanse or not based on the above factors."*
- Complete an IPNF Forest Plan Amendment to incorporate areas in the roadless expanse to adjacent IRA's.
- Unlogged areas of intact forest are not displayed. The commentor requests that areas

not contiguous with the roadless areas that have not been logged or roaded be mapped and not entered. Unlogged and unroaded areas of any size serve as important biological reserves.

Wildland Urban Interface (WUI)

The Scoping Notice only indirectly references that some of the logging units are in the WUI by citing the following Desired Condition.

FW-DC-FIRE-02 Hazardous fuels are reduced within the WUI and other areas where values are at risk. Fire behavior characteristics and fuel conditions exist in these areas that allow for safe and effective fire management.

In fact, the Wildland Urban Interface mapping for Boundary County and the IPNF violates the HFRA and NEPA and the delineation is arbitrary or capricious. Federal courts have enumerated that, under the APA.

[a] decision is arbitrary and capricious if the agency [1] has relied on factors which Congress has not intended it to consider, [2] entirely failed to consider an important aspect of the problem, [3] offered an explanation for its decision that runs counter to the evidence before the agency, or [4] [has offered an explanation] so implausible that it could not be ascribed to a difference in view or product of agency expertise.

George v. Bay Area Rapid Transit, 577 F.3d 1005, 1010 (9th Cir. 2009) (internal quotation and citations omitted).

In addition, the IPNF ignores HFRA guidelines for WUI delineation forest wide and erroneously attempts to recognize illegally drawn community forest protection plans.

Wildland Urban Interface (WUI): Approximately a third of the IPNF is within the WUI. This provides the Forest significant opportunities to partner with landowners and other jurisdictions to improve forest health conditions and reduce the risk of wildfire. Recognizing community wildfire protection plans and working in cooperation with counties is an important part of public safety and the Forest's fuels reduction program. (IPNF Forest Plan p 9).

In Hanna Flats, the court

"Though the Forest Service determined that the Project fell within the wildland-urban

interfaces as identified in the Bonner County community plan, that plan defines wildland-urban interface differently than does the HFRA. Id. @979.” in Alliance for the Wild Rockies vs Carl Petrick. No. 21-35504.

Although this is in reference to a categorical exclusion, an analogy can be made using the Boundary County community fire protection plan, which also did not use the criteria in the HFRA, and because of the faulty delineation, we cannot determine what parts of the project area are under the HFRA or be able to accurately comment on the project.

Further evidence that the Bonner County WUI is incorrectly delineated

In Alliance and Native Ecosystems Council vs USFS Randy Moore & others (Case No. 2.23-cv-00290-DCN, they state:

The first asserts that “[t]he forest plan definition of WUI has allowed entities other than the general public to set WUI boundaries outside of NEPA and NFMA processes, and defines it so vaguely as to expand the delineation of the WUI greatly—again outside NFMA and NEPA processes.” Dkt. 13-13, at 171; *see also* Dkt. 13-9, at 51 (making the same argument in nearly identical terms). The second asks Defendants to “remap the WUI according to ecological features based on fire ecology and not false arbitrary boundaries parroting that [sic] of Bonner County.” Dkt. 13-10, at 15; *see also* Dkt. 13-12, at 19 (making the same request with identical terms).

The issue with that portion of the litigation was that there was insufficient notice to the USFS of violations of the HFRA.

These Katkee Fuels SN comments put the Idaho Panhandle National Forests and Boundary County on notice of violating the HFRA by not following HFRA guidelines for WUI delineations and NEPA by not disclosing which parts of the proposed logging project are in the WUI and not using the NEPA process for revisiting and correctly designating a WUI.

Since the objection process is eliminated, the commentors can only input information

on the dEA and there is no recourse but litigation for the final decision.

Map 2 in the appendix shows areas far removed and on the far side of mountain ridges included in the Boundary County WUI delineation (eg, south of the project area over a major ridgeline to Boulder Creek}. This does not follow the guidelines for delineation in the HFRA and was done to make timber extraction easier. The BLM designation in Map 2 follows the HFRA more closely but is over 15 years old so it is not current. Note that there are a significant number of units outside the WUI.

Requested Actions.

- Delineate the WUI based on HFRA legal guidelines, not Boundary County's "lust for timber dollars" delineations.
- Follow the guidelines for fire safe homes and home protection zones inside the newly formulated WUI boundary. These should help ensure safety from any fire brands coming from the IRA, roadless expanse and other areas in the project.
- Remap the WUI according to the Federal Standards in the HFRA as the County based mapping is of questionable legality.
- Designation of a WUI requires NEPA and public comment.

