

Inland Empire Task Force

77 E Lincoln Ave.

Priest River, Idaho 83856

208.217.0609

paul.sieracki@gmail.com

March 2, 2024



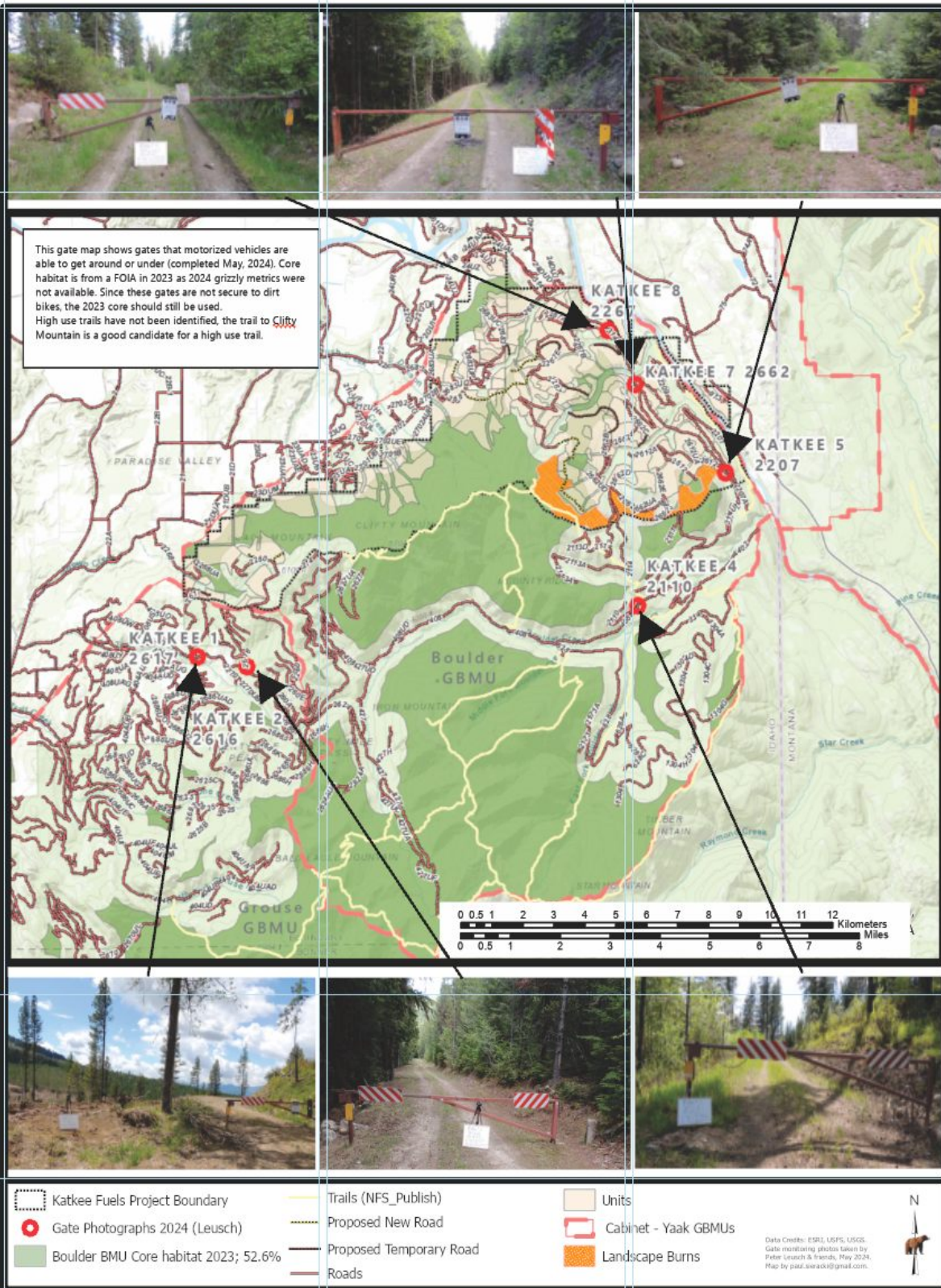
To: Heather Fuller, District Ranger, Bonners Ferry Ranger District

Re: Katkee Fuels dEA Comments.

These are comments from the Inland Empire Task force and the Alliance for the Wild Rockies for the Katkee dEA. We incorporate by reference our Scoping Notice comments, gate photos and reference papers as a separate zip file. Please note that the online submission site show a 505 error. Please confirm that these comments have been received.

