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Re: Comment on the Jasper Fire "Value Recovery" Project

Dear Ms. Allen:

The Xerces Society is a nonprofit organization dedicated to the conservation of invertebrates. For nearly three decades, the Society has been at the forefront of invertebrate conservation, harnessing the knowledge of scientists and the enthusiasm of local people to implement conservation and education programs in the United States and abroad.

The Society is very concerned the Jasper Fire "Value Recovery" Project will cause severe ecological harm to the project area. The Black Hills is a remarkable ecosystem that is home to rare plant and animal communities; some found nowhere else in the world. As you know the Black Hills is also one of the most (if not the most) heavily developed, logged, and roaded National Forests in the country. Because of past impacts the Chief of the USFS has concluded the Revised Forest Plan for the BHNF does not ensure viable, well-distributed populations of sensitive species such as the goshawk, marten, pygmy nuthatch, woodpeckers, and *land snails of special concern*.

We cannot support the Proposed Action (Alt. B) or Alternative C because both are inconsistent with the Forest Plan, would exacerbate wildlife habitat shortages on the forest, and would further reduce wildlife populations and distributions below already unlawful levels.

The Forest Service should pick either alternative A (no action) or one of the alternatives improperly dismissed in the DEIS, or another alternative that preserves wildlife habitat, helps remedy the serious snag shortage on the forest, protects soils, and does not involve extensive timber harvesting or road construction activities.

IMPORTANCE OF FOREST INSECTS

Mountain pine beetles, Ips beetle species, red turpentine beetles, and other wood boring beetles are all naturally occurring insects on the Black Hills, yet the USFS perceives these insects as a threat to the Forest ecosystem. These insect species do diminish the cash value of some conifers. Accordingly, concerted efforts have been made to rid public forests of what are called "pest insects". *However, such a strategy is not wise or feasible.* Insects including those mentioned above are integral components of healthy forest ecosystems. These native species do less damage to the forest than the commercial

logging program (which completely removes trees and nutrients from the ecosystem). In addition, these insect species are invaluable to the BHNF forest ecosystem. Insects help decompose and recycle nutrients, build soils, maintain genetic diversity within tree species, generate snags and down logs required by wildlife, and provide food to birds and small mammals. By feeding upon dead or dying trees, wood borers and bark beetles provide food to insect gleaning species of birds (*such as the black backed woodpecker which is listed as a MIS species on this Forest*), create snags that may be utilized by cavity nesting birds in the future and overall are invaluable catalysts in forest evolution - often aiding immensely in the regrowth of forest after fires, blowdowns or other naturally occurring stand removing processes. The potentially significant direct, indirect, and cumulative impacts upon insects and upon the niche of insects in the BHNF forest ecosystem should be thoroughly analyzed in the FEIS.

SALVAGE LOGGING DOES NOT EFFECTIVELY “CONTROL” INSECTS

In the DEIS you state that there will be no benefit to the control of the mountain pine beetle, woodborers or the red turpentine beetle from the salvage operation. You state:

“Effects of activities on insect populations are expected to be as follows:

- Mountain Pine beetles would likely remain at current population levels regardless of harvest level because they don’t generally use fire-damaged trees.
- Woodborers would increase regardless of harvest level because they will use non-merchantable dead material as well as the merchantable material.
- Red turpentine beetles would increase regardless of harvest levels because they attack partially burned trees which would not be cut.” (DEIS 4-7)

You go on to state:

“Ips beetles would most likely increase regardless of harvest level because they use all size classes of dead material. The amount of increase *may be effected* by the amount of salvage harvest implemented. Removal of dead and dying trees will remove *some of the better quality Ips habitat.*” (Emphasis added) (DEIS 4-7)

You go on to state: “Alternative A has the highest likelihood of increased tree mortality.” Yet the only species that “*may be affected*” by the amount of salvage logging is the Ips beetle.

