

OFFICE OF SPECIES CONSERVATION

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May 21, 2012

Public Comment Processing
Attn: FWS-R1-ES-2011-0096
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 North Fairfax Drive, MS 2042-PDM
Arlington, VA 22203

RE: Comments Concerning the Proposed Rule Designating Critical Habitat for the Southern Selkirk Mountains Population of Woodland Caribou

The State of Idaho has reviewed and analyzed the proposed rule for the designation of critical habitat for the southern Selkirk Mountains population of woodland caribou (*Rangifer tarandus caribou*), issued by the U.S. Fish and Wildlife Service ("Service") on November 30, 2011. 76 Fed. Reg. 74018. The State of Idaho by and through the Governor's Office of Species Conservation ("OSC") in cooperation with the Idaho Department of Fish and Game ("IDFG")¹, the Idaho Department of Lands ("IDL")² and the Idaho Department of Parks and Recreation ("IDPR")³ is pleased to offer the following comments on the proposed rule for the designation of critical habitat for the southern Selkirk Mountains population of woodland caribou (hereinafter "proposed rule").

In its current form, the proposed rule calls for a designation of approximately 375,562 acres of land as critical habitat for woodland caribou within Bonner and Boundary Counties in Idaho and Pend Oreille County in Washington. This is equal to roughly 600 square miles; most of which occurs in Idaho.

Occupancy Determination

As the Service should expect, the State of Idaho has many concerns with this proposed rule. Chief among them is that the Service is proposing such a vast and far-reaching designation of critical habitat for a species that rarely ventures south of the Canadian border into Idaho. Section 3 of the Endangered Species Act (ESA) defines critical habitat as:

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- ¹ Please find attached IDFG's comments regarding the proposed rule.
² Please find attached IDL's comments regarding the proposed rule.
³ Please find attached IDPR's comments regarding the proposed rule.

“(1) The specific areas within the geographical area occupied by the species, at the time it is listed in accordance with the Act, on which are found those physical or biological features (a) Essential to the conservation of the species, and (b) Which may require special management considerations or protection; and (2) Specific areas outside the geographical area occupied by the species at the time it is listed, upon a determination that such areas are essential to the conservation of the species.”

The Service states in the proposed rule at Fed. Reg. 74023, “We are not proposing to designate unoccupied critical habitat since we are unable to identify any specific areas in the U.S. that are outside the geographical area occupied by the southern Selkirk Mountains caribou at the time of listing that are essential to the conservation of the species.” The key issue here is that the Service is implying that the entire area proposed for critical habitat was occupied at the time of listing, when in fact aerial census data collected by IDFG at the time of listing indicates that very few caribou were using habitat within the United States. Those that were using habitat within the United States were found in close proximity to the U.S./ Canadian border. As such, the Service cannot justify a designation of critical habitat for woodland caribou in the amount currently proposed.

Prudency Determination

As is indicated in the proposed rule at Fed. Reg. 74021, critical habitat designation for the southern Selkirk Mountains population of woodland caribou was determined to not be prudent at the time of listing as “...critical habitat designation would require publication and extensive publicity of the precise areas occupied by the herd and the kind of habitat utilized. As a result, there would be a serious risk of facilitating poaching...”. In reality, since the time of listing, only three caribou were documented to have been illegally killed in the Selkirk region. However, the State of Idaho believes that this broad-brushed designation of critical habitat, with all its uncertainty is not prudent and may lead to increased animosity towards the species; which could hinder recovery efforts.

Furthermore, the designation of critical habitat for woodland caribou is not prudent at this time as adequate protections for the species and its habitat currently exists across the landscape in the Selkirk region. At Fed. Reg. 24027, the Service acknowledges that U.S. Forest Service Land and Resource Management Plans in the Selkirk region have been updated to address the threats to woodland caribou and its habitat going as far to say that these updated plans “...contribute to the protection of the essential physical or biological features [required by woodland caribou]...”. Additionally, Section 9 of the ESA makes it unlawful for anyone to ‘take’ a woodland caribou because of its protected status. Take under the ESA is defined very broadly going well beyond the actual killing of a member of the species to include “significant habitat modification or degradation...”. Therefore it would appear that protections for woodland caribou and its habitat are well established within the Selkirk region.

It is important to add that the designation of critical habitat for woodland caribou is again not prudent at this time as the State of Idaho firmly believes there are serious questions regarding the use of the distinct population segment (DPS) designation as the listable entity for the Selkirk woodland caribou population. The State of Idaho provided comments to the Service regarding this topic in 2007 during the most recent 5-year status review for woodland caribou.

Adverse Modification Standard

Once critical habitat is designated for a species, a new standard applies to federally authorized land-use activities that may have an impact on critical habitat for the species. The Service points out in the proposed rule that because woodland caribou are federally protected, federal land management agencies already consult with the Service over land-use activities they carry-out to ensure that those activities are not jeopardizing the continued existence of the species. However, once a final rule is published designating critical habitat for woodland caribou, the bar will be raised as the Service will prohibit the “adverse modification” of critical habitat; a standard that is largely immeasurable and unquantifiable. As such, all activities occurring on federal, state and private land that have a federal nexus must go through additional and costly consultation with the Service to ensure that those activities are not impacting critical habitat for the species. The end result could mean significant and costly changes to how those land-use activities are authorized and carried-out.

Economic Impact

A designation of critical habitat as currently proposed would impose significant costs on the State of Idaho. As you will read in the attached comments, this proposed rule will impact IDL’s ability to manage state endowment lands within the proposed critical habitat boundaries in a manner consistent with its fiduciary responsibility to maximize the return to the trust beneficiaries. Additionally, IDPR’s duty to maintain the motorized recreational utility of areas within the Selkirk region, primarily during the winter months, would be impacted. IDPR has already seen a decline in the number of snowmobile registration designations in the Selkirk region, likely due to existing motorized closures on federal lands. The State of Idaho also has concerns over how this proposed rule would negatively impact local communities and recreation-based economies in the region.

In closing, the State of Idaho strongly believes this critical habitat proposal needs considerable revision prior to being released as a final rule. In developing this proposed rule, the Service failed to take into account the best available science and instead took a broad-brushed approach that if implemented as written would carry significant economic consequences and ultimately hinder recovery efforts for caribou in the region. The State of Idaho understands that the Service is under court order to designate critical habitat for the southern Selkirk Mountains population of woodland caribou, but the State of Idaho expects the Service to work with the State on scaling back this proposal to something that is scientifically driven, legally defensible, and politically palatable.

Should you have any questions regarding these comments, please contact me at (208) 334-2189 or dustin.miller@osc.idaho.gov.

Sincerely,



Dustin T. Miller
Acting Administrator

COMMENTS ON THE CARIBOU CRITICAL HABITAT PROPOSED RULE

Docket No. FWS-R1-ES-2011-0096

Idaho Department of Fish and Game

April 2012

The Idaho Department of Fish and Game (Department) has reviewed the proposed rule to designate critical habitat for Woodland caribou (*Rangifer tarandus caribou*) developed by the USFWS. Department staff expertise includes research and monitoring of the Selkirk woodland caribou population since 1991.

The Department recognizes that the USFWS is under court order to apply a critical habitat designation, but also recognizes that the currently designated recovery zone already results in significant land management actions to protect caribou. What is not clearly articulated in the proposed rule is what additional, if any, management actions would be imposed in areas where critical habitat is ultimately designated, and if so, how those actions would further benefit caribou.

The Department notes that since the ESA listing of caribou, the primary documented cause of mortality has been predation by mountain lions. Wolves are also a known predator of woodland caribou elsewhere in their range, and with the increase in the wolf population in the Selkirk Mountains in recent years, it is not unreasonable to believe that wolves also pose increasing predation risk to the Selkirk herd. Designation of critical habitat in any amount will not likely affect predation rates and therefore does not address an important factor in caribou population dynamics.

The Department strongly believes the proposed critical habitat designation needs considerable revision prior to being released as a final rule. We believe the proposal fails to make good use of the best available scientific information and instead takes too broad a brush in the approach, based on recovery zone boundaries.

As a result of an overly inclusive approach to the amount of area being designated, the proposed critical habitat designation would result in tens of thousands of additional acres being designated that have little habitat value for caribou. Including these additional acres will not directly benefit caribou, and would likely be to the detriment of other uses of the Selkirk region and a detriment for continued local, public support of caribou recovery. Such a broad-brush designation has raised local public animosity towards caribou recovery actions.

Following are specific aspects of the current status of the caribou population, and language from the listing decision and from the Endangered Species Act, which we believe, upon more rigorous examination and consideration, will result in the need to substantially modify the proposed designation.

OCCUPIED DETERMINATION

The final 1984 listing rule (49 FR 7390-7394) did not identify a specific area that was occupied by caribou, as stated on page 74028, first column. The 1984 final rule identifies a general area,

termed “total approximate area of normal utilization”, but later states within this same document: “Actually, however, the ‘approximate area of normal utilization’ was described only for general information purposes and is definitely not equivalent to critical habitat for purposes of section 7(a)(2) of the Endangered Species Act.”

Page 74027, first column, towards the bottom of the page and other locations within the proposed rule to designate critical habitat, it is also stated that: “All areas proposed for designation as critical habitat were occupied at the time of listing and contain those physical or biological features essential to the conservation of the species....” The Department questions this claim.

Scott (1983), and Scott and Servheen (1984, 1985), surveyed caribou habitat in Idaho, Washington, and British Columbia. In 1983 and 1984, they used a helicopter and in 1985 they used a combination of fixed-wing aircraft and a helicopter. In 1983, they located 26 caribou, none of which were in the U.S. In 1984, they located 28 caribou, 2 of which were in Idaho in the upper Priest River drainage. In 1985, they located 25 caribou, one of which was located in Idaho. This was a lone bull located on upper Hughes Ridge. All other caribou observed were in British Columbia. The Scott (1983) and Scott and Servheen (1984, 1985) data do not support the claim that all areas proposed for designation as critical habitat were occupied at the time of listing.

