



August 26, 2014

Public Comments Processing
Attn: FWS-R5-ES-2011-0024
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive
MS 2042-PDM
Arlington, VA 22203

Re: Public Comment on the Proposed Listing of the Northern Long-Eared Bat

To Whom it May Concern,

The Southern Group of State Foresters (SGSF) appreciates the opportunity to comment on the US Fish and Wildlife Service's (USFWS) proposed listing of the northern long-eared bat (NLEB), *Final Determination on the Proposed Endangered Status for the Northern Long-Eared Bat* (78 Fed. Reg. 61046). SGSF represents the interests of the State Foresters from across a 13-State area of the Southern United States, 12 of which are within the range of the NLEB (AL, AR, FL, GA, KY, LA, MS, NC, OK, SC, TN and VA). SGSF believes that strong healthy forests are important to both stable economies as well as wildlife populations across the South, and are accordingly concerned about the impacts of the USFWS proposed listing and Interim Guidance (January 2014) on forest management activities.

SGSF agrees with the USFWS conclusions from the proposed listing that "*White-nose syndrome (WNS) is the most significant threat to the northern long-eared bat, and the species would likely not be imperiled were it not for this disease*" and that there is no evidence that other natural or manmade factors (Factor E), including prescribed burning, lead to significant impacts to the NLEB (78 Fed. Reg. 61072).

Since the biggest threat to the NLEB and primary cause of its decline is WNS, SGSF believes that efforts to protect the species should focus on addressing the spread and/or impact of WNS. However, in the interim guidance released in January of 2014, USFWS includes restrictions on forest management activities, including summer timber harvesting and prescribed burning, which would at best only marginally improve the longevity of NLEB populations. These restrictions could actually even be counterproductive, as active management can help create the snags and habitat diversity preferred by the NLEB. These restrictions would also have serious implications for the pace of forest restoration in the South, and be detrimental to job growth and growing local economies.

Forest management can in many cases be beneficial to the NLEB, as the desired forest conditions for the species include snags, cavity trees, open wooded foraging habitat, and the development of advanced desirable regeneration. Regarding prescribed burning, the USFWS itself noted in the proposed listing that "*A recent review of prescribed fire and its effects on bats (U.S. Forest Service 2012, p. 182) generally found that fire had beneficial effects on bat habitat*" (78 Fed. Reg. 61071).

Restrictions on forest management activities such as those found in the interim guidance may have the unintended consequence of more loss of habitat. Forest landowners will be inclined to sell their property or convert it to other uses if they cannot manage their timber as an investment and produce a positive cash return. There is no evidence that restricting timber sales to six months out of the year would maintain or improve NLEB habitat, but this would significantly restrict forest management, reduce financial returns, and reduce NLEB habitat in the long run.

Additionally, prescribed burning and active forest management are useful tools across the South in habitat creation for a variety of other Threatened and Endangered Species, including the Red Cockaded Woodpecker, that share habitat with the NLEB. If the interim guidance were made final as it reads now, forest owners throughout the South could be put in the untenable position of having to stop land management projects supported by USFWS for species conservation, in order to protect another species (NLEB) whose main threat comes not from habitat modification but from disease. The Southern Group of State Foresters strongly supports the active management being done across the South by States, private landowners, and conservation groups to restore forests and in the process create wildlife habitat. We do not support impeding the progress of restoration for restrictions that would have a questionable level of success at protecting the NLEB from WNS.

When drafting the final guidance, SGSF asks that the USFWS limits restrictions on active forest management to those activities which, using the best available science, can be reasonably expected to support the recovery of NLEB populations. Restricting activities on which the evidence is inconclusive about either harm or benefit to the species could be counterproductive to the goals of the listing, and would certainly be detrimental to the ongoing conservation activities for other species.

Once again, SGSF appreciates the opportunity to comment on the proposed listing and looks forward to working with the USFWS on ways to protect the NLEB while sustaining ongoing forest management and restoration.

Sincerely,



Wade Dubea
State Forester, Louisiana
Chair, Southern Group of State Foresters