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February 12, 2024

Doug Nishek
Bonners Ferry Ranger District
6286 Main St.
Bonners Ferry, ID.
83805

Re: Katkee Fuels Project Comments

Dear Doug,

On behalf of Idaho Forest Group and IFG Timber LLC, I offer the following comments regarding the Katkee Fuels Project.

Idaho Forest Group and our timber subsidiary are family owned businesses located in the Northern portions of Idaho as well as our facility in Lumberton, Mississippi. With our 5 lumber mills in Idaho, directly we employ over 1000 people who manufacture high end lumber products. When you consider the people indirectly employed by our company in the manufacturing of trees and logs for our production, facilitating our transportation needs for all products and by-products and the support staff necessary for our operation – our employees number in the thousands. We pay good wages that will support families and contribute significantly not only to the tax bases in the counties in which we are located – but we also contribute to the communities in which we live.

We rely on the U.S. Forest Service for a portion of our raw log and resource needs. We actively engage with U.S.F.S. personnel in both timber sale layout and administration as well as serve on multiple collaborative groups to assist the agency in solving complex resource management issues.

It is for these reasons that we fully support management and restoration activities as proposed on the Katkee Fuels project.

With the project area encompassing approx.. 20,000 acres and treatment proposed on approx.. 11,300 acres – it is apparent that this is a “landscape management” scale project. We applaud the agency for projects of this size and scope as with fire on the landscape; it does not stop at 40 acre openings and has few boundaries other than ridge tops, canyons and topography.

Fuel loading conditions and disease and insect infestations also don't limit themselves to 40 acre openings. These conditions can increase in severity based on stand ages and types as well as soil and site conditions. That is why we also commend the agency for stand based treatments across the landscape and multi prescription treatments that are proposed over the project area. These treatments when combined trends the landscape to forest plan desired conditions. While we may not agree 100% on management choices for the area, we appreciate to opportunity to comment on the proposed actions of the Katkee Fuels Project.

In reading the proposal for Katkee Fuels, it is noted there are numerous MA's with-in the project area as well as designated "old growth" stands. We feel the project should contain management activities which enhance these management areas as well protect designated old growth stands from stand replacement fire which enhances the value of the old growth. We feel this can be achieved by prioritizing vegetative management actions which reduce fuels while promoting healthy stands of early seral species. The proposed management should also strive to maintain and / or improve both wildlife habitat quality and security as well as address or improve water quality issues. All these issues are addressed in the project proposal document.

Regarding road closure and / or storage – decommissioning, this proposed project is adjacent to significant private land and contains recreational properties as well as significant communication infrastructure and power lines. The agency needs to look into the future as far as access for fire protection of this infra-structure in years to come. We realize that roads are a source for water quality degradation as well as a concern for Grizzly Bear security. They are also key to rapid response for fire suppression. Careful consideration should be given as to any road storage or decommissioning activities when considering future fire suppression and security or hydrologic concerns.

Regarding fuels treatment with fire and / or pre-commercial thinning, I realize the need to re-introduce a fire regime back into portions of the project area. Given the management history of the project area and the mixture and variability of habitat types there is the need for both active vegetation / fuels management as well as the re-introduction of fire in areas where active mechanical management is not appropriate. The agency should CAREFULLY re-introduce fire at regular intervals into the ecosystems of the project area in which historically – fire kept them in check for over-crowding. There are also numerous plantations in SERIOUS need of pre-commercial thinning. I feel the agency should prioritize this activity as those plantations are the active management "stands of tomorrow" before they succumb to overcrowding and stress.

In closing I'd like to thank you for the opportunity to provide comment on the Katkee project. The Bonners Ferry Ranger District has some of the best timber production sites on the IPNF. It also has some of the best species habitat and some of the wildest country on the Forest. We feel the agency should plan big and do what is necessary to meet the forest plan desired future conditions of the project area.

Sincerely,



Timothy P. Dougherty
Agency Resource Manager