

Revised Conservation Strategy for Forest-Dwelling Bats in the Commonwealth of Kentucky (2025, v3.0)



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INTRODUCTION

In accordance with the Endangered Species Act of 1973 (ESA)(16 U.S.C. 1531 et seq.), the U.S. Fish and Wildlife Service (Service) Kentucky Field Office (KFO) has developed this Conservation Strategy (Strategy) as a suggested framework for Federal agencies and project proponents (collectively referred to as “proponents”) to account for the loss of forested habitat important for certain federally listed, forest-dwelling bat species in the Commonwealth of Kentucky. In situations where its authorities apply, the KFO will implement the Strategy as a means of enhancing the conservation and recovery of the Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) in Kentucky, hereinafter referred to as the covered species. The Strategy provides proponents with the flexibility to address adverse effects from their projects and facilitates meaningful conservation and recovery actions for the covered species in Kentucky. The Strategy also establishes, via a section 7 nexus and the associated programmatic biological opinion, recovery-focused conservation options that a proponent can voluntarily select and use to help recover the species, enable sustainable development, and efficiently comply with section 7(a)(2) of the ESA.

An explanation of terms relevant to this document is provided in [Appendix A](#). The Service’s authorities for developing and implementing this Strategy are found in [Appendix B](#).

COVERAGE AREA

The coverage area for the Strategy is the entire Commonwealth of Kentucky and a 20-mile buffer into the surrounding states of Illinois, Indiana, Missouri, Ohio, Tennessee, Virginia, and West Virginia. Including this buffer in the coverage area helps account for potential swarming impacts associated with caves or known maternity colonies close to or overlapping state lines. It also helps address effects from interstate projects that propose impacts to forested habitat important for the covered species. Use of the Strategy for adverse effects within the 20-mile buffer must be acceptable to the proponent and the Service field office(s) in the adjacent state(s).

COVERED SPECIES AND LIFE HISTORY TIMEFRAMES¹

Indiana Bat (*Myotis sodalis*)

Northern Long-eared Bat (*Myotis septentrionalis*)

Hibernation	Spring Staging and Migration	Summer Occupancy	Pup Season	Fall Migration and Swarming
November 16 – March 31	April 1 – May 14	April 1 – October 15	May 15 – July 31	August 16 – November 15

¹ Life history timeframes will follow those found in the most recent version of the [Range-Wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#)

STATUS OF COVERED SPECIES

In Kentucky, the covered species are dependent upon caves and cave-like features for winter hibernation and primarily use trees for summer roosts. Although the species share these general life history characteristics, the known distributions of each species and specific habitats they occupy vary.

See [Appendix C](#) for a summary of the status of the Indiana bat within the coverage area.

See [Appendix D](#) for a summary of the status of the northern long-eared bat within the coverage area.

CONSERVATION PRIORITIES

The Indiana bat is the only covered species for which the Service has prepared a [recovery plan \(in draft form\)](#), though recovery planning is underway for the northern long-eared bat. We adopt the recovery actions for the Indiana bat (i.e., conservation of hibernacula, conservation of summer habitat, conduct essential research, and implementation of public information/outreach programs) as the conservation goals of this Strategy. Based on these goals, we have established Priority Conservation Areas for Kentucky. While based on the goals of the draft Indiana bat recovery plan, we expect that northern long-eared bats, as well as other bat species, will benefit from implementation of the conservation priorities described below.

Kentucky Conservation Priorities

Based on its review of the best scientific and commercial data that is currently available, the KFO has identified the following conservation priorities for the covered species:

- Conserve, restore, and/or enhance hibernacula;
- Conserve, restore, and/or enhance swarming habitat;
- Conserve, restore, and/or enhance occupied summer habitat; and
- Conserve, restore, and/or enhance other summer habitat that is of high quality and/or is associated with or connects other bat conservation areas.

Service Areas

Impacts to covered species will be tracked by service area (see [Appendix E](#)) using a standardized process. This will allow the KFO to:

- (a) Track incidental take of each listed bat species within the portion of the state where effects occur, using habitat as the surrogate for quantifying and tracking such take.
- (b) Identify and implement conservation efforts in each service area with partners, directly addressing impacts to covered species by restoring and/or maintaining suitable bat habitat and also supporting the conservation priorities identified previously in this section.
- (c) Promote higher levels of consistency among conservation banks, in-lieu fee programs, and proponent-responsible mitigation providers.

Service areas were identified by the KFO using over four decades of data specific to the covered species related to hibernation, spring staging, migration, and summer and fall swarming habitat use within and adjacent to Kentucky. Based on over two decades of working with proponents on covered species consultations, the KFO expects impacts to continue to occur and, therefore, opportunities for conservation will also be available throughout the coverage area.

Priority Conservation Areas

Kentucky's Priority Conservation Areas (PCAs) ([see Appendix E](#)) were identified specifically to support the conservation priorities identified in the previous section and represent areas that:

- Contain protected public or private lands that are known to support populations of the covered species;
- Currently support populations of the covered species that are expected to support long-term recovery and conservation efforts;
- Contain adequate suitable habitat for the covered species that will support recovery and conservation efforts;
- Provide opportunities for future conservation efforts for the covered species, especially restoration, enhancement, and/or creation of additional summer and/or winter bat habitat; and/or
- Contain conditions, as determined by the KFO, that generally are expected to contribute to the persistence of covered species populations and habitat into the future.

Collectively, PCAs are key landscapes for conservation and recovery of the covered species in Kentucky and will be where most conservation efforts will be undertaken. Conservation efforts will be directed to the PCAs within the same service area where impacts occur or to those that best mitigate the specific impact(s).

The KFO expects, however, that efforts may also be undertaken or attempted at locations outside of the PCAs in circumstances where the conservation and/or recovery benefits to a covered species can be clearly identified and justified. The merits of conservation efforts outside of PCAs will be determined on a case-by-case basis in coordination with the KFO and will depend on a variety of factors including, but not necessarily limited to: (a) location of the site; (b) the type and quality of the conservation opportunities available; and (c) new information that justifies the conservation effort.

The KFO encourages mitigation providers and those considering project-specific mitigation efforts to prioritize the PCAs in their site selection such that the collective efforts are amplified for the greatest conservation benefit to the covered species. We encourage early coordination with the KFO to ensure appropriate siting and timely approvals.

ESA COMPLIANCE

In this section, we discuss several options available to proponents seeking ESA compliance. The Strategy is designed to provide flexibility for proponents in meeting their project needs and regulatory requirements under the ESA, while also providing conservation benefits for the

covered species. The ESA compliance options discussed in this section are applicable when a project will remove suitable forested habitat for one or more of the covered species in a manner that is reasonably certain to cause adverse effects to a covered species.

With technical assistance from a KFO biologist, proponents will select a compliance option to use based on one or more of the following factors:

1. The proponent performed an initial review using the Service's Information for Planning and Consultation (IPaC) website, and one or more of the covered species were identified in the IPaC species list, but use of the determination keys resulted in a "may affect" determination for one or more covered species. After further coordination with the KFO, it is determined that the project is "likely to adversely affect" a covered species.
2. The proponent chooses to self-evaluate potential effects to listed species rather than utilize the determination keys and makes a determination of "may affect, likely to adversely affect" for one or more covered species.
3. The proponent cannot or chooses not to conduct a presence/absence survey based on timing, cost, or other factors. Instead, at their discretion, the proponent presumes presence of a covered species within their action area and makes a determination of "may affect, likely to adversely affect" for the covered species.
4. The proponent chooses not to develop a biological assessment and seek formal consultation with the lead Federal agency and the KFO due to timing, budget, or other factors affecting their project. Instead, at their discretion, the proponent presumes presence of a covered species within their action area and makes a determination of "may affect, likely to adversely affect" for the covered species.

Election of a compliance option is at the proponent's discretion based on the specific needs or circumstances of their project. Proponents should coordinate with the KFO when determining which option best fits their needs prior to taking any irreversible action or making a final decision. A brief description for each available option is provided below.