Old Growth

The commentators disagree that management of old growth stands should be allowed at all. The definition of old growth in Green et al is inadequate and uses old stems per acre and basal area to determining if a stand is old growth. Even worse, the IPNF is abusing the old stem density numbers, changing the meaning from determining the minimum number of stems for consideration as old growth to allowing logging of existing old trees down to the minimum number. Doing so highly compromises stand integrity.

The IPNF Desired condition is to increase the size of old growth stands and ensure that they are well distributed but they do not show any new RPOG stands.

- Disclose where additional recruitment stands will be designated adjacent to existing old growth to increase the size of the old growth stands with time.
- Disclose a spatially quantitative definition of "well distributed old growth" throughout the forest.
- Disclose if old growth is really increasing or decreasing with a current stand exam based inventory of old growth.

The District claims that additional stands of recruitment potential old growth *may* be set

aside. Please quantify the number of RPOGs needed to enable some of these stands to persist into an old growth condition, taking logging and natural disturbances into account. Clearly many more recruitment old growth stands need to be designated to compensate for loss due to disturbances.

Figure 6 in the Scoping Notice (below) shows the process of natural forest succession and the eventual development of old growth, and it illustrates structural complexity of a multi-layered stand, sites for ground and low level nesting birds, horizontal hiding cover for big game and the presence of a low tree layer that provides snowshoe hare habitat, prey for many carnivore species. The IPNF conflates logging for timber production with natural forest processes.

We recommend at least 25-30% of an area be designated for old growth management.

The District is again confused on the function of old growth. They propose to impact 2 stands of old growth near private property borders because of "fuel" loads. They claim that these stands are hazardous to adjacent property! More likely, activities on the adjacent private property are hazardous to the old growth stands from ignitions and disturbances like firewood cutting. The old growth report contradicts itself by stating earlier in FW-DC-VEG-03 that "Old growth stands are more resistant and resilient to disturbances and stressors such as wildfires, droughts, insects and diseases and potential climate changing effects" and yet claiming these two stands are hazards, and that logging which will exacerbate the fire potential, not old growth is needed to fight potential fires that may or may not happen.

- Disclose a quantification of "hazardous" for those stands.
- Disclose where there is legal direction stating that it is not appropriate leave hazardous vegetation conditions untreated adjacent to private lands.
- Disclose why "treatment" in the two old growth stands is proposed to extend 200 feet into them and not some other distance. Use ecology based science not arbitrary speculation on appropriate distances.



Figure 6 from the Scoping Notice showing natural tree succession.

We request a field trip to visit these old growth stands and discuss the dampening effect of old growth on the hazard potential and the risks to old growth from adjacent private lands.

Wildlife - General

Failure to address issues in regards to trapping.

Requested Actions.

- Initiate an area closure on trapping activities based on natural resource damage with emphasis on snaring grizzly bear feet, grey wolf, beavers, if not applicable, change USFS law on allowing harm by trapping to wildlife on Federal Lands.

Failure to address poisoning of carnivores and scavengers by allowing lead ammunition.

Requested Actions:

- Initiate an area closure on the use of lead or other toxic metal ammunition. This is not only a hunting issue, it is a widespread contamination with a toxic substance issue that impacts TES species, especially carrion eaters.

Lack of wildlife surveys of TES species purposefully hampers substantive comments.

All TES species with potential to be present in the area need surveys to document presence. The need for biologists to complete surveys applies to all TES species.

For example, no information was given as to the surveyed distribution of the Pygmy Nuthatch in the project area. This is important because the District plans to modify somewhat dry site douglas-fir old growth stands and possibly ponderosa pine stands on the north side of the Kootenai River canyon. Please disclose if a survey was completed, where, when and numbers found and their locations if any.

- Unlike past claims by the IPNF wildlife biologists, the pygmy nuthatch does not follow the distribution of ponderosa pines in this area. This is not accurate and is dated information. They (the nuthatch) are primarily found in low elevation habitats and not at higher elevation dry site habitats. Why has a pygmy nuthatch survey not been completed?

Requested Actions

- Conduct detailed, professionally designed surveys for all sensitive species and raptors in the project area.
- Disclose a complete list of all species that occur in the project area.
- Sponsor a bioblitz using iNaturalist for the app and data storage source.

Grizzly Bear

The IPNF was not forthcoming with a FOIA request for GIS data of the Boulder GBMU, including Core, OMRD and TMRD in time to develop substantive comments on the project. This is especially concerning since the Scoping letter specifically wants comments organized by roads among other issues and the project area has high road densities, an unknown amount of core habitat, TMRD and OMRD. The commentors will not be able to address the final Decision because the emergency declaration eliminates the objection process, leaving litigation as the only relief for a bad decision.

