



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Marion Illinois Sub-Office (ES)

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March 9, 2012

Hurston A. Nicholas
Shawnee National Forest
50 Highway 145 South
Harrisburg, IL 62946

Dear Mr. Nicholas:

This is in response to your February 23, 2012, letter requesting concurrence with your findings and determinations provided in the document titled, "Review of New Information Related to White-Nose Syndrome and Occurrence on the Forest of the Indiana Bat and the Gray Bat".

In the document you determined that reopening of formal consultation on the Forest Plan is not necessary for the following reasons:

- a. *The IDNR and USFWS are to date taking no new action in Illinois as a result of information regarding WNS.*
- b. *WNS has not been found in Illinois, even though it has been found in several adjacent states.*
- c. *Measures are already in place, or are planned to be in place in the very near future, to protect known Priority 1 and 2, and most Priority 3 Indiana bat and southeastern myotis hibernacula on the Forest from unauthorized human entry and disturbances, reducing the potential for humans to unintentionally introduce *G. destructans* into Forest hibernacula. There are no additional protection measures that the Forest could implement that would provide a greater degree of protection, given that the disease can be spread by bat-to-bat contact. There are no further mitigation measures that the Forest could implement that would reduce the likelihood of the spread of WNS into Illinois resulting from bat-to-bat transmission. The Forest has required that all researchers, including Forest personnel, conducting bat research/surveys to fully comply with all elements of the most current USFWS WNS decontamination protocol, which should further reduce the likelihood of WNS being inadvertently introduced in Forest hibernacula.*
- d. *The Forest will continue to cooperate with the IDNR and USFWS in implementing national and state WNS monitoring and "slow-the-spread"*

strategies and cooperative monitoring programs with the IDNR, WIU, BSU, and USFWS.

- e. The Forest already has a thorough and effective monitoring strategy in place to monitor the occurrence of WNS in southern Illinois. This includes monitoring of Indiana bat maternity colonies, Indiana bat winter populations, as well as Regional Forester Sensitive and non-listed bat populations. The Forest will continue to cooperate with implementing an Illinois WNS Monitoring Strategy.*
- f. Monitoring in 2009-2010 found no incidental take of Indiana bats and implementation of only a very small fraction of the allowable take of Indiana bat habitat.*
- g. Forest management activities envisioned in the 2006 Forest Plan, in conjunction with compliance with the USFWS Biological Opinion terms and conditions, in the long term should improve the overall quality of summer bat habitat by reducing stand densities, which should improve summer foraging and roosting habitat.*
- h. The probability that incidental take would occur from implementation of management activities on the Forest is very low. The terms and conditions of the 2005 USFWS Biological Opinion were designed to minimize the probability of incidental take, and those measures appear to remain valid and effective at this time.*
- i. Forest staff will continue to monitor this issue and, cooperatively with the IDNR and USFWS, take any actions necessary to address this threat to bats and important cave resources.*

These comments are provided under the authority of and in accordance with the provisions of the Endangered Species Act of 1973, as amended. Based on this information, we concur that reinitiation of formal consultation on the Forest Plan for the Indiana bat and gray bat is not necessary. Should new information indicate that the Indiana bat or gray bat may be affected, consultation or additional coordination with this office, as appropriate, should be initiated.

Sincerely,

/s/ Matthew T. Mangan

For Joyce A. Collins
Assistant Field Supervisor