Traditional ESA Options

Project-Specific Formal Consultation

Formal consultation only applies when Federal agencies are involved and may be best suited for larger Federal actions, though this option is applicable to any project that anticipates adverse effects to a listed species or critical habitat. During formal consultation, the Federal agency and Service share information about the proposed project and the species or critical habitat likely to be affected. The Federal agency makes an effects determination, and the Service prepares a biological opinion that evaluates the consequences of the action as related to any listed species or critical habitat.

For more information on the formal consultation process see: [eCFR :: 50 CFR 402.14 -- Formal consultation](#).

Habitat Conservation Plan

A Habitat Conservation Plan (HCP) is best suited for non-Federal activities conducted by state or local agencies, non-Federal landowners, and private companies. They can address non-Federal activities that cross state lines or involve multi-year projects in areas where listed species occur and may be impacted. The HCP is a planning document designed to accommodate economic development to the extent possible by authorizing the take of listed species when it occurs incidental to otherwise lawful activities.

For more information on Habitat Conservation Plans see: [Habitat Conservation Plans | U.S. Fish & Wildlife Service](#)

Recovery-Focused Conservation Options

The following Recovery-focused Conservation Options (RFCOs) provide tangible conservation benefits that support recovery of the covered species, while providing flexibility, efficiencies, cost savings, and/or project predictability benefits to the proponent. Implementation of the RFCOs is supported by the KFO's programmatic biological opinion, Biological Opinion: Kentucky Field Office's Revised Conservation Strategy for Forest-Dwelling Bats in the Commonwealth of Kentucky (2025). We encourage all proponents to coordinate with the KFO early in the process to ensure the desired option is applicable and will sufficiently meet their project needs related to ESA compliance.

In-Lieu Fee Programs (Kentucky Imperiled Bat Conservation Fund)

In-lieu fee programs collect funds from proponents as a result of impacts to a covered species and, when funding levels are sufficient, purchases or acquires suitable habitat that provides ecological functions and services that further conservation of the species. In-lieu fee programs may be more appropriate for smaller projects, one-time actions, or for projects with time constraints. In-lieu fee programs provide compliance for both Federal and non-Federal proponents and promote the conservation and recovery of the species.

The Kentucky Imperiled Bat Conservation Fund (IBCF), an in-lieu fee program, was established in 2008 and is sponsored by the Kentucky Natural Lands Trust (KNLT), which operates under a Memorandum of Understanding with the KFO. The KNLT has operated the IBCF since its inception and will continue to operate the IBCF and cooperate with the KFO in administration of the program.

For more information on the Imperiled Bat Conservation Fund see: [Imperiled Bat Conservation Fund - KNLT](#)

Species Conservation Bank

Conservation banks are permanently protected lands that are managed for the conservation of a species and their habitat. They serve as a market-based system to offset the impact of development on endangered, threatened, or at-risk species. These banks allow the owner to sell credits to developers who need to mitigate their impacts on listed species. Service approval is required for establishment of a conservation bank and prior to purchase of credits to compensate for impacts from a project. Conservation banks may be more appropriate for smaller projects, one-time actions, or for projects with time-constraints.

Currently, no conservation banks exist in Kentucky for the covered species; however, we expect this compliance option to become available in the future. We encourage conservation bank developers interested in working in Kentucky to engage with the KFO and prioritize bank development within PCAs.

Proponent-Responsible Mitigation

These are actions the proponent takes that provide ecological functions and services as part of the conservation measures associated with the proponent's proposed action. Typically, this involves the permanent protection of "like" habitat in the form of land owned by the proponent or purchased for this purpose. This option is best suited for landowners able to permanently set aside a portion of land that meets the requirements or have an ability to purchase land for this specific purpose. Similar to in-lieu fee programs and conservation banks, long-term management and maintenance of the conservation site is a necessary component of the mitigation plan. Proponents should consult with the KFO early in project development to determine if proposed land would be eligible and applicable to meet the requirements of this option.

Potential Exceptions for Recovery-Focused Conservation Options

The KFO has chosen to avoid and minimize potential impacts to the covered species by: (a) excluding projects that could impact known or potential hibernacula due to their importance for conservation of the covered species and the difficulty in analyzing effects related to potential hibernaculum impacts; and (b) requiring project-specific reviews of the categories of projects listed below that have an increased likelihood of impacting a covered species during crucial life history periods or resulting in direct impacts to larger numbers of individuals:

- Individual projects resulting in the loss of more than 100 acres of suitable forested habitat for any of the covered species.
- Projects occurring within 1 mile of Priority 1 (P1) or Priority 2 (P2) Indiana bat hibernacula.
- Projects occurring within ½-mile of Priority 3 (P3) or Priority 4 (P4) Indiana bat hibernacula or any northern long-eared bat hibernacula.
- Individual projects resulting in the clearing of greater than 10 acres of suitable forested habitat during the pup season.
- Projects that may result in adverse effects to the covered species from post-construction and/or operational activities other than the loss of forested habitat (e.g., permanent lighting, noise and vibrations above pre-construction levels, prescribed fire)

When a project falls within one of these categories, the KFO will perform a project-specific review and determine if a RFCO is appropriate or recommend another ESA compliance option (e.g., a project-specific consultation, HCP). The KFO will make its determination based on the information provided by the proponent, the likelihood and severity of effects, any other relevant and available data, and whether any other conservation measures are available and necessary.

APPLICATION OF THE STRATEGY

RFCOs are generally appropriate for land management, agricultural, and development activities when adverse effects to a covered species occur as the result of habitat loss and/or degradation. The KFO acknowledges that certain silviculture and sustainable agricultural practices can benefit the covered species by enhancing or preserving important habitats. We encourage proponents to coordinate with the KFO before making final decisions on the best course of action. The KFO determined that these types of projects have the most utility for this type of approach because these types of project impacts are easily quantifiable, effective mitigation options are present throughout Kentucky, and there is a sufficient number and quantity of impacts to justify the expenditure of resources associated with establishing and implementing the Strategy.

Typically, a proponent will make the decision to use an RFCO after determining that the project will likely have adverse effects on a covered species and evaluating the other available ESA compliance options (e.g., species surveys, formal consultation, HCP) relative to project costs, budgets, and timeframes. As a result, the proponent's decision to use an RFCO often occurs after technical assistance or informal consultation has already begun. However, based on the KFO's experience with its previous Strategy, a proponent may choose this option at the onset of project development due to expected impacts to habitat present within the action area and the timeliness, cost savings, and/or project predictability benefits that it can provide.

After the KFO and proponent have determined that an RFCO is appropriate and desirable, the proponent will coordinate with the KFO and/or Federal agency (when applicable) to determine the next steps. The following sections outline how the coordination process will occur and how the KFO will evaluate and determine any required actions relevant to the specific option selected by the proponent. Proponents will work with a KFO biologist throughout this process and will maintain flexibility to shift to other options as necessary to meet project goals.

The Strategy relies heavily on conservation multipliers in determining the appropriate level of compensation when utilizing one of the RFCOs. Multipliers were developed under the original in-lieu fee program (i.e., IBCF) based on the habitat type and time of year impacts will occur. The covered species rely heavily on forested habitat for reproduction, foraging, and commuting. The KFO determined through the programmatic biological opinion associated with this Strategy that removal of suitable forested habitat used by the covered species, regardless of time of year, is likely to result in adverse effects to the covered species, especially the Indiana bat.

Multipliers are based on the magnitude of impacts on a covered species in relation to the various stages of their life cycle. The lowest multipliers are associated with times when the fewest individuals are expected to be adversely affected, while the highest multipliers are used when impacts are likely to adversely affect the greatest numbers of individuals, including during their reproduction. During the active season, reproductively active female Indiana and northern long-eared bats exhibit philopatry by returning to established roost sites, where they form maternity colonies to give birth and raise their young. This behavior contrasts with the non-maternity period, when bats may be broadly distributed or hibernating during the non-active season. Therefore, removing trees during the maternity period will likely have a greater impact on Indiana and northern long-eared bats because more individuals are reasonably certain to be killed

or injured compared to the non-maternity period, when fewer individuals would be affected at the time the trees are removed. However, the removal of trees during the non-maternity timeframe will still likely have adverse effects on individual bats due to their philopatry to roosting areas. The loss of potential roost trees and reduced habitat availability may force individuals to travel greater distances to find suitable alternatives, increasing energy expenditure and potentially affecting reproductive success.