Map of ineffective gates

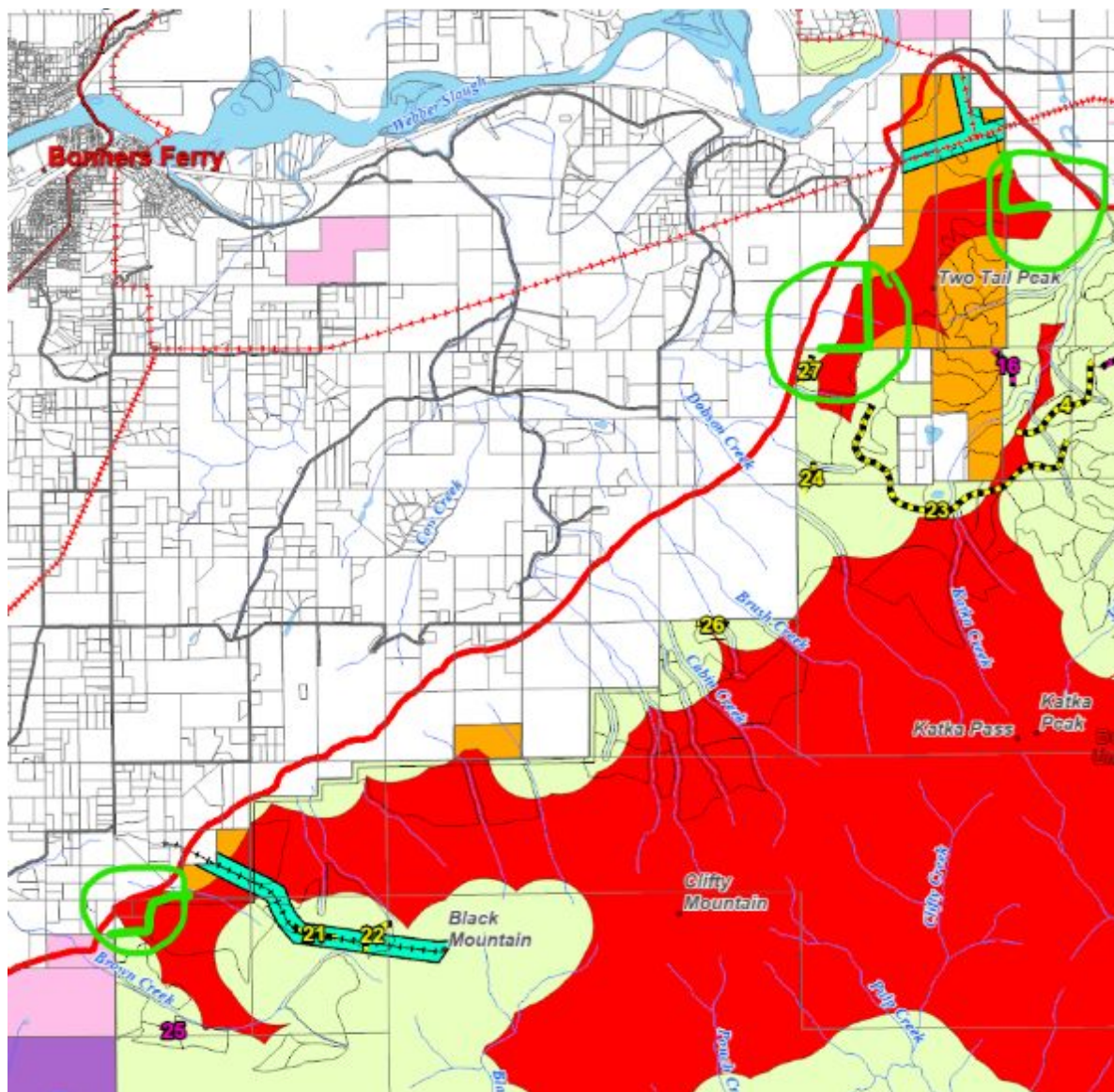
The map below presents the results of a May 2024 gate survey in the Boulder Bear Unit, which includes four gates. These gates are ineffective, allowing unauthorized entry by ATVs, dirt bikes, and e-bikes. The EA/Wildlife Report does not include maps showing the three grizzly bear metrics. The 2023 core habitat GIS dataset, obtained from the IPNF via FOIA, is shown here. Although the four gates were intended to secure roads behind them and thereby increase core habitat, their ineffectiveness means the 2023 core habitat map accurately reflects current conditions. Failure to effectively close roads and claiming core habitat constitutes a violation of NEPA and the ESA. (The map is attached with this submission.)



