

Testimony to the United States House Committee on Natural Resources
Paul Lyskava, Executive Director, Pennsylvania Forest Products Association
September 8, 2014

Oversight Field Hearing on "The Northern Long Eared Bat: The Federal Endangered Species Act
and Impacts of a Listing on Pennsylvania and 37 Other States"

We thank the committee for the opportunity to comment on the decline of the Northern Long-eared Bat (NLEB) and the consideration of the species for listing as endangered under the Federal Endangered Species Act.

We also welcome the committee to Pennsylvania, which leads the nation in the production of hardwood lumber. Pennsylvania hardwoods are valued across the nation and around the world as a renewable and sustainably managed resource of high quality and beauty. With 17 million acres of forest, Pennsylvania leads the nation in the volume of hardwood growing stock.

The decline of NLEB and other cave dwelling bat species due to the spread of white nose syndrome disease (WNS) is an issue that should be of concern for all. PFPA supports public and private research efforts to learn more about the impacts of WNS on NLEB and other bat species, and ultimately how to control, mitigate or eliminate WNS as a threat to bats. PFPA also supports the efforts of federal and state agencies to restrict recreational access to critical bat hibernacula at this time to prevent the unintentional spread of WNS.

We are also taking steps to educate the state's forestry and logging community on bats and WNS through training offered by our sister organization, the Pennsylvania Sustainable Forestry Initiative[®].

We commend the U.S. Fish and Wildlife Service (USFWS) for its decision to provide a six-month extension before its final listing determination and the re-opening of the comment period this summer. But we believe that this extension still does not provide sufficient time to address the existing gaps and conflicting data on NLEB populations and survivability.

It seems that the evidence for the proposed listing of the species as endangered is based primarily upon significant mortality events documented at a limited number of hibernacula. While these events are dramatic, it has been documented that NLEB populations remain robust in portions of the species range, including midwestern and northern states where WNS is not yet documented. The USFWS and others have also recognized that NLEB is difficult to accurately count via cave surveys, given its preference to hibernate singularly and in small groups in recessed areas such as cracks, crevices and broken stalactites. Finally, there seems to be a consensus acknowledgment that the NLEB also hibernates in rock outcroppings in Pennsylvania and other areas, although these populations are not currently being considered.

Additionally, while the USFWS has cited NLEB mortality of as much as 99 percent at these hibernaculum die-offs, other research has suggested that NLEB population declines in Pennsylvania and nearby states may be as low as 31 percent.

Until these data gaps and conflicts are addressed, we believe that it is premature for the USFWS to list NLEB as endangered.

We would like to stress that the most significant threat to the NLEB comes from the WNS disease, not a lack of habitat. This fact is recognized by the USFWS and many environmental interests. The USFWS has gone as far as to state that habitat concerns and other anthropogenic factors create no significant negative effects to NLEB alone or in combination. Timber harvesting and other forestry activities are not causing a decline in NLEB, nor are these activities associated with WNS. As further evidence, the proliferation of WNS and reported decline of NLEB in Pennsylvania has occurred during a period of historically low timber harvesting in the state.

We thank the committee for gathering information on the economic impacts associated with a federal endangered listing of the NLEB. As you know, the USFWS will not consider economic or human impacts in its determination whether to list a species as threatened or endangered.

If NLEB is listed as a federally endangered species, it will be illegal to kill, harm or harass a NLEB, even if unintentional. The definition of 'take' under the Endangered Species Act includes habitat impacts that could be an impediment to the essential behavior of the species, such as roosting or reproduction.

If NLEB is listed as endangered, the most likely USFWS management protocols, based upon the UWSFS Interim Guidance document published in January 2014, will be an extensive set of restrictions on forestry activities and other tree removals. This includes establishing 5 mile protection zones around known hibernacula and establishing seasonal tree harvesting restrictions on bats summer habitat. In Pennsylvania, these seasonal restrictions could possibly run from April 1 to November 15. All trees 3" DBH and larger would be covered by these harvesting restrictions. There would also likely be additional restrictions on other non-harvesting forestry activities, such as prescribed burning.

The NLEB is a forest generalist during the summer, utilizing a wide variety of forest age classes, tree species, tree sizes, living and dead trees, as well as various man-made structures. For this reason and the frequency of its occurrence pre-WNS, the amount of acreage in Pennsylvania impacted by these restrictions will be significant. Data recently developed for the Pennsylvania Game Commission and Pennsylvania Bureau of Forestry indicates that 54 percent of Pennsylvania (15.8 million acres) provides moderate to high potential summer use habitat for the NLEB, which accounts for much of the forested acres in the state. This includes 88 percent of State Forests and 84 percent of State Game Lands.