PRUDENCY DETERMINATION

As stated in the critical habitat proposal: “A designation of critical habitat is not prudent when one or both of the following situations exist: (i) The species is threatened by taking or other human activity, and the identification of critical habitat can be expected to increase the degree of threat to the species and (ii), such designation of critical habitat would not be beneficial to the species (50 CFR 424.12(a)(1)(i) and (ii).”

The level of human-caused mortality of woodland caribou has been relatively low, with only 3 confirmed illegally killed caribou since 1987 so we do not find that critical habitat designation is not prudent due to current taking. We do suggest that the proposal does not meet a tenet of prudence determination, i.e. *designation of critical habitat is not prudent if such designation would not be beneficial to the species*. The current proposal states that special management considerations are required to address threats (page 74027, middle column), but later states that:

“Land and resource management plans (LRMPs) for the IPNF [Idaho Panhandle National Forests] and CNF [Colville National Forest] have been revised to incorporate management objectives and standards to address the above threats, as a result of section 7 consultations between the USFWS and USFS (USFWS 2001a, b). Standards for caribou habitat management have been incorporated into the IPNF’s 1987 and CNF’s 1988 LRMP, respectively, to avoid the likelihood of jeopardizing the continued existence of the species, contribute to caribou conservation, and ensure consideration of the biological needs of the species during forest management planning and implementation actions (USFS 1987, pp.II-6, II-27, Appendix N: USFS 1988, pp. 4-10 to 4-17, 4-38, 4-42, 4-73 to 4-76, Appendix I).

These efforts contribute to the protection of the essential physical or biological features by: (1) Retaining old-growth cedar/hemlock stands; (2) analyzing timber management actions on a site-specific basis to consider potential impacts to caribou habitat; (3) avoiding road construction through old-growth forest stands unless

no other reasonable access is available; (4) placing emphasis on road closures and habitat mitigation based on caribou needs and requirements; (5) containing and controlling wildfires within southern Selkirk Mountains caribou management areas to prevent loss of coniferous species in all size classes; and (6) managing winter recreation on the CNF in Washington, with specific attention to snowmobile use within the Sullivan Lake Ranger District.”

It would appear that habitat protections are already well established. We further discuss in our comments that much of the habitat proposed for critical habitat designation does not specifically benefit caribou and thus the prudence of the current proposal should be reconsidered.

DELINEATION OF CRITICAL HABITAT

The USFWS states that they used the 1984 rule that describes the approximate area of normal utilization, information from Layser (1974), and USFWS Recovery Plans to delineate critical habitat (page 74028, middle column). They state that the area was further refined using telemetry locations and the seasonal habitat suitability model developed by Kinley and Apps (2007). Finally, results were filtered to remove isolated patches and some larger areas along the southern boundary in Washington and Idaho, or areas that had relatively low historical utilization based on telemetry.

Layser (1974), while an important historical account of caribou in the Selkirks, is largely anecdotal in nature and relies heavily on information from Flinn (1956) and Evans (1960). Layser (1974) also acknowledges the paucity of quantitative data on caribou by stating the need for a telemetry study to “determine the nature and extent of movements, travel routes and range area(s).” Better, more recent quantitative data is available (see below).

The “refinement” of the area is not apparent in the maps that are provided. The proposed critical habitat appears to essentially be the area above 4,000 ft elevation, and a “movement corridor” at a lower elevation site in the Upper Priest River drainage. Recent data suggest that caribou seldom use areas as low as 4,000 ft. (see below). Additionally, habitat modeling by Kinley and Apps (2007) identified suitable habitat and can be used to refine determinations of what more accurately constitutes critical habitat.

Servheen and Lyon (1989), using data from radio-collared resident caribou, reported the following seasonal mean elevations:

Early Winter: 1700 m (5600 ft);
Late Winter: 1900 m (6200 ft);
Spring: 1600 m (5200 ft); Calving: 1900 m (6200 ft);
Summer: 1700 m (5600 ft); and
Rut: 1500 m (4900 ft).

Unfortunately, no measure of dispersion, such as standard deviation, was reported.

Kinley and Apps (2007) used elevation as a means to delineate seasons. Their graph is shown below. The graph ranges from 1675 m (5500 ft) to 1925 m (6300 ft). This graph incorporated over 8,000 telemetry locations from 1987-2004.

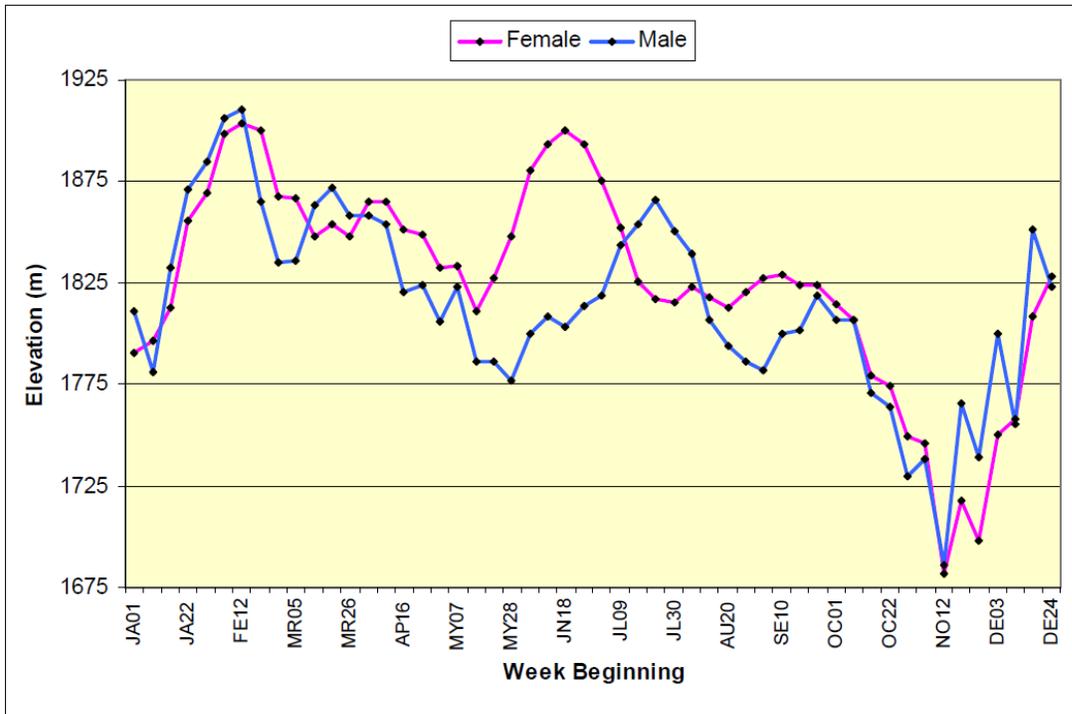
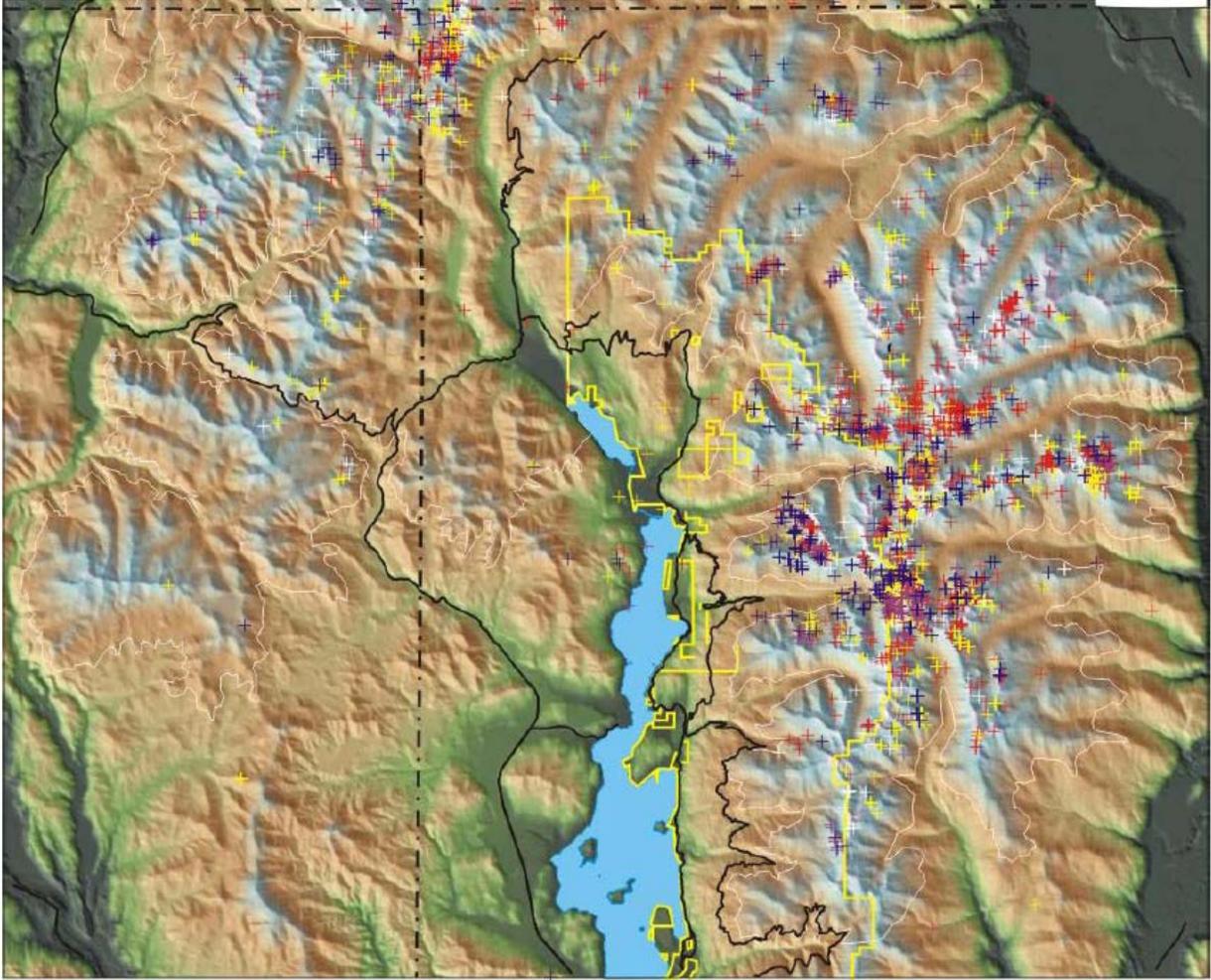


Figure 3. Running 3-week mean elevations used by radiocollared mountain caribou in the South Selkirk Ecosystem, Idaho, Washington, and British Columbia, 1987-2004.