Denning Habitat will be eliminated by logging units, controlled burns and roads. These areas will also be opened up to OSV use and will further disturb denning grizzlies. Please discuss

effects to denning habitat in the project area. See Map 3 showing impacts to denning habitat.

Ignoring disturbance to grizzlies is in violation of the following IPNF Forest Plan Guideline.

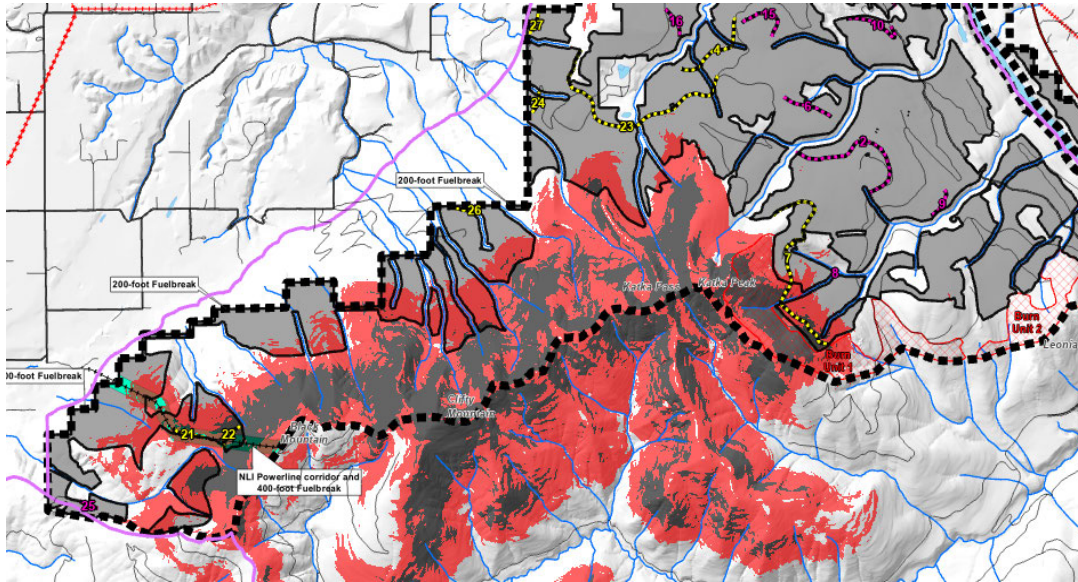
FW-GDL-WL-25. Management activities on NFS lands should avoid/minimize disturbance at known active nesting or denning sites for other sensitive, threatened, or endangered species not covered under other forestwide guidelines. Use the best available information to set a timeframe and a distance buffer around active nests or dens. Individual animals that establish nests and den sites near areas of pre-existing human use, inconsistent with the timeframes and distances in the other forestwide wildlife guidelines or in the best available information, are assumed to be accepting of that existing higher level of human use at the time the animals established occupancy. In those instances, as long as the individual animals continue to use the site, the higher intensity, duration, and extent of disturbance could continue but would not be increased beyond the level existing at the time the animals established occupancy.

Winter OSV use affects denning habitat, which is ignored in the recent Kaniksu Winter Rec EA, please assess the effects of winter recreation on grizzly denning habitat in the project area. Also follow the following guideline.

FW-GDL-WL-01. Grizzly Bear. Management activities should avoid or minimize disturbance in areas of predicted denning habitat during spring emergence (April 1 through May 1).

The SN states that the thinning activities will allow huckleberries to thrive, providing food for wildlife and humans.

- Disclose a map of huckleberry presence and density.
- Disclose what units will be managed to increase huckleberry productivity.
- Disclose areas that will be post logging burned and the impacts to huckleberries from regeneration logging (clearcuts and delayed clearcuts), road construction and skid trails.
- The SN touts that they are improving forage for grizzly bears by logging (SN p12). Unfortunately this statement is meaningless. Please keep in mind that food is not limiting to the local grizzly population and that grizzlies will be attracted to large huckleberry patches greater than 500 meters from an open road. (Proctor et al)
- Disclose the locations of large patches of huckleberries in core habitat.
- How will this project affect the risk of mortality to bears from the railroad on the south side of the Kootenai River?



Map 3. Units and roads impacting medium and high RSF value denning habitats. (Bader and Sieracki, 2022)

The cumulative disturbances to grizzly bear habitat in the Boulder Bear Unit are a violation of the ESA.

Canada Lynx

- Disclose the effects of roadbuilding, logging and burning to Canada Lynx, a threatened species.

FW-STD-WL-01. The Northern Rockies Lynx Management Direction (2007) and ROD is included in appendix B, and shall be applied.

Mustelids

Concentrated logging activities will severely impact or eliminate the fisher from the area well past the end of the 10-15 estimation to sale completion. The fisher is a sensitive species on the IPNF (from habitat elimination and fragmentation) and effects are similar for the pine marten (general loss of habitat, no designation of additional old growth recruitment stands, more access for trapping).

