

## **Lake States Forest Guild Position Statement on The Proposed Endangered Species Listing of the Northern Long-Eared Bat**

Approved by Membership and Policy Committee (MPC) of the Forest Guild  
September 25, 2014

The Northern Long-Eared Bat (*Myotis septentrionalis*; NLEB) was proposed for listing by the U.S. Fish and Wildlife Service (FWS) pursuant to the Endangered Species Act of 1973 (ESA), due primarily to significant population declines from white nose syndrome (WNS) in some eastern states. While the range of the bat includes 39 states and multiple Canadian provinces, this paper pertains to the Lake States (Michigan, Minnesota, and Wisconsin) context specifically. Fortunately, WNS is not currently well established in the Lake States region, and bat populations have not experienced the steep declines associated with WNS.

Although NLEB conservation is primarily disease-related, an endangered designation under ESA prohibits the taking of species and thus puts pressure on forest managers and others to prove that their actions will not take any individual of the endangered species, except by permit. Because there are information gaps as to what habitat features NLEB use in forests, and the bats are habitat opportunists, conservation measures suggested by FWS may impact summer forest management in a very broad way. FWS documents to date reflect this information gap by failing to name specific ways to conserve the NLEB and instead defaulting to broad strategies. For example, one suggested conservation measure is to avoid harvest of any tree over 3 inches dbh during the months of April through September. If implemented as outlined in the FWS "Interim Conference and Planning Guidance" document, seasonal restrictions on forest management activities will have an adverse affect on forest ecosystems, the forest products industry, and forest-dependent communities in the Lake States region.

For the past 20 years, strides have been made in understanding and promoting greater use of ecological principles in forest management across the country. Forest ecosystem types developed disturbance regimes that are linked to seasonality. Limiting growing season site access could have unintended consequences; altering the trajectory, resilience, productivity, and stability of these systems.

The Lake States region contains over 50 million acres of forestland which provides breeding habitat for forest-dwelling bats, including NLEB. Although forest management has not been shown to adversely impact NLEB, we understand concerns raised by FWS. However, annual timber harvesting rates in summer impact a small percentage of the forest (estimated at less than one-half of 1% of the total forest land base annually across the region) so the probability of bat mortality resulting from this activity is small. Moreover, forestry guidelines and best management practices utilized in the region promote the retention of structural elements (e.g. snags, cavity trees, riparian buffers) that are important habitat characteristics for NLEB. The Lake States region has the largest concentration of third-party certified forest in the U.S., which serves to independently verify harvest levels and ecologically-based forestry practices utilized to sustain forest habitat.

Lake States members of the Forest Guild<sup>1</sup> support the application of the ESA to protect rare species in general, and recognize the need for NLEB conservation action. However, we are concerned that potential forest management restrictions resulting from the listing will have negative impacts on forest managers' ability to manage forests responsibly, and on local forest dependent communities that will outweigh the protection afforded to NLEB under the ESA. We also believe FWS should take a more holistic and ecological approach to their assessment of forest treatments and their effects on NLEB. We believe a habitat management approach is a better means to maintain viable populations of forest-dependent bats in our region than attempting to protect individuals. The Forest Guild is committed to promote and implement forestry practices that enhance NLEB habitat in our region, to maintain populations in the face of WNS and beyond.

The Lake States Forest Guild members recommend:

1. Applied research on NLEB forest habitat requirements to better determine habitat use in the region.
2. Consider listing the NLEB as threatened rather than endangered on the basis that WNS is not well established throughout the NLEB's range, and provide for a special rule to allow summer forest management to continue on the basis that it is not the proximate cause of decline of NLEB, and provides important habitat for wildlife species.
3. The FWS work with forest landowners and resource managers to develop more effective conservation measures, and promote adaptive forest management practices (if needed) as a result of information from habitat research.
4. Increase funding and research to address WNS.

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<sup>1</sup> The Forest Guild is a professional organization of forest stewards, associated natural resource professionals, and affiliates who are passionate about restoring and sustaining the integrity of our forests while meeting the needs of the communities that rely on them.