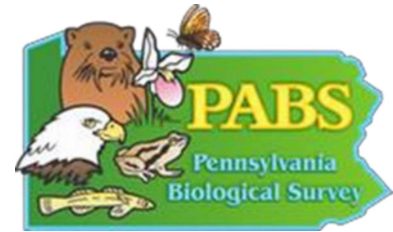


## Chapter Correspondence



Dr. Aaron Haines  
Certified Wildlife Biologist

Board of Game Commissioners Pennsylvania Game Commission  
Public Comment for Species State Listing Dear Board of Game Commissioners,

Bat species benefit human societies and biological systems by being indicators of ecosystem health and providing biological control over problem insect species (Kunz et al. 2011). For example, a colony of 150 big brown bats (*Eptesicus fuscus*) in the midwestern United States annually consumed a number of agricultural pest species including approximately 600,000 cucumber beetles (including 33,000,000 beetle larvae), 194,000 June beetles, 158,000 leafhoppers, and 335,000 stinkbugs (Whitaker 1995). Unfortunately, human activities such as depletion or destruction of forests, disturbances to caves, increased use of pesticides, and the proliferation and operation of large-scale wind energy facilities have contributed to bat mortality (Kunz et al. 2011).

Currently, there are 7 species of bats in Pennsylvania listed as species of conservation concern as identified under the 2015 Pennsylvania Wildlife Action Plan: Big brown bat, Tricolored Bat (*Perimyotis subflavus*), Northern Long-eared bat (*Myotis septentrionalis*), Eastern small-footed bat (*Myotis leibii*), Indiana bat (*Myotis sodalis*), Little brown bat (*Myotis lucifugus*) and Silver-haired bat (*Lasionycteris noctivagans*). In addition, the viability of hoary populations are at risk due to projected population declines caused by wind turbines (Frick et al. 2017).

Ten years ago the Little brown bat, Tricolored bat and Northern long-eared bat populations were common and widespread in Pennsylvania, and the federally endangered Indiana bat populations were also present in Pennsylvania. In the last decade, populations of these bat species have declined dramatically with the onset and spread of the White-nose fungal disease (*Pseudogymnoascus destructans*) (Turner et al. 2011, USFWS 2015a). Population sizes for many of these bat species have been reduced, some up to 98%, causing regional extinctions of local populations (Frick et al. 2010, Turner et al. 2011). Indiana bat populations have been reduced further by 72% from their already diminished endangered populations (Turner et al. 2011, USFWS 2015a). These declines have caused the Northern long-eared bat populations to be listed as federally threatened (USFWS 2015b).

The state of Pennsylvania should take the initiative to state list the Northern long-eared, Tricolored and Little brown bat, to prevent their local extinction and help begin the road to recovery. Listing these species as endangered in the state of Pennsylvania, provides state wildlife biologists the opportunity to work with state business's and industry to identify solutions that mitigate negative impacts to these imperiled species, while at the same time maintaining economic progress in the state. Pennsylvania has the opportunity in becoming an example of how to develop conservation solutions locally, to prevent the need for these species to become federally listed. Federal listing can impose further regulations within the state. By conserving species now, and developing strategies for species recovery, future potential federal regulations can be prevented.

I thank you for your time. Sincerely,  
Aaron Haines  
[Aaron.haines@millersville.edu](mailto:Aaron.haines@millersville.edu)

\*For citations of literature please contact [aaron.haines@millersville.edu](mailto:aaron.haines@millersville.edu)

## Chapter Correspondence Continued



## THE WILDLIFE SOCIETY PENNSYLVANIA CHAPTER

January 27, 2019

Good afternoon Commission Board Members and Commission staff, my name is Calvin DuBrock. I am a certified wildlife biologist and President of the Pennsylvania Chapter of The Wildlife Society. I am here today to comment on regulations and policies that will be under consideration in your business meeting this week, to make some suggestions concerning science-based management and to thank you for the work and accomplishments of the Board, your agency and staff in conserving our commonwealth's wildlife resources and providing opportunities to use and enjoy these resources now and in the future.

The Wildlife Society – TWS – is an international organization of professional wildlife scientists, managers, educators and consultants who study wildlife and strive to sustain wildlife populations and habitats through science-based management and conservation actions. TWS has more than 10,000 members and our state chapter has a membership of nearly 300 wildlife professionals. Many of your agency biologists are PA TWS members, but their membership constitutes less than 10 percent of our membership. In addition to serving the community of wildlife professionals in Pennsylvania, PA TWS endeavors to develop and promote sound, science-based stewardship of wildlife resources and of the environment. Advocacy for science-based stewardship is why we are here today.