- Conduct surveys for these species and all sensitive species likely to be present.
- Disclose the effects to these species.
- Locate and protect denning sites for fisher, required by *FW-GDL-WL-25 (see above)*.
- Leave large areas of unthinned stands to provide snowshoe hare habitat for fisher prey

along with providing prey for other carnivores. Parking out stands by thinning destroys snowshoe hare habitat.

Wolverine (threatened)

- Disclose effects of high elevation logging and OSV use to wolverine natal and primary habitats.
- Disclose effects to big game winter range as carcasses provide food for this species and many other carrion eaters.

Big game, wolves and carrion

- Conduct surveys for wolves and their rendezvous and denning sites.
- Disclose how the District is going to avoid management activities during critical periods for wolf denning and whelping.
- Disclose the effects of the project from increasing access to wolf trappers.
- Implement an area closure against wolf trapping and hunting.
- Disclose the effects of this project on big game abundance in relation to providing for wolf prey.
- Quantitative and spatial analysis is the mark of a professional biologist.

FW-GDL-WL-22. Wolf. Management activities should avoid or minimize disturbance to wolves near den and rendezvous sites during the times those sites are in use based on the best available information.

FW-DC-WL-19. Secure denning and rendezvous sites are available for wolf packs and avoided by management activities during critical biological periods (e.g., whelping,

Winter range, transitional and summer big game range

- Disclose the effects to big game winter range by species, moose, elk, mule deer, white-tailed deer.
- Include seasonal use maps by species.
- Locate and protect elk and other big game calving grounds, winter ranges, OSV prohibitions, and elk security habitat (actually do field work!). This is required by:

FW-GDL-WL-14. Big Game. Management activities should avoid or minimize disturbance to native ungulates during the birthing/parturition period.

FW-GDL-WL-11. Big Game. Management activities should avoid or minimize disturbance to native ungulates on winter range between December 1 and April 30, with the exception of routes identified on MVUM as open to motor vehicle use. Management activities that occur on winter range during the winter period should concentrate activities to reduce impacts to native ungulates.

FW-GDL-WL-12. Big Game. Management activities should be avoided on native ungulate winter range areas during the critical mid-winter period (January and February) when snow depths most likely influence movement and availability of forage.

FW-GDL-WL-13. Elk. Management activities in elk management units should maintain existing levels of elk security (see glossary). Where possible, management activities in high and medium priority elk management units (determined in cooperation with Idaho Department of Fish and Game; see FW-DC-WL-17) should improve elk security.

FW-GDL-WL-14. Big Game. Management activities should avoid or minimize disturbance to native ungulates during the birthing/parturition period.

- Disclose the effects to hiding cover for elk.

Monarch Butterflies (candidate)

- Disclose effects to monarch butterflies.

Goshawk Surveys, Raptor Surveys

Conduct raptor surveys for all species including owls and protect nesting locations. With the exception of flammulated owls, owl singing peaks in March so there is ample time to get into the field and complete detailed surveys.

A FOIA requesting goshawk surveys for the area has not been received as of the comment filing date. The commentors do not have the information to substantively suggest remedies to issues related to the goshawk and other raptors. The commentors cannot point out deficiencies in the Decision EA because of the elimination of the objection period due to the emergency designation.

FW-GDL-WL-20. Raptors. Management activities on NFS lands should avoid/minimize disturbance at known active raptor nests, including owls. Timing restrictions and distance buffers should be based on the best available information, as well as site-specific factors (e.g., topography, available habitat,

etc.). Birds that establish nests near pre-existing human activities are assumed to be tolerant of that level of activity.

Neotropical Songbirds

Avoid logging, roadbuilding, TSI work and burning during as much of the local nesting season as possible for priority species in the project area. For example, avoiding treatment during the core of the nesting season (see Appendix A) should reduce risk for the majority of nesting attempts. Many species, including eagles and other birds of prey, may be especially sensitive to disturbance during pair bonding and incubation so, in general, avoiding treatments during this earlier phase is more important than later phases. If eagles are potentially affected, work closely with the IFWO or Migratory Bird Permit Office to determine if a permit may be necessary Blm guidance

- Assess the effect of this project site specifically on the neotropical migrants and year round resident birds.
- How will these species respond to clearcutting and delayed clearcutting (regeneration logging) compared to a natural burn.

Impacts of burning to landbird assemblages.

Please quantitatively analyze the effects of burning to landbird assemblages. Focus on maintaining less common species in the area, claiming to manage for or monitor abundant birds like chipping sparrows, is ludicrous.