Proponents may choose to mitigate for one or more than one covered species, as appropriate. When a proponent chooses to mitigate for more than one covered species and the project is in known habitat for one species and potential habitat for the other species, the multiplier for known habitat will be used. If the habitat type for both species is the same (e.g., Summer 1 for the northern long-eared bat and Summer 2 for the Indiana bat), the higher of the two multipliers will be used. If the project occurs in known summer habitat for one species and known swarming habitat for the other species (e.g., Summer 1 for the Indiana bat and Swarming 1 for the northern long-eared bat), the appropriate multiplier for the combined habitats should be used.

The KFO suggests the following steps be taken to implement this Strategy.

Proponent Provides Initial Project Information to the Service

1. The amount of suitable forested habitat that will be impacted (i.e., “acres impacted”) will be quantified for each covered species. For impacts involving forest blocks and other dense assemblages of suitable habitat, the acres impacted is determined by calculating the area of a polygon(s) that best surrounds the impacted habitat using Global Positioning System or Geographic Information System technology (i.e., the “habitat block method”). For impacts where suitable forested habitat is sparse, such as an individual tree separated from other suitable habitat or a narrow linear corridor (e.g., fence row, riparian corridor), each tree is counted individually, and the number of individual trees is then multiplied by 0.09 acre/tree to determine the acres impacted (i.e., the “single-tree method”).
2. The timeframe(s) of all proposed habitat impacts (i.e., “impact timeframe”) will be determined.
3. The habitat type(s) (i.e., potential, swarming, staging, or summer habitat) associated with proposed habitat impacts will be determined using the habitat maps in [Appendices C or D](#).

Service Verifies and Calculates Estimated Conservation Acres

1. The KFO will verify that the project is consistent with the actions evaluated in the programmatic biological opinion and that none of the exclusions discussed above (e.g., habitat loss greater than 100 acres) would apply and prevent use of the Strategy for the project.
2. The KFO will verify the accuracy of the initial project information provided by the proponent, including the acreage and habitat type impacted.
3. The conservation multiplier (see [Appendix F](#)) will be identified based on the habitat type impacted and the impact timeframe. A worksheet to aid proponents in estimating their potential conservation multiplier, as well as a few example calculations, is provided in [Appendix G](#). The following formula will be used to

calculate the estimated initial conservation acres necessary to conserve the species after consideration of impacts.

Conservation Acres = (acres impacted) x (conservation multiplier)

4. The conservation acres can then be used to determine the estimated compensatory mitigation based on the per acre cost of the RFCO selected by the proponent.

Proponent Can Modify Project and Explore Compliance Options

1. Based on the estimated initial calculated conservation acres, the proponent will have the opportunity to modify the project to reduce the acres impacted, change the impact timeframe, or provide other data that could reduce the conservation amount, recognizing that such project modifications are not always possible.
2. The proponent will be given time to explore the RFCOs and decide on which option is most appropriate for their project needs and specific situation.

Proponent Makes Final Project Decision

The proponent will make the final decision on how to proceed with the project from the following options:

- a. Proponent notifies the KFO of their intention to use the in-lieu fee program (i.e., IBCF) and requests final approval from the KFO;
- b. Proponent notifies the KFO of their intention to use a KFO-approved conservation bank and requests final approval from the KFO;
- c. Proponent notifies the KFO of their intention to use proponent responsible mitigation and requests final approval from the KFO;
- d. Proponent notifies the KFO of their intention to use one of the traditional ESA compliance options, such as formal consultation or HCP; or
- e. Proponent notifies the KFO of their intention to withdraw the project from being considered by the KFO.

Regardless of the method a proponent selects, Section 7(d) of the ESA mandates that Federal agencies are not to irreversibly or irretrievably commit resources such that it forecloses the implementation of any reasonable and prudent alternative measures necessary to avoid jeopardizing the covered species [16 U.S.C. 1536(d)]. Therefore, a Federal agency should ensure that the KFO agrees that the method of ESA compliance that is selected by the proponent is acceptable before the Federal agency authorizes, funds, or carries out its action. For non-Federal entities, no actions should be taken that would cause take that would be prohibited by the ESA (16 U.S. C. 1538) until final approval by the KFO is obtained. The KFO will provide a letter detailing the consultation process, any conservation measures to be taken, and completion of the ESA compliance process. Conservation measures should be implemented as agreed upon and documented in an agreement or a consultation letter by the KFO, before any action is taken that would adversely affect the covered species.

MODIFICATION OF THIS STRATEGY

This Conservation Strategy is likely to be modified periodically based on new information. Modifications that could occur include but are not limited to: (a) changes to the covered species when a new species is listed or when existing species are recovered or become extinct; (b) alterations of PCAs based on trends in listed bat occurrence data; or (c) updates to the supporting information and appendices associated with this Conservation Strategy.

Appendix A: Explanation of Terms

Throughout this document, certain terminology is used to describe bat habitat and aspects of the Conservation Strategy. For the purposes of this document, the following definitions are provided for this terminology:

- “*Conservation multiplier*” is a ratio used for determining the appropriate level of compensatory mitigation. Multipliers were established based on the expected magnitude of impact on covered bats that would result from the proposed tree removal, accounting for the habitat type impacted and the time of year the impact would occur.
- “*Hibernacula*” refers to caves, cave-like structures, or anthropogenic features (e.g., mines, tunnels, etc.) where the covered species have been documented to spend some or all of the winter hibernation period.
- “*Hibernating Range*” refers to the portion of the ranges of covered species where they are using hibernacula and have been documented to spend some or all of the winter hibernation period. All Indiana bats fall within the hibernating range, whereas portions of the northern long-eared bat range fall within the hibernation range and the year-round active range. Kentucky is not located with the year-round active range of the northern long-eared bat.
- “*Impact Timeframe*” refers to the expected range of dates for which a proponent expects to complete the habitat removal associated with the project and for which any impacts to a covered species will occur. Implementation of the Conservation Strategy relies on knowing the impact timeframe to assist in determining the level of impact a potential project will have on a species and calculating the appropriate conservation.
- “*Known habitat*” refers to suitable summer, swarming, and hibernation habitat located within a predetermined distance of an occurrence record for a covered bat species. Distances will vary based on species (e.g., documented life history characteristics), the type of occurrence record (e.g., visual observation, capture, acoustic record, etc.), the habitat use associated with the occurrence record (e.g., maternity, swarming, winter, etc.), and the location (e.g., hibernating, year-round active zone 1, or year-round active zone 2).
- “*Maternity habitat*” refers to suitable summer habitat used by juveniles and reproductive (pregnant, lactating, or post-lactating) females.
- “*Service Area*” refers to a particular geographic area within the state where all impacts and conservation efforts will be tracked for the covered species. Each service area contains one or more Priority Conservation Areas for the covered species.
- “*Non-maternity habitat*” refers to suitable summer habitat used by non-reproductive adult females and/or males.

