

Testimony of Martin Melville

Before the Full Committee on Natural Resources

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

September 8, 2014

Chairman Hastings and distinguished members of the House Natural Resources Committee, my name is Martin Melville. I am a resident of Centre Hall, Pennsylvania, received a Bachelor of Science in Forestry in 1980, and have worked in the forest industry for the past 35 years; twenty years logging and ten years as proprietor of Melville Forest Services. I was presented the Pennsylvania "Outstanding Logger Award" in 1997 and met the criteria of the Sustainable Forestry Initiative® program Master Logger in 2004.

I also appear today on behalf of the members of the American Loggers Council, a national organization representing professional timber harvesters in 30 States across the U.S. with whom have had an affiliation with for the past several years. I am pleased to have the opportunity to address the Committee on the potential impacts that could occur should the U.S. Fish and Wildlife Service (USFWS) list the Northern Long Eared Bat as a Federal Endangered Species, but first I would like to throw out a few statistics for you.

The latest numbers that I have been able to gather are from 2012, taken directly from the American Forest and Paper Association website. For Pennsylvania they are:

Pennsylvania employment numbers in the forest products industry – 50,103

Payroll - \$2,622,276

With an estimated 274 manufacturing facilities ranging from mill work, treating plants, sawmills and paper mills, the total value of industry shipments in 2012 was \$14,815,029,000.00 with state and local tax payments of \$179,000,000.00.

Forests compose 16,577,000 acres in Pennsylvania, covering 57% of the State. Of that 16.6 million acres, 11.6 million are privately held.

As you know, the Northern Long Eared Bat is experiencing significant declines in parts of its range due to White Nose Syndrome (WNS). In its proposed listing, the UFWS has affirmed that WNS is the most significant threat to the NLEB and the species would most likely not be imperiled if not for this *“disease”* and that *“habitat concerns and other anthropogenic factors create no significant effects alone or in combination.” 78 Fed. Reg. at 61072 (emphasis added)*. UFWS also asserts in its document that when combined with significant population reductions due to WNS, “the resulting cumulative effect may further adversely impact the species”; **the only real threat to the species is clearly a wildlife disease, not habitat modification or loss.**

There is no evidence I am aware of indicating timber harvest restrictions will improve the NLEB's chances of surviving the WNS which is leading to the population decline, yet the Interim Conference and Planning Guidelines issued by the FWS in January of this year suggest a completely unrealistic, and in my view, unnecessary set of constraints on forest management during nearly every seasonal period of bat habitat use. These restrictions include vaguely worded restrictions on prescribed burning at various times of the year, restrictions on tree harvesting of all trees larger than 3 inches DBH and larger, and ambiguous direction to "Avoid reducing the suitability of forest patches with known NLEB use." In essence, although the species has been shown to be present in forest with a variety of age classes, management regimes, and in fact may depend upon management to perpetuate various habitat features over time, the Guidance seems to suggest that creating 5-mile radius "no management" zones around known habitat as the best way to conserve bats.

There is no evidence to suggest these measures have anything to do with the spread of White Nose Syndrome, nor that they would do anything to prevent very high levels of mortality should WNS spread throughout the bat's range, as the USFWS speculates it will.

I would argue current forest practices greatly enhance roosting and rearing habitat. In fact it may be true leaving dead snags and trees spaced apart from one another, such as those associated with logging, may separate the NLEB preventing incidental contact which spreads WNS.

This is supported by the fact where WNS is not yet present; populations of NLEB appear to be quite robust. For instance, the NLEB is one of the most frequently captured bats in the mist net surveys on the Black Hills National Forest in South Dakota, one of the most heavily managed National Forests in the country. In fact it is my understanding prior to the introduction of WNS, NLEB's were regarded as "most common" in the Northeastern portion of their range. States ranging from Northern New England through the lower portion of the Lake States and Indiana contain a variety of habitat types, forest ownerships, and land use practices. This strongly suggests the bat is not dependent on a particular type of habitat much less a particular class of trees.

While UFWS may not take economics into consideration when making decisions, it should recognize the fact it takes dollars generated from tax paying businesses to have a clean stable environment both socially and ecologically. The forest products industry is one of the largest industries in the state of Pennsylvania generating over 14 billion dollars to our state economy.

As a logger, and part of the forest products industry here in Pennsylvania, I am committed to continuing forestry practices that enhance NLEB habitat. Any premature listing of an endangered species, or listing without taking into account economic considerations to the State, could have a negative impact to Pennsylvania's Forest Products Industry, including timberland owners and loggers as well as a significant impact to our State's economy.

Rural forest dependent communities are still reeling in the aftermath of the great recession.

While housing starts have improved, they have yet to return to pre-recession levels, and I and those in our industry that I represent are still struggling.

Over the past several years, I estimate that we have lost approximately 30% of our logging capacity due primarily to the downturn in the housing markets and the curtailing of mills producing solid wood products for that market. We are just now beginning to see some improvement in those markets, but to propose an Endangered Species listing that is based on a disease rather than loss of habitat, that would restrict my ability to manage and harvest timber could spell disaster for my family-owned business.

I strongly recommend the emphasis on Northern Long Eared Bat protection be focused on stopping the spread of White Nose Syndrome and not destroying well managed forests or the communities with an ESA listing that will have no impact on the viability of the species.

Thank you for the opportunity to testify and I would be happy to try and answer any questions that you might have.