FW-OBJ-WL-03. Landbird assemblage (insectivores). The outcome is the management of planned ignitions on 1,000 to 5,000 acres annually to provide habitat for olive-sided flycatchers, hairy woodpeckers, chipping sparrows, and Hammond's and dusky flycatchers. (Also see FW-OBJ-FIRE- 02, which provides additional habitat for these species).

- Include a list of species present in the area before the burn based on survey results (actually do field work!)
- Include a projection of the species and numbers that will be present after the burn.

Habitat fragmentation and altitudinal migrations

- Use fragmentation statistics to determine effects to all wildlife in a species – specific and quantitative manner.
- Will this project create sources or sink habitat for wildlife populations of concern and

for what species?

The movements of non migratory birds are much more complex than previously thought

Cambell et al. (1997 in Boyle and Martin, 2015) found that chestnut-backed chickadees, which occur in the project area, exhibit altitudinal migration, breeding at low elevations, moving up slope in late summer, then winter at lower elevations. These complex patterns of elevational and distance migratory behaviors that many bird species have need to be addressed to maintain these species over the long-term especially with increasing climate change stressors. Chestnut-backed Chickadees should be present in the project area. Have they been documented from field work?

Subalpine habitats

Local climate changes and logging (as projected) will negatively affect migratory songbird species.

Boyle and Martin (2015) found that high elevation habitats are very important for migratory birds in British Columbia. Logging must be eliminated in high elevation habitats (subalpine) to provide natural habitats for songbirds and to reduce increased stress from un-natural design-a-stand approaches.

"Most species exhibited strong temporal variation in patterns of abundance that were related to migratory behavior. From an extensive literature-based survey, we found that ~35% of North America's breeding bird species use high elevations, and that all primary high elevation habitats are important for full life-cycle conservation of this avifauna. Our findings highlight the importance of high elevation habitats to migrating birds from wide-ranging breeding distributions for at least three months of the year, a period equivalent to the length of the breeding season for most species. These results emphasize the need for effective conservation of fragile alpine and other high elevation habitats that are increasingly threatened by local, regional, and global anthropogenic disturbance." (Boyle, W. A. and Martin, K., 2015. The conservation value of high elevation habitats to North American migrant birds. Biological Conservation 192 (2015) 461–476. <http://dx.doi.org/10.1016/j.biocon.2015.10.008>)

They found that 25 species using high elevation habitats were of concern:

"Over 26% of the species (n = 25) detected on our surveys were birds listed by

North American and local conservation planning and management agencies including five Red-listed and eight Blue-listed species or subspecies"

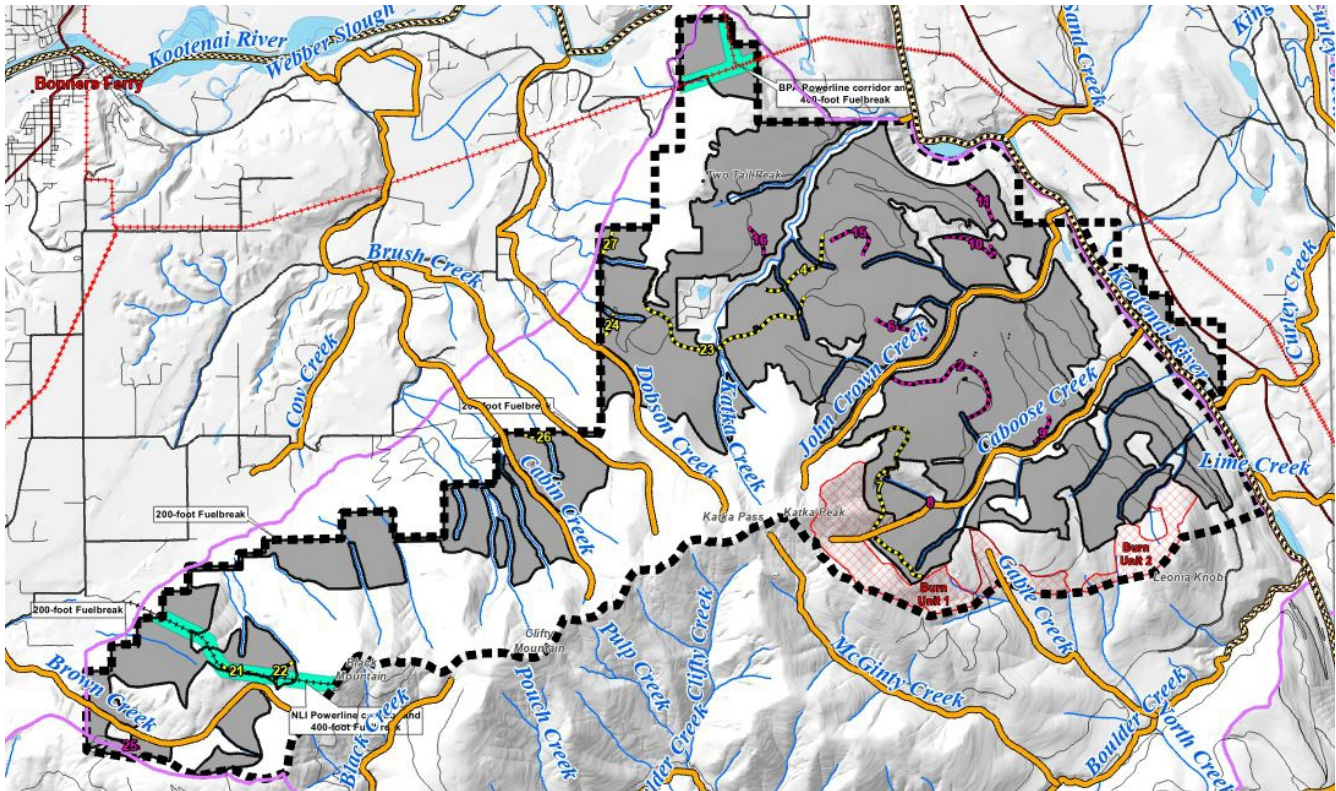
Both above examples show the dangers of assigning logging units in random locations instead of completing a credible analysis using credible science and credible data.