Wildlife are public trust resources and the Public Trust Doctrine, which establishes a trustee relationship of government holding and managing wildlife for the benefit of the public, is deeply rooted in our culture and history. Nearly 125 years ago the Pennsylvania legislature created the Game Commission for the purpose of protecting, propagating and managing the Commonwealth's wildlife for all citizens. Keeping the public's wildlife public is a big task and while you haven't won every battle – for example, deer farms – your efforts to inform and educate members of the General Assembly and our citizens have been noticed and are appreciated. We encourage you to remain vigilant and continue to strongly resist challenges that privatize and/or commercialize ownership of wildlife resources, that introduce non-native species, that compromise the health and vitality of native wildlife populations and their habitats and unnecessarily limit access to and use of wildlife.

In many ways and for many species, especially many forest game species, this is the best of times in part due to improving environmental conditions, but also because of Commission programs. We dwell too much on the challenges and issues before us, but we should celebrate the restoration and improved situation for many species, including the otter, fisher, wild turkey, elk, bald eagle, and peregrine falcon.

Wildlife management has historically been, and continues to be, a difficult and often contentious arena. There really are no "magic bullets", but there are lots of traditions and a multitude of public values and expectations. The original concept behind the Commission governance model – essentially a policy board model – is to have representative commitment and leadership from knowledgeable, appointed citizens, with a minimum of political oversight. This is a great theoretical construct, but we realize all actions concerning public resources are inherently political. We encourage you to follow your roadmap, i.e., your plans derived with the help of the public. Let mission drive your decisions, not tradition.

We commend the Commission for developing written policy, a strategic vision, mission and plan, and science-informed management plans for game species as well as species of greatest conservation need. We are encouraged by the allocation of fiscal resources to implement these plans to protect and encourage public enjoyment and use of wildlife. We commend you for hiring qualified and capable staff and for holding them accountable. We also are encouraged by the number of citizen volunteer programs and volunteers assisting in the work of the Commission.

We remain concerned about wildlife health issues and there are many including chronic wasting disease, white nose syndrome, rabies, west Nile virus, mange, epizootic hemorrhagic disease, to name just a few. Time does not allow for outlining the many challenges the Commission faces.

## The Wildlife Society - Pennsylvania Chapter

We have some simple, yet admittedly complex, suggestions for your consideration as you take action this week and in the coming months:

List wildlife species that are imperiled and in need of additional protection and extraordinary actions to help them recover. We fully support the regulations change to list as endangered the northern long-eared bat, the tri-colored bat and the little brown bat, as well as the piping plover, and to upgrade the peregrine falcon to threatened.

Use the best scientific data available in managing our public wildlife resources. Listen to your professional biologists and other wildlife professionals, follow your strategic plan and the species and habitat management plans that have been developed and approved. When applying social input, remember that this is science, too. There is credible methodology in assessing social needs, wants and attitudes. Social input is not focused on personal values, the desires of your closest confidants or those who fared best at the most recent election, it should represent input from the citizens of Pennsylvania.

Expand volunteer programs beyond the hunting and enforcement aspects of Game Commission operations to projects that engage citizen scientists in assessing the status of wildlife species and supporting recovery and management activities. Increased public involvement with the agency and its personnel will lead to increased public support for the Commission.

Take more positive action to control and manage wildlife health issues, especially chronic wasting disease. An important and essential strategy is to allocate seasons and licenses/permits to accomplish deer population goals. In our opinion there is no justifiable reason to allow deer populations to increase in CWD management zones or the WMA's in which these zones can be found.

This is contrary to good science and the agency's deer management plan.

Seek alternative funding models and methods to support agency operations that engage the vast majority of Pennsylvania's citizens, i.e., the owners of our public wildlife resources. For too long we have been dependent on hunters, furtakers and shooters as the principal source for bankrolling wildlife conservation that benefits all citizens.

Thank you for the opportunity to speak today. If our organization can be of assistance to the Commission board or its staff, we would welcome the occasion to discuss how we might benefit the work and mission of the Commission.

Sincerely,



Calvin W. DuBrock  
Certified Wildlife Biologist®  
President, Pennsylvania Chapter of The Wildlife Society