

Scientists' Letter in Support of Listing the Northern Long-eared Bat as Endangered Under the Federal Endangered Species Act

December 8, 2014

The Honorable Sally Jewell
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

The Honorable Daniel Ashe
Director, U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Dear Secretary Jewell and Director Ashe:

We, the undersigned, are scientists who stand in support of protecting the northern long-eared bat, *Myotis septentrionalis*, as endangered under the United States Endangered Species Act. We commend the U.S. Fish and Wildlife Service for its proposal to list the bat as endangered, and we urge the Service to move quickly in finalizing its recommendation to protect this highly imperiled mammal.

The northern long-eared bat has already declined by an estimated 99 percent in the Northeast,¹ and the primary cause of its decline, the fungal disease white-nose syndrome, continues to spread. Already, white-nose syndrome is in 25 of the 38 states in which this species has been found, and the disease affects all the states in the core of the species' range.

White-nose syndrome is not the only threat the northern long-eared bat faces. The species may have been in decline prior to the onset of the disease, possibly due to factors such as habitat destruction and fragmentation, environmental toxins, and climate change.² Other sources of harm

¹ U.S. Fish and Wildlife Service. 2013. Proposed Rule: 12-Month Finding on a Petition to List the Eastern Small-Footed Bat and the Northern Long-Eared Bat as Endangered or Threatened Species; Listing the Northern Long-Eared Bat as an Endangered Species. Docket No. FWS-R5-ES-2011-0024, 78 FR 61045. Oct. 2, 2013.

² Ingersoll, T.E., B.J. Sewall and S.K. Amelon. 2013. Improved analysis of long-term monitoring data demonstrates marked regional declines of bat populations in the eastern United States. PLoS ONE 8(6): e65907. doi:10.1371/journal.pone.0065907.

to the northern long-eared bat are human disturbance at caves and mines,³ and wind energy operations lacking sufficient wildlife protection measures.⁴

Although the range of the northern long-eared bat is large, its distribution is irregular and patchy; historically it was uncommon to rare throughout the majority of its range. The species was most frequently observed in the northeastern United States and southern portions of Ontario and Quebec, places where white-nose syndrome has struck the northern long-eared bat severely. In the Midwest, biologists have found the species fairly often in summer mist net surveys, but in some parts of the region, the northern long-eared bat is uncommon in summer. Most winter hibernacula surveys throughout the Midwest have turned up few northern long-eared bats.⁵ Since the bat disease has only recently moved into the upper Midwest, it remains to be seen how it will affect the northern long-eared bat there, but given the region's climatic similarities to the Northeast, it seems likely that white-nose syndrome will be similarly devastating in that region. Finally, the northern long-eared bat's numbers in the southern and western portions of its range are naturally low,⁶ providing little buffering to the extreme losses already incurred in the heart of the species' range.

Thus, patchy distribution, dramatic loss from disease, and a broad spectrum of other threats throughout the northern long-eared bat's range combine to make the species highly vulnerable to extinction.⁷

Decisions on endangered species must be made in real time, using currently available information, and such decisions by their very nature are urgent, as well as often politically controversial. The October 2013 status assessment conducted by the Fish and Wildlife Service was based on the best available scientific and commercial information, as required under the Endangered Species Act. Peer review confirmed the Service's proposal as accurately and correctly assessing the scientific evidence and properly recommending endangered status. It is highly unfortunate that opponents to the proposed listing, largely spokespersons for industries such as timber, oil and gas, and mining, as well politicians seeking to weaken the Endangered Species Act, have used misinformation and scare tactics to postpone the protection of this species, but evidence indicating the northern long-eared bat's precipitous decline is clear.

³ Amelon, S., and D. Burhans. 2006b. Conservation Assessment: *Myotis septentrionalis* (Northern long-eared bat) in the Eastern United States. In USDA Forest Service General Technical Report NC-260: Conservation Assessments for Five Forest Bat Species in the Eastern United States.

⁴ U.S. Fish and Wildlife Service, Proposed Rule.

⁵ Ibid.

⁶ Amelon and Burhans, Conservation assessment: *Myotis septentrionalis*.

⁷ The northern long-eared bat, like other bats, also has a naturally low reproductive rate, making recovery time long, even under optimal circumstances. See USGS, White-nose syndrome (WNS) http://www.nwhc.usgs.gov/disease_information/white-nose_syndrome/.

The Endangered Species Act is an invaluable tool for saving our most at-risk species from disappearing forever. Information pointing to the northern long-eared bat's downward trajectory has grown even more since the Service finished its assessment in 2013. As professional scientists, and as world citizens who value and understand the many benefits of species diversity and ecological health, we urge you, the stewards of the United States' most vulnerable wildlife, to act without further delay to protect the northern long-eared bat as endangered.

Thank you.

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