Whitebark Pine (threatened) Survey

- Please map whitebark pine distribution in the project area.
- Disclose effects of high elevation burning to this species.
- Disclose areas where whitebark pines will be restored.

Cutthroat Trout (R1 Sensitive species)

Streams below that are yellow indicate the presence of cutthroat trout.



- Please complete and disclose a fish inventory for all streams in the project area.
- What species are above an apparent fish barrier at Katka Creek?
- These streams do not have a 100 meter INFISH buffers and yet IDFG shows them to be fish bearing. Disclose the fish survey data that the IPNF's smaller buffer is derived from.

- How are stream passages being affected by the railroad?
- The effects of large clearcuts and adjacent logging and roadbuilding to the Katka, John Crown, and Caboose Creek watersheds must be devastating to cutthroat trout. Please discuss effects in detail.

Bull Trout (threatened)

- What streams have the potential to support spawning bull trout since the Kootenai River and lower Boulder Creek are critical habitat and additional spawning areas would help the population?
- Consider introducing bull trout into suitable streams.

Redband Trout

Disclose if there are redband trout in any of the streams in the project area. They are present in the Kootenai River drainage.

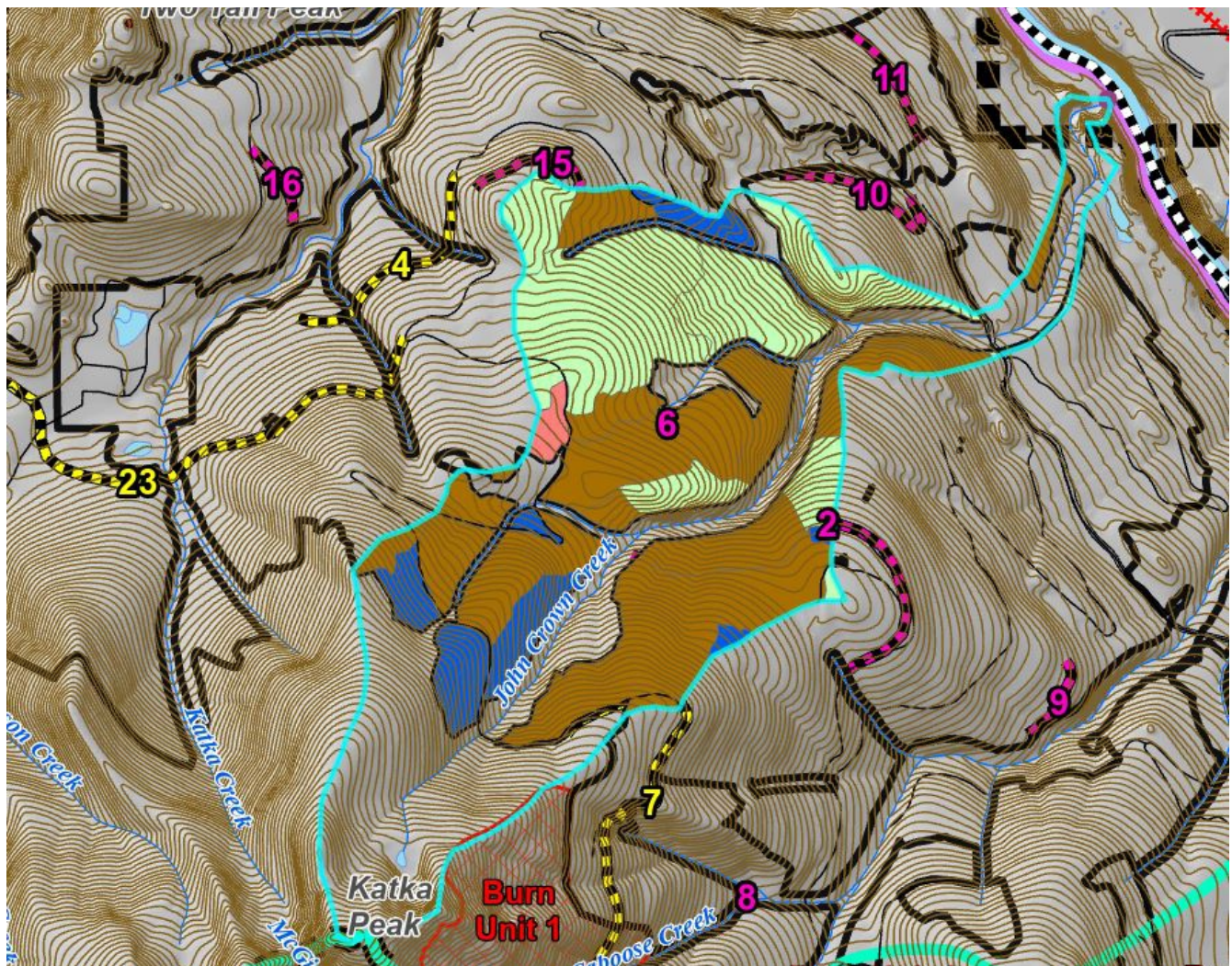
Water

The desired conditions of the Katka Project Vegetation Treatment document show unnatural conditions of forest habitat. Only very few of these areas were open parklike stands. Trees in North Idaho grow in thickly and the multi layered and dense foliage provides cover and insect food for songbirds and other insectivores. Low understory trees and shrubs provide nesting areas for songbirds that utilize the lower layers of a forest. What the District is doing is creating an extremely artificial habitat and misinforming the public due to ecological ignorance or purposeful deception to "get the cut out".

Desired Future Conditions cause watershed damage.

A rough calculation of the logging units proposed in the John Crown drainage (roughly 1996 acres) shows 625 acres of regeneration clearcuts and 442 acres of other intermediate type cuts of an undisclosed method amounting to 53% of the watershed being impacted not counting the additional impacts from 131 acres of precommercial thins. This seems to be an excessive amount of logging, precluding the designation of recruitment potential old growth in the area by impacting natural succession processes with logging and severely impacting a watershed supporting cutthroat trout and destroying the ability for fisher to inhabit that drainage.

