



NATIONAL ASSOCIATION OF STATE FORESTERS

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November 9, 2022

Public Comments Processing
Attn: FWS-R5-ES-2021-0163
US Fish and Wildlife Service, MS:PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

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Dear Sir/Madam:

The National Association of State Foresters (NASF) is pleased to provide comments on the potential listing of the tri-colored bat (TCB) as endangered. NASF represents the heads of state forestry agencies for all 50 states, five U.S. territories, three nations in compacts of free association with the U.S., and the District of Columbia. Our members assist in the management and protection of state and privately-owned forests and are frequent cooperators in the management and protection of federally-owned lands.

Principal habitat for TCB includes forested areas throughout the country that provide summer roosting and foraging sites and safe migration corridors between summer and winter habitat. As noted in the Species Status Assessment, their known range at this time includes 39 states and a diversity of forested environments – from ponderosa pine in the West to mixed-hardwoods in the East. These forested ecosystems are also managed with a range of appropriate silvicultural practices depending on the locale.

We understand the need for a listing based on the severe impact that white-nose syndrome has had on the species. For this reason, we fully support the efforts of the White-nose Syndrome National Response Team and related initiatives and stand ready to assist in this work where our members can play beneficial roles. We also understand that other threats to TCB include winter hibernacula disturbance and wind energy development.

Where currently listed bat species may exist, our members have been in support of closely monitoring, and in some cases limiting forest management activities. In many states, for instance, state forestry agencies restrict management activities that could result in winter bat roosting site disturbance. That said, there is the potential that management restrictions resulting from the listing could negatively impact sustainable forest management throughout the TCB range.

Healthy, productive, and sustainable forest resources will continue to be essential for the future recovery of TCB. The Species Status Assessment Report states that forest management can be

Executive Director
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beneficial to bat species by maintaining or increasing suitable forage habitat. It was also noted that forested habitat loss is not a major driver of the species' proposed listing status and suitable forest habitat is not a limiting factor for the species, nor is it likely to be a limiting factor in the future.

The maintenance of forested ecosystems supports a complex suite of plants and animals that are economically, environmentally, and socially important to the American people. Subsequent protocols, critical habitat designations, and other decisions made by the agency regarding TCB should view these systems in total, and consider *all* limiting factors impacting the species, not just those related to habitat.

We believe that a designation of critical habitat would not be beneficial to the species and could potentially undermine the recovery of this species. To keep forested areas that support TCB intact, landowners must be able to generate the income necessary to retain ownership of these lands and to continue improving their resilience to climate change and other threats through active forest management. Active forest management inevitably requires tree removal in a carefully planned, science-based manner. Decisions on how best to manage the recovery of TCB must provide workable protocols allowing for tree removal that is cognizant of hibernacula issues.

For this reason, it is critical the USFWS recognize and cite the importance of forest management and silviculture as being vital to the long-term survival and recovery of the TCB, by applying similar findings from the current section 4(d) rule provided for the Northern Long Eared Bat, allowing working forests and collaborative forest management to continue to provide conservation benefits for the recovery of the TCB in the final rule.

Thank you for the opportunity to share our perspectives. We are pleased to answer any questions and would welcome any follow-up communications.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kacey KC", with a long horizontal flourish extending to the right.

Kacey KC
NASF President
Nevada State Forester