- “*Occupied*” refers to the timeframe in which suitable habitat is expected to be used by covered species. This terminology is important when evaluating the RFCOs and determining the appropriate conservation multiplier. See Appendix F for more information on when habitats are considered occupied or unoccupied and how that designation affects project proponents’ consultation options.
- “*Potential habitat*” occurs where Indiana bats and northern long-eared bats are reasonably certain to occur (i.e., identified on the IPAC species list) and suitable roosting, foraging, and travel/migration habitat for one or more of the species exists, but where use of such habitat by a species has not been documented. Potential habitat for one covered species may overlap with known habitat for another covered species.
- “*Potential hibernacula*” refers to suitable caves, cave-like structures, or anthropogenic features where covered species may spend some or all of the winter hibernation period. Features may be identified as potential hibernacula based on habitat assessments completed using Appendix H of the most recent version of the [Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines](#).
- “*Priority 1 hibernacula* (or P1 hibernacula)” refers to Indiana bat hibernacula with recorded populations of $\geq 10,000$ individuals.
- “*Priority 2 hibernacula* (or P2 hibernacula)” refers to Indiana bat hibernacula with recorded populations of 1,000 to 9,999 individuals.
- “*Priority 3 hibernacula* (or P3 hibernacula)” refers to Indiana bat hibernacula with recorded populations of 50 to 999 individuals.
- “*Priority 4 hibernacula* (or P4 hibernacula)” refers to Indiana bat hibernacula with recorded populations of 1 to 49 individuals.
- “*Priority conservation areas*” refers to those geographical areas identified in the Conservation Strategy that are key landscapes for conservation and recovery of one or more of the covered species and will be where most conservation efforts for the covered species will be undertaken.
- “*Suitable habitat*” refers to any known or potential summer habitat, swarming habitat, staging habitat, hibernacula, and/or winter roosts where the necessary habitat components exist that are appropriate for use by the covered species.
- “*Suitable Indiana bat hibernacula*” includes all known and potential hibernacula and is restricted to underground caves and cave-like structures (e.g., abandoned mines, railroad tunnels). These hibernacula typically have a wide range of vertical structures; cool, stable temperatures, preferably between 4°C and 8°C; and humidity levels above 74 percent but below saturation.

- “*Suitable northern long-eared bat hibernacula*” refers to all known and potential hibernacula and includes underground caves and cave-like structures (e.g., abandoned mines, railroad tunnels). These hibernacula have large passages with significant cracks and crevices for roosting; relatively constant, cool temperatures between 0°C and 9°C; high humidity levels; and minimal air currents.
- “*Suitable summer habitat*” for the covered species can be found in Appendix A of the [Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines](#).
- “*Suitable Indiana bat primary maternity roost tree (PMRT)*” refers to a dead tree or snag that is nine inches or greater in diameter at breast height (DBH) and has loose or exfoliating bark, cracks, crevices, and/or hollows. A live tree may also be a PMRT if it contains hollows or dead portions with loose or exfoliating bark, cracks, and/or crevices sufficient to support a maternity colony. Trees more than 16 inches DBH are considered optimal for maternity colony roosts, but trees in excess of nine inches DBH are known to provide suitable maternity roosting habitat.
- “*Suitable roost tree*” refers to a tree (live or dead) that exhibits characteristics suitable for roosting by the covered species. Indiana bats and northern long-eared bats typically roost under exfoliating bark, in cavities of dead, dying, and live trees, and in snags (i.e., dead trees or dead portions of live trees). For Indiana bats, suitable roost trees have a DBH of five inches or greater. For northern long-eared bats, the minimum DBH is three inches and includes trees with crevices in addition to the above-mentioned characteristics attributable to Indiana bat roosts.
- “*Summer 1 habitat*” refers to known summer habitat used by the covered species. For the Indiana bat, Summer 1 habitat is associated with maternity records and occurs within five miles of a reproductive capture record or confirmed acoustic detection location or within 2.5 miles of a documented roost tree. For the northern long-eared bat, Summer 1 habitat is used for maternity and non-maternity records because there is no known separation of habitat use by reproductive and non-reproductive individuals during the summer season. Summer 1 habitat for the northern long-eared bat occurs within three miles of a capture or confirmed acoustic detection location or within 1.5 miles of a documented roost tree.
- “*Summer 2 habitat*”- Summer 2 habitat is associated with Indiana bat non-maternity records and occurs within 2.5 miles of a capture location or documented roost tree. Summer 2 habitat does not apply to the northern long-eared bat because there is no known separation of habitat use by reproductive and non-reproductive individuals during the summer season.
- “*Swarming habitat*” refers to suitable roosting, foraging, and commuting habitat for the covered species that is within a determined distance of a known hibernaculum.
- “*Swarming 1 habitat*” refers to swarming habitat within 10 miles of a P1 or P2 Indiana bat hibernaculum.

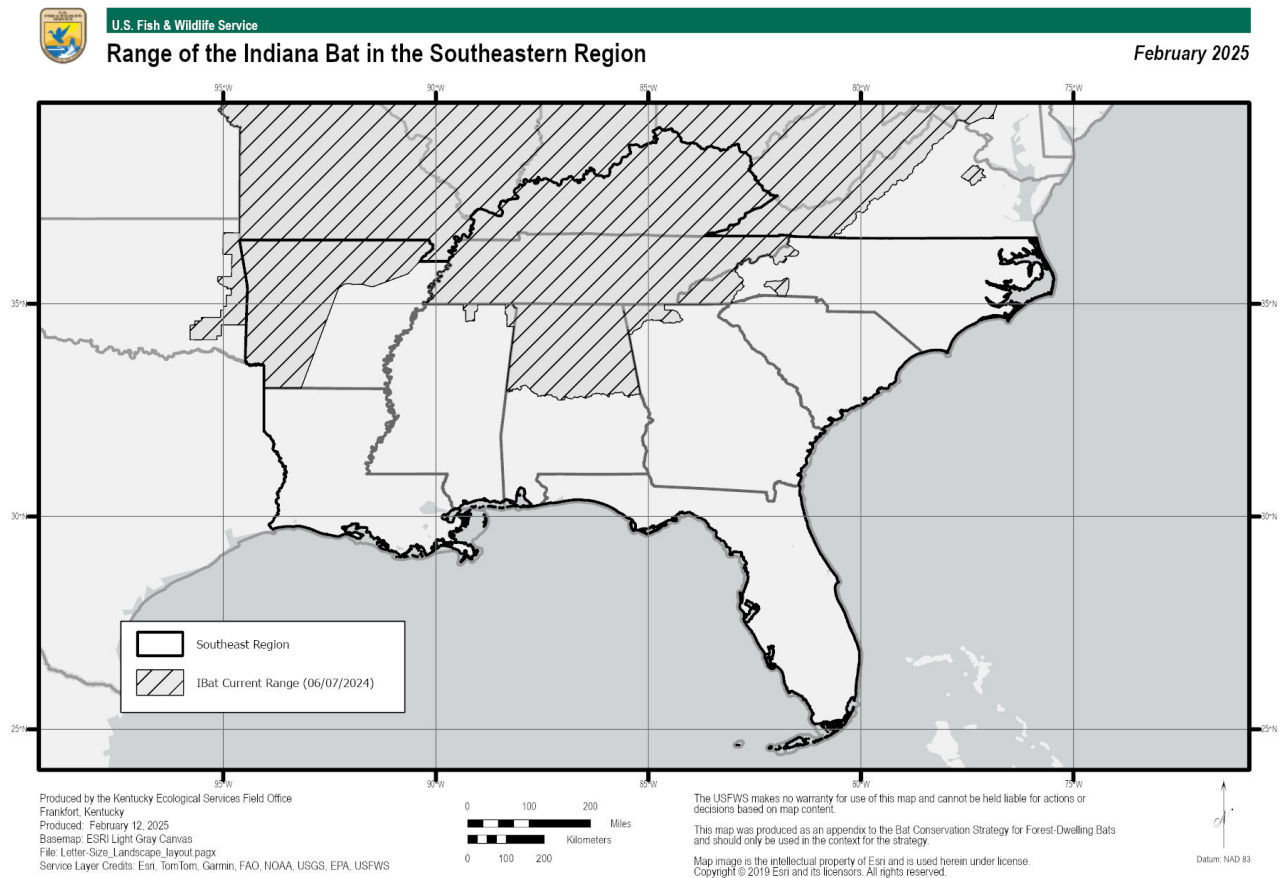
- “*Swarming 2 habitat*” refers to swarming habitat within five miles of a P3 or P4 Indiana bat hibernaculum and any northern long-eared bat hibernaculum.
- “*Timeframe*” refers to the range of dates when the covered species are expected to go through certain phases of their annual life cycles, such as hibernating, swarming, or giving birth and raising young. These timeframes are used to determine if a particular habitat type is expected to be occupied or unoccupied. The relevant timeframes for the covered species can be found in Appendix L of the [Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines](#).
- “*Unoccupied*” refers to the timeframe in which suitable habitat is not expected to be used by the covered species. This terminology is important when evaluating RFCOs and determining the appropriate conservation multiplier. See Appendix F for more information on when habitat types are occupied and unoccupied and the conservation ratios associated with those time periods.
- “*Year-round Active Range*” refers to the portion of the range of the northern long-eared bat where the species occupies suitable summer habitat throughout the calendar year. Kentucky is not located with the year-round active range of the northern long-eared bat.

