



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

