CENTER for BIOLOGICAL DIVERSITY Because life is good.

Nancy Sutley, Chair
Council on Environmental Quality
722 Jackson Place NW
Washington, DC 20506

April 11, 2012

Petition to Develop Guidelines for Federal Land Management Agencies to Prevent Further Spread of White-Nose Syndrome, a Disease Threatening North American Bat Species

Dear Chairwoman Sutley:

On behalf of the Center for Biological Diversity and its more than 350,000 members and online activists, we respectfully petition you to direct federal land management agencies to develop and adopt regulations for the management of caves to stop further spread of white-nose syndrome. In a wildlife crisis of unprecedented proportions, this newly emergent fungal disease has devastated bat populations across the northeastern U.S. and is spreading west. The U.S. Fish and Wildlife Service estimates that close to 7 million bats have died from white-nose syndrome in just five years. To date, the disease has affected six species in 20 states and four Canadian provinces. The loss of the insect-control services provided by millions of bats has the potential to cost American farmers billions of dollars. In a statement last week, Fish and Wildlife Service director, Dan Ashe, put it simply: "Bats are crucial to our nation's ecosystems and our economy."

Despite the severity of the crisis presented by white-nose syndrome, the response from federal land management agencies has been inconsistent and in many cases lackluster. In the eastern U.S., where the disease has already spread, most federal land agencies have enacted strict cave closures to slow human transmission of the bat-killing fungus. However, only a smattering of jurisdictions in the western U.S., where there is greatest risk of further spread, have passed protective regulations. Consistent regulations, including administrative closures of caves with bats, decontamination requirements for those people entering caves, and surveys to identify and recognize significant cave resources, are badly needed to prevent further spread of white-nose syndrome.

We seek your support and oversight in the case of this urgent environmental matter, and file this petition under the Administrative Procedure Act. In the event that your office chooses to deny our petition, we ask for timely notification, per the specifications of the APA, which states that "[p]rompt notice shall be given of the denial in whole or in part of a written application, petition, or other request of an interested person made in connection with any agency proceeding."[1]

[1] 5 U.S.C. § 555(e)

The threat of white-nose syndrome

White-nose syndrome is the "worst wildlife health crisis in memory."[2] Named for the fuzzy, white substance that sometimes appears on sickened bats' muzzles, white-nose syndrome is caused by a fungus previously unknown to science aptly named *Geomyces destructans.* Afflicting bats while they hibernate in caves and mines, the disease has caused regional mortality rates of 70 percent to nearly 100 percent. Multiple native bat species are at risk, and some may not persist in the future without human assistance. The disease first appeared in upstate New York in late winter 2006. Today it is confirmed in 19 states and four provinces,[3] and suspected in another state—a vast zone of infection stretching from Nova Scotia to Oklahoma. Scientists believe it is only a matter of time before the disease afflicts bats from coast to coast.

The threat of this bat disease is not confined to natural systems alone. American farmers depend on the free pest control services of insect-eating bats. Loss of bats in North America could result in between $3.7 billion and $53 billion in annual agricultural losses[4] and increased environmental impacts from additional pesticide use on crops. This winter, new reports of white-nose syndrome in Alabama, Missouri and other parts of the Midwest confirm the disease is well established in the American heartland and spreading.

The need for cave management

Although the exact mechanisms for spread of white-nose syndrome are not fully understood, there is strong evidence that humans visiting caves spread the disease and are likely responsible for its introduction to North America. A recent study confirms that the fungus that causes white-nose syndrome originated in Europe.[5] European bats suffer few ill effects from the fungus, which was discovered in Europe after the advent of white-nose syndrome in North America.[6] In contrast, North American bats have little resistance to the disease. Evidence that humans were the cause of the introduction of this novel organism from Europe includes the fact that bats do not migrate across the Atlantic Ocean;[7] no other animals are known to travel such long distances and also access caves as part of their life history; the fungus can grow on many different organic materials and will adhere to clothing and gear taken into an infected site; and the disease was first documented at a heavily visited commercial cave in upstate New York.[8] Although the disease is also spread among bats, all of the above evidence indicates it was introduced by people, specifically people who visited a cave or caves in Europe and then North America.[9]