Appendix B: Relevant Authorities of the U.S. Fish and Wildlife Service

The Service will implement this Conservation Strategy where its authorities allow as a means of enhancing the conservation and recovery of the covered listed bat species in Kentucky. Authorities that directly support the development and implementation of this Conservation Strategy include:

- The Endangered Species Act (16 U.S.C. 1531 et seq.) (ESA) provides (section 5) that, “The Secretary...shall establish and implement a program to conserve fish, wildlife, and plants, including those which are listed as endangered species or threatened species...” and “shall utilize land acquisition and other authority under the Fish and Wildlife Act, as amended, and the Migratory Bird Conservation Act, as appropriate”. Section 7(a)(1) of the ESA further directs Federal agencies to “utilize their authorities in furtherance of the purposes of this Act [ESA] by carrying out programs for the conservation of endangered species and threatened species.” Additionally, section 7(a)(2) of the ESA directs Federal agencies to “insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species.”
- The Fish and Wildlife Act of 1956 (16 U.S.C. 742a. et seq.) provides that the Secretary shall “...take such steps as may be required for the development, advancement, management, conservation, and protection of fish and wildlife resources....”
- The Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.) states that the Secretary is authorized “to provide assistance to, and cooperate with, Federal, State, and public or private agencies and organizations in the development, protection, rearing, and stocking of all species of wildlife, resources thereof, and their habitat...”

Appendix C: Status of the Indiana Bat in Kentucky



Summary of Indiana Bat Status in Kentucky

Kentucky is centrally located within the Indiana bat's range and boasts numerous summer and winter records for the species. The state's 108 known hibernacula, including five Priority 1 hibernacula, support significant winter populations, with an estimated 49,779 bats hibernating in 2024. Additionally, 43 hibernacula occur within 20 miles of Kentucky's border, including five Priority 1 hibernacula. Priority 1 hibernacula within Kentucky and the 20-mile buffer collectively housed 214,620 bats in 2022, representing 37% of the species' estimated range-wide population. Summer records for the species are closely aligned with areas containing sufficient forest cover to support summer roosting behavior. Despite the arrival of white-nose syndrome (WNS) in 2011, Kentucky has not documented a significant winter population decline, and it appears that many of the Indiana bat summer colonies that existed pre-WNS remain occupied by the species. For further information, visit the Service's Indiana bat website at <https://www.fws.gov/species/indiana-bat-myotis-sodalis>.

Known Habitat Features for Indiana Bats in Kentucky

This summary outlines known habitat features utilized by the Indiana bat in Kentucky, based on current species occurrence data:

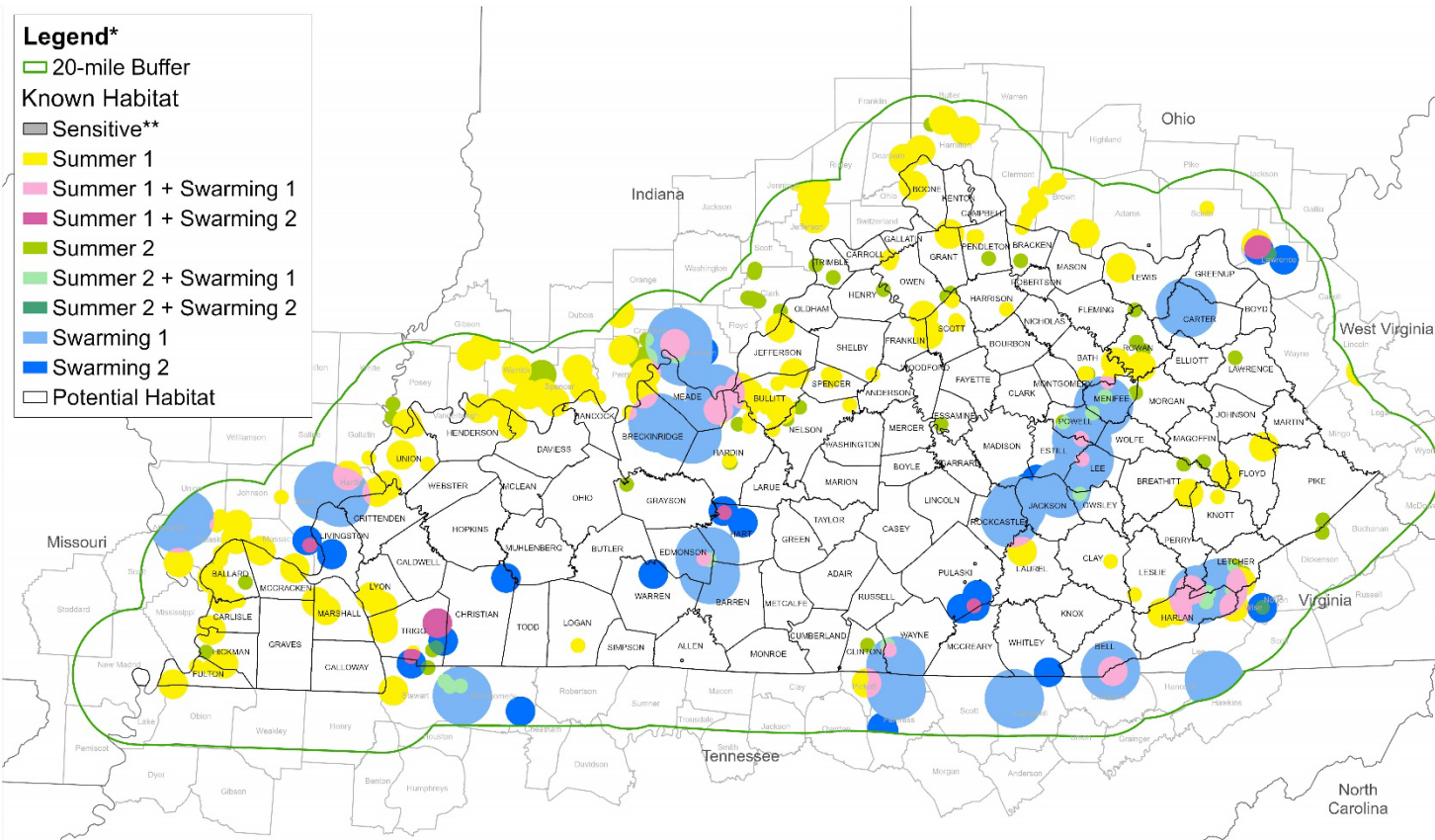
- **Designated Critical Habitat:** 2 cave hibernacula were designated as critical habitat for the Indiana bat in Kentucky on September 24, 1976 (41 FR 41914): Bat Cave in Carter County and Coach Cave in Edmonson County.
- **Summer Colonies:** 471 individual summer occurrences have been documented. This includes 360 maternity records compiled from captures, acoustic detections, and verified maternity roosts and 111 non-maternity records of solitary males and non-reproductive females.
- **Hibernacula:** 108 documented hibernacula have been identified among the caves, mines, or cave-like features where bats could hibernate during the winter months. This includes 21 Priority 1 and Priority 2 hibernacula and surrounding Swarming 1 habitat and 87 Priority 3 and Priority 4 hibernacula and surrounding Swarming 2 habitat.
- **Bridges/Culverts:** 4 man-made structures have been identified that provide roosting sites for Indiana bats during the non-hibernation season.