RX	FREQUENCY	SUM_WshdAcres	PCT
Fuels	1	15.673138	0.785227
Intermediate	10	442.193165	22.153966
PCT	10	131.981369	6.612293
Regeneration	18	624.770871	31.301146



Rough estimation of areas proposed for logging in the John Crown watershed (1996 acres estimated). Brown areas are clearcut or delayed clearcut regeneration logging (seed trees or shelterwoods), green areas are intermediate cuts of some type, blue areas are precommercial thinnings and the red areas are burns. Black outlines are logging units outside the watershed.

IDEQ TMDL limited streams

Caboose, John Crown, Katka, Dobson and Cabin Creeks and unnamed streams between Cabin and Brown Creeks have not been surveyed by IDEQ, this makes it impossible to assess the existing conditions and comment on the effects of logging and roadbuilding to these streams.

For example, there is a delta at the confluence of Caboose Creek and the Kootenai River. Is this natural or exacerbated from past logging activities?



A similar situation exists at John Crown and Katka Creeks.

Kootenai River

We are concerned that increased water runoff from tree removal will deposit sediments at the confluence with the Kootenai River like at Boulder Creek although on a smaller scale or even worse, would a rain on snow event blow out the railroad stream crossings? These will become

more severe as abrupt climate change progresses.

Forest related comments

The SN, page 8 makes statements about “resiliency” and forest “health”. Please define and quantify resiliency and health for the project area discussing what metrics are used. Please discuss how the patchwork of logging units, called fragmentation is resilient. The SN describes resiliency as well spaced early seral trees. This is a clever attempt and calling plantations forests. They are not ecological equivalents. Discuss the difference between plantations and intact native forests. The SN starts out with a fire scare to try to influence the readers to support a project designed to provide volume to timber industry. Additionally, discuss in detail the process used to place units so that they strategically reduce the risk of fire spread as claimed. What models were used? what is the probability of large fires before and after the logging project? What is the probability of a large fire during the 10-15 year time to completion of the project.