Pennsylvania has 114 hibernacula known to house NLEB. As a result, as much as 20 percent of the state could be subject to the additional restrictions applied to the anticipated hibernacula protection zones.

If implemented, these various forestry restrictions across such a wide swath of Pennsylvania will decimate the state's forest products industry.

During the fraction of the year that forestry will be unimpeded by these NLEB restrictions, Pennsylvania's forestry community is already subject to a variety of mandated, encouraged and voluntary restrictions on timber harvesting activities. This includes hunting seasons; forest roads closed or with plowing restrictions during winter to support snowmobile activities; best practices that encourage minimizing the transport of logs during the spring freeze/thaw period when paved roads are most susceptible to damage; and periods in the spring when it is too wet to log.

As a result, logging would essentially become a part-time activity across much of Pennsylvania, unencumbered for only a fraction of the year. The owners and employees of these logging companies will not be able to continue their operations in this fashion. The local supply chain that provides logs to sawmills, paper mills and other forest product manufacturers will be disrupted. It is difficult to conceive of a scenario where larger production facilities will be able to sustain operations under such a restricted supply of logs.

Even secondary forest product manufacturers of products such as cabinets, flooring, millwork, and pallets will come to find Pennsylvania as an uncompetitive place to base operations, as the local supply of hardwood lumber dries up when the sawmills close.

Currently, Pennsylvania is home to more than 2,200 forest product establishments, employing approximately 60,000 Pennsylvanians. This is about ten percent of the state's manufacturing workforce. The forest product industry has a presence in every county of the Commonwealth.

The listing of the NLEB as an endangered species and implementation of the suggested forestry restrictions will result in the loss of tens of thousands of these jobs and the closing of hundreds of businesses.

Most of the jobs lost will be in forestry, logging and manufacturing, paying middle class wages and above. Most establishments that will be forced to close will be owned by hardworking individual entrepreneurs and families, some of which have been in the forest product business for generations.

The listing of NLEB as endangered will impact forest landowners as well. Pennsylvania contains nearly 17 million acres of forest. Nearly 30% of this acreage (4.8 million acres) is publically owned. An estimated 533,000 private owners hold over 70 percent of the forested acres (11.7 million acres) in Pennsylvania. Families and individuals are the dominant group in this private category, accounting for 54 percent (9.6 million acres) of forest in Pennsylvania. The listing of NLEB and associated restrictions will impede public and private landowners from their desired and necessary forestry practices. Furthermore, a collapse of the state's forest products industry will lower the demand for logs, decreasing the value of timber on both public and private lands. Any disincentive to maintain lands as working forests provides an incentive for this land to be permanently converted to non-forest uses.

From forestry and forest products alone, the effect of the NLEB listing will have a significant negative impact on Pennsylvania's economy. In 2012, the state's wood industry had \$11.5 billion in sales and an overall total economic impact of \$19 billion contributed to the state's economy. This included total direct, indirect and induced employment of over 98,000

individuals, with \$5.0 billion in wages and salaries earned. The anticipated loss of forest product business and jobs will significantly impact these figures. Local impacts will be even more dramatic in the communities where forestry and forest products are the leading employer.

Pennsylvania is just one of many states where forestry will be negatively impacted by an NLEB listing. According to the National Alliance of Forest Owners, 27 of the 38 states touched by the NLEB range have a sizable forest products industry presence. These states contain a total of 372,535,969 acres of public and private timberland. The industry provides a total of 2.2 million direct, indirect, and induced jobs with a combined payroll of \$80 billion. Annual timber sales and manufacturing shipments equaled \$210.7 billion, with a combined contribution to state GDPs of \$89 billion.

The negative impacts of a NLEB listing are not only economic. The associated forestry restrictions will create a significant impediment to public and private forest owners seeking to improve the forest habitat for other species, including other listed species and other bat species being negatively impacted by WNS.

In Pennsylvania, for example, the state's Game Commission and Department of Conservation and Natural Resources are working on a habitat conservation plan that will improve forest habitat for the benefit of the endangered Indiana Bat. The forest management restrictions suggested for a NLEB listing may make this plan unfeasible.

The restrictions will also create an obstacle for landowners to engage in needed forest management practices to maintain forest health and address the impacts of forest diseases and invasive pests. A endangered listing of NLEB will lead to a general decline in the health of Pennsylvania's forests.