Assigning Core habitat on Private Lands violates the ESA.

The map below displays core habitat from the 2023 core dataset in red, showing it extending on adjacent private lands in three locations. The Bonners Ferry Ranger District cannot designate core habitat on private lands due to the potential for development or road construction. To assign core habitat status to private or State of Idaho lands, enforceable conservation easements would be required. Since neither the EA nor its appendices include maps of grizzly bear core habitat, it cannot be determined whether this potential mapping “error” or purposeful inclusion to gain more core habitat was carried forward into the proposed timber sales. (The map is attached in the submission.)

- Disclose maps of the three grizzly metrics for each timber sale.
- Disclose enforceable conservation easement agreements if core habitat is truly assigned to private lands.



Failure to buffer private lands adjacent to Federal lands violates the ESA.

The interface of private lands with Federal Lands in the Boulder GBMU should be buffered. There is inconsistency in the application of buffers for private lands in bear units. For example private lands and the privately held Continental Mine are buffered in the Blue-Grass Bear Unit, Selkirk Grizzly Bear Ecosystem. Although out of the recovery area the Beaverhead-Deerlodge National Forest creates an inward buffer from private lands for grizzly bear core habitat (See metadata in Appendix 1). Furthermore the recent BORZ guidelines also require an inward buffer from private lands due to the potential for roading and development on private lands. “Negotiated down” core habitat requirements are not consistent with recovery goals.

- Disclose why some grizzly bear units have buffers around private lands in or adjacent to the bear unit and others do not from a scientific perspective.
- Apply an inward buffer to core habitat calculations for the private and IDL lands adjacent to Federal lands in the Boulder GBMU.

Effect to grizzly bears from helicopter logging operations are subjective and should not be included in a wildlife report.

“Due to the fact that harvest activities would be limited to daylight hours, grizzly bears would have an opportunity to utilize disturbed areas at night, but foraging efficiency may be reduced. Harvest activities would be confined to harvest units themselves and would not last for more than several weeks in any individual unit. Additionally, harvest would rarely take place in multiple units at the same time, so bears would have undisturbed habitat to move to during any phase of timber harvest.” Katkee Fuels Project, Biological Evaluation p 69.

Rank speculation about nocturnal bear behavior and other subjective snippets from the above quote are violating 40 CFR § 1506.6 Methodology and scientific accuracy, comments follow.

(a) Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analyses in environmental documents

1. Assumption about Temporal Avoidance Without Empirical Support

The statement assumes that because timber harvest occurs only during daylight hours, grizzly bears will opportunistically use disturbed areas at night. This implies a behavioral adaptation without citing empirical data or studies demonstrating that grizzlies alter their foraging patterns sufficiently to offset diurnal disturbance occurring over several weeks. This is speculative and should be supported by scientific evidence or monitoring data.

2. Qualitative and Vague Language

Terms such as “may be reduced,” “confined,” “not more than several weeks,” and “rarely take place in multiple units at the same time” are vague and lack quantitative measures or thresholds. This reduces the ability to objectively evaluate the magnitude or significance of disturbance or habitat displacement and impedes independent verification.

3. **Limited Consideration of Cumulative Spatial Effects**

While noting harvest occurs in individual units and rarely simultaneously in multiple units, the statement does not address cumulative landscape-level impacts from phased harvests occurring sequentially across the project area. Grizzly bears with large home ranges may still experience habitat fragmentation or displacement over time, even if harvest units are temporally separated.

4. **No Consideration of Non-harvest Disturbances**

The focus is exclusively on the temporal and spatial pattern of harvest activities, without discussion of related disturbance (noise, machinery movement, increased human presence) that can extend beyond harvest hours or units and impact grizzly behavior.

5. **Lack of Discussion Regarding Adequacy of “Undisturbed Habitat”**

The statement assumes that bears have sufficient access to undisturbed habitat, but does not assess the quality, connectivity, or availability of this habitat relative to grizzly bear habitat needs or core areas. This assumption requires verification.

