

**PUBLIC COMMENTS
REGARDING CARIBOU ISSUES**

IDAHO PANHANDLE NATIONAL FOREST

MARCH, 2004

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PART 1: Comments on Issues in the Strategy

These responses are to comments that were made on issues addressed in the "Report on Mountain Caribou and Winter Recreation on the North Zone of the Idaho Panhandle National Forests". Changes were made to the document to respond to some of these issues. Other responses are found here.

ELEMENT #1 - Information and Education:

Comment received include:

- Idaho State Snowmobile Association educates our members, will avoid habitat used by the lone caribou in the Idaho Panhandle, and can adjust use if population increases, plans to stay involved in developing winter recreation strategy, and will assist with education, protecting caribou, and funding and labor for projects.
- How is Information and Education funded?
- Forest Service education effort has been inadequate for conserving caribou, has allowed trespass and habitat degradation. Web site hasn't been updated for > 4 years.
- Forest Service should consider notifying the public weekly of results of enforcement.
- Document cases of caribou poached in BC. Work with the Border Patrol.
- Coordinate I&E work with British Columbia, Colville National Forest and IDL to reduce user confusion and provide more effective conservation.
- This approach won't affect people who don't care about caribou.
- I&E proposals have limited value because they won't get through to some people.
- Suggest brochures for local businesses - discuss what to do if you see a caribou.
- There's no way to evaluate the success of I&E program; questionnaires won't work. Violators won't answer them honestly.
- Describe I&E plans in more detail.
- Educate recreationists, outfitters and shop owners about need to change recreation use patterns.
- Current education effort has been inadequate for conserving caribou, has allowed trespass and habitat degradation. Forest Service web site caribou article hasn't been updated in over 4 years.
- Posting signs while allowing increasing snowmobile use isn't protecting the caribou.
- Information and Education won't recover caribou. Same ineffective actions as current forest plan and caribou recovery plan.

Response Information and education action is an important element of our strategy. We will increase our efforts regarding information and education, which includes an increased level of signing at trailheads, development of brochures, working with local groups and publics. This will include our continuing to work with interested groups and

individuals so that habitat issues, restrictions and closures are understood. Partnerships are always important in meeting our goals for information and education. We will identify specific information and education needs and other sources of materials and funding to meet these needs.

By monitoring how well recreationists comply with existing regulations; we can evaluate the effectiveness of our Information and Education program. Monitoring information would be reported annually as part of our forest plan monitoring report.

(Refer to the "Element #1: Information and Education" section in the summary.)

ELEMENT #2 - Enforcement:

Comment received include:

- Forest Service hasn't effectively dealt with snowmobile / caribou problems for 10 years.
- Recommend that Forest Service ensure full enforcement of areas closed to motorized recreation where closure violations have occurred: Bunchgrass Meadow RNA, Salmo-Priest Wilderness, Selkirk Crest Snowmobile Closure Area and Long Canyon
- Idaho State Snowmobile Association members don't condone harassment of caribou or other wildlife, do respect closures and would report violations.
- Full ban of snowmobiles in specified areas is essential because it's impossible to enforce trails only riding. With area closures, enforcement would be easier.
- How is enforcement funded?
- Forest Service hasn't enforced the management direction of 1987 Forest Plan.
- Forest Service hasn't done anything to deal with increasing violations of closure areas by snowmobiles.
- Forest Service should let the public help enforce closures.
- Forest Service should enforce own snowmobile policy and signs for snowmobiles to stay on trails.
- Forest Service and Fish and Wildlife Service should provide full funding and personnel for enforcement in Bunchgrass Meadow RNA, Salmo-Priest Wilderness, Selkirk Crest and Long Canyon.
- Forest Service has no implementation or enforcement strategy.
- Self-policing by snowmobile users isn't effective.
- Enforcement won't work without penalties for violators.
- ORV and snowmobile use have cumulative impacts because their access is not controlled or policed, according to researcher Horejsi.
- Forest Service hasn't dealt with increasing snowmobiles in closed areas, off trails and in caribou habitat.

- Marketing attracts snowmobilers who defy regulations. It's difficult for law enforcement officers to match their skill and technology and patrol remote areas.
- Enforcement doesn't resolve noise issues caused by snowmobiles.
- Forest Service should coordinate with Border Patrol, British Columbia, Colville National Forest and IDL to identify snowmobile/caribou conflicts and for enforcement.
- Enforcement doesn't exist in Selkirk Crest closure, and Forest Service hasn't dealt with increasing snowmobiles in closed areas, off trails and in caribou habitat.
- How will caribou be protected from snowmobile and ORV harassment between now and when Forest Plan Revision is final in several years?
- How are snowmobile closures monitored / enforced? Is enforcement effective?
- There is no implementation or enforcement strategy or assessment of current effectiveness of enforcement. Restrictions are meaningless without enforcement. Self-policing isn't effective.
- Monitoring at trailheads doesn't account for what is happening beyond the trailhead. Monitoring needs an evaluation component.
- Let the public help enforce closures.
- Signs for snowmobiles to stay on trails aren't enforced.
- Posting closure signs without enforcement isn't "protection." Enforcement of Selkirk Crest closure doesn't exist.
- 15% of snowmobile registration fees could be used for enforcement.
- This area belongs to all Americans and should be protected.
- Enforcement won't recover caribou. Same ineffective actions as current forest plan and caribou recovery plan.
- Monitoring and enforcement aren't enough to recover caribou.
- Enforcement of snowmobiles hasn't been effective in protecting / recovering caribou for 10 years.

Response: The enforcement of existing management direction and closures is one of the elements of our strategy. We do plan to increase the existing level of enforcement within the existing closure areas. We also plan to continue working with interested groups and individuals to make sure that existing restrictions and closures are understood and being followed. We also plan to work with interested volunteer groups and individuals so that they can assist with monitoring of the closure areas. Often budget constraints limit our ability to provide full enforcement. Also, we will work with adjacent management agencies, other State and Federal agencies and British Columbia. The strategy will also identify actions the Forest Service will take when a violation appears to have taken place.

The Forest Service recognizes that snowmobile use is increasing. This has also been documented in the Idaho Statewide Comprehensive Outdoor Recreation and Tourism Plan 2003-2007. The level of effectiveness of enforcement is unknown. In 2004 Forest Service is conducting aerial monitoring to determine where snowmobile activity is occurring in the Selkirk's. If additional snow play areas are found, they will be added to the map.

Refer to pages 32 - 34 of the draft summary.

