

# Wisconsin County Forests Association

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August 28, 2014

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Director  
Gillett, Wisconsin

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

William Walker  
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Medford, Wisconsin

Wisconsin County Forests Association (WCFA) urges USFWS to refrain from listing northern long-eared bat (NLEB) as a threatened and endangered species under the U.S. ESA. After reviewing the interim-guidance document associated with this species, it is apparent a listing will have detrimental effects on sustainable forest management practices and our forest products industry across the entire range of NLEB.

Ed Kelley  
Director  
Florence, Wisconsin

Wisconsin alone is home to 16 million acres of forestlands, nearly 5.5 million of which are in public ownership. Wisconsin's County Forests represent the largest public ownership at nearly 2.4 million acres.

Graham Rankin  
Director  
Irma, Wisconsin

Paul Lokken, Sr.  
Director  
Eau Claire, Wisconsin

Wisconsin's local governments are dependent on the sustainable management of our forest resources. Between 2% and 3% of our county forest lands are harvested on an annual basis. Therefore, our county forest lands provide undisturbed habitat protection on over 2.3 million acres of forestlands each year. If the ability to sustainably harvest these lands is further diminished due to additional restrictions resulting from a federal listing of NLEB it is a distinct possibility our county forest lands will not remain in public ownership and the landscape scale habitat protection currently provided will be lost.

John Robinson  
Director  
Superior, Wisconsin

Tom Thompson, Jr.  
Director  
Mercer, Wisconsin

L.H. "Skip" Fiedler  
Director  
Minong, Wisconsin

Local governments value our county forest lands for their ability to provide timber sale revenues to directly offset local tax levies. Our county forests also provide recreational opportunities; a place for citizens to hunt, fish, and pursue their preferred activities. Unlike the federal government, our local units of government operate within balanced budgets and with limited funds. Because of the value our FSC and SFI certified forests provide, local public ownership can currently be justified. We urge the USFWS to seriously consider the potential ramifications of a federal listing, an action that may result in unintended consequences, including the possible loss of 2.4 million acres of landscape level habitat for innumerable species of flora and fauna.

Phil Schneider  
Director  
Sheldon, Wisconsin

Joe Waichulis  
Director  
Thorp, Wisconsin

Michael Luedeke  
Director-at-Large  
Spooner, Wisconsin

There is no evidence we are aware of indicating timber harvesting restrictions will improve the NLEB's chances for surviving the devastating disease leading to population decline. Rather, we would argue our current forest management practices greatly enhance roosting and rearing habitat for NLEB.

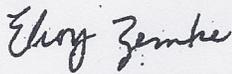
Henry Schienebeck  
Director-at-Large  
Butternut, Wisconsin

We realize USFWS is not concerned with economic implications of federal ESA listings, but we are. Wisconsin's forest products industry is the second largest industry in our state, and the largest in many of our member counties. This industry contributes \$20 billion dollars to our state's economy while enhancing forest health and providing clean water, clean air, and recreational opportunities to everyone. We deeply care about the ecological aspects of our natural resource management but cannot afford to ignore the economics; that is reality.

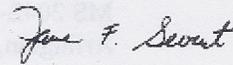
Economics aside, we hope the USFWS would highly value the landscape level ecological benefits our 2.4 million acres of Wisconsin County Forests provide.

Thank you for the opportunity to provide these comments regarding the potential listing of NLEB.

Sincerely,



Elroy Zemke, President  
Wisconsin County Forests Association



Jane F. Severt, Executive Director  
Wisconsin County Forests Association