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[2] "About white-nose syndrome," U.S. Fish and Wildlife Service White-nose syndrome web page. Accessed March 27, 2012. http://www.fws.gov/WhiteNoseSyndrome/about.html

[3] http://www.whitenosesyndrome.org/news/north-american-bat-death-toll-exceeds-55-million-white-nose-syndrome

[4] Boyles, J.G., P.M. Cryan, G.F. McCracken and T.H. Kunz. 2011. "Economic importance of bats in agriculture." Science 332 (6025): 41-42,.DOI: 10.1126/science.1201366 (Available at http://www.fort.usgs.gov/Products/Publications/23069a/23069a.pdf).

[5] "Fungus behind white nose syndrome, killer of millions of bats in N. America, came from Europe." Washington Post, April 9, 2012. Available at http://www.washingtonpost.com/national/energy-environment/fungus-behind-white-nose-syndrome-killer-of-millions-of-bats-in-n-america-came-from-europe/2012/04/09/gIQAlz1L6S_story.html. Accessed April 10, 2012.

[6] Blehert, D.S., J.M. Lorch, A.E. Ballman, P.M.Cryan, and C.U. Meteyer. 2011. Bat white-nose syndrome in North America. Microbe 6 (6): 267-273; Puechmaille, S.J. et al. 2011. Pan-European distribution of white-nose syndrome fungus (Geomyces destructans) not associated with mass mortality. PLOS One PLoS ONE 6(4): e19167. doi:10.1371/journal.pone.0019167.

[7] Castle, K.T. and P. M. Cryan. 2010. White-nose syndrome in bats. : A primer for resource managers. ParkScience 27(1) . Accessed 05 April 2012 from http://www.nature.nps.gov/ParkScience/index.cfm?ArticleID=395.

[8] Cave advisory, March 26, 2009. U.S., Fish and Wildlife Service. Available at: http://www.fws.gov/WhiteNoseSyndrome/caveadvisory.html

[9] "Bats do not naturally migrate between Europe and North America, so if G. destructans was recently introduced to the United States, it is highly unlikely that it arrived here on the wings of a bat without human assistance…The fact that the same fungus exists on two continents provides compelling evidence of long-distance, human-assisted spread." Castle and Cryan 2010, ibid.

The above evidence also indicates people are a likely source of further spread to new areas beyond the dispersal distance of bats, raising concern for the western United States and other regions. Already, the disease has shown patterns of spread that suggest humans are furthering the reach of the disease in North America. After its initial documentation in New York in 2006, the disease moved rapidly and discontinuously from New York and New England to the southern Appalachians by 2008. Moreover, records kept by caving groups show that cavers had visited the two different regions during this period.[10] In 2010, the bat-killing fungus showed up on a bat in a cave in western Oklahoma, over 900 miles from the closest known white-nose syndrome site. The known migration distances of bats do not exceed a few hundred miles.[11] These events provide strong evidence that humans are continuing to spread the disease to new areas.

Given the likelihood of anthropogenic spread of white-nose syndrome, particularly over long distances, it is essential that land management agencies take immediate action to prevent its further spread. In support of this conclusion, Dr. Jonathan Sleeman, director of the U.S. Geologic Survey's National Wildlife Health Center, the leading research center on white-nose syndrome, concluded in 2011: "It is always important epidemiologically to focus on preventable actions and the emphasis on control of human assisted transmission by the use of universal precautions seems to be a good 1st step."[12]

Accordingly, many land management agencies have taken action to stop further spread, including closing caves, requiring decontamination procedures and prohibiting the use of clothing or gear from infected areas. These actions, however, have been largely limited to the eastern half of the U.S., and elsewhere they are spotty and inconsistent. In particular, federal land units in the best position to prevent or at least slow the disease's spread have not, for the most part, taken any meaningful action to minimize risk of human transport of the white-nose fungus. The land units in the best position to take meaningful action to slow the disease's spread are located in regions **outside** the current, known white-nose syndrome zone, including the Southwest, Northern Rocky Mountains, Pacific Northwest, Pacific Southwest and Intermountain West.