ELEMENT #3 - Monitoring of recreation use, caribou use and habitat impacts

Comment received include:

- Monitoring of snowmobiles hasn't been effective in protecting / recovering caribou for 10 years.
- Recommend that Forest Service ensure monitoring of areas closed to motorized recreation where closure violations have occurred: Bunchgrass Meadow RNA, Salmo-Priest Wilderness, Selkirk Crest Snowmobile Closure Area and Long Canyon
- Support the use of vegetation screening and Kelly-humps to prevent off-road snowmobile use. Kelly-humps aren't effective. Constant monitoring may determine how effected these methods are.
- How is monitoring funded?
- Monitoring can be prohibitively expensive.
- Forest Service and Fish and Wildlife Service should provide full funding and personnel for monitoring in Bunchgrass Meadow RNA, Salmo-Priest Wilderness, Selkirk Crest and Long Canyon.
- Forest Service doesn't have an accurate assessment of what's going on.
- Explain telemetry.
- Ensure full monitoring, unlike past promises.
- Counting snowmobile trailers isn't adequate monitoring of recreation use beyond the trailhead. This area needs an evaluation component.
- Stated recovery actions and monitoring are vague.
- Monitoring with aircraft has negative effects on caribou.
- Monitoring won't recover caribou. Same ineffective actions as current forest plan and caribou recovery plan.
- Monitoring and enforcement aren't enough to recover caribou.

Response: Monitoring is an important element of the strategy. The Forest Service will seek additional partnerships to increase monitoring efforts. Implementation of the strategy will include the identification of specific tasks, methods and also to identify potential partners to assist with the monitoring. The caribou strategy is being developed which lists specific monitoring actions and schedules. Vegetative screening and Kelly-humps (large earthen berms) are two tools to encourage vehicles to stay on designated roads and trails.

Telemetry is the technique of using radio receivers to track signals from radio collars which have been put on individual animals. Tracking the signal sent out by the radios provides information on the animals' locations and status (dead or alive). Caribou are little impacted by occasional aerial monitoring.

For additional information, refer to pages 32 - 34 within the draft summary.

Caribou Recovery Plan / Emergency Action Plan / Endangered Species Act:

Comment received include:

- This winter strategy doesn't comply with caribou Recovery Plan or fulfill Emergency Action Plan requirement.
- Summary isn't the Emergency Snowmobile Strategy required by January, 2004 under Caribou Emergency Action Plan. Nor does it meet legal obligations listed in Caribou Recovery Plan, Emergency Caribou Recovery Plan, Amended Biological Opinion to the Forest Plan or current Forest Plan.
- Caribou gene pool is diminished and population critically low. Forest Service proposed actions to promote recovery are completely inadequate. They won't support survival, let alone recovery.
- Low caribou population may not survive the delay until closures are implemented.
- Extirpation is forever. Protect what is left of natural world.
- Recommendations avoid actions such as emergency snowmobile closures which could protect and recovery caribou.
- Situation summary only continues conditions which threaten caribou survival.
- No caribou in Priest Lake area; explain what area is occupied by remnant core Selkirk caribou population.
- If document is promising motorized winter recreation will be mitigated and enforced, conflicts will continue to harm caribou but possibly slower.
- What happened to 103 introduced animals? Did they die or leave? If they died, what was cause? Did winter recreation contribute?
- When will Forest Service place higher priority on protecting an endangered species than unsupervised recreation?
- Biologists know closing core caribou habitats to winter recreation is best approach, but agencies are more concerned with managing recreation than endangered species.
- Forest Service is more concerned about vocal minority of snowmobilers than snowmobile threats to an endangered species which were discussed in Recovery Plan and amended biological opinion. Priorities should reflect more than local, vocal minority.
- Endangered Species Act should take precedence over economics and recreation. These uses should only be allowed where appropriate with endangered species management.
- Until recovered, caribou must be higher priority than recreation.
- Endangered Species Act should take precedence over multiple use to provide economic and recreational opportunities.

- Forest Service should base recreation management on minimum habitat needed by delisted caribou population. If not, snowmobiles will continue to push caribou into unsuitable habitat, restricting survival and population growth.
- Why are so many roads closed for 1 or 2 caribou?
- Winter recreation strategy is a plan for caribou extinction.
- Recommendations conflict with Caribou Emergency Action Plan direction to prevent short-term extirpation of caribou.
- I&E, enforcement, monitoring and multi-species analysis will only continue ineffective actions proposed in Caribou Recovery Plans.
- 1994 Caribou Recovery Plan says problem of recreation impacting caribou will increase. Winter strategy doesn't restrict snowmobile use in winter caribou habitat even though use has increased exponentially and closures are violated often.
- Concerned no action is being taken to deal with threats to caribou.
- Situation summary delays action until the Forest Plan Revision is done. This conflicts with caribou Emergency Action Plan which discussed an "immediate need to prevent the short-term extirpation...."
- Forest Service is responsible for recovering caribou, not just protecting surviving caribou.
- Implementing draft situation summary will facilitate extinction of caribou, not recovery.
- What is role of IDL in caribou recovery?
- This winter strategy doesn't comply with caribou Recovery Plan or fulfill Emergency Action Plan requirement.
- According to Recovery Plan, Forest Service should reduce or eliminate impacts of recreational activity on caribou and their habitat.
- Determining fate of transplanted caribou is important for management and should be addressed in this document.
- Were caribou transplanted in Canada?
- Why did 11 caribou die in BC in 1996?
- How is recovery related to play area boundaries?
- Is there only one caribou in lower 48 states?
- Caribou may not be able to adapt to environmental changes. If that is the case, money should be spent on them elsewhere.
- Caribou studies showing declines - same time as declines in other caribou herds?
- Page 6 - Explain "was not entirely successful" for describing caribou augmentation.
- recommendations are inadequate for recovery of the small caribou population with limited gene pool.
- Explain why different elevations used to define recovery boundary in BC, WA and Idaho. Is it based on politics or biology?
- When can endangered species be classified as extinct?
- Explain protection of an endangered species vs. recovery of a species.
- Summary doesn't meet legal obligations of agencies under caribou recovery plan, emergency caribou plan, amended biological opinion or current forest plan.

- This plan doesn't address mandate of recovery, but maintains status quo which threatens caribou survival.
- Forest Service should meet amended biological opinion deadline of January 2004 to develop and implement a comprehensive recreation strategy identifying species standards and restrictions to protect caribou and their habitats. Identifying 11 overlap areas of caribou and recreation use isn't sufficient to meet this.
- How will caribou be protected from snowmobile and ORV harassment between now and when Forest Plan Revision is final in several years?
- Explain why winter recreation overlaps with several caribou use areas.
- When is socio-economics considered in managing threatened or endangered species?
- Include price of extinction in economic analysis.

Response: The Endangered Species Act requires all federal agencies to provide actions, which will promote species recovery. Recovery is defined as the improvement in the status of listed (threatened or endangered) species to the point at which listing is no longer appropriate under the criteria set out in section 4(a)(1) of the Endangered Species Act. These include increasing populations and habitats. Habitats, which are included in a species' recovery plan, are managed for recovery regardless of how many animals currently occur there. The Forest Service works cooperatively with the U.S. Fish and Wildlife Service and other State and Federal agencies in caribou recovery.

Protection is only one part of an overall recovery effort for an endangered species. The caribou recovery plan also requires other measures to increase the population and improve caribou habitats in the recovery area. The caribou recovery team developed the emergency action plan to prioritize tasks for recovery of woodland caribou

The Emergency Action Plan was prepared by the Woodland Caribou Steering Committee and Recovery Team in response to the immediate need to prevent the short-term extirpation of the Selkirk Mountains Woodland Caribou population. This Emergency Action Plan outlined those efforts of immediate need to prevent the short-term extirpation of the remnant population of mountain caribou in the southern Selkirk Mountains

A socio-economic analysis which would include the price of extinction for threatened or endangered species such as the caribou is usually only conducted at the time when critical habitat is designated.