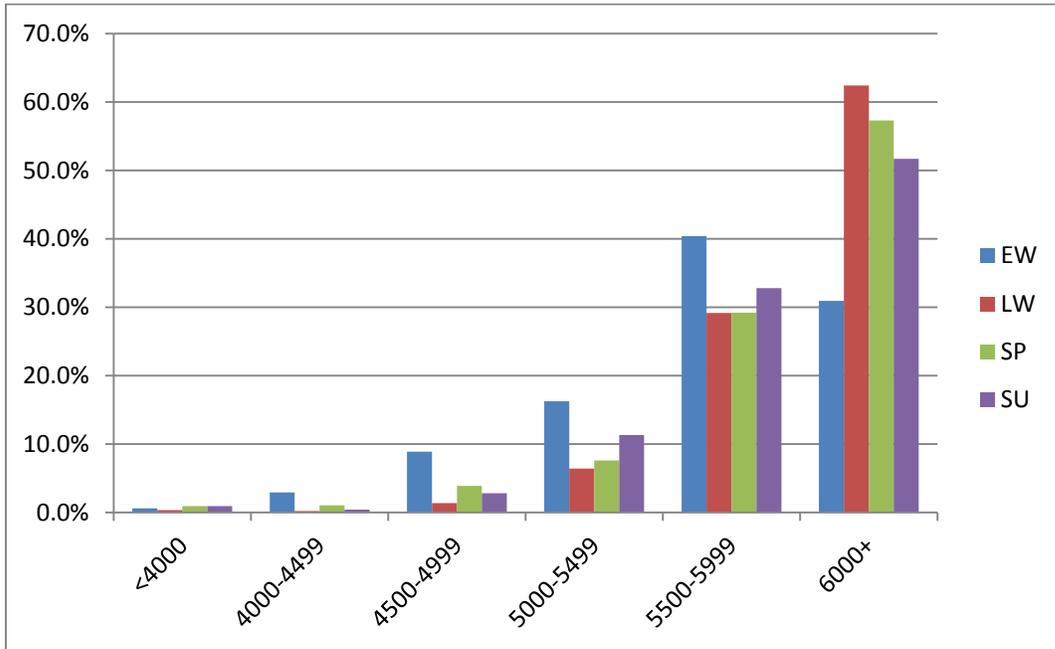
The map below, taken from Kinley and Apps (2007) shows the distribution of telemetry points in the U.S. A comparison of this map and the proposed critical habitat map does not show the incorporation of the telemetry data in the refinement of the 4000 ft elevational map that the USFWS states took place in the consideration of critical habitat designation.



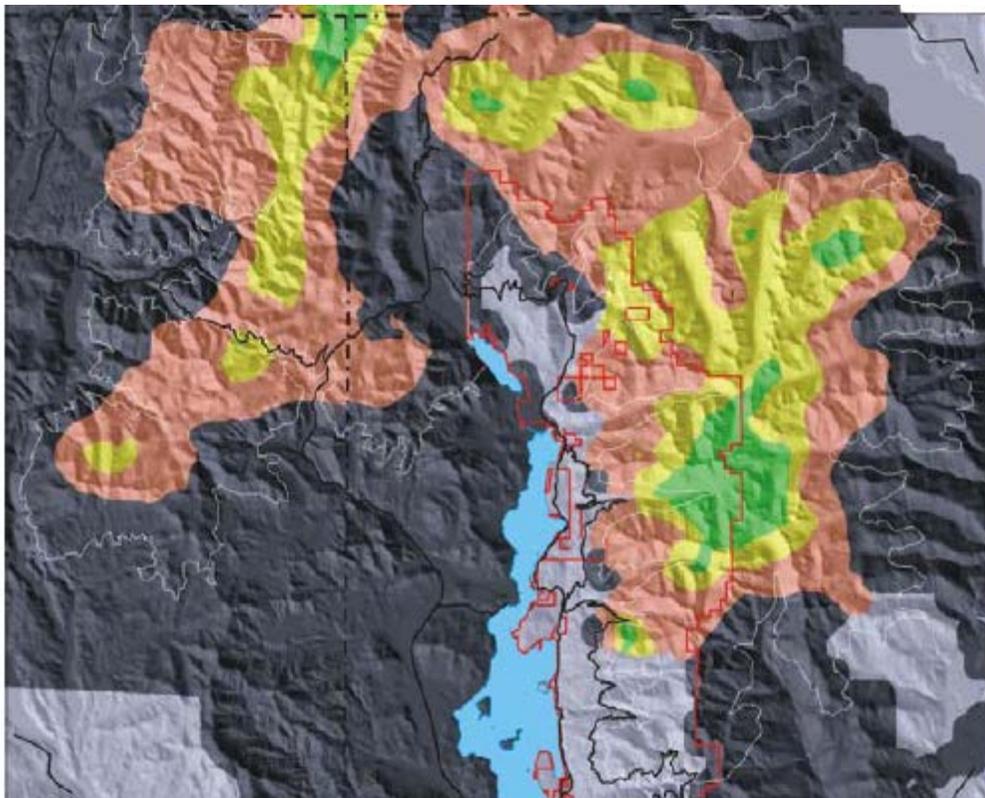
These telemetry data, as used by Kinley and Apps (2007), show that little use occurs below approximately 5,000 ft in elevation. Overall, 6% of 8,437 telemetry locations occurred below 5,000 ft. The following table summarizes these data by season:

Season	Elevation (ft)					
	<4000	4000-4499	4500-4999	5000-5499	5500-5999	6000+
EW	0.6%	2.9%	8.9%	16.3%	40.4%	30.9%
LW	0.4%	0.2%	1.4%	6.4%	29.2%	62.4%
SP	0.9%	1.0%	3.9%	7.6%	29.2%	57.3%
SU	0.9%	0.4%	2.8%	11.3%	32.8%	51.7%

The following summarizes the same telemetry data:

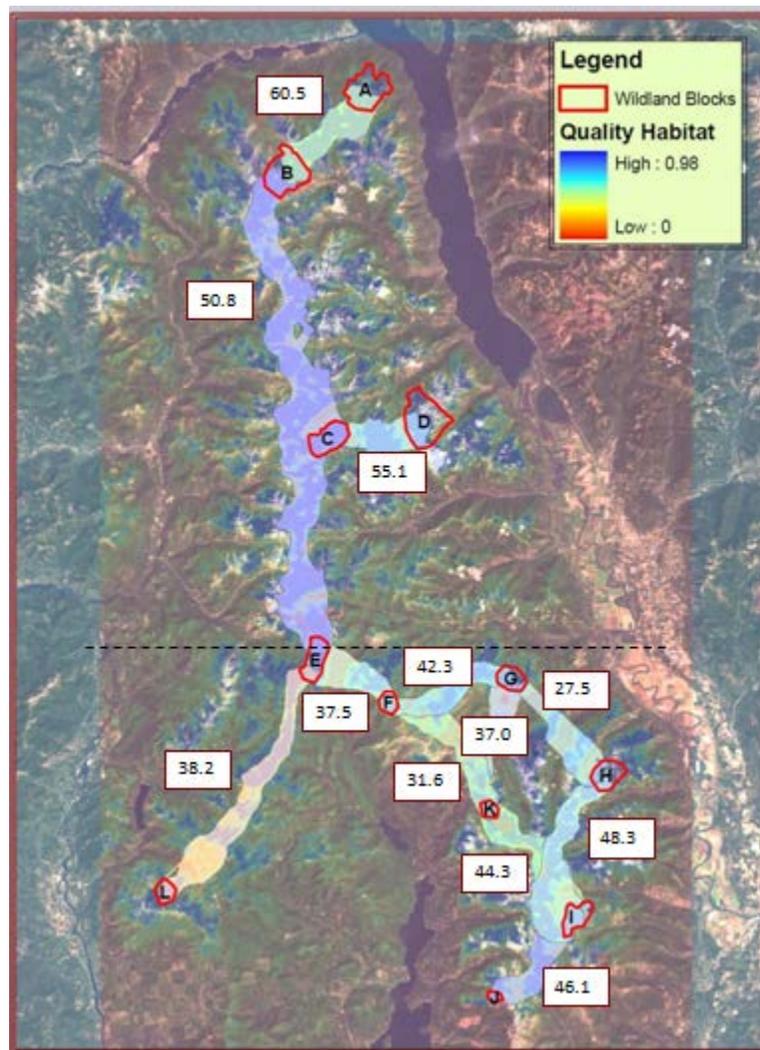


The map below, taken from Kinley and Apps (2007), shows priority areas as defined in their report.



Travel corridors between areas of quality caribou habitat are stated as a consideration in designating critical habitat. Wakkinen and Slone (2010) modeled travel corridors between areas of high quality habitat, using the habitat quality maps developed by Kinley and Apps (2007).