In contrast, most federal land units within regions already afflicted with white-nose syndrome (the East, Midwest, and South) have closed caves to all but essential access since the spring of 2009. A number of state agencies in the eastern U.S. have also closed publicly owned caves since the advent of white-nose syndrome in North America. The Center strongly supports these actions and believes they are necessary to slow spread of the disease both out of and within the East. Several factors have made the effort to stop the disease in the East problematic, however.

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[10] Cave advisory, 2009, ibid. "The discontinuous nature of the rapid spread of WNS, especially to the most recently discovered sites in West Virginia and Virginia, suggests that something other than bat-to-bat transmission is contributing to the spread of WNS. The potential for the human-assisted spread of WNS is further supported by the fact that many of the recently affected sites are also popular destinations for recreational cavers, while many bat hibernacula in less-popular or inaccessible caves between the newly affected caves and those affected in 2008 remain unaffected. Records of caver movements also reveal a connection between sites in these affected regions, additionally suggestive of a link to human activity."

[11] Gardner, J. E. and Cook, E. A. (2002). Seasonal and geographic distribution and quantification of potential summer habitat. In The Indiana bat: biology and management of an endangered species: 9–20. Kurta, A. and Kennedy, J. (Eds). Austin, TX: Bat Conservation International; Tuttle, M.D. (1976). Population ecology of the gray bat (Myotis grisescens): Philopatry, timing and patterns of movement, weight loss during migration and seasonal adaptive strategies. Occ. Pap. Mus. Nat. Hist., Univ. Kans., 54:1-38.

[12] White nose syndrome, bats - North America: comment. Jonathan Sleeman, MRCVS Center Director USGS, National Wildlife Health Center. Accessed March 27, 2012. http://beta.promedmail.org/direct.php?id=20111001.2963

These factors include the disease's origination in the East; a lack of understanding regarding the disease's cause and mechanisms of spread early in the history of the epidemic; a limited proportion of public lands, and thus limited government ability to control human access to most caves; and the fact that bats themselves can gradually spread the disease.

In the western U.S., however, where the disease has not yet taken hold, there is a real opportunity to stop further spread of the disease with swift action. The federal government controls significant portions of every western state, ranging from nearly 30 percent in Montana to over 84 percent in Nevada. Thus, rather than waiting for white-nose syndrome to move west before taking action, it is imperative federal land managers take assertive and coordinated action now, to gain the best possible chance of preventing the western spread of the lethal bat disease.

The inconsistent nature of the federal land managing agencies' response to white-nose syndrome is well illustrated by the contrasting status of federal lands overseen by the U.S. Forest Service in Colorado, versus those managed by the Bureau of Land Management (BLM). After a suspect case of white-nose syndrome was reported in western Oklahoma in the spring of 2010, Region 2 of the Forest Service, which borders Oklahoma, enacted a region-wide cave closure in July of the same year. These lands include national forests and grasslands in Colorado, Kansas, Nebraska, South Dakota and Wyoming. The Colorado BLM, in contrast, still has not prepared a state-wide white-nose syndrome/cave management plan and has closed no caves as a precaution against the spread of the bat disease. In fact, in 2011, the BLM granted a permit for group tours associated with the annual convention of the National Speleological Society, held last year in Glenwood Springs, Colorado. The Colorado Division of Wildlife had recommended in its scoping comments to the BLM that permits not be granted for two of the caves, as they were documented bat hibernacula. Nonetheless, not only did the BLM grant the permits for the tours in these caves, the agency violated its own cave management plan for one of the sites by allowing more group visits than stipulated in the plan. The BLM ignored a request by the Center to enact emergency cave closures on Colorado BLM lands to protect them from an anticipated spike in usage associated with the national caving convention. In contrast, the Forest Service also granted permits for cave tours associated with the convention, but unlike the BLM, selected caves that were deemed not to harbor bats. In addition, an already-in-place, region-wide cave closure on national forest lands provided further safeguard for bat hibernating and roosting sites on Forest Service land during the convention.