U.S. Fish & Wildlife Service

Known Indiana Bat Habitat in Kentucky and within 20 miles

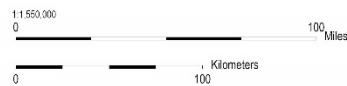
July 2025



Note: This map is based on species occurrence information and is subject to change as new data becomes available. Please contact our office at KentuckyES@FWS.gov to ensure you are working with the most current version.

*For an explanation of terms, please see the Revised Conservation Strategy for Forest-Dwelling Bats in the Commonwealth of Kentucky.

**Sensitive - work in these areas require site-specific coordination with the KFO.



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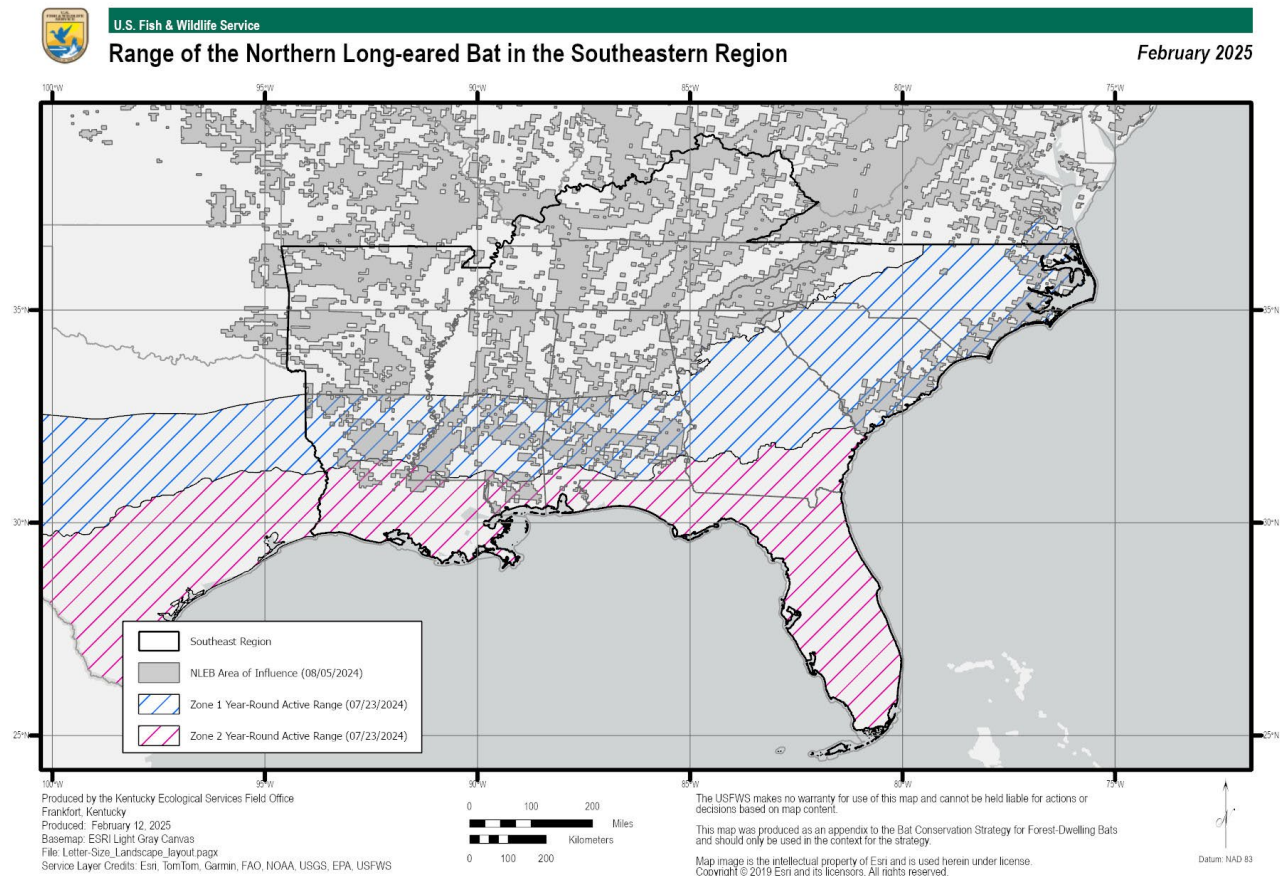
This map was produced as an appendix to the Revised Conservation Strategy for Forest-Dwelling Bats in the Commonwealth of Kentucky and should only be used in the context of the strategy.

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Datum: NAD 83

Appendix D: Status of the Northern Long-Eared Bat



Summary of Northern Long-eared Bat Status in Kentucky

The northern long-eared bat is present year-round in Kentucky. During winter, these bats hibernate in caves, mines, or cave-like features. Estimating populations of northern long-eared bats in Kentucky from winter counts has been challenging due to the bats' tendency to hibernate in cracks and crevices. In the summer occupancy season, northern long-eared bats roost under bark, in tree cavities, or in crevices of both live and dead trees. They will also roost in man-made structures, such as bridges and abandoned buildings, and in natural rock shelters and crevices in cliff lines. Prior to the arrival of white-nose syndrome (WNS) in 2011, the northern long-eared bat was one of the most common bat species encountered during the summer in Kentucky. However, the first noticeable WNS effects appeared in 2013, which led to significant declines in Kentucky's northern long-eared bat populations. Spring staging and fall swarming are significant time periods for mating and migration to hibernacula. As such, forested habitat is crucial for roosting, foraging, and commuting behavior. For further information, visit the Service's northern long-eared bat website at <https://www.fws.gov/species/northern-long-eared-bat-myotis-septentrionalis>.

Known Habitat Features for Northern Long-eared Bats in Kentucky

This summary outlines known habitat features utilized by the northern long-eared bat in Kentucky, based on current species occurrence data:

