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I am commenting on the Blacklead mountain goat herd, illegal snowmobiling in the Blacklead area, and the draft plan's alternatives that would remove 47,000 acres in the Blacklead area from the Great Burn (Hoodoo) Recommended Wilderness and/or permit motorized and mechanized recreation in recommended wilderness areas on the Nez Perce-Clearwater National Forests.

The Blacklead mountain goat herd is one of several native mountain goat herds in the Great Burn Recommended Wilderness. In a March 18, 2020, phone conversation, Clay Hickey, Clearwater Regional Wildlife Manager for the Idaho Fish and Game Department, told me that during a winter helicopter survey in 2011, the department counted 56 goats in the herd's winter range, centered in the South Fork of Kelly Creek and Williams Creek (where about three-fourths of the goats winter) with scattered goats wintering in other areas nearby, such as Cache, Crooked, and Boulder Creeks.

Previous work by the Idaho Fish and Game Department had determined that winter helicopter surveys detected about 50 to 60 percent of the mountain goats (Hickey, March 18, 2020, personal communication).

In 2017, the department counted just seven mountain goats in the Blacklead herd's winter range.

Hickey said he was concerned not only by the lack of goats in 2017, but by the amount of snowmobile tracks he saw throughout the areas where the Blacklead goats wintered. Tracks covered all the ridges and cirque basins above the South Fork of Kelly Creek and Williams Creek, Hickey said.

"Can I say there's a causal relationship between the reduction in numbers of goats and the amount of snowmobile travel? No," Hickey said. "But if the goats were displaced during winter, they likely perished."

All of the snowmobile tracks the Idaho Fish and Game Department observed were in the Great Burn (Hoodoo) Recommended Wilderness where snowmobiling and other forms of motorized or mechanized recreation were illegal based on the Nez Perce-Clearwater travel management plan.

Yet one of the alternatives being considered by the Nez Perce-Clearwater National Forest management plan would remove about 47,000 acres in the Blacklead area from the boundaries of the Great Burn (Hoodoo) Recommended Wilderness, legalizing the activity that may well have decimated the Blacklead herd of mountain goats. Another alternative that would permit motorized and mechanized recreation in recommended wilderness areas would have the same effect.

Snowmobilers might argue that if the Blacklead area can be legally opened for snowmobiling with areas of critical mountain goat winter range closed to protect the goats. That approach is not likely to help.

If snowmobiling in the area is legalized, the amount of use is likely to increase dramatically. Increased use overall would probably lead to additional trespassing in areas supposedly closed to snowmobile use.

Increased enforcement could help ensure that closures are effective, but I am unaware of evidence that enforcement to date has reduced illegal snowmobiling in the Great Burn. Furthermore, there are many practical challenges to enforcing regulations during winter in mountainous terrain that's accessible only to powerful snowmobiles and snow bikes ridden by experts in winter travel.

The Nez Perce-Clearwater National Forests should determine the current status of the Blacklead mountain goat herd, monitor illegal snowmobiling in the herd's winter range, and strenuously enforce the existing prohibition against snowmobiling to increase the likelihood that this native herd can recover from past disturbance.

Please do not shrink the boundaries of the Great Burn (Hoodoo) Recommended Wilderness or permit motorized and mechanized recreation in recommended wilderness on the Nez Perce-Clearwater National Forests. Doing so will expose mountain goats to additional stress during winter when they're already stressed and could displace them from the winter habitat critical to their survival.

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My record of the March 18, 2020 phone conversation with Clay Hickey, Clearwater Regional Wildlife Manager for the Idaho Fish and Game Department follows:

Mountain goats that summer in the Blacklead Mountain Area of the Great Burn Recommended Wilderness northwest of Lolo Pass winter largely in Williams Creek and the headwaters of the South Fork of Kelly Creek (also in the recommended wilderness). About three-fourths of the population winters there. Scattered goats winter in other nearby areas such as Cache, Crooked, and Boulder Creeks.

In 2011, Idaho Fish and Game counted 56 goats during a helicopter survey of the Blacklead goats' wintering areas (formerly hunt area 10-3).

During mid-April in 2017, Idaho Fish and Game counted just seven goats during a helicopter survey of the Blacklead goats' wintering areas.

Hickey said he was concerned not only by the lack of goats in 2017, but by the amount of snowmobile tracks he saw throughout the areas where the Blacklead goats wintered. Tracks covered all the ridges and cirque basins above the South Fork of Kelly Creek and Williams Creek, Hickey said.

"Can I say there's a causal relationship between the reduction in numbers of goats and the amount of snowmobile travel? No," Hickey said. "But if the goats were displaced during winter, they likely perished."

Idaho Fish and Game has determined the effectiveness of winter helicopter surveys for mountain goats. Researchers marked goats with paint balls as they counted them. During a later helicopter survey, the percentage of marked goats to unmarked goats established the survey detection rate, about 50 to 60 percent. That means that if 56 goats are counted during a winter helicopter survey, there are probably more than 100 goats in the population.