In conclusion, the habitat protection provisions associated with an endangered listing of the NLEB will have dramatic negative consequences for Pennsylvania's forestry industry, its forest landowners, the state's economy and the forest habitat itself – all while providing no benefit to addressing the impact of WNS that threatens the NLEB.

The USFWS needs to forego any mandated restrictions on forest management practices. The USFWS needs to work with other federal agencies, state wildlife and forestry agencies and other stakeholder to fill the gaps in the existing data and understanding of NLEB and WNS. Finally, the USFWS and others need to remain focused on the research and efforts on the control and elimination of the WNS that is the actual threat to NLEB and other bat species.

Thank you again for this opportunity to comment on this important matter.

The Pennsylvania Forest Products Association (PFPA) is the leading trade group in the state representing the various sectors of the forest products industry. PFPA's members own or manage more than one million acres of private forest in Pennsylvania. PFPA is also the administrative host and sponsor of the Pennsylvania Sustainable Forestry Initiative® (PA SFI®), which has provided safety, environmental and ecological training to more than 7,000 loggers, foresters and others. It is the leading logger training program in the state. PA SFI® regularly includes courses related to wildlife, habitat and biodiversity issues as part of its continuing education opportunities.

Attachments:

PFPA Comments: Docket No. FWS-R5-ES-2011-0024 (August 29, 2014)

Consensus Forest Industry Comments: Docket No. FWS-R5-ES-2011-0024 (August 29, 2014)

PFPA Comments: Docket No. FWS-R5-ES-2011-0024 (January 2, 2014)



Pennsylvania Forest Products Association

301 Chestnut Street, Suite 102, Harrisburg, PA 17101
Phone: 717-901-0420 800-232-4562
Fax: 717-901-0360
E-mail: pfpa@paforestproducts.org
Web: paforestproducts.org

January 2, 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: Endangered and Threatened Wildlife and Plants; Listing the Northern Long-Eared Bat as an Endangered Species – [Docket No. FWS-R5-ES-2011-0024]

Dear UFWS:

The Pennsylvania Forest Products Association (PFPA) offers the following comments related to the above referenced proposal to list the northern long-eared bat (*Myotis septentrionalis*) as an endangered species and to not list the eastern small-footed bat as a threatened or endangered species.

The Pennsylvania Forest Products Association (PFPA) is the leading trade group in the state representing the various sectors of the forest products industry. Pennsylvania leads the nation in the production of hardwood lumber. PFPA's membership accounts for approximately three-quarters of the state's hardwood lumber production and many of the leading pulp and fiber utilizing manufacturing facilities in the state. PFPA's members also own or manage more than one million acres of private forest in Pennsylvania. Forest product manufacturing is an important component to the state's economy, employing an approximately 60,000 Pennsylvanians.

PFPA is also the administrative host and sponsor of the Pennsylvania Sustainable Forestry Initiative[®] (PA SFI[®]), which has provided safety, environmental and ecological training to more than 7,000 loggers, foresters and others. It is the leading logger training program in the state. PA SFI[®] regularly includes courses related to wildlife, habitat and biodiversity issues as part of its continuing education opportunities.

We offer the following comments on the related proposal:

Proposed Listing of northern long-eared bat:

We believe that the information provided in the Status Review of its proposal is insufficient to support the listing of the northern long-eared bat at this time. The Status Review acknowledges that the information regarding the impact of white nose syndrome on the species is limited, with significant data gaps, conflicting information, over-reliance on antidotal information and other data that has not been peer-reviewed, and assumptions that may well not accurately reflect what is happening to the species across its range.

For example, the Service references reports of declines from winter cave surveys in Pennsylvania and a limited number of other states. However, this is not confirmed by adequate surveying in during other seasons of the year. This is noteworthy, as the Service acknowledges that the northern long-eared bat is easily overlooked during hibernacula surveys. It is also noteworthy that recent summer mist net surveys and acoustic surveys in several states indicate the northern long-eared bat to be among the most common bat detected.

Given the data gaps and use of anecdotal and non-peer reviewed information, we believe that the proposal is not supported by the best scientific and commercial data available, as is required by the Endangered Species Act.