The recovery area boundaries were initially delineated as part of the Idaho Panhandle National Forests Forest Plan and were based on elevations and where caribou were known to occur. The Colville National Forest's Forest Plan was developed at a different time and were revisited during the most recent revision of the Caribou Recovery Plan. The British Columbia government determined what elevations in BC would be included in the recovery area. The recovery area is the area where management is implemented to facilitate caribou recovery. This is shown by the dark black line on the map in Figure 4 of the summary.

The survey which only found once caribou in the lower 48 states represented only one point in time for the distribution of caribou within the recovery area. The current population estimate for the Selkirk's is 41 woodland caribou, which is based on the most recent completed census in 2003. The Southern Selkirk woodland caribou herd declined during the 1960s and 1970s; other herd declines were detected in the 1990s.

Woodland caribou were transplanted several times to augment the population within the recovery area. The 1996 winter caribou census detected a population decline, but the cause is not known. The caribou could have died or moved out of the ecosystem. Although the caribou population hasn't responded as well as had been hoped, transplants (augmentations) were successful in maintaining a core herd of caribou in the South Selkirk Ecosystem and have prevented expiration of caribou from this area. Data on caribou mortality are in Appendix E or the strategy.

As part of the implementation, if an emergency situation were to present itself, we will work closely with the U.S. Fish and Wildlife Service to resolve any conflicts which arise.

An economic analysis or socio-economics is considered by the U.S. Fish and wildlife Service when there is the designation of critical habitat and often during the development of species recovery plans. Many of the earlier species recovery plan did not include and evaluation of the economic or social impacts. This type of analysis is not considered by the U.S. fish and wildlife Service during the process of species listing. The Forest Service considers economic and social -economic effects during the planning process (NEPA) when these effects have been identified as relevant issues. This may often include projects which impact threatened and endangered species.

The Strategy and the Forest Plan revision will use current and any new science which is available. Any science used will be peer reviewed and published.

U.S. Fish and Wildlife Service determines when a species is extinct or extirpated from an area, and when it is removed from protection under the Endangered Species Act. Figure 6 in the summary shows where snowmobile play areas are inside the caribou recovery area.

Caribou Strategy Report and NEPA concerns:

Comment received include:

- How will public be able to comment on later versions of this strategy before decision?
- Couldn't find notification of Winter Recreation Situation/Summary in IPNF Quarterly Schedule of Proposed Activities or Spokesman-Review. NEPA requires 30 day comment period. It would be helpful to explain that this is not a

NEPA decision, either in the document or as part of a cover letter that goes out with this.

- Recommendations avoid actions, which could protect and recover caribou.

Response: The Caribou Strategy was not prepared to meet the intent of the National Environmental Policy Act (NEPA) because it does not result in management decisions that change the current condition. The analysis that may result in access changes will be incorporated into the Forest Plan revision. Because the Strategy is not a NEPA document, it was not included in the NEPA Quarterly Schedule of Proposed Actions. There were, however, many opportunities for public involvement and comments. There have been two public meetings (find out how they were announced – new releases? Website?) and a public comment period that resulted in the comments that are being responded to in this document. As the strategy does not conclude in management decisions, ongoing discussion and comment are welcome. It is expected that the Forest Plan Work Groups (see www.fs.fed.us/kipz for more information) will address caribou and winter recreation issues. In addition, there will be other public comment opportunities on the revision of the Forest Plan over the next year.

Miscellaneous edits, comments and clarification:

Comment received include:

- Please document details of incident which triggered emergency closure.
- Statement about caribou using immature stands conflicts with statement about arboreal lichens being most abundant on 100+ year old trees.
- Page 5 - map shouldn't show Idaho as "present population" if lone U.S. caribou is in Washington.
- Is most current caribou data 11 years old?
- If caribou don't travel far, why would caribou come to Idaho from Canada if food supply is limited in U.S.?
- Does ongoing research concur with current caribou census?
- Who approves this recreation strategy?
- Page 33 - What is meant by "continue to limit cross-country access"? What is the current limit?
- Does this strategy apply to British Columbia?
- Please use footnotes, not appendix
- List staff who made recommendations.
- Page 12 - use a different word than extirpation.
- Page 21 - Table 5 is confusing.
- Page 23 - typo in sentence about late winter habitats...magnitude of...
- Page 32 - Define management direction re snowmobiling.
- Please provide all citations.
- Overlooked several key references to effects of snowmobiles on wildlife. Please add these.
- We are being shut out of the forest when caribou aren't there.

- Many conclusions on effects of motorized recreation are based on emotions, not science.
- Who approves this recreation strategy?
- The timeline for positive action is unclear.
- When will winter recreation plan referred to in caribou emergency recovery plan be done?
- At public meeting favoritism shown to one aggressive, confrontational speaker. Other viewpoints not allowed to be expressed equally. Agenda wasn't followed.
- Concerned about how 8/6/03 public meeting was conducted and managed, specifically precedent Forest Service set by allowing one aggressive speaker an extended audience with agency personnel after the meeting ended.
- Forest Service is capitulating to Access Alliance's aggression and confrontational nature. Their spokesman should not have been allowed so much time to speak, going beyond the scheduled meeting time.
- Hope Forest Service doesn't concede to aggression and confrontation in future public meetings.
- Federal law requires Forest Service and Fish and Wildlife Service to ensure the protection and recovery of all threatened and endangered species. That is the #1 priority in Situation Summary, not conceding to local and collaborative public input to help determine final document or decision.
- Unclear where motorized use is restricted in Selkirk's, Myrtle Creek. Who decides this?
- Why is there an emergency closure? Where is it? How long will it be in effect?
- Because there are no caribou and snowmobiles don't harm caribou habitat, what is justification for vegetation buffer on gated roads?
- How does 20 foot vegetation buffer along gated roads relate to limiting cross-country snowmobile access?

Response:

The "present population" map on page 4 shows areas caribou have used in the last 10 years. Caribou have very large home ranges which include parts of Washington, Idaho and British Columbia, and annual surveys do not always find caribou in the same locations as previous years.

Idaho Department of Fish and Game, Washington Department of Fish and Wildlife, British Columbia Ministry of Water, Land and Air Protection, and the Forest Service collect data on caribou and update it annually. (See Table 1 in the summary.)

Caribou travel long distances, especially during winter. There is no information to indicate food supply is limiting in the caribou recovery area.

The Forest Supervisor will review the strategy and associated implementation plan, which will include timelines for completion of specific tasks. The Fish and Wildlife

Service will be given an opportunity to provide their support for the strategy also. This strategy does not apply to management of caribou habitat in B.C.

The statement about limiting cross-country snowmobile access means limiting the areas where cross-country snowmobile travel is allowed, not putting a limit on the number of snowmobile users.

Extirpation is a scientific term which refers to a local population going extinct, but not the entire species. For example, grizzly bears have been extirpated from Oregon.