I respectfully submit that Ips would increase regardless of harvest level because they will use non-merchantable dead material as well as the merchantable material and that an Ips infestation with substantial loss of healthy trees is not likely even under these circumstances. Ips are not considered primary tree killing pest and rarely colonize and kill healthy trees. (Coulson, R N. and J.A Witter. Forest Entomology, ecology and Management, 1984. John Wiley & Sons New York). The very logging you promote may create conditions that are more favorable for outbreaks of Ips because Ips preferentially infests felled trees and slash. (Coulson, R N. and J.A Witter. Forest Entomology, ecology

and Management, 1984. John Wiley & Sons New York). Although they may lead to some mortality of already weak and dieing trees this does not justify the extreme measures promoted in Alternative B (or C).

There is no justification for this salvage sale based on insect activity, but there is justification for NOT salvage logging to increase snags and insect trees for the black backed woodpecker and other insect feeding birds.

POTENTIAL NEGATIVE IMPACT TO LAND SNAILS

The following land snail taxa in the BHNF are considered to be Species of Special Concern:

- Pahasapa mountainsnail (*Oreohelix strigosa n. subsp.*)
- Black Hills mountainsnail or Cooper's Rocky Mountain snail (*Oreohelix strigosa cooperi*)
- Berry's mountainsnail (*Oreohelix strigosa berryi*)
- Mystery vertigo snail (*Vertigo paradoxa*)
- Frigid ambersnail (*Catinella gelida*)
- Callused vertigo (*Vertigo arthuri von Martens*)
- Striate disc (*Discus (Gonyodiscus) shimeki*)

In 1993, Frest and Johannes (Deixis Consultants) identified each of these land snails as "Species of Special Concern" in the Black Hills National Forest because they "are believed to be currently rare over their entire range, to have suffered considerable reduction in numbers of sites and individuals, to be unprotected as yet by existing federal or state laws, rules, or regulations, and to be in imminent danger of extinction or likely to become so in the near future." (T. J. Frest and E.J. Johannes, "Land Snail Survey of the Black Hills National Forest, South Dakota and Wyoming," Final Report, Contract #43-67TO-2-0054, (1993), p. 41).

Frest and Johannes concluded that logging in the BHNF is "essentially disastrous" to these land snails, for instance, because logging "increases isolation; removes cover; increase ground temperature in summer; decreases effective ground temperature in winter (i.e., increase exposure); decreases available moisture and effective humidity; removes shelter, hibernation, and egg-laying sites; removes ground cover, including forage plants for many species; simplifies community structure; and decreases diversity. The removal of coarse woody debris and litter by logging (often followed by slash burning) is particularly objectionable."

The DEIS states that:

“Value Recovery operations could add to disturbance at these colonies with uncertain effects. Removal of standing dead trees could make sites warmer and drier adding to the effects of the fire. Removal of these trees also precludes their falling to the ground as down woody debris later slowing re-accumulation of the duff layer.” (DEIS 4-14)

Although the DEIS later states that there are seven known locations of the snails in the project area the Forest Service has only surveyed two of the known snail sites. The other five locations need to be surveyed to determine if there are still snails. A revised or supplemental draft EIS must be prepared to fully evaluate the cumulative impacts to the resident snails and other wildlife, including viability concerns exacerbated by the fire and proposed logging activities.

A revised or supplemental draft EIS is also needed to present key impacts "analysis" that was left out of the existing DEIS (e.g., assessment of cumulative impacts to wildlife populations, viability and distribution, etc.).

CONCLUSION

The Jasper Fire "Value Recovery" proposal is not an "emergency," and should not be treated as one. The "emergency" conditions listed in 36 CFR 215.10(d) all relate to existing unsafe or hazardous conditions. There is no existing unsafe or hazardous condition in the Jasper fire area that needs to be treated as an "emergency." If trees may die and pose a risk, they can be felled and/or burned the next year, and the USFS can impose a temporary closure on areas that are believed to be unsafe.

Thank you for your consideration of these comments

Scott Hoffman Black
Entomologist/Ecologist
Executive Director
The Xerces Society