Results of this assessment are shown below. This map shows average quality habitat corridors; seasonal corridors were also mapped and are shown in the Wakkinen and Slone (2010) report. The legend denotes the quality of the habitat that underlies the corridors, as scored by the multivariate analysis of Kinley and Apps (2010). The corridor scores are shown in the boxes adjacent to the corridors and have been standardized, with a possible range of 1-100. The U.S./Canada border is immediately north of Wildland Block E, denoted by the dashed line.



The Department believes the USFWS failed to integrate the best available science with ESA direction and language in the listing decision, in preparing their proposal rule to designate caribou critical habitat. While encompassed in the “broad brush” approach used in the proposed designation, recent studies, which identify areas utilized by caribou and assess the habitat value for both seasonal use and as movement corridors, could have been more

effectively used in delineating areas that actually provide habitat features occasionally sought out and used by caribou. Doing so would have allowed the USFWS to propose a critical habitat designation that more effectively serves caribou recovery efforts.

However, the proposed rule appears to rely heavily on the originally designated recovery area, which USFWS itself recognized at the time of listing as inappropriate for designation of critical habitat. Further, this proposed critical habitat area encompasses a great deal of habitat not suitable for sustaining caribou, which has the potential to affect other uses of the area and may stimulate negative attitudes towards caribou recovery.

Recognizing that the USFWS is under a court order to designate critical habitat for caribou, The Department strongly recommends that the USFWS apply information from the Kinley and Apps (2007) and Wakkinen and Slone (2010) studies more rigorously to specifically identify those portions of the recovery zone that provide suitable caribou habitat and are critical for supporting a viable population in the designated critical habitat area.

The Department believes those criteria can be met by including the area identified as Priority 1 in the Kinley and Apps 2007 report, and the higher rated (scores ≥ 35) associated movement corridors as identified in the Wakkinen and Slone 2010 report. Doing so would designate those habitats, and connecting corridors between them, that provide the greatest potential for caribou recovery. It is also important to note that much of the currently designated recovery zone, due to large stand replacing fires in the 1960s and to some extent timber harvest, will not be suitable caribou habitat for another century or more, and would not seem to fit the criteria for critical habitat at this time.

Finally, whether or not specific areas in the recovery zone are designated as critical habitat, we suggest that land management agencies be afforded the use of available and current information on caribou distribution and use to address caribou needs rather than a blanket restriction on certain activities. In particular, the information from the annual winter surveys conducted by the Department could be used by land managers to manage human activities such as winter motorized recreation in an adaptive manner, thereby providing flexibility in meeting other public uses on public lands while ensuring protective measures for caribou.

Literature Cited

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March 7, 2012

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Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive
MS 2042-PDM
Arlington, VA 22203

RE: Proposed Rule for Woodland Caribou Critical Habitat

Dear Sir/Madam,

The Idaho Department of Lands (IDL) appreciates the opportunity to comment on the proposed Critical Habitat for Woodland Caribou.

IDL manages approximately 2.3 million acres of State endowment trust lands. These lands were granted to the State through various Territorial Acts and upon statehood by the federal government for the express purpose of maximizing returns to the trust beneficiaries – the largest trust beneficiary being K-12 public schools.

The proposed listing includes over 65,000 acres of State endowment trust lands, most of which lie within the Priest Lake Supervisory Area. Geographically, the proposed listing covers 35% of the endowment land within the Priest Lake Supervisory Area. Thus, the proposed critical habitat listing would have significant financial and management impacts on these lands.

Several statements within the proposed listing document infer, "*The habitat requirements of mountain caribou are incompatible with most currently used forest management practices*". This statement appears pre-deterministic and prejudicial without considering and balancing other factors, especially since the listing document also identifies wildland fire, insect and disease and road construction as threats to woodland caribou habitat. Forest management is one of the main tools used to reduce threats of catastrophic wildfire and mortality from insects and disease. In addition, well placed forest roads greatly facilitate effective and timely wildland fire suppression efforts which can help reduce the loss of woodland caribou habitat.

This proposed listing also raises significant concerns about possible federal nexus situations whereby IDL will be expected to meet onerous and costly federal requirements. At present, obtaining a joint U.S. Army Corp of Engineers/Idaho Department of Water Resources Stream Alteration Permit involves a federal nexus. Federal nexus situations may also include future requirements to obtain a point source NPDES permit for forest roads or other as yet unknown nexus situations created by further federal mandates.

The proposed listing could significantly impact IDL's ability to manage over 65,000 acres of forestlands, reduce annual harvest levels by 3.66 million board feet (mmbf), significantly reduce revenues to K-12 public education, and increase fire protection costs. As shown in Attachment A, the calculated value of timber revenue loss over the next 30 years would be in excess of \$23 million with an average annual loss of over \$700,000. Due to reduced road maintenance and road upgrades associated with the proposed designation, fire suppression response will be slower and more expensive as some fires will only be accessible via aerial resources that are quite costly and sometimes not available during a busy fire season. IDL estimates fire suppression costs over the same 30 year period could increase within the proposed critical habitat area by at least \$3.5 million.

In addition to the revenue loss to K-12 public schools, there are also direct and indirect economic impacts associated with reduced harvest levels. Using the most recent forest sector job and wage information from Dr. Jay O'Laughlin (*Idaho Forest, Wildlife, and Range Experiment Station, Station Bulletin 98, January 2012*), a reduced harvest of 3.66 mmbf would result in an estimated loss of 66 jobs with annual wage and benefits totaling \$2,247,240. The estimated 30-year loss would exceed \$67 million. The annual indirect economic impacts associated with the sales of goods and services are estimated to be even greater at 9.5 million. The estimated direct and indirect costs associated with the foregone harvest volume do not include the local economic impacts associated with recreational access restrictions.

Contrary to what is stated in the listing document, IDL is particularly concerned that, the proposed critical habitat area grossly exceeds what was occupied at the time of listing. Even though attempts were made to transplant over 100 caribou into the system and no large scale modifications to habitat have occurred from either fire or high elevation harvesting since 1984, caribou primarily occupy the same areas that were occupied at the time of listing in 1984. Defining critical habitat so broadly at this time is simply not a reasonable approach, especially since habitat does not appear to be the limiting factor. Woodland caribou populations in Canada are in decline and more expansive occupation of caribou into U.S. habitat is highly unlikely.

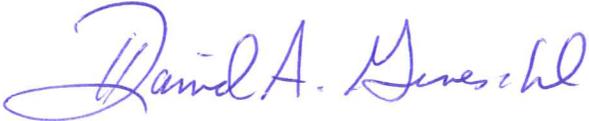
The United States portion of the South Selkirk Mountains population of woodland caribou has been impacted over the past 20 years due in large part to predator/prey interactions. Habitat is not currently a limiting factor for this population, as supported by a number of citations in the proposed critical habitat document. The two translocation efforts did not significantly increase the size of this population, and failed to establish and maintain a second or third herd, as outlined in the 1994 Recovery Plan. There have been no caribou identified on IDL ownership since 2004, and there have been no more than 4 caribou per year seen south of the U.S. border (Snowy Top area) since 1999.

The significant level of economic impact on IDL's trust mandate to maximize returns to the trust beneficiaries seems out of balance with the low probability that caribou will inhabit the proposed critical habitat area in the future. Therefore, we disagree with the inclusion of any State Endowment Trust Lands within designated critical habitat for woodland caribou. In fact, IDL questions the need for designating critical habitat at all. If, however, the U.S. Fish and Wildlife Service continues to move forward with designating critical habitat, then IDL strongly recommends that the approach and the area proposed for critical habitat be re-evaluated and reduced significantly using data relevant to Idaho and with input from the Department of Lands and other state agencies.

Detailed comments on the proposed listing document are shown in Attachment B.

Thank you for the opportunity to submit comments on this proposal. Please contact Patrick Seymour at (208) 769-1525 or by email at pseymour@idl.idaho.gov if you have any questions regarding these comments.

Respectfully Submitted,



David Groeschl
Idaho State Forester and Assistant Director, Forestry and Fire
Idaho Department of Lands

ENC: Attachment A, Economic Impact of Proposed Critical Habitat
Attachment B, Detailed Comments on Proposed Rule

C: Tom Schultz, Director
Kathy Opp, Deputy Director
Roger Jansson, Operations Chief-North
Bob Helmer, Forest Management Bureau Chief

Attachment A

Proposed Critical Habitat for Woodland Caribou

Economic Impact

The proposed listing document makes several inferences about “*The habitat requirements of mountain caribou are incompatible with most currently used forest management practices*”. This statement appears pre-deterministic and prejudicial without considering and balancing other factors, especially since the listing document also identifies wildland fire, insect and disease and road construction as threats to woodland caribou habitat. Forest management is one of the main tools used to reduce threats of catastrophic wildfire and mortality from insects and disease.

The proposed listing document also states:

Activities that may affect critical habitat, when carried out, funded, or authorized by a Federal agency, should result in consultation for the southern Selkirk Mountains population of woodland caribou. These activities include, but are not limited to:

- (1) Actions that would reduce or remove mature old-growth vegetation (greater than 100–125 years old) within the cedar hemlock zone at lower elevations (below 4,000 ft (1,220 m)) and within subalpine fir/Engelmann spruce zone at higher elevations stands (at or greater than 4,000 ft (1,220 m)), including the ecotone between these two forest habitats. Such activities could include, but are not limited to, forest stand thinning, timber harvest, and fuels treatment of forest stands. These activities could significantly reduce the abundance of arboreal lichen habitat, such that the landscape’s ability to produce adequate densities of arboreal lichen to support persistent mountain caribou populations is at least temporarily diminished.*
- (2) Actions that would cause permanent loss or conversion of old-growth coniferous forest on a scale proportionate to the large landscape used by mountain caribou. Such activities could include, but are not limited to, recreational area developments, certain types of mining activities, and associated road building. Such activities could eliminate and fragment mountain caribou and arboreal lichen habitat.*
- (3) Actions that would increase traffic volume and speed on roads within mountain caribou critical habitat. Such activities could include, but are not limited to, transportation projects to upgrade roads or development, or development of a new tourist destination. These activities could reduce connectivity within the old-growth coniferous forest landscape for mountain caribou.*

This proposed listing also raises significant concerns about possible federal nexus situations whereby IDL will be expected to meet onerous and costly federal requirements. At present, obtaining a joint U.S. Army Corp of Engineers/Idaho Department of Water Resources Stream Alteration Permit involves a federal nexus. Federal nexus situations may also include future requirements to obtain a point source NPDES permit for forest roads or other as yet unknown nexus situations created by further federal mandates.