BLM and USFS guidelines on forest management differ. Disclose the difference in the application of laws and guidelines between the agencies site specifically.

Because of the numerous NEPA and NFMA violations pointed out in these comments and the potential for extreme effects to streams like John Crown from logging and roadbuilding in that example watershed, and the potential for exacerbating large fire risk instead of minimizing it, an EIS is needed.

Respectfully Submitted,

Paul Sieracki
Inland Empire Task Force
Member AWR

[REDACTED]

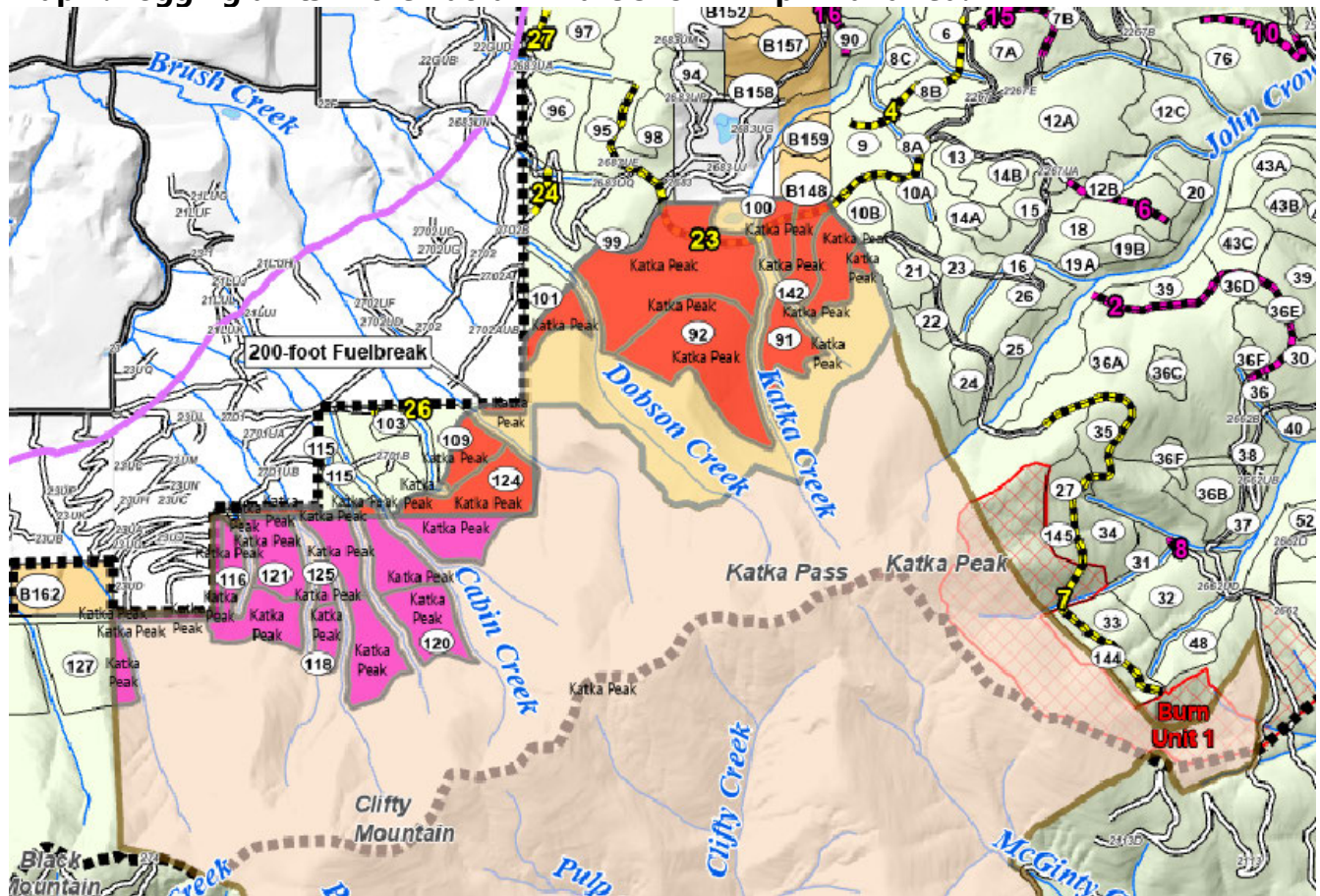
and for

Michael Garrity
Alliance for the Wild Rockies

[REDACTED]

Appendix.

Map 1. Logging units in the Katka IRA are shown in pink and red.



Map 2. A comparison of the Bonner County and BLM WUI designations. The Bonner County WUI is bounded by red lines, and the BLM WUI has green shading bounded by a yellow line. Grey areas are proposed units.