There is no emergency closure on the Idaho Panhandle National Forests. Figure 7 shows areas of the caribou recovery area which are not open to motorized winter recreation. Each land management agency decides where motorized use is allowed on the lands it manages.

The Selkirk closure was delineated and implemented as a result of identified conflicts between snowmobiles and caribou. In April 1992, monitoring by Idaho Department of Fish and Game indicated that caribou were displaced from the Beehive Lakes area following an instance where snowmobiles were coming in close contact with the band of caribou. In March 1994, two instances were reported by Idaho Department of Fish and Game where caribou were displaced from the Two Mouth Lakes Area following use of that area by snowmobiles. Again in March 1997, after the closure was implemented, caribou were observed having been displaced from the Harrison Lakes area to an area to the north following use of the Harrison lake area by snowmobiles. These instances of caribou displacement have been documented both by the Idaho Panhandle National Forests and the U.S. Fish and Wildlife Service.

Several parts of the summary have been corrected and reworded for clarity.

The Amended biological opinion (USFWS, 2001) for the Idaho Panhandle National Forests established guidelines for vegetational buffers along gated roads. This guidance was intended to provide for reduce sightability from road systems thus potentially reducing mortality risk for grizzly bears.

PART 2: Comments that will be addressed in the Forest Plan Revision

This section includes comments that were received on issues that will be addressed in the Forest Plan revision for the Idaho Panhandle National Forest. There are many ongoing public opportunities to be involved in discussions regarding the Forest Plan revision. Please see the website at www.fs.fed.us/KIPZ for more information on this effort.

Element #4: Forest Plan

The Forest Plan for the Idaho Panhandle National Forest is currently being revised. Element #4 of the Caribou Strategy proposes to incorporate caribou habitat analysis into a multi-species analysis for the development of the Environmental Impact Statement for the revised Forest Plan. See Appendix C of the Caribou Strategy for more information regarding what parts of the Forest Plan are expected to be reviewed that affect the management of caribou habitat, recreation uses, and other activities pertaining to these issues.

It is expected that the Forest Plan analysis will address the following issues:

Multi-species analysis: This section addresses comments received regarding using a multi-species analysis approach. An interdisciplinary team will consider the following comments and other public input in the forest plan revision. The multi-species analysis section includes:

- A) Snowmobile / caribou issues
- B) Effects on caribou from other activities
- C) Species other than woodland caribou and multi-species analysis

A) Snowmobile / caribou issues

Comment received include:

- Caribou won't expand into snowmobile use areas.
- Page 33 - Policy of no net increase in over-the-snow routes in lynx range isn't supported by science.
- Policy of no net increase in over-snow routes is completely unacceptable because use is excessive now.
- Snowmobiles should not be allowed in early winter habitat until snow conditions allow caribou to disperse to other habitat.
- Change Forest Plan direction from "protection from direct mortality" to "protection from indirect and direct mortalities."
- This sensitive wildlife area should be protected from the damaging public intrusion of motorized use, especially snowmobiles.
- Snow play area map on page 16 is incomplete.
- Endangered Species Act requires habitat protection, so effective measures must be taken to protect caribou. One way is to eliminate snowmobile in specific habitats.

- Cited British Columbia study showing caribou have abandoned areas used by snowmobiles.
- Caribou are affected by direct and indirect exposure and harassment by snowmobiles and snow compaction.
- To protect and restore winter wildlife habitat in Priest Lake area, eliminate or greatly reduce snowmobiling and develop non-motorized winter recreation facilities. This will provide local partnerships for stewardship instead of long-term destruction of natural resources.
- Page 33 - Policy of no net increase in over-the-snow routes in lynx range isn't supported by science.
- Cited Quebec study showing caribou behavioral responses to tours, with less time spent foraging and resting than when people absent.
- Forest Service should restrict motorized use (limit open trails and snow play areas) in core areas and corridors.
- Snowmobiles allow access for predators to other herbivores, maybe preying on caribou.
- Caribou should have precedence over snowmobiles in areas of suitable habitat. Caribou should have priority over recreationists. Forest Service has been ignoring caribou's "rights" for 15 years.
- Priority hasn't been given to protecting caribou habitat since 1987.
- Why do you close roads and restrict snowmobiles when there are so few(or no) caribou in the Selkirk's?
- Is cross-country snowmobile use allowed now?
- Current management isn't effective in recovering caribou.
- Delaying decision until Forest Plan doesn't protect caribou.
- Management should respond to exponential increase in winter recreation use in winter caribou habitat.
- Forest Service isn't complying with own policies or federal mandate to preserve habitat whether or not it is occupied by caribou.
- Forest Service should follow Forest Plan direction and not support human intrusion into protected caribou habitat.
- Forest Service hasn't made protecting caribou habitat a priority since the Forest Plan was written.
- There is an imminent need to identify areas essential to Selkirk caribou and close them to motorized winter recreation.
- Management decisions should be practical and base on real world.
- Forest Service should evaluate impacts at new sites if management includes trading snowmobile routes or play areas. Appropriate areas may be difficult to find.
- This area is promoted internationally as a snowmobile destination. Snowmobilers don't have right to ride in protected habitat.
- Winter recreation is Forest Service's highest priority. Since Forest Plan won't be in effect for years, dangerously low caribou population may not survive a policy of no further closures.
- At what distance from snowmobiles do caribou not react when not seen?

- It's speculation that caribou decline is associated with snowmobiles.
- Cited Horejsi - Purcell caribou herd has declined from 100 to 20 from 1994 to 2000. Remaining individuals occupy unroaded areas.
- Cited Horejsi - Displaced caribou may be prone to increased death when displaced to avalanche areas. 8 of 12 "natural" winter caribou deaths were caused by avalanches.
- Horejsi re BC caribou, snowmobile use and mortality. Snowmobiles pose serious threats to caribou; displacement from preferred areas, increased energy costs affecting condition and reproduction, accidental injury and mortality.
- Cited Horejsi - telemetry shows caribou don't use suitable habitat when intensive snowmobiling occurs. Area used by 93 caribou was used by 16 after snowmobiles accessed it. Other caribou strongly selected no-snowmobile area even with some trespass.
- Cited Horejsi - 7 groups of caribou ran away when snowmobiles approached to within 100 meters, 8 walked away and 3 did not appear to react.
- Cited Horejsi - A healthy female caribou was found dead; her tracks overlapped with snowmobile tracks.
- Cited Horejsi - ORV and snowmobile use have cumulative impacts because their access is not controlled or policed.
- Snowmobiles don't destroy caribou habitat or lichens.
- How can strategy contribute to recovery when habitat's degrading exponentially with increasing snowmobile use?
- Do caribou become accustomed to snowmobiles if not chased?
- How do snowmobilers contribute to direct mortality?
- Snowmobiles invade most sensitive areas when snow is deep.
- What happened to all the transplanted caribou? Did snowmobilers kill them?
- Documents from FOIA show Fish and Wildlife Service biologists know snowmobiles threaten caribou recovery in Selkirk's.
- Where is science proving snowmobilers contribute to caribou mortality when snowmobile trails help caribou conserve energy?
- Provide documentation of caribou displaced several times from winter ranges.
- It remains to be shown that snowmobiling is a threat to caribou. May assist caribou and doesn't harm habitat.
- Snowmobiles adversely affect caribou.
- Forest Service is accommodating snowmobilers too much when scientific evidence shows this use threatens caribou.
- Forest Service primary responsibility is to caribou, not recreation. Snowmobiles should be restricted in caribou habitat until science shows caribou are compatible with snowmobile use.
- Quebec study showed caribou behavioral responses to tours, with less time spent foraging and resting than when people absent.
- Simpson study found increased caribou use in an area when it was closed to snowmobiles, and less use in adjacent open area.
- Forest Service should read Kinley caribou study and apply its scientific findings.

