



VIA Email: <http://www.fs.usda.gov/project/ipnf/?project=65300>

July 24, 2025

Bonnors Ferry Ranger District
Attn: Heather Fuller
6286 Main Street
Bonnors Ferry, ID 83805

Dear Heather:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide Draft EA comments on the Katkee Fuels Project.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Idaho Panhandle National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Katkee Fuels project area is in Boundary County, Idaho and encompasses lands managed by the Idaho Panhandle National Forests (IPNF), Bureau of Land Management (BLM) and some private lands. The project area is about 7 miles southeast of the city of Bonners Ferry, including Leonia Knob, Two Tail Peak, and along the Katka Peak ridge to Black Mountain. The landscape in this Project area is highly prone to wildfire with the last large fire occurring in the early 1900's. Fortunately, all other wildfires since then have been quickly suppressed with the exception of the Katka fire that burned 400 acres in 2022. During that fire, local residents were put on notice for possible evacuation. However, these effective suppression efforts over the past century have had the unintended consequence of creating an unnaturally high level of fuel loading.

AFRC provided scoping comments on this Project on February 19, 2024. That letter outlined our support for the Katkee Fuels Project that aims to improve forest health, address wildfire risk and resiliency, and provide useful timber products to the local communities. We believe this is exactly the type of project that then Secretary of Agriculture Vilsack, Forest Service Chief Moore and the Biden Administration hoped to execute through the Wildfire Crisis Strategy (WCS).

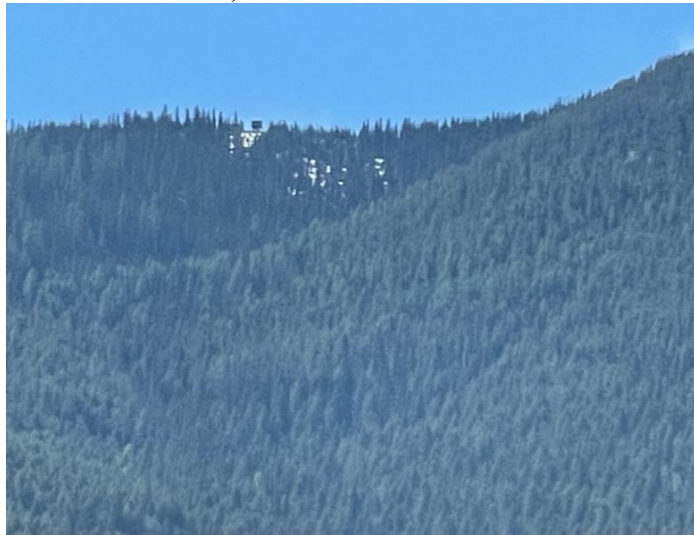
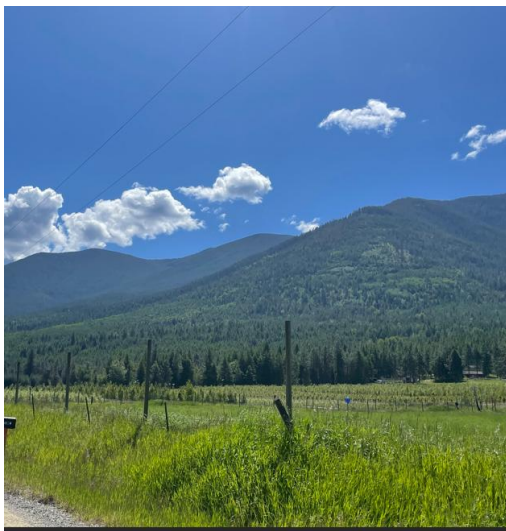
On April 3, 2025, Secretary of Agriculture Brooke Rollins signed Secretarial Memo 1078-006 titled -Increasing Timber Production and Designating an Emergency Situation on National Forest System Lands. The Secretarial memo contains an Emergency Action Determination (EAD) under the Infrastructure Investment and Jobs Act (IIJA), Section 40807. The Katkee Fuels Project is consistent with WCS objectives, IIJA section 40807, and the EAD because the project is designed to provide relief from wildfire threats to public health and safety, critical infrastructure, and/or mitigation of threats to natural resources on NFS lands.