State Regulatory Actions:

In its Status Review, the Service has wrongly mischaracterized (p.61068) a pending bill in the Pennsylvania General Assembly (HB 1576) as a proposal to prohibit state species listings. This representation is incorrect, as the bill explicitly does continue to allow for state listings and provides a defined process that ensures that proposed listings are reviewed to ensure that they are based in sound science and open to public comments, as is the required by the federal Endangered Species Act. It should also be noted that this bill has been introduced, but not yet enacted into law, not unlike the thousands of other bills introduced in the Pennsylvania General Assembly each legislative session – including HB 1099, which would mandate the state endangered listing of northern long-eared and other bat species. Given the uncertainty of final enactment, this legislative proposal did not warrant mention in the Status Review, let alone its mischaracterization.

Furthermore, we do not believe that the Service has fully considered to actual state efforts which are on-going and under development to both address white nose syndrome and conserve the northern long-eared bat, nor have states been given adequate time to do the necessary research to fully develop and initiate their own action plans. The Endangered Species Act allows for federal determinations to be made only after taking into consideration all of the efforts of the states and political sub-divisions to protect the species.

Critical Habitat:

The Service's proposes to list northern long eared bat as endangered of extinction predominately due to the threat of white nose syndrome. The Service has stated that the even if all habitat-related stressors were eliminated or minimized, the significant effects of white nose syndrome on the northern long-eared bat would still be present.

There is little definitive research that suggests that specific forest types or forest structures are a limiting factor for survival of the species or that restricting forest management activities will aid the species in recovery. There is also little evidence linking forestry activities to the spread of white nose syndrome.

We urge the Service to forego the designation of any forested areas as critical habitat, as no specific area of its range is critical to its future survival. Although the Service states that there is much to learn about the interactions between the species and its forest needs, there does seem to be a level of consensus that the northern long-eared bat is more of a forest generalist able to utilize a wide variety of forest conditions.

The only areas where critical habitat may be warranted are the hibernacula, as this is where white nose syndrome seems to have its greatest direct impact on the species.

We also urge the Service to minimize the restrictions on forestry as part of the recovery plan. These restrictions will have little if any impact on preservation of the species. They will, however, negatively impact thousands of hardworking families that depend on forest product jobs for their livelihood. We also believe that unnecessary and unproductive regulation of forestry activities will ultimately discourage forestry practices that may help improve forest habitat to the benefit of other species.

Decision to deferral on listing of eastern small-footed bat:

We agree that with the Service's determination that a threatened or endangered listing of the eastern small-footed bat is not warranted at this time, given the survey data and information on the species known at this time.

Response to the information request:

We offer to the Service the following information:

- According to the U.S. Forest Service, there was a one percent net gain of forestland cover in Pennsylvania between 2004 and 2009, with the minimal conversions of forest acres to non-forested and agricultural uses off-set by other lands reverting to forest. http://www.fs.fed.us/nrs/pubs/rb/rb_nrs82.pdf. Prior to that, there was no significant change in the total acreage of forestland cover between 1989 and 2004. <http://www.nrs.fs.fed.us/pubs/2990>.
- Since 2007, Pennsylvania's forest products industry has suffered through a significant downturn of which it is still struggling to recover. Hardwood lumber production in the state dropped by more than 40% since 2006. These are the lowest levels of sawmill production since the Great Depression. http://www.fs.fed.us/nrs/pubs/rb/rb_nrs82.pdf.

This data is offered as further evidence that the reported demise of the northern long-eared bat in Pennsylvania is not due to any scarcity of forest habitat for the species. The reported decline of the species has occurred during a period where the forest cover in the state has been stable and there has been a historic low level of timber harvesting and other forestry activities in the state.

Conclusion:

- We request that the Service withdraw or delay the proposed listing of northern long-eared bat until gaps in the science and species data have been addresses, information peer reviewed and all current efforts to protect the species have been fully considered.
- We also request that the Service forego the designation of any forested areas as critical habitat.
- We agree that with the Service's determination that a threatened or engendered listing of the eastern small-footed bat is not warranted at this time.

Thank you for the opportunity to comment on this proposal. We welcome any additional conversations with the U.S. Fish and Wildlife Service on this process and other efforts to address the impact of white nose syndrome on this and other bat species.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Lyskava". The signature is fluid and cursive, with the first name "Paul" being more prominent and the last name "Lyskava" written in a more compact, connected style.