Given the uncertainty associated with federal nexus, IDL would be subject to adopting the federal harvest restrictions listed above, and thus suffer foregone harvest volume and value in these timber types. The proposed listing would significantly impact IDL’s ability to manage over 65,000 acres of forestlands, significantly reduce revenues to K-12 public education, and increase fire protection costs. As shown in the table below, the calculated value of timber revenue loss over the next 30 years would be \$23,030,810.52 with an average annual loss of \$713,469.60.

Area	Annual foregone volume	30 year foregone volume	\$/mbf (2011 dollars)	Annual foregone value (2011 dollars)	30 year foregone value of harvest (Annual real price increase of 1.5%)
Priest Lake	3245 mbf	97,350 mbf	\$187.78	\$609,346.10	\$19,669,702.21
Kootenai Valley	415 mbf	12,450 mbf	\$250.90	\$104,123.50	\$3,361,108.31
TOTAL	3,660 mbf	109,800 mbf		\$713,469.60	\$23,030,810.52

According to the recent data presented in "Idaho's Forest Products Industry Current Conditions and 2012 Forecast" (Idaho Forest, Wildlife, and Range Experiment Station, Station Bulletin 98, January 2012), each one million board feet of timber harvested provides 18 jobs, \$614 thousand in labor income, and generates more than \$2.6 million in sales of goods and services. Using these economic multipliers, we would expect the following additional economic impacts to occur due to foregone harvest associated with the designation of the proposed critical habitat.

	Annual foregone volume	30 year foregone volume	Foregone jobs	Foregone income (2011 dollars, no inflation)	Foregone goods and services (2011 dollars, no inflation)
Annual	3,660 mbf	---	65.9	\$2,247,240.00	\$9,516,000.00
30-year	---	109,800 mbf	1,976.4	\$67,417,200.00	\$285,480,000.00

IDL is also responsible for fire protection on over 6 million acres of State and private forestlands throughout the State of Idaho. Almost the entire proposed critical habitat on State and private land in Idaho falls under State fire protection responsibility. Due to reduced road maintenance and road upgrades associated with the standards listed above, fire suppression response will be slower and more expensive. As a result, some fires will become accessible only by extensive walk-ins with support limited to aerial resources. IDL estimates annual initial attack fire suppression costs will increase within the proposed critical habitat area by \$37,137.00 (2011 dollars). Over the next 30-year period, the value of these additional costs is expected to be \$1,114,110.00. Over the same 30-year period, IDL would also expect to incur at least one additional extended attack project fire with a minimum estimated cost of \$2,381,200 (2011 dollars). This amount would be considerably higher if the additional project fire occurred during a fire season with very extreme burning conditions. The combined total of additional fire suppression costs over the 30 year period is expected to exceed \$3,495,310 with a minimum average annual cost of \$116,510.34 per year. These values only represent the additional fire suppression costs resulting from reduced access, and do not include other potential resource losses such as timber loss, environmental degradation, habitat loss or loss of structures. The economic value of these other losses is unknown during the 30 year period, but could exceed our combined estimate of the additional fire suppression costs and timber revenue loss.

Attachment B
Detailed Comments on Proposed Woodland Caribou Critical Habitat

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
Pg. 74019, col.2, para. 2	The mountain ecotype of woodland caribou, to which the endangered southern Selkirk Mountains population belongs, occurs in high elevations (generally above 4,000 feet (ft) (1,220 meters (m)), steep terrain of the mountainous southeastern and east-central portions of B.C., and the Selkirk Mountains of northern Idaho and northeastern Washington (USFWS 1994, p. 6; USFWS 2008a, p. 2).	While historically, the 4000' elevation line may have been the best available information, especially in Canada, more recent information and habitat modeling seems to indicate elevations not quite as low as this, including, for example, the Kinley & Apps 2007 report which for this study reported elevation use of caribou in the South Selkirks occurred down to a mean of approximately 1675 meters or ~5500 feet (see Figure 3).
Pg. 74019, col. 3, para. 1	Consequently, caribou that migrate to alpine habitats during the summer reduce their exposure to predators (Bergerund et al., 1984 and Seip, 1992 <i>in</i> Seip et al. 1994, p. 77)	<p>Are there known relationships between predator/prey above/below 4000'?</p> <p>Cougars and translocated caribou? Wolves were not present in the U.S. at time of listing, but now there are several packs in the proposed CH.</p> <p>The citations made in this paragraph regarding predator/ prey relationships do not seem to include any citations since 1994. Are there any more recent studies documenting predator/ prey relationships in relation to caribou, especially in the south Selkirks?</p>
Pg. 74020, col. 1, para. 1	Although caribou numbers in the southern Selkirk Mountains population have fluctuated over the last few decades, augmentation efforts between 1987 and 1990, and 1996 and 1998, from northern caribou herds in B.C. has allowed this herd to have a modest increase (average of 7 percent) in population over the last 5 to 10 years (USFWS 2008a, pp. 15–16).	This sentence as it reads is somewhat misleading- it implies that over the "last 5 to 10 years" there has been a modest increase in population size; in fact, the increase as cited, was specifically for the 5 years prior to 2008. If other statistics have been run since 2008, they could be added here.
Pg. 74020, col. 2, para. 1	Preliminary estimates reported from surveys conducted in late winter 2011 indicate the population to be approximately 36 animals; however, IDFG reports low confidence in that estimate due to poor weather conditions that limited aerial surveys (Wakkinen 2011, pers. comm.).	No caribou were sighted in the U.S. during the 2011 survey. Also, it might make sense to include the 2010 census information as well.

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
Pg. 74020, col. 2, para. 2	Ecology and Habitat	The Kinley & Apps 2007 document is not referenced in this section, but contains relevant information, including some more specific numbers for lichen quantification and elevation use.
Pg. 74020, col. 3, para. 2	...and lichens in spring and summer (Paquet 1997, pp. 13, 16)	There does not appear to be any reference to spring on the referenced pages of the Paquet 1997 document.
Pg. 74020, col. 3, para. 2	For southern Selkirk Mountains caribou, the fall and early winter diet consists largely of dried grasses, sedges, willow and dwarf birch tips, and arboreal lichens (Paquet 1997, p. 13)	The Paquet 1997 document does not specifically reference 'south Selkirk' mountain caribou on this referenced page.
Pg. 74021, col. 1, para. 1	The cedar/hemlock zone at lower elevations and the subalpine fir/Engelmann spruce zone at higher elevations.	<p>It would be helpful to further clarify these general elevation terms ('lower'; 'higher') using more specific numbers. The beginning of this document describes the mountain ecotype of woodland caribou as occurring at 'high elevations', which then are further defined as 'generally above 4000 ft.' Based upon that description, it's not clear as to where the 'lower' elevations referred to here would be.</p> <p>This comment applies to other areas in the document where 'high', 'mid', and 'lower' elevation terminology is used as well.</p>
Pg. 74021, col. 1, para. 1	In general, mountain caribou seasonal habitats consist of early winter, late winter, spring, calving, summer, and fall habitats, which are primarily within the above vegetation zones (Servheen and Lyon 1989, p. 235; USFS 2004, p. 18; USFWS 2008a, p. 20)	The term 'fall' may be somewhat confusing to the reader, as the USFS 2004 document appears to call this 'late summer/ rut', and the USFWS 2008a document doesn't appear to reference this season at all (p. 20). More consistency in terminology would be helpful.
Pg. 74021, col. 1, para. 1	Early-winter and late-winter habitats are usually considered to be the most important habitats to caribou, and represent the most limiting type of habitat on the landscape within the recovery area (USFS 2004, p. 19).	If early & late winter habitats are considered the most important, this suggests that any proposed critical habitat would need to target these winter habitats, as opposed to generally encompassing all of the seasons of use. Consider Kinley & Apps 2007 as a reference for

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
		<p>models of these habitat areas. The referenced document and page appear to contradict this statement in the subsequent paragraph which states that, "Habitats are not considered limiting to caribou for the foreseeable future because of [t]he low population numbers of caribou in relation to the distribution and amount of forage and the increasing amount of suitable habitats being created as stands reach maturity."</p> <p>Further, the revised Recovery Plan (USFWS 1994) states on p. 6 that "...early winter habitat is considered to be the most critical..."</p>
Pg. 74022, col. 1, para. 2	(i) Information sufficient to perform required analyses of the impacts of the designation is lacking,	We can reasonably predict direct and in-direct impact to local economies due to reduced timber harvest within the proposed CH, but we cannot predict impact on local businesses, communities and counties from reduction in recreation or access due to proposed CH.
Pg. 74022, col. 1, para. 4	Recovery Plan	If this 1994 recovery plan is being used to inform the critical habitat listing, is it too outdated in 2012?
Pg. 74022, col. 1, para. 4	..., is to maintain the existing two herds in the Selkirk ecosystem and establish a third herd in Washington State	The recovery plan is from 1994; is this strategy to "...maintain the existing two herds in the Selkirk ecosystem and establish a third herd..." still valid after the less-than-successful translocation attempts?
Pg. 74022, col. 2, para. 2	reducing the impacts of fire;	Reducing fire impact is listed as a recovery task, and also within this document, but no/ more limited timber management and no/ more limited access on roads likely means more fire. With reduced roads, access to fires will become more costly and more time consuming.
Pg. 74022, col. 2, para. 2	reducing impacts of insects and disease;	There is a lot of inter-relatedness among these 3 topics- if timber management is reduced, a significant increase in I&D issues and fire will occur.