We request that an objective analysis and that no helicopter logging be proposed in Boulder GBMU core habitat. See “Federal Judge Rules in Conservation Groups Favor on Issue of Helicopter Logging in Grizzly Bear Habitat” [Federal Judge Rules in Conservation Groups Favor on Issue of Helicopter Logging in Grizzly Bear Habitat - Alliance For The Wild Rockies](#)

Maps; the IPNF did not supply OMRD, TMRD and Core change maps for the existing condition, logging sales and final condition, forcing a FOIA for this data. A mere table is not sufficient.

- Construct a stacked 3d map showing areas of core by project and persistent core over the EA’s period.
- Provide GIS data on the Project website for all NEPA projects.

Railroad mortality

Grain spillage and associated mortality can occur along the heavily used railroad on the south side of the Kootenai River, in the Boulder GBMU. There is no discussion of the mitigation needed to reduce mortality risk, eg immediate spillage cleanup, development of wildlife crossings to the river. Etc.

“Brown and grizzly bears are killed by train strikes in Europe and North America every year. In the contiguous USA alone, 55 grizzly bears have been killed by trains since 1980, accounting for 9% of total known or probable deaths in the Cabinet-Yaak (CYE) and Northern Continental Divide (NCDE) Ecosystems since 1997. In the similar physical environment of Banff National Park (NP), Canada—but with roughly twice the railway traffic as in the USA—train strikes currently account for nearly ¼ of all grizzly bear deaths.” Mattson, D. J., 2019. Mostly natural grizzlies: Trends in habitat and food availability. Mostly Natural Grizzlies.

https://www.mostlynaturalgrizzlies.org/files/ugd/779f47_41aa88aa610642a9a57dea94946a989f.pdf

The draft Biological Evaluation fails to even mention “huckleberries” a keystone food for Cabinet-Yaak grizzly bears.

Proctor et al (2019) found that “The models predict that applying motorized access controls to backcountry areas with huckleberry patches would increase grizzly bear abundance by 23% on average across the region and 125% in the lowest density portion of the study area (Yahk). “

The BE does not show where large patches of huckleberries occur at a distance from roads, especially those ≥ 10 Ha. These areas are preferred by female grizzlies. Rather than incorporate huckleberry management into the dEA, this logging project recklessly takes a shotgun approach to unit design and placement in relation to grizzly bears. In addition, natural succession is slower than the quick canopy formation from genetically selected for blister rust resistance and fast growth plantation trees, truncating the time artificial openings would provide huckleberries and forbs for foraging grizzlies.

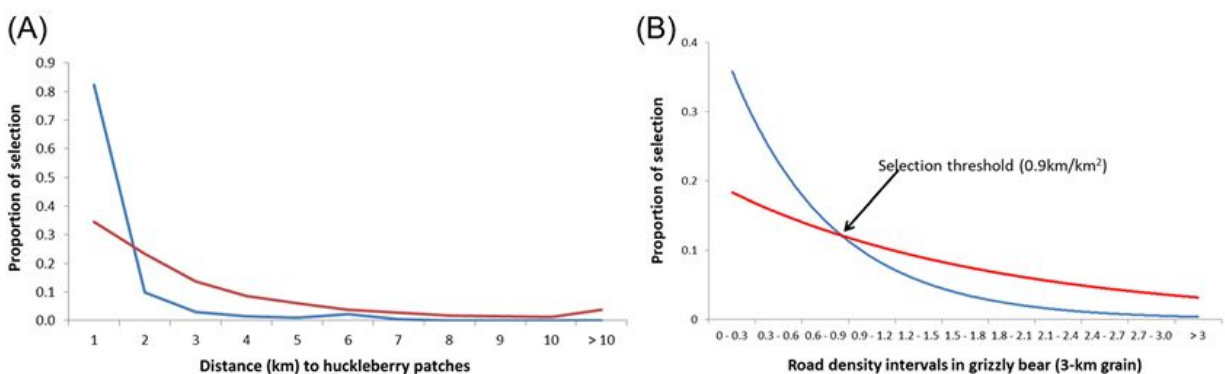


FIGURE 12 A) Response curves for distance to huckleberry patches show that proximity to patches >10 ha was an important draw for female grizzly bear habitat selection. Data were collected in the south Selkirk and Purcell mountains of southeast British Columbia, Canada (2004–2015). The red curve is available habitat and the blue curve is use. B) Response curves for habitat selection in summer (15 July–15 September) associated with road density show that grizzly bears can tolerate road densities between 0.6 and 0.9 km/km² but prefer habitats (and likely have increased survival) with road density <0.6 km/km².