Paul Lyskava
Executive Director, PFPA



Pennsylvania Forest Products Association

301 Chestnut Street, Suite 102, Harrisburg, PA 17101
Phone: 717-901-0420 800-232-4562
Fax: 717-901-0360
E-mail: pfpa@paforestproducts.org
Web: paforestproducts.org

August 29, 2014

Docket No. FWS-R5-ES-2011-0024

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: Final Determination on the Proposed Endangered Status for the Northern Long-Eared Bat, 78 Fed. Reg. 61046 (October 2, 2013) - [Docket No. FWS-R5-ES-2011-0024]

Dear USFWS:

The Pennsylvania Forest Products Association (PFPA) offers the following comments related to the above referenced proposal to list the northern long-eared bat (*Myotis septentrionalis*) as an endangered species. We thank the USFWS for its six-month extension for the final listing determination and the re-opening of the comment period.

The following comments supplement our previous comments submitted on January 2, 2014, and the consensus comments submitted by coalition of forestry and forest product organizations (including PFPA) dated August 29, 2014.

About PFPA:

The Pennsylvania Forest Products Association (PFPA) is the leading trade group in the state representing the various sectors of the forest products industry. PFPA's membership accounts for approximately three-quarters of the state's hardwood lumber production, as well as many of the leading pulp and fiber utilizing manufacturing facilities in the state. PFPA's members also own or manage more than one million acres of private forest in Pennsylvania.

PFPA is also the administrative host and sponsor of the Pennsylvania Sustainable Forestry Initiative[®] (PA SFI[®]), which has provided safety, environmental and ecological training to more than 7,000 loggers, foresters and others. It is the leading logger training program in the state. PA SFI[®] regularly includes courses related to wildlife, habitat and biodiversity issues as part of its continuing education opportunities.

We offer the following additional comments on this issue and respond to the USFWS request for additional information.

NLEB Population and Species Decline:

We share the concern about the decline of northern long-eared bat (NLEB) as a result of white nose syndrome (WNS). It seems that the evidence for the proposed listing of the species as endangered is based primarily upon significant mortality events documented at a limited number hibernaculum. While these events are horrific, the overall science on NLEB populations and survivability currently contains both gaps and conflicting data.

- It has been documented that NLEB populations remain robust in portions of the species range, including midwestern and northern states where WNS is not yet documented. Even in Pennsylvania, the Pennsylvania Game Commission has said that NLEB is still commonly found in parts of the state.
- The USFWS and others have recognized that NLEB is difficult to accurately count via cave surveys, given its preference to hibernate singularly and in small groups in recessed areas such as cracks, crevices and broken stalactites. As a result, there is a probability that actual NLEB populations in identified hibernacula are being under-reported. If so, the NLEB mortality rates at documented die-off events could be over-estimated, perhaps by a significant amount.
- While the USFWS has cited NLEB mortality of as much as 99 percent at these hibernaculum die-offs, other research has suggested that NLEB population declines in Pennsylvania and nearby states may be only 31 percent.
(http://www.nrs.fs.fed.us/pubs/jrnl/2013/nrs_2013_ingersoll_001.pdf)
While still significant, this rate of decline may not foretell the imminent demise of the species.
- There seems to be a consensus acknowledgment that the NLEB also hibernates in rock outcroppings. Numerous occurrences of NLEB in Pennsylvania where rock outcroppings are common suggest that rock outcroppings may be a significant undocumented resource for NLEB in Pennsylvania.

Additionally, we believe that certain characteristics of the ecology of the NLEB may suggest greater potential for species survivability than implied by reported mortality rates in the proposed listing. In comparison to other bats species impacted by WNS, NLEB tends to winter singularly and in small groups, segregated in the cracks and crevices of hibernacula (as opposed to other species that cluster in larger groups). Compared to the federally listed Indiana Bat, NLEB has been documented in significantly more hibernacula (114 vs 18 documented sites). As stated above, it is likely that there are significant undocumented populations wintering as individuals and small groups in remote rock outcroppings. Finally, the NLEB seems to congregate in smaller numbers during maternity and summer roosting. All of these factors combined would suggest the possibility that the spread of WNS could be slower within the NLEB population, compared to other bat species, benefiting the survivability. Research on this issue is needed.

In summary, we recognize the impact that WNS is having on NLEB. We believe, however, that there are still significant conflicts and gaps in the research to suggest that the species may not be at the brink of extinction. These research gaps need to be better addressed before an endangered listing is warranted.

NLEB Habitat:

As was emphasized in our previous comments and in the comments of countless others, the most significant threat to the NLEB comes from the WNS disease, not a lack of habitat. The USFWS recognizes this and has gone as far as to state that habitat concerns and other anthropogenic factors create no significant negative effects to NLEB alone or in combination.