Elsewhere in the western states, the federal response to white-nose syndrome has been extremely variable and inconsistent. For example, federal land managers in the Pacific Northwest have done extensive planning in advance of white-nose syndrome, but have largely eschewed cave closure as a tool for reducing the risk of fungal transport. In New Mexico, the Forest Service, BLM, National Park Service and the New Mexico Department of Fish and Game collaborated on a white-nose syndrome plan that included closures of approximately two dozen important bat caves. However, many more caves in New Mexico await inventory before the agencies consider further closures. For the most part, caves on BLM and Forest Service lands in Nevada, Utah, Arizona, California, Idaho, and Montana remain open to recreationists.

In January 2011, the Center issued a report on the status of western federal land cave closures and other efforts to respond to the threat of white-nose syndrome spreading to the West. At that time, we wrote:

> The limited extent of closures in the West to date leaves bat caves and mines on the vast majority of federal public lands open and vulnerable to the inadvertent transmission of WNS by people. These federal jurisdictions include the remaining regions of the U.S. Forest Service in the lower 48 (Southwestern, Northern, Intermountain, Pacific Northwest and Pacific Southwest); and virtually all Bureau of Land Management lands. The National Park Service has kept its popular show caves open in both the East and West, and appears to have few plans to alter this approach. [13]

More than a year later, virtually nothing has changed with regard to additional cave closures or other measures on the ground to prevent the human transmission of white-nose syndrome into the western U.S. Most western federal land managers have squandered another precious year that could have been used to implement closures, institute decontamination requirements, and inventory cave and bat resources. Given the ongoing rapid rate of spread, with white-nose syndrome now officially west of the Mississippi, as of April 2, 2012, and the continuing high mortality of bat populations, this inaction on the part of public land stewards is irresponsible and inexcusable.

White-nose syndrome presents a new, gravely urgent reason for federal land managers to directly grapple with long-standing issues surrounding human use of vulnerable cave habitat. For decades, scientists have cited human disturbance of bats in their hibernating and roosting sites as a leading threat to bat populations.[14] Human disturbance, both inadvertent and deliberate, is responsible for the complete disappearance of certain bat species in parts of their former ranges.[15] With white-nose syndrome, the need to protect vulnerable bat habitat from unnecessary entry and disturbance, as well as potential disease transmission, is more pressing than ever.

A glaring gap remains in the federal government's response to white-nose syndrome, an unprecedented wildlife epidemic. Cave closures on eastern federal lands, and limited closures in the West (the Forest Service's Rocky Mountain Region, most National Park Service units, and approximately two dozen caves in New Mexico) have been important, but to date, the federal government has failed to take the actions **most likely** to make a difference in the spread of the disease across the continent. Until a more aggressive , comprehensive and consistent approach is taken by western federal land managers, the federal government itself must be held responsible for any future outbreaks of white-nose syndrome that appear on western federal lands.

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[13] Center for Biological Diversity (2011). Bats, white-nose syndrome, and federal cave and mine closures. Available at: http://www.biologicaldiversity.org/campaigns/bat_crisis_white-nose_syndrome/pdfs/bat_report_jan2011.pdf

[13] E.g. "Human use [of caves] for both recreational and scientific activities is a well known culprit leading to the decline of bat populations." Cave Ecology. USGS/ Colorado Plateau Research Station. Available at: http://sbsc.wr.usgs.gov/cprs/research/projects/caves/threats.asp. Accessed April 6, 2012.

