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First name: Amy

Last name: Anderson

Organization: Selkirk Conservation Alliance

Title: Executive Director

Comments: Idaho Panhandle National Forest

Supervisors Office

3232 West Nursery Road

Coeur d'Alene, Idaho 83815

RE: Selkirk Conservation Alliance's comments on the NFS- IPNF proposed action for the Kaniksu Over-snow Vehicle (OSV) Use Designation Project - File Code 1950

SCA would like to thank the members of the North Idaho Working Group and NFS staff for their valuable time and thoughtful input on these proposed actions.

Selkirk Conservation Alliance (SCA) greatly appreciates the opportunity to comment on these proposed actions. The proposed actions and project area, within the Bonners Ferry, Priest Lake, and Sandpoint Ranger Districts (Kaniksu Unit) of the Idaho Panhandle National Forests falls within SCA's advocacy area and is very important to our members and supporters.

SCA has been working to protect and conserve the sensitive wildlife and habitat of the lower Selkirk Mountains for the last 35 years including the endangered southern Selkirk mountain caribou that has recently been extirpated from their lower Selkirk Mountain home range and are one of the most critically endangered mammals in the lower 48 states.

SCA would like to preface these comments and recommendations with the statement that, without enforcement and oversight of the proposed open and closed OSV areas these "proposed actions" have the potential to greatly negatively impact wildlife and habitat resources and will continue to push threatened and endangered species towards extinction.

This proposed action is seeking to open up seasonally and year round almost 65% of ALL NFS lands (1,041,460 acres) within the Bonners Ferry, Priest Lake, and Sandpoint Ranger Districts of the Idaho Panhandle National Forests - 673,982 acres. To put it into perspective, the state of Rhode Island is 788, 832 acres.

The USFS - Idaho Panhandle National Forest Kaniksu Unit currently lacks the staff to enforce the existing year round and seasonal open OSV routes. Currently, there is only one individual available for winter OSV route enforcement within the Kaniksu unit.

Without a practical mechanism in place to patrol and enforce NEW open areas and routes the NFS is opening up the door to potential negative impacts on area wildlife (including many threatened and endangered species) and important habitat that the NFS is unable to actively protect.

That is, how, without a working mechanism for enforcement, will the NFS ensure the minimization of damage to vegetation, wildlife habitats, harassment of wildlife, conflicts between recreational use areas etc. as is required under the Travel Management Rule?

When designating over-snow vehicle trails and areas, the Travel Management Rule requires the Forest Service to consider effects on, with the objective of minimizing:

- 1.Damage to soil, watershed, vegetation, and other forest resources

2. Harassment of wildlife and disruption of wildlife habitats
3. Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System land or neighboring Federal lands
4. Conflicts among different classes of motorized vehicle uses of National Forest System lands or neighboring Federal lands.

To open up any new areas and routes within the Kaniksu Unit without a system in place to ensure the above negative impacts to wildlife & habitats are minimal would be extremely irresponsible management by the NFS.

If the proposed routes and use areas (and times) are approved, SCA recommends devoting US Department of Agriculture - Forest Service funds to recruit and support a sufficient amount of staff to patrol these areas annually.

Harassment of wildlife and disruption of wildlife habitats

The project area, consisting of the three northern ranger districts of the IPNF forests while "offering some of the most sought-after over-snow vehicle recreational opportunities in Idaho (proposed action pg. 3)" is also home to some of the last remaining critical habitat for several species listed as federally threatened and endangered. The project area also includes important reintroduction recovery habitat/areas for the extirpated mountain caribou and grizzly bear recovery zones.

Noise travels farther distances in cold weather. Noise pollution has been documented to negatively impact many species especially during winter months when animals are at their most vulnerable and resources are scarce. Snowmobile noise and activity disturbs wintering wildlife causing stress, elevated energy expenditures, changes in habitat use, fragmentation of winter ranges and other negative impacts. This results in the displacement of wildlife from their preferred habitat and the reduction of winter survival rates.