AFRC supports the decision to use the Forest Health and Hazardous Fuels EAD for the Katkee Fuels Project, which will expedite implementation of these priority treatments by waiving the pre-decisional objection review process (36 CFR 218).

AFRC continues to support the Purpose and Need for this Project which includes:

- Decrease wildfire impacts on resource values and private land through hazardous fuels reduction activities on public lands.
- Maintain and improve forest resiliency by managing the composition and structure of the stands that mimic historic landscapes.
- Decrease sediment to improve water quality and habitat.
- Maintain and improve habitat for grizzly bears.
- Enhance the local economy with the work needed for Forest restoration.

AFRC and our members visited the Project site on June 10, 2024.



As the pictures illustrate, the terrain is very steep in some places and a variety of logging systems will be needed to effectively treat the entire project area. AFRC supports the proposed logging systems listed in Table 2 below.

Table 2. Summary of Fuels Treatment Systems

Fuels Treatment System	Total Acres
Ground Based Mechanical	7526
Cable	383
Helicopter	1137
Hand	300
Aerial and/or Hand Ignition	1267

Due to the large acreage of cable and helicopter being proposed, the consideration of economic viability is crucial to the effective implementation of the treatments. Additionally, the value of any product harvested from the Project area can help offset the cost of doing the work. With that in mind, we would like to remind the District that there are many ways to design a timber sale or stewardship contract that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season).

We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Idaho Panhandle National Forest market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators.

For example, restricting certain types of ground-based equipment rather than describing what condition the soil should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area will likely be planned for cable yarding, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease

disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70 percent. We urge the Forest to consider allowing this equipment to be used where appropriate on the Katkee Fuels Project to mitigate implementation obstacles.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only make surviving in the logging business much more difficult.

While visiting the Project site, we had a lengthy discussion of how to best implement the helicopter acres. There was some agreement that those units would not be economically viable and would instead need subsidized funding to be implemented. One proposal suggested implementing all of the helicopter units as a stand-alone service contract (IRSC) where the logging would be paid for and the resulting log decks could be sold following yarding.

The proposed treatments would also provide the timber products that local sawmills need to operate. Without these sawmills and the forest infrastructure, much of the restoration work needed in the Katkee Project could not be accomplished. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Specifically, studies in Idaho have shown that 18 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

To effectively address the high fuel loading conditions in the Project area, we urge the Forest Service to develop default silvicultural prescriptions that retain basal area levels of 40 sq. ft. per acre. This density level has proven effective for forest health and fire resilience objectives in similar stand types in the region.

AFRC also supports the proposed regeneration harvests in stands impacted by root diseases and consequent bark beetle infestations. This also helps to regenerate a young cohort of early seral species (western larch, western white pine, and/or ponderosa pine) which are more fire resistant. Some of the areas of regeneration will need to be larger than 40 acres, which would require Regional Forester approval, which we support.

AFRC also supports the use of fuel breaks proposed along the power line corridors and adjacent to private land boundaries. These accomplish both improved fire suppression opportunities in addition to enhancing residual tree growth. We also recommend that these fuel breaks be located along all ingress and egress roads accessing the Project area for the safety of the residents and protection of resources. We suggest these fuel breaks be at least 200 feet on either side of the properties and thinned down to a residual 40 sq. ft. of basal area.

AFRC supports the proposed treatment of stands classified as old growth. Two of the ten stands classified as old growth in the Project area need treatment to meet the project's purpose and need. One stand would receive underburning and a second, which is adjacent to private lands, would receive a 200 ft. fuel break, where small trees would be thinned, piled, and burned. These actions not only protect the old growth stands but also protect adjacent private land. All Forest Plan standards, guidelines, objectives and desired conditions related to old growth management and distribution would be met. No moist forest old growth would be treated or affected by the proposed activities.