Excerpted from: Proctor, M., Lamb, C., & MacHutchon, G. (2018). *Predicting grizzly bear food—Huckleberries—across the Columbia Basin (HCTF Project: 4-562, FWCP Project: COL-F18-W-2456)*. Prepared for the Habitat Conservation Trust Foundation and the Fish and Wildlife Compensation Program. <https://transbordergrizzlybearproject.ca>

- Map and disclose areas of high huckleberry occurrence and remove roads of all designations that are near these areas.

Respectfully Submitted,

Paul Sieracki
Inland Empire Task Force
Member AWR
Priest River, ID 83856
paul.sieracki@gmail.com
208.217.0609

Michael Garrity
Alliance for the Wild Rockies
P.O. Box 505
Helena, Montana 59624
406-459-5936

Appendix 1. Metadata for the Beaverhead-Deerlodge inward buffer GIS dataset for grizzly core habitat from private lands and inholdings.

Grizzly Bear Secure Area (GBAUSA)

Type File Geodatabase Feature Class

Tags USDA Forest Service, grizzly bear, bau, GBAU, security, secure area, secure habitat, bear analysis unit

Summary

Polygon feature class depicting areas of Grizzly Bear Secure Habitat (GBAUSA) within Grizzly Bear Analysis Units on the Beaverhead-Deerlodge NF, for the purpose of analyzing potential effects to grizzly bears on the BDF.

Analyzing secure habitat within grizzly bear analysis units provides a consistent method to analyze potential effects to grizzly bears on the BDNF. Recent literature (e.g., (Northrup et al., 2012; Proctor et al., 2018; Proctor et al., 2019) suggests the distance and location of roads in relation to certain habitats may be as or more important than road density in predicting impacts to bears. This measure of "secure habitat" (refer to glossary) that results from the distance from motorized roads is one of the key issues related to the effects of motorized access on grizzly bears and is important to the survival and reproductive success of this species. Secure habitat more adequately represents the potential effects related to motorized access as it provides a more accurate indication of the spatial mix of motorized routes and secure habitat. Limiting impacts from roads to bears depends on use, location, and distribution of secure habitat that is a function of the spatial arrangement of motorized routes.

This SDE Geodatabase is intended for read-only use.

Future Updates and Other Issues:

Although infrequent, land sales, purchases, donations, and exchanges occur between the Beaverhead-Deerlodge National Forest and private individuals or organizations. In these instances, GBAU boundaries and secure habitat may be adjusted or recalculated based on land exchanges.

The most up-to-date road and trail inventory, based on the most current information, is used to inform grizzly bear secure habitat. Travel Management decisions may create new routes or close/obliterate existing routes. Site-specific inventories may reveal the need for route position or alignment corrections, such as finding additional non-system/unauthorized routes (which may or may not support illegal motorized access) or discovering a route that is passable with a motorized vehicle despite a non-motorized status. Inventory will be updated after such discoveries.

Description

Grizzly Bear Analysis Unit Secure Habita (GBAUSA's) are areas outside of recovery zones or Primary Conservation areas which contain no motorized travel routes during the active bear year, are more than 0.31 miles (500 meters) from an open or gated motorized route, and are at least 10 acres in size.

NOTE: These are Default GBAUSA's intended for coarse scale modeling and analysis. For detailed analysis, Secure Habitat should be remeasured per the process defined below using CURRENT and SITE-SPECIFIC forest ownership and road/trail status and alignment.

Secure habitat is relatively free of motorized access during the non-denning period and an important habitat component for adult females to successfully rear and wean offspring (Mace & Manley, 1993; Mace et al., 1996; Wakkinen & Kasworm, 1997). Since the BDNF is between both the GYE and the NCDE recovery zones, guidance

for both areas was considered to define secure habitat. Within the GYE, secure habitat is defined as area that is more than 500 meters from an open or gated motorized access route or reoccurring helicopter flight line and must be greater than or equal to 10 acres in size (Yellowstone Ecosystem Subcommittee, 2016). Within the NCDE, the term "secure core" is used in a similar manner and consists of an area within the primary conservation area (which is specifically managed for grizzly bear populations) of more than 500 meters from a route open to wheeled motorized use during the grizzly bear non-denning season, or a gated route, and that is greater than or equal to 2,500 acres in size (Northern Continental Divide Ecosystem Subcommittee, 2021).