The negative impacts of noise, especially during winter months, on the southern mountain caribou cannot be understated. Southern mountain caribou survive the winter by feeding on lichen in the old growth forests of the lower Selkirk's and on NFS lands on the east side of Priest Lake. It has been documented that these endangered mammals are easily startled by noise and disturbance from motorized vehicles. Noise disturbance displaces caribou from their winter refugia which reduces their survival rates and reproductive success.

If reintroduction areas for the extirpated South Selkirk's and Purcell's herds are to be successful OSV travel should be prohibited in and around identified critical recovery zones.

Noise has also been documented to negatively impact economically valuable species such as deer and elk reducing foraging success and inducing flight which expends critically needed energy during winter months, increasing population mortality.

SCA recommends that the proposed action consider additional OSV restrictions for winter big game habitat and population protection.

SCA recommends that to reduce the negative impacts of OSV noise on wildlife (if these actions are approved) all areas proposed to be closed year round and seasonally be expanded by several miles. And, where areas are proposed to be open year round and seasonally to OSV use SCA recommends decreasing boundaries to account for noise disturbance.

Damage to soil, watershed, vegetation, and other forest resources

OSV use has additional negative impacts on aquatic and terrestrial ecosystems including, polluting regional surface water. Pollution from snowmobile exhaust accumulates in the snowpack and is released during spring snowmelt, elevating the acidity of nearby surface waters.

Snowmobiles also cause significant damage to land cover through direct physical injury to plants (as evidenced in photos of broken whitebark pine tops - P. Sieracki) and increased erosion in areas with inadequate snow cover. Snowmobiles compact the snow, affecting vegetation growth and development later in the year.

Further, snowmobile exhaust contains dangerous levels of airborne toxins including nitrogen oxides, carbon monoxide, ozone, aldehydes, butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons. These pollutants degrade air quality and alter snow chemistry.

Summary Comparing the Existing Condition of OSV use in the Project Area and the Proposed Activity and Difference in Acres

OSV Management	Existing Condition Acres	Proposed Action Acres	Difference Acres
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All NFS lands within the Kaniksu Unit of the IPNF	1,041,460		
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Acres OPEN to OSV Use	746,296	770,165	23,869
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OPEN OSV YEARLONG	735,597	144,731	590,866
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OPEN to OSV YEARLONG (when motorized access standards are met)	03,159	3,159	
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OPEN Nov 16-March	310,351	791,351	791
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OPEN Dec 1-March	310,270	484,270	484
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CLOSED to OSV USE	295,971	271,292	24,679
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CLOSED April 1-June	3010,055	010,055	
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CLOSED March 15-June	306,440	644	
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OSV ROUTES - MILES	782,750	32	
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Groomed	416,434	18	
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Ungroomed	366,316	50	
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Ungroomed Nov 16-March	310	55	
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Ungroomed Dec 1-March	310	33	
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Under the proposed action, the NFS would be opening up to seasonal and year round use 673,982 new acres of previously closed land in the Kaniksu Unit of the IPNF. Proposed - 23,869 additional acres open to use, 3,159 additional acres open when motorized access standards are met, 351,791 additional acres open 11-16 to 3-3, 270,484 additional acres open 12-1 to 3-31, 24,679 acres once closed to OSV use now open, 10,555 acres once closed to OSV 4-1 to 6-30 now open.

This proposed action is seeking to open up seasonally and year round almost 65% of ALL NFS (1,041,460) lands within the Bonners Ferry, Priest Lake, and Sandpoint Ranger Districts of the Idaho Panhandle National Forests 673,982 acres. To put it into perspective, the state of Rhode Island is 788, 832 acres.

Due to the spectrum of negative impacts on wildlife and forestry resources SCA does not support opening any new, year round or seasonal areas to OSV use within the Kaniksu Unit of the IPNF.

