



KENTUCKY HEARTWOOD

Protecting the Beauty and Wellbeing of Kentucky's Native Forests

Dan Olsen, Forest Supervisor
Daniel Boone National Forest
1700 Bypass Road
Winchester, Kentucky 40391

March 25, 2018

RE: Forest Plan Amendment

Dear Supervisor Olsen,

Thank you for the opportunity to submit comments on the proposed Forest Plan Amendment with regards to Indiana bats and other federally listed species. The following comments are being submitted on behalf of Kentucky Heartwood and the Center for Biological Diversity.

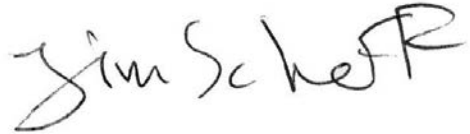
To begin with, we have no immediate concerns with the proposal to update definitions in order to bring the Forest Plan in to alignment with current U.S. Fish and Wildlife Service (USFWS) terminology. This is reasonable and prudent. We do have concerns regarding changes to restrictions or parameters in the Forest Plan affecting vegetation management, and logging in particular. The removal or reduction of protective measures with regards to Indiana and northern long-eared bat maternity colonies are particularly worrisome. Both of these species of bats are in sharp decline, and immediately imperiled. The possibility that the Daniel Boone National Forest would change Forest Plan standards in such a way as to increase the probability of impacting or destroying a maternity colony is not something that we find acceptable. The loss of a single maternity colony at this juncture could be catastrophic.

The following are questions and concerns that should be addressed in the environmental analysis for the Plan Amendment:

- 1) What are the current protocols for identifying maternity colonies or other active roosts? When during planning and harvest operations are surveys made, and by whom? What training is received by personnel to identify active roosts?
- 2) How often have maternity colonies been found in project areas? Following the identification of Indiana (and northern long-eared) bats, how did the Forest Service modify or delay specific projects and operations in order to comply with Forest Plan Standards? Please be specific.
- 3) Please provide ample scientific evidence demonstrating that the newly proposed Forest Plan standards (e.g., changes to basal area standards, snag retention, seasonal harvest restrictions relating to habitat occupancy, etc.) are more or as protective for federally-listed bat species as the current plan standards. It does not appear to us that they are.

We expect the Forest Service to commit to a thorough, detailed, and reasoned analysis with regards to any changes to Indiana and northern long-eared bat management on the Daniel Boone National Forest. Any changes to the Forest Plan should be firmly rooted in evidence that future management will be as or more protective of Indiana and northern long-eared bats as the current procedures.

Sincerely,

A handwritten signature in black ink that reads "Jim Scheff". The signature is written in a cursive, slightly slanted style.

Jim Scheff, Director
Kentucky Heartwood
P.O. Box 1486
Berea, KY 40403

(859) 334-0845
jim@kyheartwood.org