

UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU
OF LAND MANAGEMENT WASHINGTON, D.C.

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August 19, 2010

In Reply Refer To:
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EMS TRANSMISSION 08/20/2010
Instruction Memorandum No. 2010-181
Expires: 09/30/2011

To: All Field Office Officials

From: Assistant Director, Renewable Resources and Planning

Subject: White-nose Syndrome

Program Area: Wildlife, Threatened and Endangered Species,
Recreation, and Abandoned Mine Lands.

Purpose: This Instruction Memorandum (IM) provides direction on how to prepare for the anticipated occurrence of white-nose syndrome (WNS) on Bureau of Land Management (BLM) administered lands nationwide.

Policy/Action: It is current BLM policy, as articulated by the stay out, stay alive campaign, to discourage the public from entering underground abandoned mine features on public lands, as they risk injury or death, and potentially increase the risk of transferring WNS among vulnerable bat populations.

The BLM recognizes that there are knowledge gaps concerning WNS

etiology and epidemiology; however, we are committed to implementing measures to prevent and reduce the impacts of WNS. The BLM may adjust its policy on WNS as more information becomes available through ongoing monitoring and research efforts.

In the meantime, an Interagency National Response Plan (INRP) for managing white-nose syndrome in bats is being drafted, and the BLM is an active participant.

Until more detailed guidance is available, implement the BLM-WNS Interim Response Strategy (Attachment 1), which includes the following guidance:

- Coordinate and conduct outreach with appropriate internal and external stakeholders to prevent or contain the spread of WNS. Identify caves and abandoned mine features (hereinafter referred to as sites; refer to the definitions of caves and abandoned mine features found in Attachment 2) with important bat resources (refer to all three attachments for more detail).

- Emphasize ongoing inventory efforts of Abandoned Mine Land Program Surveys.

- Consider restricting access to caves and abandoned mines on BLM-administered lands in your state. It is suggested that BLM State Directors use a targeted approach to closure that prioritizes sites with important bat resources.

- Adhere to the current version of BLM containment and decontamination procedures (refer to Attachments 1 and 2).

- Participate in interagency groups to develop state WNS response plans that consider the INRP, as appropriate.

- Recommend locations to test for the presence of WNS at a subset of the sites that have been identified as having important bat resources and support WNS research efforts where practicable and feasible within budgetary constraints.

The BLM will continually assess the effectiveness of this policy and implement adaptive strategies, as appropriate.

Timeframe: This IM is effective immediately.

Budget Impact: The implementation of this IM is anticipated to result in costs for a variety of BLM activities, including data review and analysis to identifying caves and abandoned mines with important bat resources, disease surveillance, response planning, cave closure (administrative and physical), decontamination protocol implementation, interagency coordination, outreach, and education.

Background: WNS is a condition associated with massive mortalities of cave and mine hibernating bats and has spread at an alarming rate across the eastern United States. The fungus (*Geomyces destructans*) associated with the disease has now been reported as far west as Missouri and Oklahoma. This spread has occurred within only 3 years of the first observation of clinical signs of WNS. Mortalities at affected hibernacula in the Northeast have ranged from 80-100 percent of their hibernating bats and have affected six species of bats, including one endangered species. The fungus has also been observed on live bats in an additional three species. The BLM administers thousands of caves and abandoned mines, many of which are used by bats for hibernation or roosting.

While the disease is not known to be harmful to people, evidence suggests that the dispersal of the *Geomyces destructans* fungus, considered the primary causal agent for WNS, can be transmitted via bats or people. Although bat-to-bat transfer of the fungus occurs, people may also inadvertently transfer the fungus from an affected site to an unaffected site, via spores on their clothing or gear, where it can then affect bats using the site.

Bat populations in the northeast have plummeted due to WNS, and state and Federal agency personnel and their budgets have been strained as they have struggled to react to this relatively new threat.

Manual/Handbook Sections Affected: None.

Coordination: This policy was coordinated with the Renewable Resources Directorate (WO-200), and the Divisions of Fish Wildlife and Plant Conservation (WO-230), Recreation and Visitor Services (WO-250), and Environmental Quality and Protection (WO-280).

Contact: If there are any questions regarding this IM, please contact Dwight Fielder, Chief, Division of Fish, Wildlife and Plant Conservation, at 202-912-7230; Andy Tenney, Deputy Division Chief, Division of Recreation and Visitor Services, at 202-912-7094; or Bill Ypsilantis, Acting Chief, Division of Environmental Quality and Protection, at 202-912-7163.

Signed by:
Bud C. Cribley
Deputy Assistant Director
Governance, WO-560
Renewable Resources and Planning

Authenticated by:
Robert M. Williams
Division of IRM

3 Attachments

- 1 [BLM-WNS Interim Response Strategy \(3 pp\)](#)
- 2 [BLM Containment and Decontamination Procedures \(6 pp\)](#)
- 3 [Site Feature Bat Inventory Spreadsheet \(2 pp\)](#)

Last updated: 08-20-2010

Bureau of Land Management
White-nose Syndrome Interim Response Strategy
August 2010

- 1. Stakeholder Coordination:** Effective disease management requires a coordinated and consistent approach to the extent feasible. The Bureau of Land Management (BLM) will coordinate with appropriate internal and external stakeholders to prevent and contain the spread of white-nose syndrome (WNS). Stakeholders may include BLM program coordinators, state and other Federal agency partners, tribes, and concerned members of the public. The BLM values partners and relies on them for most of the “on-the-ground” cave management activities that occur on BLM-administered lands. The BLM will consider this valuable coordination in developing policies and actions.