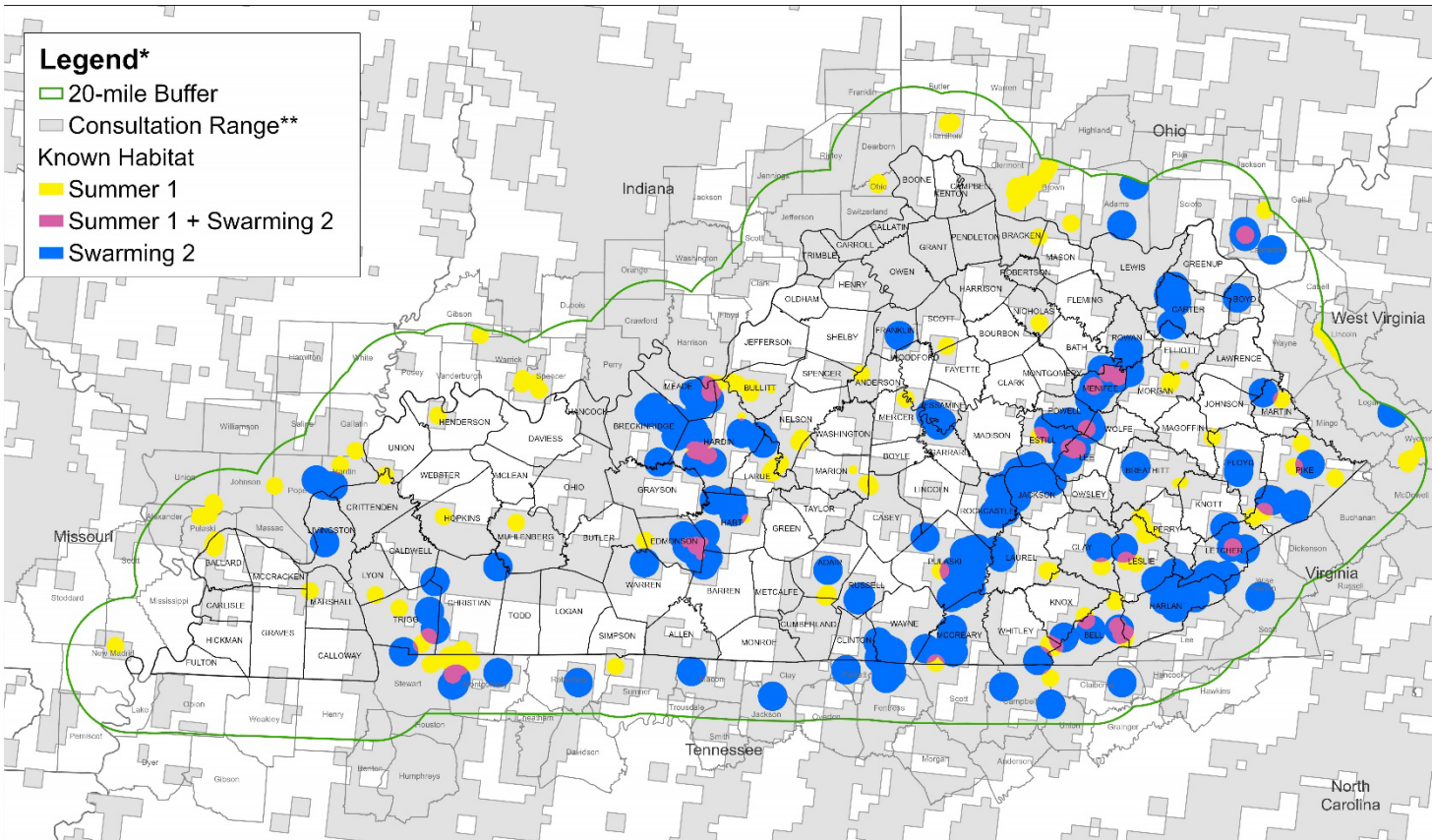
- **Designated Critical Habitat:** Critical habitat has not been designated for the northern long-eared bat.
- **Pre-WNS Summer Colonies: 1,541** individual occurrences were documented prior to 2013 during the summer occupancy timeframe from captures, acoustic detections, and verified maternity roosts.
- **Post-WNS Summer Colonies: 195** individual occurrences have been documented since 2013 during the summer occupancy timeframe, including captures, acoustic detections, and verified maternity roosts.
- **Hibernacula: 172** caves, mines, or cave-like features have been documented as hibernacula during the winter months.
- **Bridges/Culverts:** No man-made structures have been documented that provide roosting sites for bats during the non-hibernation season.



U.S. Fish & Wildlife Service

Known Northern Long-eared Bat Habitat in Kentucky and within 20 miles

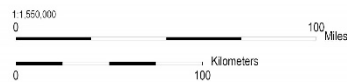
July 2025



Note: This map is based on species occurrence information and is subject to change as new data becomes available. Please contact our office at KentuckyES@FWS.gov to ensure you are working with the most current version.

*For an explanation of terms, please see the Revised Conservation Strategy for Forest-Dwelling Bats in the Commonwealth of Kentucky.

**See "Consultation Range" section in Northern Long-eared Bat and Tricolored Bat Voluntary Environmental Review Process for Development Projects Version 1.1 for a more detailed discussion.



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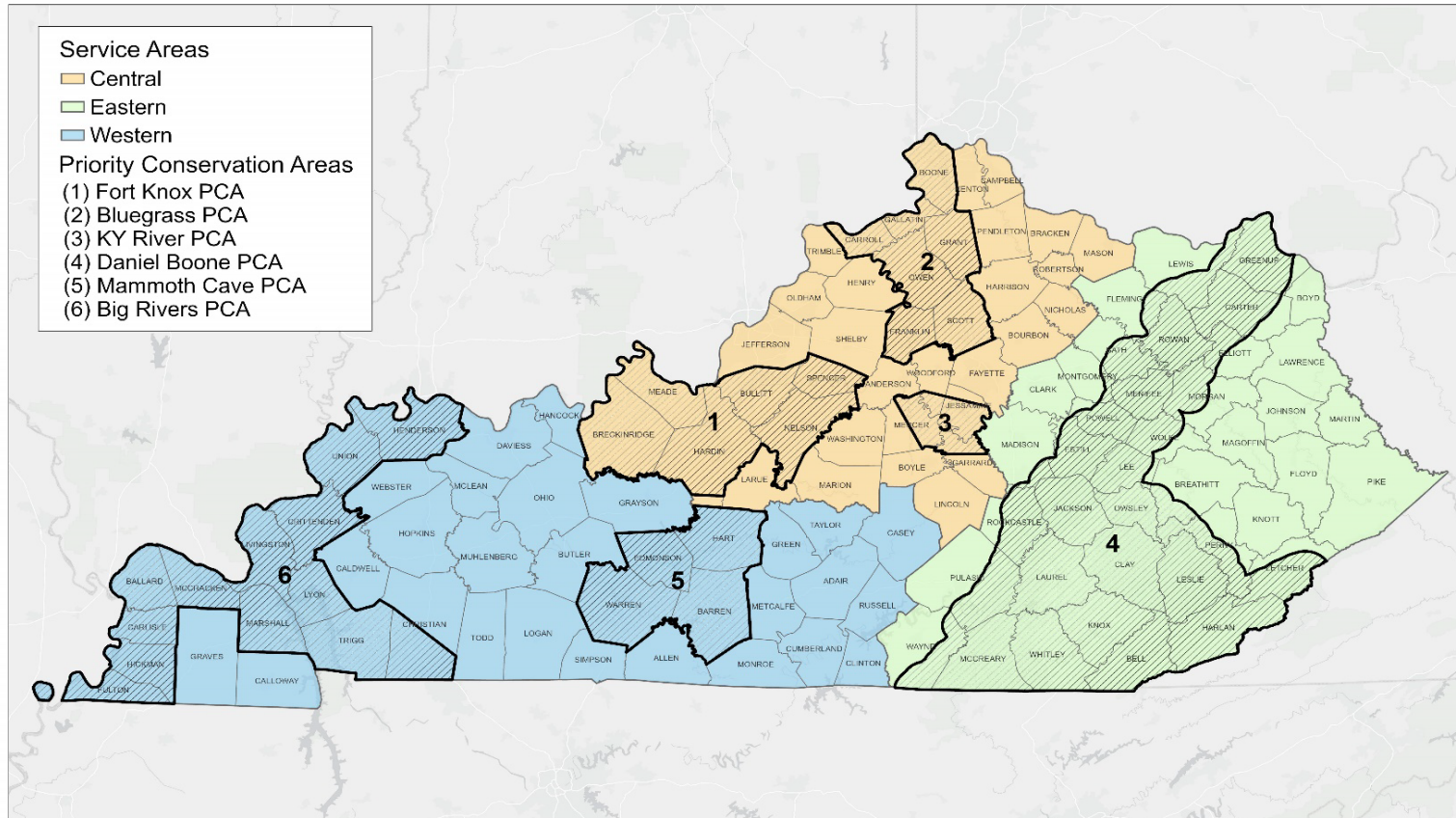
Appendix E: Service Areas and Priority Conservation Areas



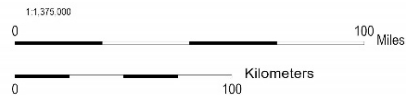
U.S. Fish & Wildlife Service

Service Areas and Priority Conservation Areas for Federally Listed Bats in Kentucky

July 2025



Produced by the USFWS Kentucky Ecological Services Field Office
 Frankfort, Kentucky
 Produced: July 8, 2025
 File: C-Size_Landscape_layout.paxg
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Service Area	Priority Conservation Area	Description
Central	Fort Knox PCA	The assemblage of hibernacula, swarming habitat, and summer habitat associated with Fort Knox, Bernheim Forest, Knobs State Forest, and Yellowbank Wildlife Management Area.
	Bluegrass PCA	The assemblage of summer habitat associated with various protected lands in Boone, Franklin, Grant, Owen, and Scott counties.
	KY River PCA	The assemblage of summer habitat associated with various protected lands in Garrard, Jessamine, Woodford, and Mercer counties near the Kentucky River.
Eastern	Daniel Boone PCA	The assemblage of hibernacula, swarming habitat, and summer habitat associated with the Daniel Boone National Forest, Carter Caves State Park, and the various protected lands on Pine Mountain.
Western	Mammoth Cave PCA	The assemblage of hibernacula, swarming habitat, and summer habitat associated with Mammoth Cave National Park and the various protected lands along the upper Green River.
	Big Rivers PCA	The assemblage of hibernacula, swarming habitat, and summer habitat associated with Fort Campbell, Land Between the Lakes National Recreation Area, Clarks River National Wildlife Refuge, and Ballard, Boatright, Doug Travis, and Big Rivers Wildlife Management Areas.

