



February 15, 2021

Kalesnikoff Lumber Co. Ltd.
PO Box 3000 Hwy 3A
Castlegar, BC V1N 4N1
By email: referrals@kalesnikoff.com

Re: Forest Stewardship Plan (FSP#597) 2021-2026 (Amendment #3)

To Whom It May Concern;

Thank you for the opportunity to provide comments on the third amendment to the Forest Stewardship Plan #597 (FSP) 2021 to 2026. I am submitting this letter in my capacity as a bat specialist on behalf of Wildlife Conservation Society Canada (www.wcscaanada.org). WCS Canada is a national non-government organization of scientists conducting research on species and ecosystems to inform conservation decisions. I have led the Western Canada Bat Program (www.wcsbats.ca) since its' founding in 2011, which leads research and monitoring activities in BC. I have an MSc and PhD in bat thermoregulation and roost selection, landscape genetics, and winter ecology. I am one of 3 bat biologists in North America who was invited by the US government to design the North American Bat Monitoring Program and I continue to assist in production of protocols and sit on a Steering Committee that oversees implementation of this program in US and Canada. I am also working closely with the US and Canadian governments on treatment options for white-nose syndrome in bats, and roost mitigation options including continental guidance on use of bat boxes. In 2020 I began a new bat conservation project in the Kootenay region investigating use of bark manipulations and fake bark roosts as 'old growth mimics' to mitigate for loss of tree roosts in logged forests.

Through our recent engagement in some bat-related conservation issues at one of your current operating sites in the Smallwood area, we were made aware of the opportunity to provide strategic bat conservation advice for your 2021-2026 Forest Stewardship Plan.

More bat species in BC are likely to be listed as 'at risk' in coming years due to cumulative threats, including white-nose syndrome, an invasive fungal disease that kills bats while they hibernate. In 2020 this disease was found in the Columbia River Basin of Washington, and is anticipated in BC's Columbia Basin in coming years, possibly during the duration of your FSP. This calls for the need to incorporate some appropriate adaptive perspectives into your FSP pertaining to the 11+ species of bats found in your two Forest Development Units – four of which are currently threatened/endangered either provincially or federally, and two are currently under COSEWIC review. Although this is a diverse group of species with multiple threats, they share in common their use of forests as important habitat, with 10 of these species regularly using trees as roosts. As information about bat ecology and

conservation is changing rapidly, we recommend that your company regularly seek advice from bat specialists to ensure you are operating with the latest information.

As has been done for bears and caribou, we recommend a special section on bats in your FSP. All of these species face unprecedented threats; it is anticipated that many will experience drastic declines in coming years, and it is likely that many more species of bats will be identified as 'regionally important wildlife'. In this section, or elsewhere, we suggest that you include specific language in your FSP that makes it clear that Kalesnikoff will follow all bat-related Best Management Practices* issued by the Ministry of Environment and Climate Change Strategy, and train staff and contractors on implementation of these BMPs.

Bats are highly mobile, are not easily observed, and can use a large swath of habitat features in both summer and winter; thus it is important to include a scale-appropriate examination of an area when developing a harvest prescription. Examples:

- on page 15 in the section Species at Risk "Practice" ("the licence holder will review known species at risk occurrences and their proximity to development areas. Where there are known species at risk in proximity to development areas..."), we suggest that this be revised with something similar to "the licence holder will consult wildlife specialists to provide species-specific assessments" and "Proactive measures will be taken to locate presence of at risk or regionally important wildlife..."
- on p. 18 in the bat WHF (section Wildlife Habitat Features, "Strategy"): We suggest you reword this passage pertaining to bat-related WHFs, as these are not easily 'encountered'. Instead we emphasize the need to actively look for nursery and hibernacula roosts, and that this may be best accomplished by a specialist, given the difficulty in properly locating such features. Because bat WHFs could influence some aspects of forestry operations hundreds of metres from harvesting areas, it would be advisable to proactively search for WHFs a suitable distance from proposed cutblocks to ensure these are not discovered at a later stage in the process.

Thank you for consideration of our comments, and please do not hesitate to contact me should have any questions or wish to follow up. I look forward to working with you collaboratively as we monitor and learn more about bats in your operating areas.

Sincerely,



Cori Lausen, PhD
Research Biologist, Bat Specialist

**There are 4 Best Management Practices (BMPs) for bats in BC online currently or to be released in 2021: Wind Energy, Mines, Caves and Crevices, and Forestry.*

<https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/laws-policies-standards-guidance/best-management-practices> *Select Bats*