Specifically, SCA does not support motorized access (with or without seasonal restrictions) in the Roman Nose area in the Selkirk Grizzly Bear Recovery Zone or the proposed open areas in the Moose Lake area in the Cabinet-Yaak Grizzly Bear Recovery Zone(s)

SCA is in agreement with the following IPNF Kaniksu Over-Snow Vehicle Use - Proposed Action- Forest Plan Directions (8-2022);

*No motorized vehicle use allowed within the following management areas (MA): Salmo-Priest Wilderness (MA1a); recommended wilderness (MA1b); and research natural areas (MA4).

*No additional over-snow vehicle routes within wild segments of eligible wild and scenic rivers (MA2b).

*Botanical, Geological, Scenic, and Pioneer areas emphasize non-motorized recreation experiences and access, with the exception of the Northwest Peaks Scenic Area, which allows over-snow motorized use. Visitors stay on routes within Botanical Areas to protect sensitive resources (MA3-DC-AR-04). *

*Over-snow use allowed on designated routes only, within the Priest River Experimental Forest (MA4b).

*No grooming of snowmobile routes in grizzly bear core habitat after April 1 of each year (FSSTD-WL-04).

*The Motorized Access Management within the Selkirk and Cabinet Yaak Grizzly Bear Recovery Zone Management Direction shall be applied (FW-STD-WL-02).

*Designated over- snow routes or designated play areas should not expand outside baseline areas of consistent snow compaction, unless designation serves to consolidate use and improve lynx habitat. This may be calculated on a lynx analysis unit basis, or on a combination of immediately adjacent lynx analysis units (FW-STD-WL-01, HU G11).

*Grizzly bear: Management activities should avoid or minimize disturbance in areas of predicted denning habitat during spring emergence (April 1 through May 1) (FW-GDL-WL-01).

*During the winter period of December 1 to April 30, disturbance from over-snow vehicle use should be avoided or minimized in areas known to be occupied by caribou (FW-GDL-WL-04).

Provide over-snow vehicle opportunities and contribute to the social and economic well-being of local communities while meeting wildlife management objectives (GA-DC-AR-LK-05, GA-DCAR-PO-02, GA-DC-AR-PR-01, GOAL-SES-01, FW-DC-SES-01, FW-DC-SES-02), specifically providing:

*Areas with low levels of disturbance or no disturbance for woodland caribou in the Selkirk Mountain range (GA-DC-WL-PO-03 and GA-DC-WL-PR-04).

*Low levels of human disturbance for denning activities of wide-ranging carnivores in the upper elevations of Northwest Peaks and the Selkirk Mountains (GA-DC-WL-LK-03).

*Habitat conditions for wildlife movement, especially woodland caribou, throughout the Selkirk recovery zone (GA-DC-WL-PR-01).

*FW-GDL-WL-11- Big Game. Management activities should avoid or minimize disturbance to native ungulates on winter range between December 1 and April 30, with the exception of routes identified on the forests' motor vehicle use map as open to motor vehicle use. Management activities that occur on winter range during the winter period should concentrate activities to reduce impacts to native ungulates.

*FW-GDL-WL-12. Big Game. Management activities should be avoided on native ungulate winter range areas during the critical mid-winter period (January and February) when snow depths most likely influence movement and availability of forage.

Selkirk Conservation Alliance (SCA) is one of north Idaho's oldest conservation organizations and has been working to protect and conserve the lower Selkirk Mountain ecosystem for the past 35 years.

Idaho Panhandle Forests and the wildlife and habitats they support are in need of protection by the NFS. Decisions made by the NFS have a direct effect on the short and long term preservation and conservation of our region's air, land, wildlife, water, wetland and forest resources.

Respectfully submitted,

Amy Anderson

Selkirk Conservation Alliance
Executive Director
Amy Anderson
anderson@scawild.org
(208) 448-1110