

Maine Division
NEW ENGLAND SOCIETY OF AMERICAN FORESTERS

**Maine
Division
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Inland Fisheries & Wildlife
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To whom it may concern:

The Maine Division of the Society of American Foresters (MESAF) thanks the Maine Department of Inland Fisheries and Wildlife (IFW) for the opportunity to provide comment regarding the proposed listing of Little Brown Bat (LBB) and the Northern Long-eared Bat (NLEB) to the State of Maine Endangered Species list. Our organization represents the Maine contingent of the Society of American Foresters (SAF), a national organization of professionals who specialize in many aspects of forest science. Our members work for a wide variety of employers including industry, state and federal government, nonprofit conservation organizations, academia, and private consultants. The members of our organization possess dedication, passion and a unique skill set for managing forest land for a wide variety of uses including biodiversity, forest products, recreation, water, and wildlife habitat. Our organization is committed to implementing forest management that is based on science and practical experience. We bring with us over 100 years of research and experience related to forest management.

As noted in IFW's press release on the proposed changes, the three bats are experiencing catastrophic declines from White Nose Syndrome (WNS). The observed population decline appears to be caused solely by WNS, not the lack or the alteration of habitat. There have been no indications that sustainable forest management is a threat to LBB or NLEB, and our concern is that the proposed listing will unduly impact forest management throughout the state.

As evidenced by the attached SAF policy statements on "Protecting Endangered Species Habitat on Private Land" and "Biological Diversity in Forest Ecosystems" our organization is committed to working with agencies, such as IFW, to make forest management a positive contributor in managing for wildlife and biodiversity.

As discussions progress regarding threatened and endangered species in the state of Maine, we offer our organization's knowledge, and experience working with forests, to your department and the state of Maine. We are willing and able to provide counsel and insight on the impacts of proposed regulations and the ways that active forest management can play a positive role in helping our threatened and endangered species. Our organization is committed to maintaining healthy forest ecosystems and we look forward to having an opportunity to work with IFW towards this common goal.

Sincerely,



Wilfred J. Mercier, Chair
Maine Division, SAF

Kenneth Laustsen, Immediate Past Chair
Maine Division, SAF

Enclosed:

SAF position statement entitled "Protecting Endangered Species Habitat on Private Land"
SAF position statement entitled "Biological Diversity in Forest Ecosystems"