- Off-trail use has grown with increased snowmobile use and as more powerful snowmachines can go places they couldn't before.
- Areas snowmobiles use aren't old growth.
- Elaborate on Kinley 2003 study.
- Excluding caribou from preferred areas can lead to increased forage competition and predation and reduced productivity.
- When caribou flee from snowmobiles, humans can still shoot or pursue them. Human induced mortality is additive to natural mortality.
- How do snowmobilers hinder closed canopy old growth and lichens?
- More snowmobiles, improved snowmobile technology allowing access to previously undisturbed caribou habitat including off trails; trend will increase.
- As caribou increase, conflict with snowmobiles will increase.
- The magnitude of increasing snowmobile use requires implementing rigid controls to protect habitat.
- Elaborate on Kinley study documenting 6 of 8 caribou herds declining in areas of heavy snowmobile use compared to 2 herds where less overlap with snowmobiles.
- Cited Horejsi - Displacement of caribou contributes to deaths from hunters, snowmobiles and other vehicles.
- Explain why you concluded caribou movements were due to displacement and not natural movements between foraging areas.

Response: Where adequate research and findings on caribou are available, that information is used and incorporated in the summary. Information on effects to other ungulates helps us understand where information on caribou are lacking. They can also indicate where similar effects might apply to caribou even though researchers haven't studied specific effects to woodland caribou.

Kinley (per comm.) indicated that the abandonment of caribou within eight areas of increasing snowmobile use would have been statistically unlikely to all have been the result of natural movements.

Access management is decided by each land management agency for the land it manages. For example, the Forest Service decides where motorized closures are needed on National Forests, but Idaho Department of Lands decides such matters on state lands. The Forest Service bases its management decisions on the best science available. Two recently published studies show caribou may abandon ranges as a result of increasing snowmobile use (Stimson and Kinley). These will also be considered in the Forest Plan revision. Specific factors associated with the population declines are not known but are believed to include predation, timber harvest and snowmobile use. Direct effects may include increased energy expense to the caribou, which may decrease winter survival, lower reproductive rates, and possibly lead to direct mortality. Indirect effects may include range abandonment and displacement from preferred habitats. As displacement increases in amount and frequency, caribou may be exposed to increased mortality from avalanches, increased energy expenditure, isolation and use of lower quality habitats. Also see pages 25 - 28 of draft summary. Data on caribou mortality are in Appendix E.

Research indicates caribou may at times become accustomed to snowmobiles where snowmobile use is restricted to linear routes and is predictable in times and space.

The preferred habitat of caribou includes old growth and late successional forests. They also forage in and travel through younger forests. Many snowmobile routes go through older forests which are preferred caribou habitats. Although snowmobile play areas are typically early successional forests, they are often near older forests. Vegetation buffers established by the 1987 Forest Plan for the Idaho Panhandle National Forests confine snowmobiles to linear routes; this helps prevent displacement of caribou by providing secure habitats for caribou free from human disturbance away from snowmobile trails.

The Selkirk Crest closure will be maintained as part of ongoing efforts to protect suitable habitats and to meet caribou recovery efforts. The emergency closure in the Selkirk's was implemented by the Forest Supervisor in 1994 after the Forest Service received reports of several incidents of harassment and displacement of caribou by snowmobiles. These incidents are described within the summary and strategy.

Twenty-four percent of the Idaho Panhandle National Forests within the recovery area is closed to motorized use. See the map (Figure 5) in the draft summary. No other motorized closures, and no changes to the current closure are planned prior to the Forest Plan Revision. If the Forest Plan Revision recommends changes to motorized access in caribou habitat, the Forest Service will consult with the U.S. Fish and Wildlife Service before implementing any changes. Most of the closed areas are in British Columbia.

The Forest Plan revision will identify areas of motorized and non-motorized winter use. It will also decide the appropriate locations and level of snowmobile use in caribou habitat. For motorized areas, it may identify areas where use is limited to routes and designated play areas and where use is unrestricted.

There are no scientific data showing snowmobile trails enhance caribou movement or help caribou conserve energy.

B) Effects on caribou from other activities

This section focuses on roads, fires, timber management and motorized recreation.

Comment received include:

- Large fires have contributed in a major way to caribou loss in U.S.
- Have caribou declined due to loss of suitable habitat from fires?
- Has habitat fragmentation affected caribou?
- Threats of motorized recreation on mountain caribou and other wildlife are well documented.

- How were timber management, roads, other recreation and other factors considered in this analysis?
- Cited an Alberta study showing caribou avoidance of roads, wells and seismic lines increased with increasing human activity. Females with calves are especially sensitive to human disturbance. Avoidance distances range from 250 - 1,000 meters.
- Roads and other manmade linear structures may act as barriers to caribou movement.
- Compacted snow interferes with the ability of caribou to dig for vegetation.
- Cited study showing roads and railways caused reindeer to abandon traditional migration routes in Eurasia; another caribou expert blamed overhunting.
- Cited Alaska study showing caribou crossed areas with roads and pipelines less than controls, and Alberta study where caribou crossed roads 1/6 of frequency expected, based on road density.
- Logging 36,000 acres in the caribou recovery area since 1950 has fragmented and removed mature and old growth stands.
- Research in Ontario and Newfoundland shows clearcutting displaces caribou.
- Large fires and wolves pose a larger threat to caribou than winter recreation. Large fires have probably played a major role in caribou loss in the U.S.
- Forest Service should address fire danger in caribou habitat.
- ORV and snowmobile use have cumulative impacts because their access is not controlled or policed, according to researcher Horejsi.
- How were timber / roads / recreation considered?
- Logging and roads have affected caribou by eliminating canopy, migration corridors and lichens.
- Forest Service won't improve habitat for caribou even though hundreds of miles of groomed trails and thousands of acres of snow play areas are open to snowmobiles.
- Cited Newfoundland and Alberta studies showing caribou avoid roads with traffic. Cited a Newfoundland study showing caribou activity centers were as far as possible from roads as a result of hunting and disturbance.
- Cited Horejsi - 13 caribou herds in Newfoundland occupy "inaccessible barrens" far from human activity.
- Cited an Alaska study showing caribou density was inversely related to road density. Road density approximately 1 mile per square mile resulted in 86% decline in caribou density and excluded most cows with calves.
- Studies have shown caribou are extremely susceptible to impacts from motorized winter recreation (cited references).
- Sound science has shown allowing motorized recreation in caribou management units will continue to inhibit recovery.
- Roads and other manmade linear structures may act as barriers to caribou movement.
- Forest Service should curtail logging, road building and summer recreation where necessary.
- Monitoring with aircraft has negative effects on caribou.