- 2. Identify Sites with Important Bat Resources:** BLM offices will utilize the best available scientific information to assess and identify sites on BLM-administered lands that have important bat resources. The purpose of this assessment is to identify sites as potential disease surveillance locations and to assess sites for closure to public entry. Best available scientific information may include, but is not limited to state/district/field office files, Federal agencies, State wildlife agencies, State abandoned mine programs, bat researchers, speleological societies and other recreational caving groups, published accounts, and local experts. Assessment of the importance of bat use at a particular site is locally subjective and should be coordinated with state fish and wildlife agencies and other stakeholders, and assessment should consider local ecological factors. Examples of factors to consider when identifying sites that have important bat resources include the potential for the species to be affected (based on what is known at the time of assessment), status of the species present, number of individuals, proximity to human populations, frequency of human entry, and timing and duration of bat use. The BLM offices will coordinate with state fish and wildlife agencies as described in 43 Code of Federal Regulations, Part 24.4 in the assessment of importance of bat resources. For sites with no previous bat inventories, the BLM offices should evaluate their potential value as bat habitat using existing information and best professional judgment.

Bureau policy generally limits the duration of temporary closure or restriction orders to 24 months or less. The BLM must also generally comply with the National Environmental Policy Act prior to closing public lands to certain uses or restricting specific uses of the public lands. For additional information, Refer to IM 2010-28, Requirements for Processing and Approving Temporary Public Land Closure and Restriction Orders.

The BLM state offices will identify a state WNS point-of-contact within 30 days of the issuance of this Instruction Memorandum (IM). The identified contact will work with the BLM Washington and state offices in the coordination of the BLM’s response to WNS including the collation and transfer of data, as appropriate. For outreach and communication purposes, states will coordinate with the Washington Office regarding which sites, if any, are proposed for closure. To assist the Washington Office in facilitating the BLM response to

WNS, existing site data as described in Attachment 3, Site Feature Bat Inventory Spreadsheet, will be submitted to Jessica Rubado, Division of Fish, Wildlife and Plant Conservation, with copies to Erinn Shirley, Division of Environmental Quality and Protection, Abandoned Mine Lands Program, and James Goodbar, Division of Recreation and Visitor Services within 90 days of the issuance of this IM.

3. **Emphasize Ongoing Inventory Efforts:** The BLM conducts inventory of Abandoned Mine Lands that collect bat presence information; states will continue these ongoing efforts.
4. **Site Administrative and Physical Closure:** The BLM State Director will assess which, if any, sites at risk for spread of WNS will be administratively or physically closed. It is suggested that BLM State Directors utilize a targeted approach to closure that prioritizes sites with important bat resources. The BLM offices will carefully evaluate whether restricting access to caves and abandoned mines on BLM administered lands is appropriate to minimize the spread of WNS. Before recommending closure orders, managers will coordinate with land managers at other agencies and consider the effectiveness and level of public support relative to using voluntary restrictions and applying decontamination procedures.

Closure orders for sites with important bat resources will include exemptions for persons conducting search-and-rescue operations, approved WNS related monitoring, research, surveys, underground abandoned mine surveys and closures, and those authorized for activities granted by the Mining Law. The BLM offices will require decontamination procedures to be followed by all exempted parties.

5. **Identification of Potential WNS Surveillance Locations:** The BLM state offices will recommend locations to test for the presence of WNS at a subset of the sites that have been identified as having important bat resources. To facilitate the coordination of the ongoing national interagency response effort for WNS, the BLM states are directed to identify and submit to Jessica Rubado, Division of Fish, Wildlife and Plan Conservation, the locations, if any, they recommend for testing on BLM administered land within 90 days of the effective date of this IM.

The BLM will utilize its external partners in assisting with reporting the presence of the fungus and suspected WNS afflicted bats. Examples of groups assisting with reporting information include Federal and state agencies, recreational cavers, mining claimants, field personnel, and contractors.

A number of different documents outlining protocols for surveillance and monitoring are being developed by various Federal and state groups. In addition, the surveillance working group associated with the WNS national response planning process is preparing recommendations on how to conduct these activities.

6. **Containment and Decontamination:** The BLM offices will implement the attached BLM-WNS containment and decontamination procedures (Attachment 2) immediately for all site entries. The BLM states and district offices will collaborate with stakeholders as appropriate,

including caving organizations, concessionaires, abandoned mine contractors, state agencies, and other parties to apply containment and decontamination procedures for all caves and abandoned mine feature entries. Also refer to the USFWS White-Nose Syndrome Decontamination Protocols for Researchers located at:

http://www.fws.gov/WhiteNoseSyndrome/ppt/NPS_Decontamination_Protocols_Webinar_June_9_2010.ppt.

- 7. Research:** Where practicable and feasible within budgetary constraints, the BLM will participate in and support WNS research efforts.

- 8. Outreach:** The BLM will educate its internal and external stakeholders through various forms of media and also participate in the educational efforts of other governmental and non-governmental organizations. The BLM Washington Office will create an external WNS web page to inform the interested publics of our efforts concerning WNS. An internal WNS web page will be created to share information amongst the state and district offices. The BLM will participate, where appropriate, in interagency media activities in cooperation with other organizations to heighten public awareness of WNS. A BLM WNS Communication Plan is under development.