



June 27, 2025

Heather Fuller
Bonners Ferry Ranger District
6286 Main Street
Bonners Ferry, ID 83805

Subject: Katkee Fuels Proposed Action

Dear Heather Fuller:

I am writing on behalf of the Idaho Conservation League (ICL) to comment on the Environmental Assessment (EA) for the Katkee Fuels Project. Founded in 1973, the mission of ICL is to create a conservation community and pragmatic, enduring solutions that protect and restore the air you breathe, the water you drink, and the land and wildlife you love. ICL's seven strategic initiatives include confronting climate change, recovering Idaho's wild salmon and steelhead, cleaning up the Snake River, protecting public land, restoring abundance and diversity of Idaho's wildlife, safeguarding North Idaho lakes and waters, and reducing pollution. ICL achieves these goals through public outreach and professional advocacy. With offices in Boise, McCall, Ketchum, and Sandpoint, the organization is a consistent, statewide voice for conservation in Idaho and represents more than 26,000 members and supporters. ICL's members and supporters care deeply about protecting and restoring the environment.

We appreciate the Forest Service's thoughtful approach to reducing the risk of high-severity wildfire to the local community and important ecological values in the Katka Peak area. In particular, we support the project's objectives to improve forest resilience, maintain habitat diversity, and reduce hazardous fuels in a fire-prone landscape. We also commend the proposed changes to motorized access and road management that, once implemented, will result in an overall increase in grizzly bear core habitat—an important and measurable conservation benefit.

Additionally, we support treatments within inventoried roadless areas (IRAs) where they are consistent with the Idaho Roadless Rule and are designed to preserve or enhance roadless characteristics while contributing to landscape-scale restoration goals. We appreciate that no new roads are proposed in the Backcountry Restoration theme areas and that treatments will help reduce the risk of uncharacteristic wildfire in roadless forests.

We are also pleased to see that the Forest Service has not proposed logging in moist old growth forest stands, which provide unique habitat and ecological functions and are typically less fire-prone. At the same time, we support treatments in dry old growth forest types, which

evolved with frequent low-intensity fire and benefit from fuels reduction and restoration-based thinning. We encourage the Forest Service to continue prioritizing treatments that will help maintain and restore these dry old growth stands and their associated ecological values.

However, we respectfully request the Forest Service improve its documentation and transparency regarding treatment methods in roadless areas. The EA and supporting documents identify that approximately 1,530 acres will be treated within the Katka Peak IRA, including 847 acres in the Backcountry Restoration theme and 743 acres in the General Forest, Rangeland, and Grassland theme. While total treatment acres are clearly outlined, the EA does not provide a clear breakdown of how many of these roadless acres will be treated using helicopter logging versus those that will be accessed using temporary roads.

This is a critical omission given the Idaho Roadless Rule's intent to limit road construction in order to protect the ecological and social values of roadless areas. We therefore recommend the Final EA include a table or appendix specifying the number of acres in roadless areas proposed for helicopter yarding and the number that will be treated using road access, including those served by temporary roads. This information is essential for the public and interested stakeholders to evaluate consistency with the Roadless Rule and broader national forest management goals.

Furthermore, we encourage the Forest Service to maximize the use of helicopter logging within roadless areas wherever feasible. While we recognize that helicopter operations are more expensive than ground-based methods, this approach better preserves the integrity of roadless lands by avoiding the soil disturbance, vegetation fragmentation, and long-term impacts associated with road construction and use. In particular, helicopter logging is well suited to the steep terrain, remote settings, and restoration priorities of the Katka Peak IRA. Where ground-based access is unavoidable, we ask that the Forest Service continue to limit such activity to areas where roads already exist or where temporary roads can be carefully decommissioned and restored following project implementation.

In closing, ICL supports the goals and general design of the Katkeel Fuels Project, especially the emphasis on forest and community resilience and long-term improvements to habitat connectivity. We appreciate the Forest's proactive engagement with grizzly bear conservation and wildfire risk reduction, as well as its attention to old growth forest values. We look forward to continued engagement and request that the final analysis include greater detail regarding the treatment systems employed in roadless areas.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad Smith".

Brad Smith
Conservation Director
Idaho Conservation League

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