Furthermore, existing research and the wide diversity of habitat within the NLEB range suggests that the species is not dependent upon any particular type of forest habitat. For its summer roosting needs, NLEB seems to be adaptive to a wide variety of forest age classes, tree species, tree sizes, living and dead trees, as well as various man-made structures. NLEB has not been adversely impacted by forest habitat changes resulting from forest management activities.

Because NLEB is such a forest generalist, data recently developed for the Pennsylvania Game Commission and Pennsylvania Bureau of Forestry indicates that 54 percent of Pennsylvania (15.8 million acres) provides moderate to high potential use habitat for the NLEB in the summer. We suspect that other states in the NLEB range also have expansive areas of potential use habitat for the NLEB in the summer.

For this reason, we continue to urge the USFWS to forego the designation of any forested areas as critical habitat, as no specific area within its range is critical to its future survival, save for hibernacula that are currently free from WNS.

We are distressed that the USFWS continues to seek to address the decline of NLEB by focusing on seasonal restrictions to forest management practices, as expressed in the Interim Guidance issued in January. These restrictions for timber harvesting, prescribed burning and other forest management practices throughout much of the year will do nothing to prevent the spread of WNS or protect NLEB from WNS. Such restrictions will, however, have a negative impact on efforts by public and private forest owners to improve the forest habitat for other species, including other listed species and other bat species being negatively impacted by WNS. In Pennsylvania, for example, the Game Commission and Bureau of Forestry are working on a habitat conservation plan that will benefit the endangered Indiana Bat. The forest management restrictions suggested for a NLEB listing may make this plan unfeasible.

Ongoing Bat Conservation Efforts:

Recognizing the impacts that WNS is having on local bat populations, the Pennsylvania Sustainable Forestry Initiative[®] is offering a course entitled *Bats and Forest Management* as part of its logger training continuing education program. Taught by Pennsylvania Bureau of Forestry wildlife specialists, the course covers the importance Pennsylvania bat species, their habitat requirements, WNS, current regulations and additional steps that individuals can take to minimize potential impacts on bats during a timber harvest. We estimate that more than 700 harvesters and foresters will have an opportunity to take this course as it is offered during the upcoming years.

PFFPA also continues to support public and private research efforts to learn more about the NLEB and for the control and elimination of the WNS that is the actual threat to NLEB and other bat species.

Potential Economic and Human Impact:

We recognize that the USFWS will not consider economic or human impacts in its determination whether to list NLEB under the Endangered Species Act. However, we feel obligated to provide such information as it relates to Pennsylvania, given the scope of forestry in Pennsylvania and the impact that any listing will potentially have on future conservation efforts affecting a broad range of wildlife species and forest health issues.

Pennsylvania contains nearly 17 million acres of forest. Nearly 30% of this acreage (4.8 million acres) is publically owned. An estimated 533,000 private owners hold over 70 percent of the forested acres (11.7 million acres) in Pennsylvania. Families and individuals are the dominant group in this private category, accounting for 54 percent (9.6 million acres) of forest in Pennsylvania.

Pennsylvania is the leading producer of hardwood lumber in the U.S. In 2012, the state's wood industry had \$11.5 billion in sales. The total economic impact of wood industry amounted to \$19 billion contributed to the state's economy, with total direct, indirect and induced employment of over 98,000 individuals. The state's forest products industry directly employs nearly 60,000 individuals, accounting for more than ten percent of the state's manufacturing workforce.

Conclusion:

- Because of the continued gaps and conflicting data, we request that the USFWS not list NLEB as endangered.
- We request that the USFWS forego the designation of any forested areas as critical habitat.
- We request that the USFWS forego any mandated restrictions on forest management practices. These will not prevent the spread of WNS nor protect the NLEB from WNS, but will impede public and private forest landowners from effectively implementing other habitat and forest health improvements.
- We urge the USFWS to work with other federal agencies, state wildlife and forestry agencies and other stakeholder to fill the gaps in the existing data and understanding of NLEB and WNS.
- Finally, we urge the USFWS to focus its research and efforts on the control and elimination of the WNS that is the actual threat to NLEB and other bat species.

Thank you for the opportunity to comment again on this proposal. We welcome any additional conversations on this process and other efforts to address the impact of white nose syndrome on NLEB and other bat species.

Sincerely,



Paul Lyskava
Executive Director, PFPA

Comment tracking number: 1jy-8e2o-2r0n