[15] Piaggio, A. 2005. *Corynorhinus townsendii*. Townsend's Big-Eared Bat. Species Account. Updated at the 2005 Portland Biennial Meeting of the Western Bat Working Group. Available at http://www.wbwg.org/species_accounts.

The need and basis for Council on Environmental Quality oversight

The halting and inconsistent response of federal agencies to white-nose syndrome, even five years after the crisis became widely known, calls out for leadership, initiative, and clear guidance at a higher level of government. The U.S. Fish and Wildlife Service, which is the main federal agency charged with managing wildlife, has closed access to caves on national wildlife refuges and last year, finally released a national plan for white-nose syndrome. These are important steps toward addressing the threat of white-nose syndrome, but the Fish and Wildlife Service lacks the authority to compel the primary land management agencies in the West, namely the Forest Service and BLM, to enact closures and other measures necessary to stem the further spread of the disease. Executive level action on the part of the Council on Environmental Quality (CEQ) is clearly required.

The basis for the CEQ's engagement with the white-nose syndrome issue lies in its essential function as overseer of the nation's environmental policy. The purpose of the National Environmental Policy Act, the CEQ's charter law, is, in part, to promote "efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man."[16] The loss of a substantial portion of the nation's insect-eating bat fauna to an exotic, invasive pathogen is undoubtedly an environmental calamity, with serious implications for the biosphere as well as various human enterprises. The charge of the CEQ, as representative of the executive branch of federal government, is to use "all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources…"[17] This role perfectly positions the CEQ to address the widespread biological crisis of white-nose syndrome through facilitation of coordinated action among federal agencies.

The authority of the CEQ to guide and promote adherence to the policies set forth in Section 101of NEPA may be manifested in a variety of ways, as delineated in Section 204. Relevant to our request regarding white-nose syndrome, these avenues for action include:

> …review and appraise the various programs and activities of the Federal Government in the light of the policy set forth in title I of this Act for the purpose of determining the extent to which such programs and activities are contributing to the achievement of such policy, and to make recommendations to the President with respect thereto[18];
>
> …conduct investigations, studies, surveys, research, and analyses relating to ecological systems and environmental quality[19]

and

[16] 42 U.S.C. § 4321
[17] 42 USC § 4331(b)
[18] 42 USC § 4344(3)
[19] 42 USC § 4344(5)

> …document and define changes in the natural environment, including the plant and animal systems, and to accumulate necessary data and other information for a continuing analysis of these changes or trends and an interpretation of their underlying causes.[20]

CEQ oversight of the federal white-nose syndrome response will enable the federal government to appraise how well it is responding thus far to the disease threat; to better coordinate implementation of the national white-nose syndrome plan; and to hasten the collection of data and information vital to development of potential treatments and more efficacious methods of controlling disease spread. Most importantly, it increases the likelihood the federal response to white-nose syndrome will actually diminish the harm caused by the disease, including slowing its spread, determining its cause, finding effective treatments, minimizing other harms to bats, and supporting recovery of species in the aftermath of the bat epidemic.

Management recommendations

Because of the severe threat posed by white-nose syndrome and the lack of a comprehensive and coordinated response, we petition CEQ to direct federal land management agencies to begin planning processes to enact regulations to stop the further spread of white-nose syndrome, including full compliance with NEPA. Specifically, CEQ should direct federal agencies to develop and enact regulations that will restrict non-essential human access to caves and abandoned mines utilized by bats, and require U.S. Fish and Wildlife Service white-nose syndrome decontamination protocols be followed by any persons entering caves and abandoned mines on federal lands, wherever agencies still allow access to occur.