Appendix F: Conservation Multiplier Table

Habitat Type Impacted	Hibernation ¹	Summer Occupancy/ Spring Staging ²	Pup Season ³	Summer Occupancy/ Fall Swarming	Fall Swarming
	Nov 16-March 31	April 1-May 14	May 15-July 31	Aug 1-Oct 15	Oct 16-Nov 15
	Potential, Summer, & Swarming unoccupied	Potential & Summer occupied			Potential & Summer unoccupied
		Swarming unoccupied		Swarming occupied	
Summer (1 or 2) and Swarming 1	2.5	3.0	4.0	3.5	3.5
Summer (1 or 2) and Swarming 2	2.0	2.5	3.5	3.0	3.0
Swarming 1	1.5	2.0	3.0	2.5	2.5
Swarming 2	1.0	1.5	2.5	2.0	2.0
Summer 1	1.5	2.0	3.0	2.0	2.0
Summer 2	1.0	1.5	2.5	1.5	1.5
Potential	0.5	1.0	2.0	1.0	1.0

¹ No impacts to listed bat hibernacula are allowed under this Conservation Strategy.

² Spring staging occurs close to hibernacula entrances in the early spring, with females emerging in their poorest condition of the year. Special consideration should be given to projects occurring near hibernacula in the early spring due to the potential to affect emerging bats.

³ Projects impacting Potential or Summer habitat that occur between May 15 – July 31 require a project-specific evaluation by the Service. Only a limited amount of habitat removal has been authorized during this timeframe, and additional mitigation has been added to the ratio during this timeframe to offset the increased severity of impacts that could occur. In addition, impacts during this timeframe may not exceed 10 acres of forested habitat removal per project.

Appendix G: Calculation Worksheet and Example Calculations

This sample calculation worksheet is provided to help project proponents estimate the potential conservation cost for a project that will result in the removal of suitable forest habitat for one or more of the covered species. The final conservation acres required will be verified by the Service prior to completion of the project review process.

Species	Habitat Type Impacted	Impact (acres)	Conservation Multiplier	Conservation Acres Required

Conservation Acres= (acres impacted) x (conservation multiplier)

Once the conservation acres are calculated, proponents can explore the available Recovery-focused Conservation Options to determine the best approach for their project.

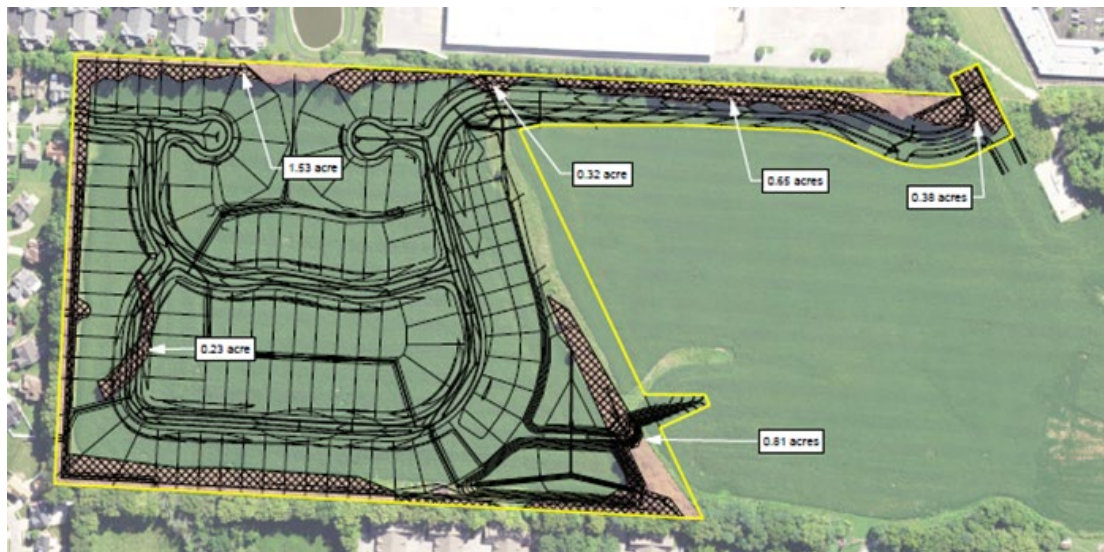
IBCF option= (conservation acres) x (IBCF land value rate)

Conservation Bank option: (conservation acres) x (conservation bank land value rate)

For those considering proponent responsible mitigation, please contact the KFO to discuss.

The following examples have been provided to assist project proponents in calculating their conservation cost when electing to use one of the recovery-focused conservation options. The examples below are specific to determining the IBCF cost; however, they could also be used to identify the amount of in-kind conservation for proponent responsible mitigation that would be required or amount of credits that would be required if utilizing a species conservation bank. These examples are not intended to cover every possible scenario. Proponents are encouraged to contact the Service at any time to discuss the specific details of a project.

EXAMPLE A



The Indiana bat was determined to be the only species that would be adversely affected by the proposed project. The project is in an area of habitat determined to be “Potential” (i.e., unsurveyed) and would be removed between November 16 – March 31. The total amount of habitat removal is 3.73 acres. See below for worksheet table and IBCF calculation.

Species	Habitat Type Impacted	Impact (acres)	Conservation Multiplier	Current Rate/Acre	IBCF Contribution Amount
Indiana bat	Potential	3.73	0.5	\$5,480 ⁵	\$10,220.20

3.73 (acres impacted) x 0.5 (conservation multiplier) x \$5,480(current USDA per acre rate) = \$10,220.20

⁵ IBCF land value rate is based on the current average land value of farm real estate in Kentucky published annually by the U.S. Department of Agriculture in the Land Values and Cash Rents document. IBCF land value rates are update annually on Sept 1st of each year.

EXAMPLE B

The Indiana bat and northern long-eared bat were determined to be the species that would be adversely affected by the proposed project. The project is in an area of habitat determined to be “Summer 1” for the Indiana bat and “Potential” for the northern long-eared bat and would be removed between August 1 – October 15. The total amount of habitat removal is 1.32 acres.

Species	Habitat Type Impacted	Impact (acres)	Conservation Multiplier	Current Rate/Acre	IBCF Contribution Amount
Indiana bat	Summer 1	1.32	2	N/A	N/A
Northern long-eared bat	Potential	1.32	1	N/A	N/A

Use the highest conservation ratio, which is determined to be two (2) to appropriately account for both species.

Species	Habitat Type Impacted	Impact (acres)	Conservation Multiplier	Current Rate/Acre	IBCF Contribution Amount
Indiana bat	Summer 1	1.32	2	\$5,480 ⁶	\$14,467.20
Northern long-eared bat	Potential				

1.32 (acres impacted) x 2 (highest conservation multiplier) x \$5,480 (current USDA per acre rate) = \$14,467.20

⁶ IBCF land value rate is based on the current average land value of farm real estate in Kentucky published annually by the U.S. Department of Agriculture in the Land Values and Cash Rents document. IBCF land value rates are update annually on Sept 1st of each year.