

BAT CONSERVATION
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TO: Sam Hamilton, Director, U.S. Fish & Wildlife Service

We the undersigned are writing to express our deepest concern regarding the following recurring issues relative to the management of White-Nose Syndrome (WNS) in hibernating bats: 1) killing bats to slow the spread of WNS; 2) closure of affected roosts; 3) disturbance of roosts; 4) introduction of fungicides and other compounds into caves to combat possible pathogens.

All available evidence indicates that eradication of bats infected with the fungus *Geomyces destructans* will not slow the spread of WNS. Also, such attempts have the potential to eliminate bats that, if left alone, could possibly survive to rebuild resistant populations, and it is not yet possible to distinguish infected from uninfected bats by relying only on external manifestations of the fungal infection (i.e. active fungal growth on the muzzle or skin).

Closure of roosts where WNS has been detected deprives bats of critical habitat that is already in limited supply, precludes recovery, and may facilitate spread by forcing excluded bats to seek new roosts.

Since many WNS-infected bats apparently die from premature depletion of stored fat reserves, and human disturbance can greatly exacerbate loss of these reserves, stringent permitting is needed to minimize (and where possible eliminate) roost disturbance, especially at infected sites.

The arbitrary use of fungicides or other pesticides to treat bats in hibernacula affected by WNS should also be discouraged. Native fungal communities are basic to cave ecosystems and may prevent colonization of exogenous species. Because chemical treatments could irreparably harm microbial populations, they should not be considered without a full evaluation of dosages, delivery methods, potential side effects and long-term impact.

It is important to note that most caves in the United States are on private property where government agencies have no legal authority. Greatest compliance with measures to minimize spread of WNS is likely to be achieved through careful permitting for managers and researchers and through provision of clear guidelines for cavers and the public (i.e., avoid entering caves in infected areas prior to entering uninfected caves without taking all possible precautions to disinfect clothes, boots and gear). Also, when possible, confine activities to single cave systems and avoid caves where bats hibernate.

We emphasize the urgent need for research to define the role of *G. destructans* or other agents in bat epizootiology and cave ecology. Until we confirm causes and routes of transmission, some of the management strategies that have been suggested are likely to be useless, and in some cases highly counterproductive.

Sincerely,

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