- Old growth should be critical for defining suitable caribou habitat.
- Cited Horejsi - Habitat fragmentation and degradation from roads displace caribou and lead to mortalities and viability concerns. .
- Cited Horejsi - Access to caribou calving areas will increase mortality. Access "ties together" formerly isolated areas or caribou groups, increasing predation and mortality and threatening viability.
- Cited Horejsi - Despite augmentation of 100 animals, Selkirk caribou population has declined to 35 and isn't viable. Six were poached by people who came into U.S. from British Columbia.
- Cited Horejsi - Mortality from predation is significantly higher when road density exceeds 1 km per square mile.
- Cited Horejsi - 83% of human-caused caribou mortality in west central Alberta was within 50 meters of a road. Roads fragment habitat.
- Cited Horejsi - 27 of 150 caribou in an Alberta herd were killed by motor vehicles on one highway in 3 years.
- Cited Horejsi - Salt attracts caribou to highways. 56 Selkirk caribou were killed on Hwy. 3 in BC over 15 years.
- Selkirk caribou selected areas of low road density in late winter and summer (0.2 to 0.5 km per sq.km) and only used areas with road density ≥ 1.3 km per sq.km during the rut.
- Cited Horejsi - Caribou have foraged in active timber harvest areas but these sites don't provide long-term foraging opportunity.
- Management should take into account natural population fluctuations.
- Excluding caribou from preferred areas can lead to increased forage competition and predation and reduced productivity.

Response: Timber harvest may affect caribou and their habitat by and altering levels of human access into caribou habitat. Also, timber harvest may have positive or negative effects on habitat depending on the harvest prescription, which designates which trees, will be harvested. Roads are generally closed as part of or immediately following timber sale activities for a variety of reasons of which may include caribou. All timber harvests on national forests are coordinated with and evaluated by a wildlife biologist. If there is any possibility that they could affect caribou or other threatened or endangered species, the Forest Service consults with the U.S. Fish and Wildlife Service on the project before it begins. This issue will be discussed more fully in the Forest Plan revision. Timber harvest with caribou habitat in the Idaho Panhandle has dropped significantly since the 1990s and now consists of only a few hundred acres each decade and is conducted primarily to maintain or enhance caribou habitat values. The Forest Service will reference additional literature about effects to caribou which were not available for the draft copy of the summary.

Caribou have existed in this ecosystem for centuries with large fires. Caribou have adapted to historical fire regimes. In recent decades, there have been far fewer large fires than there were when caribou populations were higher. There is no information that fire has caused a direct decline of caribou numbers, but fires may have resulted in caribou being displaced from their habitat. There is no indication habitat is currently limiting

caribou populations in the Selkirks. The Forest Plan revision will analyze the effects of fire on the habitat of caribou and other wildlife.

Research in Alberta (Dryer 1999) showed that caribou avoided roads within open forested habitats and that caribou avoidance of roads was less when road were located with a closed canopy forest. This lesser difference that author believed was ameliorated by the shielding effect of the denser vegetation. Oberg et al (2000) found that in west-central Alberta, that caribou showed a pronounced preference for areas far away from roads, with a significantly reduced preference by caribou up to 100 meters. The authors felt that this behavioral avoidance could have been similar as the avoidance of streams where caribou perceive roads as travel corridors for predators or avoid other ungulates associated with these areas. In addition, the authors stated that caribou may avoid roads due to increase human activity associated with these areas

Old growth is one factor in defining suitable habitat for caribou. (Refer to "Habitat Conditions" section of the summary. The Forest Plan developed guidelines for timber management that were compatible with recovering caribou. We follow those guidelines when planning timber sales in caribou. The Forest Service consults with the U.S. Fish and Wildlife Service on every project which may have the potential to affect caribou. If U.S. Fish and Wildlife Service recommend changes to protect caribou, these are incorporated.

We recognize natural population fluctuations do and will continue to occur. The Endangered Species Act requires all federal agencies to use their authorities to provide actions which will facilitate species recovery. These actions will provide for increased populations and habitats.

C) Species other than woodland caribou and multi-species analysis

Comment received include:

- Wolves are a bigger threat to caribou than recreation.
- Multi-species management should discuss wolf introduction.
- Snowmobiles allow access for predators to other herbivores, maybe preying on caribou.
- Looking forward to multi-species analysis. How will not restricting snowmobiles affect lynx and wolverine?
- Issues affecting caribou also affect lynx, fisher, wolverines and to a lesser extent grizzly bears. Issue is protection of wildlife habitat from human intrusion, especially machines. All these species sensitive to human disturbance and need large home ranges for feeding.
- Support multi-species analysis in Forest Plan revision. Should include grizzly bear, wolverine and native big game.
- Multi-species management should include lynx, fisher, wolverine and grizzly bear; issues are similar to caribou. Include grizzly bear denning concerns. All these species require large territories and are highly sensitive to human contact.

- Snow compaction facilitates movement of coyotes and other predators.
- Discussion about whether packed trails are beneficial or detrimental to wildlife is contradictory. Words like "could" and "may" aren't conclusive.
- Statement that snowmobile trails enhance caribou movement is refuted by statement that trails allow access of predators, resulting in mortality, not survival.
- Comments about caribou using snowmobile tracks is refuted by comments about predators accessing caribou habitat and affecting caribou mortality.
- Snowmobiles adversely affect herbivores other than caribou.
- Snowmobiles often cause wildlife to flee. In Yellowstone NP this has been documented in deer and elk. Cites flight distances, energy costs.
- Snowmobiles add significant stress to wildlife which can increase mortality, decrease productivity and change behavior. May also increase disease and competition. Effects may be short or long term, even years. Study showed deer heart rate increased 250% when near snowmobile activity. Riders chase, harass and run down fleeing wildlife.
- References to studies on ungulates (pages 25-29) don't apply specifically to caribou. Some methodologies and models are questioned. Need to base management decisions on real research data on caribou.
- Compacted snow interferes with the mobility of snowshoe hares and red fox and other species, and allows coyote and bobcat to out compete lynx..
- Cited 5 studies showing even low intensities of snowmobile use can increase winter mortality in wildlife.
- Pages 25 - 28 - Why aren't you citing or researching the benefits of snowmobile trails for ungulates? Don't state uncertain conclusions as fact.
- Page 29 - Why don't you state that concept of coyotes competing with lynx by using packed snow trails is controversial among scientists?
- Studies have shown snowmobiles increase ungulate metabolic rates and stress responses, harassment, can disrupt movement patterns and interfere with locating food. Other species respond similarly to snowmobiles.
- Repeated snowmobile exposures can displace wildlife and expand home ranges, increasing stress and energy expenditures.
- Research has shown increase in mountain lion predation on caribou.
- Compacted snow interferes with the mobility of snowshoe hares and red fox and other species, and allows coyote and bobcat to out compete lynx.