Both the U.S. Fish and Wildlife Service and the USGS National Wildlife Health Center have strongly recommended restricting access to caves with hibernating bats, including in areas not yet affected by white-nose syndrome, and using decontamination procedures. The U.S. Fish and Wildlife Service issued a Cave Advisory in March 2009, that recommends "cavers avoid all caves and mines containing hibernating bats (hibernacula), even in states where WNS is not known to occur…"[21] The Service's latest decontamination protocol states:

> "In order to effectively reduce the risk for human transfer of G.d., **it is imperative that everyone follow these decontamination procedures any time you plan cave visits.** Under no circumstances should clothing, footwear or gear that was used in a WNS-affected state or region be used in a WNS-unaffected state or region."[22]

Likewise, a bulletin produced by the USGS states:

> "…infested caves and mines are potential sources for disease spread by humans that enter these sites and come into contact with fungal spores… standard procedures known as universal precautions can be implemented to reduce disease transmission and spread (Thrusfield, 2005; USDA National Animal Health Emergency Management System

[20] 42 USC § 4344(6)
[21] Cave advisory, March 26, 2009. . http://www.fws.gov/WhiteNoseSyndrome/caveadvisory.html. Emphasis added.
[22] White-nose syndrome decontamination protocols, February 2, 2011. Emphasis added. Accessed March 27, 2012. http://www.fws.gov/WhiteNoseSyndrome/cavers.html

> Guidelines: Biosecurity). These standard disease management procedures as applied to WNS include **decontamination procedures, equipment restrictions, and limitation of access to contaminated environments**. The primary objective for implementing universal precautions is to prevent human-assisted movements of pathogens to unaffected locations….[23]

Thus, the two federal agencies taking the lead on addressing the threat posed by white-nose syndrome recommend cave avoidance and decontamination procedures to avoid human transport of the white-nose fungus. The positions of these two agencies on the potential for human spread and the threat it poses to bats clearly demonstrate the need for comprehensive regulations across federal lands.

We further ask that CEQ direct agencies to conduct cave inventories on federal lands with the goal of identifying bat hibernating and roosting sites on federal lands. We ask that the federal agencies provide to CEQ cost estimates and timeframes for execution of such inventories. The purpose of the bat cave inventories is to help agencies focus now and in the future on the most important, vulnerable, or otherwise high-priority sites for protective measures for bats, potentially including: administrative closure, installation of bat-friendly gates, outreach and education efforts, law enforcement, and other actions.

Finally, we request that CEQ direct federal land agencies to identify and designate significant caves on the basis of use and occupation by bat species, per the provisions of the Federal Cave Resources Protection Act[24] and associated departmental regulations. Under Forest Service/USDA regulations, criteria for significant cave designation include "…seasonal or yearlong habitat for organisms or animals, or contains species or subspecies of flora or fauna native to caves, or are sensitive to disturbance, or are found on State or Federal sensitive, threatened, or endangered species lists."[25] Department of Interior regulations utilize virtually identical language to describe criteria for cave designation based on biotic features.[26] Criteria include "…seasonal or yearlong habitat for organisms or animals, or contains species or subspecies of flora or fauna that are native to caves, or are sensitive to disturbance, or are found on State or Federal sensitive, threatened, or endangered species lists."

Other actions

We further urge CEQ to convene a meeting of agency directors in order to foster coordination and cooperation in addressing the bat epidemic among the various federal land, wildlife, research, and agriculture agencies. The lack of top-level leadership and communication about the bat crisis among all relevant agencies has hampered progress on the white-nose syndrome response. A convening of agency leaders will facilitate development of the kind of consistency, coordination, and goal-sharing we are seeking with the various requests made in this petition. In a meeting with the director of the U.S. Fish and Wildlife Service, we learned that no such

[23] Ibid. Emphasis added.
[24] 16 U.S.C. §§4301
[25] 36 CFR § 290.3 (c) (1)
[26] 43 CFR §37.11 (c)(1)

director-level meeting of relevant federal agencies has occurred on white-nose syndrome, but that the director believes such a meeting would be useful.

