

Data Submitted (UTC 11): 4/9/2019 4:00:00 AM

First name: Tanner

Last name: Jessel

Organization:

Title:

Comments: Hi,

I forgot to submit this yesterday.

The first Indiana bat maternity roosts in the Southeastern U.S. were discovered in Great Smoky Mountains National Park in a pitch pine (*Pinus rigida*) snag and eastern hemlock (*Tsuga canadensis*) snag in 2003.

See: Britzke, Eric R.; Harvey, Michael J.; Loeb, Susan C. 2003. Indiana Bat, *Myotis Sodalis*, Maternity Roosts in the Southern United States. *Southeastern Naturalist* 2(2):235-242. 2003; Linzey, D. W. (2016) available online at <https://www.fs.usda.gov/treesearch/pubs/5477>.

Pine, hemlock, and red oak are documented maternity roosts for Indiana bat in the Southeastern U.S. / Southern Appalachian region, according to Forest Service researchers.

It would follow removal of mature pine, hemlock, and red oak trees / snags may harm "maternity roosts" for Indiana bat.

Why then would the definition of "maternity roost" at https://www.fs.usda.gov/nfs/11558/www/nepa/108623_FSPLT3_4264717.pdf be limited to "live shag bark, shell bark, or red hickory that is equal to or greater than 6 inches dbh?"

Given the additional pressure of white nose syndrome on bat survival, it would seem prudent to broaden the definition of potential host trees to include Forest Service supported research findings from the Southeastern U.S., in addition to the management guidelines proposed by the Midwest division of the U.S. Fish and Wildlife Service.

Sincerely,

Tanner Jessel