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First name: Julia

Last name: Brokaw

Organization:

Title:

Comments: To United States Forest Service,

My name is Dr. Julia Brokaw and I have PhD in entomology from the University of Minnesota where I specialized in invertebrate conservation. I am writing regarding my concerns about the proposed Rochford Mineral Exploratory Drilling Project. This project would threaten the biodiversity, cultural significance, and water of the Black Hills. My comment will speak specifically to the incredibly rare Black Hills Mountain Snails that will be threatened by this project.

I strongly urge the United States Forest Service to conduct a thorough environmental review and require an Environmental Impact Statement. Specifically, there is an endemic population of threatened Black Hills Mountain Snails that have been in decline for years but are crucial for the ecosystem. These snails were once widespread, but have undergone drastic declines. These snails require very specific set of conditions to thrive, like those of the Black Hills that are moist and have limestone and/or dolomite substrates. Being 'endemic' means that they only occur in the Black Hills as a special population. They require intact riparian areas of the Black Hills and are sensitive to environmental disturbances, thus would be threatened by the mining project which could contaminate the water and their environments (Frest and Johannes 2002). Indeed, two colonies of the Black Hills Mountain Snails are managed by the USFS, and should continue to be protected from mining threats. For decades, researchers have noted the potential negative impacts on mining on this species (Frest and Johannes 1995, 1997, 2002). These snails serve vital functions of the ecosystem of the Black Hills, helping to decompose plant matter and are food sources for many different species up the food chain.

Additionally, the location of the mining projects would threaten the sacred sites, Pe' Sla of the Lakota people. They have been coming to this place for thousands of years and the mining project would threaten their sovereignty and lifeways.

Please use your full regulatory authority to protect the Black Hills, the organisms and people who care for it - from the small invertebrates like Black Mountain Snails to the Indigenous peoples who have stewarded the land for generations.

If you need further data or expertise on the invertebrates of this region, please contact me for additional information that may help aid in your decision. Thank you.

Sincerely,

Julia Brokaw, PhD

Citations:

Frest, T.J. and E.J. Johannes. 1995. Interior Columbia Basin Mollusk Species of Special Concern. Final Report to Interior Columbia Basin Ecosystem Management Project. Deixis Consultants, 2517 NE 65th St, Seattle, WA 98115. 362 p.

Frest, T.J. and E.J. Johannes. 1997. Land Snail Survey of the Lower Salmon River Drainage, Idaho. U.S. Department of the Interior, Bureau of Land Management, Idaho State Office, Boise. Idaho Technical Bulletin 97-18. 142 p.

Frest, T.J. and E.J. Johannes. 2002. Land Snail Survey of the Black Hills National Forest, South Dakota and Wyoming, Summary Report, 1991-2001. Final Report to the USDA Forest Service, Black Hills National Forest. Deixis Consultants, 2517 NE 65th St, Seattle, WA 98115. 127 p.