On May 29, 2025, a decision was issued from the U.S. Supreme Court in the *Seven County Infrastructure Coalition et al. v. Eagle County, Colorado et al.*, a case involving the interpretation of the National Environmental Policy Act (NEPA). In an 8-0 decision, with Justice Gorsuch recusing himself, the Court ruled to limit the environmental effects agencies must consider when assessing a proposed project. This decision provides a major course correction on the court's role in reviewing NEPA cases and highlights the delay tactics from project opponents and impermissible judicial overreach when reviewing NEPA claims. We ask that the Bonners Ferry District consider several components of this landmark decision as you conduct the NEPA analysis for the Katkee Fuels project. The following excerpts were pulled verbatim from the decision and should inform the scope and extent of the ensuing analysis.

The role of a court in reviewing the sufficiency of an agency's consideration of environmental factors is a limited one. The bedrock principle of judicial review in NEPA cases can be stated in a word: Deference.

The agency is better equipped to assess what facts are relevant to the agency's own decision than a court is. As a result, agencies determine whether and to what extent to prepare an EIS based on the usefulness of any new potential information to the decision-making process.

So long as the EIS addresses environmental effects from the project at issue, courts should defer to agencies' decisions about where to draw the line, including (i) how far to go in considering indirect environmental effects from the project at hand and (ii) whether to

analyze environmental effects from other projects separate in time or place from the project at hand. On those kinds of questions, as this Court has often said, agencies possess discretion and must have broad latitude to draw a 'manageable line.'

We urge the Bonners Ferry District to review the Supreme Court decision in its entirety. However, the excerpts highlighted above capture the essence of that decision as it applies to project analysis:

1. Courts should apply deference to agency expertise in project NEPA analysis, particularly regarding the scope of the analysis.
2. This deference specifically applies to the extent of analysis on:
 - a. Indirect effects of the proposed action
 - b. Cumulative effects from separate projects and actions

There are two Tables that point out the importance of treatments near the Wildland Urban Interface.

Table 6. Acres of potential rate of spread under or over 5 chains/hour burning during severe conditions in the Katkee Fuels project area.

Alternative	Rate of Spread less than 5 chains/hour
Alternative 1 No Action	3,463 (17%)
Alternative 2 Proposed Action	8,501 (42%)

Table 6 shows that only 17% of the Project area will have low rates of fire spread. Alternative 2 shows that 42% of the area will have reduce fire spread conditions due to the treatments.

Table 7. Acres of potential crown fire activity under severe conditions within the Katkee Fuels project area.

Alternative	Acres of Surface Fire	Acres of Crown Fire*
No Action	5,112 (26%)	14,799 (74%)
Proposed Action	13,062 (65%)	6,849 (35%)

*Includes passive and active crown fire.

Table 7 shows that following treatment, the probability of crown fire across the Project area is reduced by 39%.

Additionally, AFRC strongly supports treating both the Forest Service and BLM lands within the Project area. Table 7 below shows the treatments by silvicultural prescriptions. The Project would be less successful in many ways if only the Forest Service lands were treated.

Table 7: Proposed Vegetation Treatments (Approximate Acres).

Proposed Treatments	BLM	NFS	Total
Fuels	57	1,487	1,544
Fuels reduction/fuel breaks	57	220	277
Natural Fuels (Prescribed burning)		1,267	1,267
Intermediate treatments – including young stand improvement, improvement cuts, commercial thinning	815	3,581	4,396
Intermediate treatments – commercial	90	2,517	2,607
Young stand improvement – non-commercial	725	1,064	1,789
Regeneration	55	4,620	4,675
Total Acres	926	9,688	10,614

Thank you for the opportunity to provide Draft EA comments on the Katkee Fuels Project. We look forward to an expedited implementation schedule due to the fire risk in the Bonners Ferry WUI area.

Sincerely,



Tom Partin
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