



May 6, 2010

Wayne LaRoche, Commissioner
Vermont Fish and Wildlife Department
103 South Main Street Building 10 South
Waterbury, Vermont 05671-0501

Dear Mr. LaRoche:

The Center for Biological Diversity has been engaged with the issue of white-nose syndrome and the threat it poses to North American bats since early 2008. We have vigorously advocated for increased funding and a swifter federal response to the disease, and have also petitioned the federal government for stronger protective measures for white-nose-affected bats and their habitat.

While our focus has been primarily on federal action and policy, I am writing you, as the lead wildlife manager for the state of Vermont, to advocate for the implementation of policies that should aid the long-term persistence of bats in your state. Surviving bats are the best hope for restoring the ecological balance these creatures have long provided.

Precautionary measures against human-caused disturbance of bats and against potential human transmission of the disease to new sites are crucial. It is also important to work with and educate landowners, cavers, and the general public, so that they can better understand the threat white-nose syndrome poses to bats, and why cooperation with bat protection policies is so important.

While there is not yet conclusive proof that anthropogenic spread of white-nose syndrome has occurred, biologists studying the disease believe it possible, and think humans were likely responsible for the initial introduction of the white-nose fungus (*Geomyces destructans*) to North America. Bat-to-bat and bat-to-cave transmissions of the fungus appear to be the most common ways for the disease to spread, but the recent appearances of white-nose syndrome in caves several hundred miles from other infected sites, often in heavily-visited caves (such as Dunbar Cave State Park in Tennessee) is mounting evidence in support of the human transmission theory.

Clearly, it is too late to stop white-nose from reaching Vermont. However, limiting human access to bat caves is still important for several reasons. First, though bats are clearly moving the disease around themselves, human transmission has the potential to accelerate the introduction of the white-nose fungus into new and distant sites. In the absence of a cure for the disease, slowing the spread of white-nose syndrome is the best thing we can do to increase the odds that some bats will survive until an effective treatment is found.

Second, bats already under stress from white-nose syndrome may be even less tolerant of human disturbance than under normal circumstances. Every effort should be made to minimize disruption of ailing bat colonies, especially during the critical winter hibernation period. Only essential activities, such as research or monitoring related to white-nose syndrome itself, should occur in caves while bats are present.

Third, whenever gear and clothing are taken into an infected cave or mine, regardless of whether bats are actually present at the time or not, there is the potential for contaminated materials to be inadvertently transported out. If decontamination protocols are not followed or not fully effective, contaminated items could eventually end up in pristine (non-white-nose) sites. While decontamination procedures appear to be partially effective, they are not an absolute guarantee against fungal transport. Given the devastating effects of white-nose syndrome on affected colonies, minimizing cave entry to essential purposes seems the most prudent course of action.

Thus, we strongly support the following policies, and urge you to include them in Vermont's white-nose syndrome planning and response:

- Administratively close, or keep closed, all state-owned bat caves to recreational access. Allow research and other essential access by permit only, and require decontamination protocols in all situations where access is permitted. Grant exemptions for rescues and other emergencies.
- Work with cavers and cave conservation organizations to educate cavers about the importance of cave access restrictions to protect bats, even those already affected by white-nose syndrome.
- Educate the general public about the devastating impact of white-nose syndrome on bats, their ecological and economic significance, and the importance of protecting surviving bats and their habitat.
- Develop educational materials for private cave owners regarding cave stewardship and bat protection. The materials should recommend voluntary measures for safeguarding cave bats on private property, including the following strategies (from most to least restrictive):
 - prohibit recreational cave access and tours year-round
 - allow recreational cave access and tours only for a limited period between summer maternity roosting and fall swarming, with strict requirements for decontamination
 - allow recreational access, but only if groups agree to follow decontamination protocols
- Provide assistance and support to cave owners who wish to implement year-round or seasonal closures for their caves.
- Encourage responsible cave stewardship practices by show cave owners. Provide information on the threat of white-nose syndrome to the owners of show caves, and educate them about the necessity of including visitor screening, decontamination, and other actions in their operations. Cave owners should be encouraged to protect the source of their livelihood by acting as environmental stewards, and promoting a positive public image of the show cave business community.

- Consider encouraging seasonal or year-round closures for private caves that pose particularly high risk of white-nose contamination and/or have particularly high ecological value (large hibernacula, rare or endemic cave species, etc.).
- Consider using your position as state wildlife director to publicly promote a bat protection “ethic.” As the state’s top wildlife manager, you can demonstrate that Vermont takes the threat of white-nose syndrome very seriously. While bats have long been unfairly maligned, they also engender great curiosity and enthusiasm. People appreciate the important role bats play in controlling insect populations, including crop pests and mosquitoes. You have the opportunity to encourage the citizens of Vermont to be good stewards of bats.
- Develop a white-nose syndrome response plan, if you have not already done so. The U.S. Fish and Wildlife Service has issued recommendations for state planning for areas of the country within the current disease-affected zone. We urge you to incorporate the policies we have outlined in this letter in the state’s response plan.

While there is no doubt that white-nose syndrome has been catastrophic for Vermont’s bats, wildlife managers have both the opportunity and the responsibility to safeguard remaining populations. While the odds for recovery in the near term may be discouraging, the maintenance of at least small numbers of survivors is in itself a worthy goal, and may be the most important one to focus on in the future.

Finally, we wish to extend our appreciation to you and your staff for what you have done to date in response to white-nose syndrome. In the face of very limited resources, grappling with an unprecedented crisis, state wildlife biologists have struggled valiantly to understand this new disease and to protect bat populations as they dwindle. Dealing with this crisis has been extremely challenging for all those involved, and we do recognize your efforts.

Thank you for your attention to our concerns. Please contact me if you have any questions. And, if your state already has a white-nose syndrome plan underway, please send any relevant documents that may be available.

Sincerely,

A handwritten signature in black ink that reads "Mollie Matteson". The signature is written in a cursive, flowing style with a long, sweeping underline that extends to the right.

Mollie Matteson, Conservation Advocate

Cc: Scott Darling, Wildlife Biologist, Vermont Department of Fish and Wildlife