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
Pg. 74022, col. 2, para. 2	reducing impacts of timber management;	The majority of this document seems to suggest it's not 'reduce' impacts- it's eliminate timber management (in any areas that would alter stand age classes from mature/ old to younger stands.
Pg. 74022, col. 2, para. 3	<ul style="list-style-type: none"> • researching habitat needs; • determining caribou habitat relations; • evaluating timber management practices related to caribou habitat; • evaluating the effects of roads and motorized vehicles on caribou and their habitats; • developing, implementing, and validating the cumulative effects model; • conducting population research; • determining recovery goals and objectives; • determining the amount of habitat needed for a recovered population; and • establishing caribou in the western portion of the Selkirks in Washington. 	It seems many of these items weren't accomplished in order to inform the recovery objectives, therefore it appears that recovery objectives haven't been verified yet.
Pg. 74022, col. 3, para. 2	...and its habitat (USFWS 2008, p. 15).	It appears this reference should be to 'USFWS 2008a' p. 15.
Pg. 74022, col. 3, para. 2	Since 1994, a great deal of information has been collected regarding caribou and their habitat, the effects of threats such as habitat fragmentation, predation and human access, and various options and approaches for recovery efforts.	Based upon this sentence, are there more recent predator/ prey citations especially relating to south Selkirks in Idaho that belong in this document?
Pg. 74022, col. 3, para. 3	The current recovery plan establishes the actions and conservation objectives needed to recover the southern Selkirk Mountains population of the woodland caribou.	As listed above, we have some concerns that the 1994 recovery plan does not contain enough up-to-date information; for example, the USFWS 2008a reference (p. 15) states "... when the recovery plan was revised, the

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
		Service acknowledged that we had insufficient data to establish specific, long-term recovery criteria.”
Pg. 74024, col. 1, para. 2	<i>Climate Change</i>	The climate models in use at this time are very broad scale, with coarse resolution. The area in question is already influenced by a Pacific Maritime flow. There are wide ranges of temperature, precipitation, snow levels and duration documented in historical records. Recent advances in the understanding of the influences of Pacific decadal water temperature oscillations (La Nina, El Nino) help in understanding the wide variations for weather in the historical record.
Pg. 74024, col. 1, para. 3	The impacts from these effects could lead to increased habitat fragmentation and changes in forest composition,...	Within recent times there are changes going on with stands at alpine elevations. The reduction in range and density of White-bark pine (a widely distributed alpine species), due to White pine Blister Rust is allowing the expansion of Alpine fir and Engelmann spruce in many areas. This may buffer any loss of range due to climate change in the near term.
Pg. 74024, col. 2, para. 1	Because of the close ties between caribou movement and seasonal snow conditions, seasonal shifts in snow conditions will likely be significant to the caribou (Utzig 2005, pp. 4, 8).	It is problematic to project modeled coarse-scale trends onto this highly variable system; especially in the attempt to characterize potential stand level changes. Documented historical weather events such as wind storms and large wildfires (Early 1900's; Big Blowup, 1910; Sundance & Trapper fires, 1967) have modified large segments of the landscape beyond the scale of any subtle shifting of maximum-minimum average temperatures.
Pg. 74024, col. 2, para. 2	However, both tree species maintain significant presence in the area presently occupied by mountain caribou, and their increased distributions to the north may indicate the potential for range expansion for caribou in those northern areas	See comments ON CLIMATE MODELS ABOVE. In addition, it must be recognized that most of the CH area is generally west facing and higher elevations are exposed to prevailing winds. Alpine species often occupy

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	(Utzig 2005, p. 5).	<p>areas that might have lower elevation species but for the severe seasonal conditions precluding regeneration.</p> <p>Changes in these seasonal conditions would be difficult to project at the local scale, especially with the general prediction for increased storm intensities.</p>
Pg. 74024, col. 2, para. 3	In general, climate change projections suggest reduced snowpacks and shorter winters, particularly at lower elevations (Utzig 2005, p. 7)	What specific elevation bands are affected?
Pg. 74025, col. 1, para. 2	The southern Selkirk Mountains caribou population requires large contiguous areas of high-elevation forest summer and winter habitat, with little or no vehicle access and disturbance, so they can spread out at low densities (i.e., 30–50 caribou/250,000 ac (100,000 ha)) and avoid predators (Seip and Cichowski 1996, p. 79; Stevenson <i>et al.</i> 2001, p. 1	<p>It seems that the predator/ prey relationship hasn't been fully explored/ summarized. It was noted in USFWS 2008a that part of the reason that augmentation of caribou into WA state didn't succeed was the result of a high mountain lion population.</p> <p>This Seip document explores caribou in British Columbia. There is no mention of the 'southern Selkirk Mountains caribou population' as noted in this sentence.</p>
Pg. 74025, col. 1, para. 3	...due to a combination of timber harvest, wildfires, and road development.	Fires have generally been minimized (exception: Sundance & Trapper). Mixed severity historic fires are the historical fire regime providing some habitat
Pg. 74025, col. 1, para. 3	(1) Reduction of the amount of space available for caribou, limiting the ecological carrying capacity;	It seems that the caribou in the south Selkirks are nowhere near carrying capacity, and therefore 'amount of space available' doesn't seem to be an immediate threat.
Pg. 74025, col. 1, para. 4	In the last decade, timber harvest has moved into high-elevation mature and old-growth forest habitat types due to more roads and more powerful machinery capable of traversing difficult terrains (Stevenson <i>et al.</i> 2001, p. 10)	<p>This statement is not true.</p> <p>The reference cited is a land manger's guide for operations in British Columbia and does not represent the situation in north Idaho. The State of Idaho endowment trust lands and federal lands are the major holdings at high elevations within the recovery area.</p>

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		<p>State lands within the recovery area above 4400' have harvest levels of 40% of the level at time of listing. Further, they have dropped another 22% within the same area over the last 10 years. Federal lands are less than 10% of the volume level at the time of listing, it is highly unlikely that this volume is coming from high elevation lands.</p> <p>During the two previous decades, IDL foresters have not noted any trends toward more powerful machinery capable of traversing difficult terrain. In fact, State timber sale contracts generally impose size limits on equipment thereby eliminating the most powerful tractors and skidders from operating on State timber sales. A trend towards more mechanized felling and harvesting equipment is evident. However, ground capabilities have remained largely unchanged.</p>
Pg. 74025, col. 1, para. 4	The habitat requirements of mountain caribou are incompatible with most currently used forest management practices (Stevenson <i>et al.</i> 2001, p. 1).	This statement is pre-deterministic and prejudicial. Further, Stevenson and Coxson 2006 summarize several studies on lichen production and harvesting finding that partial cutting prescriptions which keep basal area removal low maintain lichens best. Partial cutting at higher elevations may not be common in B.C., but it is common on IDL managed land.
Pg. 74025, col. 1, para. 4	..., but will not allow the herd to effectively avoid predators in the southern Selkirk ecosystem (Stevenson <i>et al.</i> 2001; p. 1)	This reference does not mention the south Selkirk ecosystem.
Pg. 74025, col. 2, para. 2	... sufficient winter forage of lichens (Stevenson <i>et al.</i> 2001, p. 15).	This reference does not specifically address 'winter forage of lichens'. It makes general reference to 'forage'.

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Pg. 74025, col. 2, para. 2	..., large contiguous areas of mature to old-growth western hemlock/western red cedar forests and subalpine fir and Engelmann spruce forests,	<p>The Stevenson doc was designed as a guide to land managers in B.C., Canada, and is not fully applicable to more marginal caribou habitat located at the edges of the range for the woodland caribou where large stand replacing fires have been more prevalent.</p> <p>The Stevenson doc does not reference specifics. The document only says 'suitable' habitat... and the connected habitat.</p> <p>What constitutes "large contiguous"?</p>
Pg. 74025, col. 3, para. 2	During the spring and summer, the southern Selkirk Mountains caribou move to lower elevations to forage on grasses, flowering plants, horsetails, willow and dwarf birch leaves and tips, sedges, and lichens in subalpine meadows (Paquet 1997, p. 13, 16),	<p>It should be noted that this vegetation is often associated with disturbance conditions; landslides, fire or timber harvesting. These are listed as a summer, not spring, food source for caribou in the Paquet document.</p> <p>The Paquet document (p. 16) also states that during the summer, "... caribou move back to mid-and upper elevation...", which appears to contradict the beginning of this sentence.</p> <p>Material referenced was for light material not woody.</p>
Pg. 74025, col. 3, para. 4	...to areas with green vegetation, which become the primary food source.	It would be helpful to be more specific with species here.
Pg. 74025, col. 3, para. 4	These areas may overlap with early and late winter ranges at mid to lower elevations (Servheen and Lyon 1989, p. 235; MCTAC 2002, p. 11), and vegetation in these areas allow caribou to recover from the effects of winter (USFWS 1994, p. 7).	The Servheen and Lyon 1989 document (p. 233) also states that, "Caribou used openings and cutover sites adjacent to mature timber stands" during this time of the year.
Pg. 74025, col. 3, para. 6 Pg. 74026, col. 1, para. 1	...and have sufficient forage of lichens to...	Quantification of lichen amounts would be helpful- the Servheen and Lyon 1989, and Kinley and Apps 2007