Response: The monitoring of caribou within the Selkirk's is conducted by a variety of Agencies, which include, Washington Department of Fish and Wildlife, Idaho Department of Fish and Game, British Columbia Agencies, U.S.Forest Service and the U.S. Fish and Wildlife Service.

To date, no incidents have been documented of caribou mortality being attributed to wolf predation within the southern Selkirk recovery area. Wolf populations may increase in the future and may become established within the vicinity of the caribou recovery area. We have documented reports of wolves within this area for several years, but to date there has be no indication of pack establishment. Once wolves become delisted federally

as a threatened species the responsibility for wolf management within this area would reside with the States of Washington and Idaho within the United States portion of the recovery area, and would still reside with British Columbia agencies on the Canadian side of the recovery area. Within the United States portion of the recovery area, this the increase the flexibility in controlling wolf populations or individual animals if close monitoring indicated that this was a significant factor which was effecting caribou populations.

Where relevant published research on caribou are available, that information is used and incorporated in the summary. Information on effects to other ungulates helps us understand address issues and effects where specific information on caribou are lacking. They can also indicate where similar effects might apply to caribou even though researchers haven't studied specific effects to woodland caribou. This information on other ungulates and caribou can be found within the current summary and strategy

The science is currently inconclusive on whether packed snow trails are beneficial or detrimental to wildlife. Researchers have found predators generally remain on trails in winter, and are not able to use adjacent habitats with uncompacted snow. A study of mountain lions and caribou in Washington, although not designed to evaluate mountain lion movements in relation to trails, found that in winter mountain lions generally are at lower elevations than caribou.

Habitat loss, predation and poaching all affect caribou recovery.

Future Snowmobile Decisions:

Comment received include:

- Forest Service should implement emergency closures in critical areas where "take" is occurring.
- Waiting several years until Forest Plan Revision is complete avoids action such as emergency snowmobile closure that would protect and recover caribou.
- Forest Service should issue an emergency snowmobile closure of Willow Creek, Hughes Meadow, Hughes Ridge, Boulder Creek, Boulder Meadow, Trapper Creek-Continental Mountain, Gunsight Peak and Caribou Ridge where caribou habitat and use overlap with snowmobile play areas.
- Forest Service should issue emergency snowmobile closure for backcountry non-motorized recreation in core caribou winter habitats.
- Emergency closures should be implemented immediately in winter caribou habitat and travel corridors.
- Is Forest Service considering limiting snowmobile use with a lottery system?
- Consider restricting snowmobile use based on season, snow depth and snow condition.
- Forest Service should consider permit system to limit number of snowmobiles.

- Consider restricting snowmobile use based on season, snow depth and snow condition.

Response: Emergency closures are not part of our strategy at this time. Decisions regarding winter recreation access and overlap with caribou habitats will require further analysis in the Forest Plan Revision. See Appendix C for more information.

At this time, the Forest Service is not considering a lottery and permit system to limit snowmobiles on the Idaho Panhandle National Forests. Before any limitations can be considered, the analysis of where and how snowmobile use is appropriate must be completed. This analysis will be completed in the Forest Plan revision.

Winter Recreation Opportunities:

Comments received regarding winter recreation other than snowmobiling, which will be addressed as part of the Forest Plan revision.

Comment received include:

- Summary should fully analyze other winter recreation activities and Idaho Statewide Comprehensive Outdoor Recreation and Tourism Plan data.
- Snowmobiling is incompatible with skiing because snowmobiles destroy groomed ski tracks and sometimes collide with skiers.
- Snowmobiles require more space than skiers and monopolize some areas. They effectively diminish the size of the natural environment. It is difficult to escape the impact of snowmobiles, and skiers are forced to accommodate motorized users.
- Non-motorized recreation benefits wildlife because trails are shorter than for snowmobiles, and there is less interference.
- Existing nordic ski facilities are too short, poorly marked, not at good snow elevations, not scenic, lack adequate parking, and sited too close to snowmobiles. Majority of recreationists prefer non-motorized setting and are willing to pay for that experience. Priest Lake area is ideal for these activities except it is currently dominated by snowmobile use.

Response: Winter recreation activities other than snowmobiling are discussed on page 18. This includes activities listed in the Idaho Statewide Comprehensive Outdoor Recreation and Tourism Plan. Current levels of these activities in the Idaho Panhandle National Forests part of the recovery area are minimal and not believed to be affecting caribou. Winter recreation will be analyzed more fully in the Forest Plan revision.

The Forest Service has no plans to develop new nordic ski facilities at this time.

Economics:

Comment received include:

- What economic studies have been done? Federal and state agencies handle this differently.
- What are economic impacts of cross-country skiing, downhill skiing, dog sledding and showshoeing?
- Tourism is important for local businesses.
- Tourism is important for local economy.
- Snowmobile use has short-term positive economic impact on local businesses. Over long-term, expect outside commercial interests to come into area and compete with local businesses.
- Forest Service economic studies should show long-term economic stability of family recreational use such as cross-country skiing.
- Economic success shouldn't depend on intruding into this sensitive area.
- Commercial interests from out of the area could negatively impact local businesses as snowmobile use increases in Priest Lake area.
- Forest Service economic analysis should include long-term family-related recreation, which benefits local businesses more than snowmobilers from out of the area.
- Economics shouldn't have priority over the natural environment and wildlife.
- Community can change to nature-based economy by developing winter landscape to attract non-motorized recreationists.
- For a healthy economy in Priest Lake area, eliminate or greatly reduce snowmobiling and develop non-motorized winter recreation facilities. This will provide local partnerships for stewardship instead of long-term destruction of natural resources.
- Explain why statewide snowmobile revenues are pertinent to Selkirk management.

Response: Economic and recreation issues and impacts are recognized and considered in management decisions. An economic analysis will be completed as part of the Forest Plan revision. This analysis will be done at a forest-wide scale with most available information being at the county level. Forest Plan Work Group input and other public input, however, may provide more specific information that can be incorporated into the Forest Plan discussion.

Statewide snowmobile revenues were mentioned to provide a context for the economic discussion. They are not directly related to caribou management.

Cumulative Effects

Comment received include:

- Use Cumulative Effects Model referenced on page 38 of Caribou Recovery Plan.

- Forest Service should use Cumulative Effects Model to analyze cumulative effects of past and future activities.
- Management should take into effect natural population fluctuations.
- Has degradation of Idaho Department of Lands been considered in caribou analysis?
- Was removal of large trees / habitat loss on Idaho Department of Lands ownership evaluated?
- For cumulative effects analysis, analyze IDL proposal to log remaining caribou early winter habitat.
- Caribou Recovery Plan states, "cannot afford additional habitat losses." Idaho Department of Lands logging plan would eliminate early winter caribou habitat.
- Concerned that Idaho Department of Lands wasn't represented at 10/6/03 public meeting. IDL has been involved with caribou recovery for long time. IDL announcement to liquidate all old growth on state lands is counter to protecting and recovering caribou. Agencies should comment to IDL on their plan to liquidate old growth.

