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Comments:

As Kentuckians, we are privileged to share our forests with a diverse assemblage of temperate, insectivorous bats. Disease and habitat loss have decimated populations of cave-hibernating species, including the federally endangered Indiana Bat (*Myotis sodalis*). Conservation-minded management by the Daniel Boone National Forest (DBNF) has provided rich habitat supporting this imperiled species, and given this history of responsible stewardship, we are confident that amendments to the Forest Plan will proceed with the care necessary to ensure the persistence of the Indiana Bat for years to come.

We support the DBNF's efforts to clarify and modernize the Forest Plan, as well as their emphasis on safety and sustainability. However, greater specificity of language would clarify the continued benefits to the Indiana bat. The scoping document notes that decisions will be made using "the best available science." We believe the proposed amendments can be improved by directly referencing peer-reviewed literature, government publications, and other credible sources. For example, we recommend review of Hazard-Daniel et al. (2017), Johnson et al. (2010), Loeb and O'Keefe (2014), and Silvis et al. (2016).

The scoping document posits that risk to aquatic threatened and endangered species could be reduced by relaxing treatment date restrictions. It is difficult for readers to weigh the benefits and risks to either bats or aquatic species should all proposed amendments be adopted as no evidence is provided to support this conjecture.. Furthermore, although the federally threatened Northern Long-eared Bat (*Myotis septentrionalis*) is acknowledged in a table on page 6 of the scoping document, the species is not discussed in the main text. Kentucky populations of Northern Long-eared Bats have experienced dramatic mortality as a result of White-nose Syndrome, necessitating federal threatened species listing. As the conservation needs of this species will more closely reflect those of the Indiana Bat than those of the listed aquatic species, it is unclear what effects the proposed amendments may have on the Northern Long-eared Bat.

Although challenging, we believe that it is possible to balance conservation (of both bats and aquatic species) with sustainable forestry and the efficient utilization of forest resources. We applaud the DBNF for taking the initiative to meet this challenge head-on by amending their Forest Plan in consideration of the greatest good for the greatest number. We are confident that the amended Forest Plan will continue to satisfy all requirements of the Endangered Species Act, and indeed provide additional benefits for the resources and at-risk species.