The BDNF decided to utilize the GYE recommendation, which consists of at least 10 acres that is greater than 500 meters from an open or gated motorized access route. The habitat on the BDNF is more similar to the GYE than the habitat within the NCDE. In addition, grizzly bears use and can successfully rear cubs in areas with less than 2,500 acres of secure habitat (as evidenced in the GYE ecosystem). In general, secure blocks of 2,500 acres or greater are typically part of designated wilderness or roadless areas. On the BDNF, these large secure tracks are infrequent, and bears continue to expand their distribution and use the landscape. Therefore, using 10 acre blocks for secure habitat for bears makes sense within the Forest boundary.

Process

Create a 500 meter buffer on Forest lands from all non-Forest Service ownership, including external adjacent lands and inholdings.

Create a 500 meter buffer on motorized access roads and trails, restricted roads, and other roads and trails that have known motorized use (see "**Guidelines**" below).

Use "erase" to remove the buffers developed in the previous steps.

Remove any remaining polygons that are less than ten acres in size.

Merge remaining polygons into a single polygon, then intersect with GBAU boundaries.

The resulting polygons represent secure habitat, which excludes buffers on Forest Service lands from non-Forest Service ownership (step 1) and motorized routes and trails (step 2), and are larger than 10 acres (step 4). This resulted in a total of 1,509,700 acres of secure habitat (42 percent of the Forest; Appendix B: Grizzly Bear Analysis Unit names, associated areas, and excluded parcels on the Beaverhead-Deerlodge National Forest.) on the BDNF. This calculation represents a baseline of known motorized routes and trails.

Guidelines

Identify route type and determine if a 500 meter buffer is warranted:

Motorized access routes are defined as all routes having motorized use or the potential for motorized use (including restricted roads that are not permanently blockaded), such as motorized trails, highways, and forest roads. Private, state, and county roads that intersect or are within 500 meters of the Forest boundary are also considered motorized (USDA 2009). Secure habitat is calculated using a 500 meter buffer from routes with this classification.

Restricted routes are those in which use is restricted seasonally or yearlong (USDA 2009). These roads are generally gated to control access but may also include routes where use is allowed by permittees but not the general public. Because these routes are navigable and may be driven, they are considered motorized and are buffered by 500 meters. These roads may fall into the "administrative" category (see glossary).

Permanently restricted routes are those in which are considered impassible because of vegetation growth or permanent, impassable barriers. These areas are not subject to the 500 meter buffer for secure habitat calculations as the route is not accessible to motorized travel.

Decommissioned, obliterated, or reclaimed routes are managed with the long-term intent of no motorized use and no longer function as motorized routes. These roads are not subject to the 500 meter buffer for secure habitat calculations unless they have known and existing motorized use. If project decisions authorize decommissioning, obliteration, or reclaiming roads to prevent motorized use, then secure habitat calculations would change after the project is implemented.

If non-system/unauthorized routes or trails are discovered within a project area, calculations for secure habitat are based on the potential for motorized use. If the route or trail is potentially accessible via motorized means, it is considered the same as an open, motorized route and the 500-meter buffer is applied. If no confirmation of accessibility can be made, the route is assumed accessible by motorized vehicles and the 500-meter buffer is applied.

Apply a 500-meter buffer to all Forest Service lands adjacent to and within the Forest Service administrative boundary that are not under Forest Service ownership. The Forest lacks inventory information and has no management authority over non-Forest lands, so this buffer is a conservative approach from effects that may result from non-Forest actions on non-Forest lands that may occur adjacent to Forest lands.

Credits

There are no credits for this item.

Use limitations

The USDA Forest Service makes no claims, promises, or guarantees about the accuracy, completeness, or adequacy of the content; and expressly disclaims liability for errors and omissions. No warranty of any kind, implied, expressed or statutory, including but not limited to warranties of non-infringement of third party rights, title, merchantability, fitness for a particular purpose and freedom from computer virus, is given with respect to the contents or hyperlinks to other Internet resources. Reference to any specific commercial products, processes, or services, or the use of any trade, firm or corporation name is for the information and convenience of the public, and does not constitute endorsement or recommendation by the USDA Forest Service.

Extent

West	-113.990685	East	-111.364729
North	46.711924	South	44.336717

Scale Range

Maximum (zoomed in)	1:5,000
Minimum (zoomed out)	1:150,000,000