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
		documents both include some relevant information. This comment applies to other locations in this document where 'sufficient' amounts of lichens are discussed.
Pg. 74026, col. 1, para. 2	These habitats generally occur between 4,000 and 6,200 ft (about 1,220–1,900 m) in elevation, and have a more closed-overstory canopy (70 percent or more) to intercept snow (USFS 2004, p. 18, USFWS 2008a, p. 20).	The lowest 3 week running mean elevation of radio collared caribou found by Kinley & Apps doc for early winter was ~ 5500'. Unable to find these specific elevations referenced in either of the documents/ pages listed at the end of the sentence.
Pg. 74026, col. 2, para. 1	...(approximately 10 to 50 percent canopy cover),...	This seems to be an appropriate number for canopy closure on these ridgetops above 6000', as opposed to the 50% number listed under Primary Constituency Elements, bullet #ii.
Pg. 74026, col. 2, para. 2	...areas that have green vegetation...	The USFWS 1994 doc also adds that unlike other mountain caribou populations which descend to valley bottoms in late April, "The Selkirk caribou remain at mid-elevation where they use open-canopied areas often adjacent to mature forest..."
Pg. 74026, col.2, para. 2	Summer range includes Engelmann spruce/ subalpine fir forests and western hemlock/western red cedar forests...	USFWS 1994 states these are "...at an average elevation of ...5600 ft... in the southern Selkirks...". An example of the inconsistent descriptions of forest type and elevations in the proposed listing.
Pg. 74026, col. 3, para. 4	i.Mature to old-growth western hemlock (<i>Tsuga heterophylla</i>)/ western red cedar (<i>Thuja plicata</i>) climax forest, and subalpine fir (<i>Abies</i>	Within the caribou recovery area in Idaho, the stands meeting these characteristics that are relevant for

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	<i>lasiocarpa</i>)/Engelmann spruce (<i>Picea engelmanni</i>) climax forest over 4,000 ft (1,220m) in elevation; these habitats typically have 70 percent or greater canopy closure.	caribou habitat are at elevations over 4400 feet .
Pg. 74026, col. 3, para. 4	ii. Ridge tops with deep (up to 16 ft. (5 m)) snowpack that are generally 6,000 ft (1,830 m) in elevation or higher, in mature to old stands of subalpine fir (<i>Abies lasiocarpa</i>)/Engelmann spruce (<i>Picea engelmanni</i>) climax forest, with relatively open (approximately 50 percent) canopy.	It seems unlikely that ridge tops above 6000' will have snow depths at or above 16', or that canopy closures will be as high as 50%.
Pg. 74027, col. 1, para. 2	These areas also have little or no disturbance from forest practices, roads, or recreational activities.	The likelihood that the PCEs, as listed in the previous section, occur in areas with less 'disturbance' from forest practices and roads than areas without these PCEs is largely true, however it seems that a number of these PCEs listed above are in areas that do overlap with recreational activities, particularly in the winter.
Pg. 74027, col. 2, para. 2	... actions to minimize the potential for wildfire and the implementation of rapid response measures when wildfire occurs,	Fire suppression actions will become much more difficult/ costly/ time-consuming to implement if access to forested areas via roads are limited/ removed. This will lead to fires becoming larger before access can be made to put them out, and much of the access may need to be accomplished by air which will increase suppression cost
Pg. 74027, col. 2, para. 3	<i>Existing Conservation Measures</i>	The Idaho Department of Lands has been implementing an Interim Winter Access Plan on its Priest Lake Area since 2010. Included as part of the Plan are criteria for Restricted Winter Access Units. IDL acknowledges that there may be potential impacts to woodland caribou as a result of motorized winter recreation, and this plan is an

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
		effort to pro-actively address this concern.
Pg. 74027, col. 3, para. 1	... (5) containing and controlling wildfires within southern Selkirk Mountains caribou management areas to prevent loss of coniferous species in all size classes;	As previously noted, this will become increasingly more difficult as access to forested lands are limited. If roads are closed or road maintenance is restricted, the likelihood of aerial access to fires will significantly increase costs to fight fires and lead to greater habitat loss.
Pg. 74028, col. 1, para. 2	<p>We used the following criteria to select areas occupied by southern Selkirk Mountains caribou at the time of listing for inclusion in critical habitat:</p> <p>(a) The geographical area occupied by the southern Selkirk Mountains caribou at the time of listing (1984) as identified in the final listing rule (49 FR 7390-7394).</p> <p>(b) Areas representative of the distribution of the southern Selkirk Mountains caribou seasonal habitat needs throughout the geographical area occupied at the time of listing, with the goal of maintaining the species' range of habitat and genetic variability.</p>	<p>The critical habitat perimeter as drawn Pg. 74035 of the proposed rules notice grossly exceeds the areas occupied by caribou within the United States at the time of listing in 1984.</p> <p>The genetic variability that seemed to be present in the south Selkirk caribou population as of the USFWS 5-year review conducted in 2008 is noted to likely be a result of the augmentation process (USFWS 2008a, p. 18)</p> <p>If there are any studies since the 2008 review that could help shed light on whether that genetic diversity has continued to be present in the population, it would be helpful to see that.</p>
Pg. 74028, col. 1, para. 2	(c) Areas that provide the essential physical or biological features necessary to support the species' life-history requirements under varying environmental conditions.	<p>The Kinley and Apps 2007 report represents the best available information regarding caribou habitat on State endowment trust lands. The important early and late winter modeled/identified habitat in this study is at higher elevation and far more refined than the proposed critical habitat.</p> <p>This and the Wakkinen study below are specific to Idaho and should be weighted more than the preponderance of the British Columbia studies currently referenced in</p>

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
		the listing document.
Pg. 74028, col. 1, para. 2	(d) Areas that provide connectivity between mountain caribou habitat to provide for seasonal movement and genetic variability.	<p>The Selkirk Ecosystem Woodland Caribou Movement Analysis by Wakkinen and Slone 2010 is the best available information regarding connectivity of and to State endowment trust lands. These modeled corridors, particularly the higher rated ones should be carefully considered for any critical habitat proposal.</p> <p>These connectivity areas may generally be difficult to assess given the low numbers of caribou using the U.S. portion of the ecosystem.</p>
Pg. 74028, col. 2, para. 1	We overlaid seasonal telemetry radiolocations of caribou collected in the southern Selkirk Mountain ecosystems (B.C., Idaho, and Washington), from 1987 through 2004 by the IDFG	This appears to reference telemetry locations from translocated caribou. Radiolocations of translocated caribou do not represent the caribou population at time of listing since the information was gathered after listing and the translocation effort was artificially interjected onto U.S. landscapes. Even if translocation information was relevant, it would be important to take a critical look at this information to ensure that locations of translocated animals shortly following release aren't giving an unrealistic view of the habitat these animals were using. IE: it is well established that the period of time immediately following release, these animals would be confused and movement patterns could be expected to be quite random. NOTE: This is the reason the Kinley & Apps 2007 work discarded telemetry locations for caribou in the first month following translocation.
Pg. 74028, col. 2, para. 1	To further refine proposed critical habitat boundaries, we overlaid the currently defined Recovery Area boundaries, caribou movement corridors mapped by the IPNF (USFS 2004, pp. 22–23), and results of the seasonal habitat suitability	It appears that the proposed CH boundary encompasses the Kinley & Apps seasonal habitat, but this doesn't seem to have helped 'further refine' the PCH area, given that everything above 4000' elevation is included.

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	model developed by Kinley and Apps (2007, entire) for the southern Selkirk Mountains ecosystem.	There is no mention of Wakkinen’s modeled movement corridors (from the 2010 report titled, ‘Selkirk Ecosystem Woodland Caribou Movement Analysis’.
Pg. 74028, Table Pg. 74029, col. 1, para. 2	State.....65,218 acres	65,236 acres stated in narrative. IDL calculates this as 65,181 acres based on the critical habitat shapefile provided by USFWS to IDL.
Pg. 74029, col. 2, para. 1	Special management considerations or protections needed within the Unit would need to address habitat fragmentation of contiguous old-growth forests due to forest practices and activities, wildfire, disturbances such as roads and recreation, and altered predator/prey dynamics.	Is all recreation considered a disturbance, or could this item be more specific?
Pg. 74030, col. 2, para. 2	(2) Actions that would cause permanent loss or conversion of old-growth coniferous forest on a scale proportionate to the large landscape used by mountain caribou.	What constitutes “scale proportionate”?
Pg. 74030, col. 2, para. 3	(3) Actions that would increase traffic volume and speed on roads within mountain caribou critical habitat. Such activities could include, but are not limited to, transportation projects to upgrade roads or development, or development of a new tourist destination.	<p>Previously in this document, it was mentioned that management activities which could ameliorate threats of fire impacting habitat include “... minimize the potential for wildfire and the implementation of rapid response measures when wildfire occurs...”. Without being able to maintain/ upgrade roads, access to extinguish fires will be made more difficult/ time consuming/ costly.</p> <p>This statement is counter to other ESA projects and the NPDES requirements. “Upgrading roads” is a major activity associated with the SRBA IFP and as such is a direct requirement to complete upgrades for the benefit of listed fish species (reduce sediment) .</p>

Document Reference (FR page #, column #, paragraph #)	Document Text	Comment
Pg. 74030, col. 2, para. 5	Mountain caribou strongly prefer old-growth forests to young forests in all seasons.	Earlier it was stated young green was needed in spring and summer.
Pg. 74030, col. 3, para. 1	For example, a commercial thinning or fuels reduction project in a young forest may not require formal consultation, whereas a commercial thinning or fuels reduction project conducted within an old-growth forest may be an adverse effect to mountain caribou critical habitat and would require formal consultation.	Note that fuels reduction projects being precluded will increase the potential for large fires.
Pg. 74033, col. 1, para. 2	The designation of critical habitat in areas currently occupied by the southern Selkirk Mountains caribou may impose nominal additional regulatory restrictions to those currently in place	Should this read 'occupied at time of listing' as the rest of the document indicates?