We ask CEQ to require federal agencies to give additional consideration to how proposed activities may affect bat species, both listed and unlisted, when reviewing their actions under NEPA. It is crucial that federal agencies avoid additional harm to bats, either from direct impact or disruption of habitat. Surviving bat populations need to be as robust as possible in order to provide a better chance of recovery in the future. For example, the federally endangered Indiana bat (*Myotis sodalis*) has declined 72 percent in the northeastern United States over the last several years due to white-nose syndrome.[27] The disease is now becoming well-established in the Midwest, the core range of the species, and is likely to significantly reduce the total population of Indiana bats over the next few years. The species' habitat is found on federal lands stretching from New England to Missouri, and the bats are at risk from federal activities ranging from national forest logging and federally funded highway construction, to FERC-permitted energy pipelines.

Federal agencies need to consider impacts to Indiana bats and other white-nose syndrome impacted species early in their environmental analyses. Such action would help agencies to avoid unnecessary conflict due to a failure to understand and integrate the rapidly changing status of bat populations into their planning. Where WNS is or may soon be affecting bat species, especially listed species, CEQ should formulate guidance instructing agencies to prepare complete environmental impact statements (EISs), not mere environmental assessments (EAs). EAs frequently fail to capture the effects of agency actions on bats already being impacted by WNS. For example, the Shawnee National Forest recently suggested preparation of an EA for a proposed land exchange but failed to adequately describe impacts to listed Indiana bats during scoping.[28] The Monongahela and Ozark National Forests have both recently proposed timber sales that will affect Indiana bats.[29] On the Monongahela sale, an EA was written and impacts to Indiana bats were not properly assessed. In scoping on the Ozark sale, an EA is proposed and, again, impacts to Indiana bats are not properly addressed. If NEPA analysis continues systematically to fail to capture impacts to WNS-affected species, we would expect the Environmental Protection Agency or FWS to formally register their concerns.[30] Your assistance in assuring that bat issues are raised early and adequately in proposals with the potential to affect bat habitat and/or white-nose-syndrome affected species will help minimize harms to the human environment, and improve the chances that bats will remain significant providers of insect-control services in both natural and agricultural landscapes.

Finally, we request that CEQ staff meet with us at your earliest convenience to discuss the issues and appeals for action in this petition. We would appreciate the opportunity to answer your questions and provide further background on the truly unprecedented wildlife crisis that white-nose syndrome has precipitated.

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[27] Turner, G.G., D.M. Reeder, and J.T.H. Coleman. 2011. A five-year assessment of mortality and geographic spread of white-nose syndrome in North American bats and a look to the future. *Bat Research News*, 52(2): 13-27.

[28] "A Land-for-Land Exchange between American Land Holdings of Illinois, LLC and the Shawnee National Forest." Proposed Action, Shawnee National Forest, December 2011.

[29] Monongahela National Forest, Upper Greenbrier North Final EA and FONSI, March 5, 2012; Ozark National Forest, Indiana Bat Habitat Restoration Project Scoping Notice, March 8, 2012.

[30] *See* 42 U.S.C. § 7609(a) and 40 C.F.R. § 1504, respectively.

Although bats are often unfairly maligned and misunderstood animals, they play a key role as the major predators of night-flying insects in North America. The future of our bat species and their freely provided, nontoxic pest-control services depends directly on whether government's actions today are swift, coordinated, and efficient, or whether they continue to bog down from a dearth of top-level commitment and communication among our land, wildlife, and agriculture agencies.

We call on your help, Ms. Sutley, to assist the Administration's top natural resource appointees in coming together in a consistent, coordinated, and productive fashion, while such action still has the chance to make a difference.

Thank you so much. We look forward to your response.

Sincerely,

Mollie Matteson, Conservation Advocate

Bill Snape, Senior Counsel

Cc:
Dan Ashe, Director, U.S. Fish and Wildlife Service
Lisa Jackson, Administrator, Environmental Protection Agency