Response:

The cumulative effects model was based on seasonal habitat of caribou as they were known about 15 years ago. Based on new information, habitat surveys and several years of monitoring caribou and consulting with the U.S. Fish and Wildlife Service, the Forest Service has developed procedures for analyzing effects on caribou. These will be reviewed and, if necessary, updated in the forest plan revision.

This document does not deal with management policies of the Idaho Department of Lands (IDL). The forest plan revision will consider Idaho Department of Lands and other landowners / land managers in cumulative effects in the forest plan revision. According to the U.S. Fish and Wildlife Service, the Idaho Department of Lands is not responsible to contribute to the recovery of threatened or endangered species other than avoiding incidental take. IDL is working with the Fish and Wildlife Service developing a habitat management plan for their lands to avoid incidental take of caribou and other listed species.

Effects of snowmobiles on other resources:

Comment received include:

- Snowmobiles and other ORVs can damage vegetation, including shallow roots and rhizomes.
- Snowmobile use can change plant density and species composition, erode soil, and cause off-site sedimentation and turbidity.
- Snow compaction can retard snowmelt, alter vegetative phenology, damage trails and roads, alter timing of runoff and increase soil erosion.

- Snow compaction can damage soil, soil microbes and vegetation under the snow and seed germination.
- Cited 3 studies showing most snow compaction occurs on the first pass, so minimal snowmobile use can cause considerable damage.
- Snow compaction can retard snowmelt, alter vegetative phenology, damage trails and roads, alter timing of runoff and increase soil erosion.
- Snowmobiling annoys skiers and impairs their health by producing air pollution and noise.
- Consider multiple use since snowmobilers aren't destroying habitat.
- Restrict snowmobiles and OHVs because of disturbing wildlife and air pollution.
- Several studies showed snowmobiles have severe impacts to vegetation and soil from snow compaction.
- Snowmobiles impact the visual resource.
- Non-motorized recreation benefits wildlife because trails are shorter than for snowmobiles, and there is less interference.
- The Forest Plan revision will assess the impacts to soil of the activities that it authorizes.

PART 3 - Outside the Scope

The following comments are outside the scope of the Caribou Summary and outside the scope of the Forest Plan Revision:

- Deer diseases (ringworm) displace caribou.
- Has climate shifted caribou to the north?
- Did not understand photos of lichen and snowmobiles.
- How many years must caribou be gone from an area?
- Is IDFG statement that Trapper Peak area hasn't been used by caribou since Trapper Peak Fire correct?
- Are authors present at meeting?
- How do deer differentiate need for cover in hunting season vs. out of season?
- Snowmobiles should not be referred to as natural.
- Chose not to comment due to strong hostility at public meetings; fear retaliation from Priest Lake neighbors for minority opinion.
- Good science isn't popular when it inhibits freedoms or is perceived as threat to economic activity.
- Encourage FS not to be intimidated by aggressive behavior at public meetings.
- FS should be objective, not political in analyzing data.
- FS and Fish and Wildlife Service have "keeled over" to confrontational demands of motorized users at the expense of caribou.
- Access Alliance has been coached by Congressional offices on how to "tear apart" agency documents aimed at recovering caribou.
- Number one priority in Situation Summary is protection and recovery of caribou; public comment shouldn't be allowed to sidetrack that.
- Hope final document will be greatly improved, based on sound science, not motorized users' input.
- Recommendations are based on politics, not science.
- Snowmobiling can be spiritual experience.
- Snowmobiles can seriously impair air quality.
- Discusses pollutants from snowmobiles.

Response: Climates haven't changed in the short time frame in this century when caribou populations have declined. The microclimate associated with 80-year-old and older forests often favors high arboreal lichen production. See page 16 of the summary. Lichen growth is controlled by microclimate factors such as wetting and drying cycles and relative humidity.

Idaho Department of Fish and Game is unaware of ringworm occurring in Idaho Panhandle deer

The following comments were determined to be outside the scope of the summary.

- How will IDL handle multiple species management?
- Snow compaction impacts sage grouse that depend on subnivean spaces for winter survival.
- How will you fix ineffective actions proposed in Caribou Recovery Plan?
- Recommendations are inadequate for recovery of the small caribou population with limited gene pool.
- This issue applies to a much larger area than Priest Lake, North Idaho or the Inland Northwest. It is a global issue. Where else can you find such biodiversity (lists caribou and several other species)? Snowmobiles have millions of areas for recreating. Why intrude on such a sensitive area?
- Cited Horejsi - Logging and road building in BC don't require environmental impact statements or best science.
- High noise levels affect cross-country skiers and other winter recreationists. Preserving soundscape is a high priority for National Park Service.
- Snowmobilers frequently are DUI and put other forest users at risk. In one year in Minnesota 32 people died from snowmobile accidents. 15,000 were treated at hospitals for snowmobile related injuries. Risk of death or injury in a snowmobile accident is 9 times that of an automobile accident. High horsepower of snowmobiles and their marketing invite aggressive and reckless operation.
- Telling snowmobilers that are out of bounds commonly results in anger and defiance.
- Failed augmentation may show the futility of managing habitat for caribou.
- Noise from ORVs can lead to hearing loss in wildlife, which can impair communication, increase vulnerability to predators and interfere with prey detection.
- Noise from ORVs can travel long distances, disturbs and stresses many wildlife species, and can result in physiological and other behavioral responses, displacement and can affect survival and productivity
- Washington law limits snowmobiles to 78 decibels at 50 feet; law is difficult to enforce. Some users adapt snowmobiles by removing muffler to increase power.
- Enforcement doesn't resolve noise issues caused by snowmobiles.
- Speed and air pollution from snowmobiles displaces many non-motorized users.
- Small mammals which are active under snow in winter are impacted by snow compaction due to: compacted snow insulates less, leading to higher metabolic rates and increased mortality; compacted snow forms movement barriers which can be fatal.
- Stress can have physical and psychological impacts to wildlife. ORVs' noise, pollution, activity patterns and harassment can stress wildlife and impair productivity. Effects may not show for days to years after disturbances. Recreation-induced stress exacerbates effects of disease and competition, contributing to mortality. Other comments were included about stress and wildlife species other than caribou.
- Snowmobiles create lots of noise. EPA says noise is a physiological stressor and can affect reproductive function.

- If caribou smell people, they can also smell and hear snowmobiles. Document scientific proof of caribou smelling people.
- Sight and smell of snowmobiles can disturb wildlife.
- If human smell displaces caribou, what other human activities will be stopped?
- Cited Horejsi - Caribou react to scent of humans by fleeing.
- Sight and smell of snowmobiles can disturb wildlife..

Response: We will review the literature to determine the effects of noise on caribou, other wildlife and other forest users. If appropriate to decisions addressed in the Forest Plan revision, they will be considered at that time.

Noise is discussed in the summary in the section titled "Effects of snowmobiling on caribou."

Sage grouse do not occur on the Idaho Panhandle National Forests.

Penalties for violators are outside the scope of the caribou summary.

Research hasn't been conducted to distinguish between caribou smelling people and smelling snowmachines. It isn't known how far from a snowmobile a caribou will react when it cannot see the snowmobile.