C. L. "Butch" Otter
governor

Nancy C. Merrill
director

David M. Ricks
deputy director

.....
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May 11, 2012

Brian Kelly, State Supervisor
U.S. Fish and Wildlife Service
Attn. Docket FWS-R1-ES-2011-0096
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N Fairfax Dr.
MS 2042-PDM
Arlington, VA 22203

RE: Designation of Critical Habitat for the Southern Selkirk
Mountains Population of Woodland Caribou (*Rangifer tarandus*
caribou) Proposed Rule

Dear Mr. Kelly:

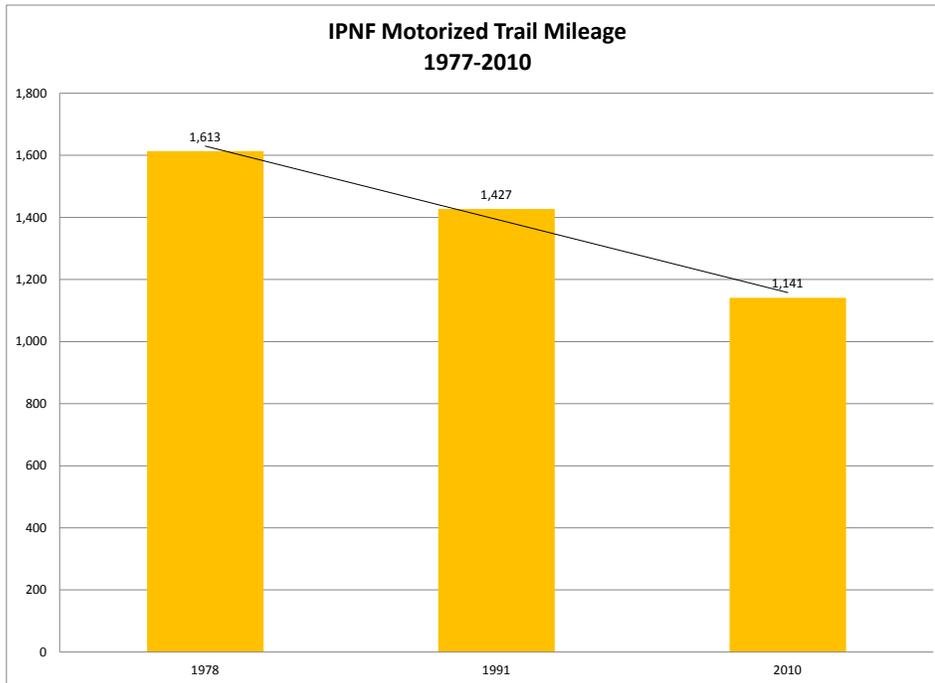
The Idaho Department of Parks and Recreation (IDPR) staff reviewed the Designation of Critical Habitat for the Southern Selkirk Mountains Population of Woodland Caribou (*Rangifer tarandus* caribou) Proposed Rule. The U.S. Fish and Wildlife Service (USFWS) is designating critical habitat for the Southern Selkirk Mountains Population of Woodland Caribou.

The IDPR is a duly-established executive department of the State of Idaho. Idaho Code §§ 67 2402(1) and 67 4222(a). The IDPR, acting under the supervision of the Idaho Park and Recreation Board, carries out recreational policies and programs of the State of Idaho. Idaho Code §§ 67 4221 and 67 4222. The IDPR is authorized by state statute to prepare and keep current a "Statewide Comprehensive Outdoor Recreation and Tourism Plan" referred to as "SCORTP," for the protection and maintenance of areas of scenic beauty, recreational utility, historic, archeological, or scientific interest for the enjoyment of the people. Idaho Code §§ 67 4219 and 67 4223(h). Consistent with these authorities, the Department participates in USFWS land management planning and project planning to further the public interest in recreational, scenic, and historical/archeological values.

Our staff is concerned about this habitat designation because critical habitat management restrictions will have an effect on recreation activities (particularly snowmobiling) and motorized vehicle restrictions on roads and trails.

The Selkirk Mountains provide the only open terrain snowmobile riding experience in North Idaho. North Idaho (Bonner and Boundary Counties) provide limited motorized vehicle recreation opportunities due to extensive restrictions put into place for Grizzly Bear Recovery.

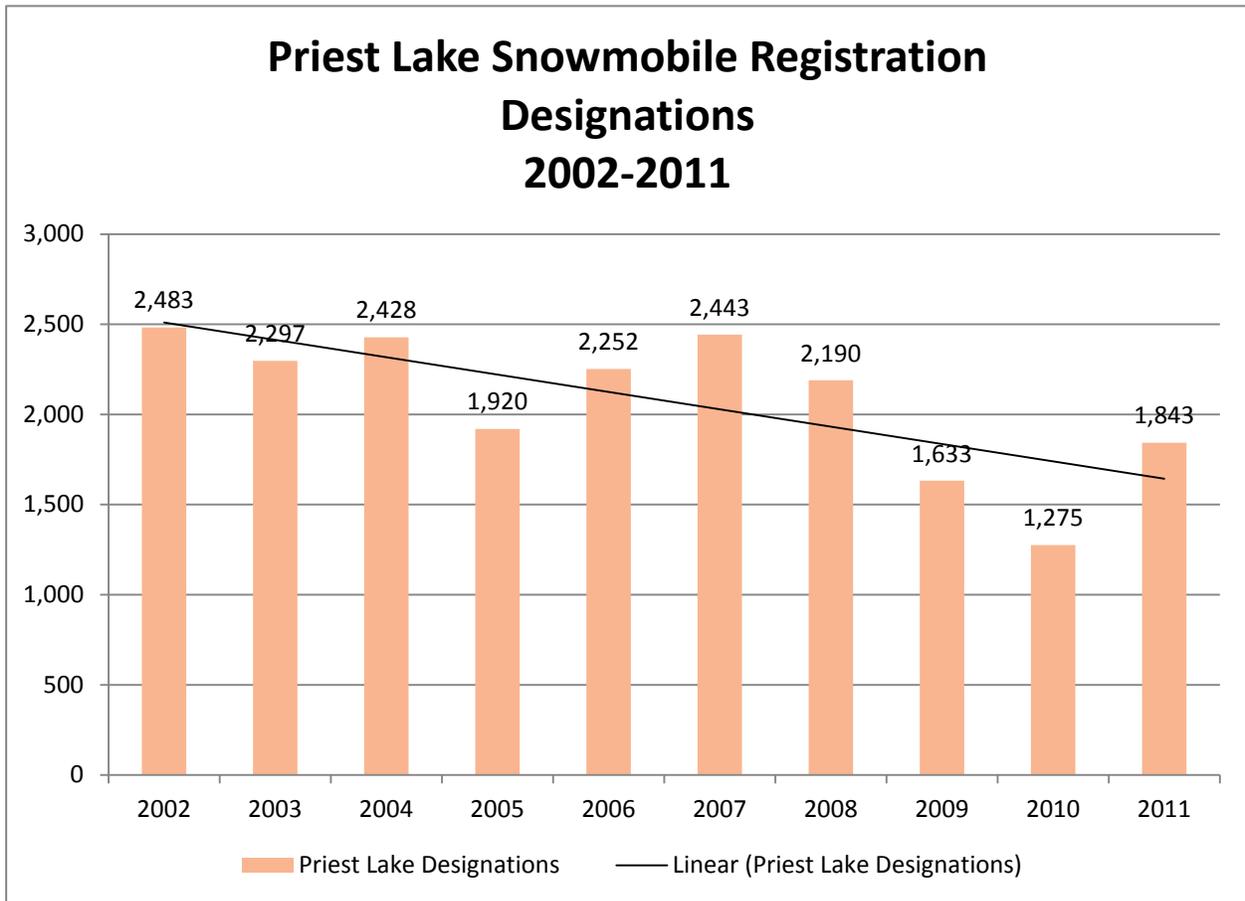
Over the years, the IDPR staff has collected motorized recreation opportunities statistics from the U.S. Forest Service and Bureau of Land Management (BLM). In 1977, the Idaho Panhandle National Forests (IPNF) had 1,613 miles of trail open to motorized vehicles. In 1991, the IPNF had 1,427 miles of trail open to motorized vehicles. In 2010, the IPNF 1,141 miles of trail open to motorized vehicles. These statistics show a continual decline in motorized recreation opportunities. The chart below illustrates how these opportunities have been reduced.



Motorized Trail opportunities on the North Zone of the IPNF are currently very limited. Only trail opportunities in the Purcell Mountains and the Coeur d' Alene Mountains are available. No summer motorized trail opportunities exist in the Selkirk Mountain within the proposed critical habitat area.

Winter recreation opportunities in the Selkirks offer the only open riding in North Idaho. The Priest Lake Snowmobile Program provides an extensive groomed trail system that goes around Priest Lake. Without this looping opportunity and further restrictions on open riding, snowmobilers might be driven away to other areas like McCall, ID.

The Federal Register Notice on Page 74026 asserts that "Increasing levels of winter recreational activities (e.g., snowmobiling) within the southern Selkirk Mountains caribou recovery area, which includes the Colville National Forests (CNF) in Washington and Idaho Panhandle National Forests (IPNF) in Idaho, is an emerging threat to the southern Selkirk Mountains caribou." It also states that use has increased over the past 10 to 15 years. Our registrations designations tell another story.



This chart shows resident, non-resident, and rental snowmobile registration designations for Priest Lake for the past 10 years. This chart shows that these registration designations are on the decline. Over the past 10 to 20 years, the area available for mountain riding in the Selkirks has been reduced. A reduction in off-trail riding opportunities may be responsible for this decline.

Winter recreation plays a key role in the local economy. In 2006, the University of Idaho published an economic study on Snowmobiling in Valley County. This study found, on average, snowmobile visitors spend approximately \$106 per person per day, \$89 of that in Valley County. Similar economic indicators could be used for the economic analysis for this critical habitat area.

We realize that the USFWS is required under court-order to designate woodland caribou critical habitat. The USFWS needs to consider the effects this designation would have on winter and summer recreation opportunities, as well as the economic impacts.

Sincerely,

Jeff Cook, Outdoor Recreation Analyst
Recreation Bureau