

In Support of the Listing of the Northern Long-Eared Bat as Endangered Under the Endangered Species Act

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

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

August 28, 2014

Dear Secretary Jewell and Director Ashe:

We undersigned organizations are writing to express our support for the proposed rule, published by the U.S. Fish and Wildlife Service (FWS) on October 2, 2013, to list the northern long-eared bat (*Myotis septentrionalis*) as endangered (78 FR 61045).

The northern long-eared bat warrants designation as endangered under the Endangered Species Act. Populations of the species have plummeted as a result of the bat disease white-nose syndrome (WNS). In the northeastern United States, where WNS has been present longest in North America, winter and summer surveys demonstrate that the northern long-eared bat has declined by more than 90 percent. The Northeast is also the region in which the species was historically most abundant; declines there have a disproportionately large impact, therefore, on the species' overall status. Moreover, no solution yet exists for WNS. So long as this is the case, the disease will likely spread and cause similar mortality among northern long-eared bats in other regions. Although the primary threat to the northern long-eared bat is WNS and not human activity, it is an established biological principle that small populations of a species are more vulnerable to discrete threats than large populations are. For that reason, the severely reduced northern long-eared bat population is more at risk from human activities than it was prior to WNS, and FWS is correct to safeguard the species against them.

We take issue with the claims of those calling for FWS to list the northern long-eared bat as threatened rather than endangered. Population declines of more than 90 percent in the core of its range, with more declines predicted due to WNS, constitute a present "danger of extinction throughout all or a significant portion of its range." The decreases do not represent a mere "[likelihood] to become an endangered species within the foreseeable future throughout all or a significant portion of its range." In other words, for the northern long-eared bat, endangerment is not just a possibility on the horizon – endangerment is already here.

In addition, there are currently no Candidate Conservation Agreements, Safe Harbor Agreements, state-level conservation plans, or other regulatory frameworks that even partially address the northern long-eared bat's urgent conservation needs. This further underscores the necessity of federal endangered status for the species.

Given the precipitous rate at which northern long-eared bats are dying, we are disappointed that FWS has extended its listing determination by six months, from October 2, 2014, to April 2, 2015. We hope you will issue the final rule without further delay.

Thank you for using the best available science in your assessment, and making the appropriate recommendation for listing the northern long-eared bat as endangered under the Endangered Species Act. Please now take the next step in protecting this vulnerable species by publishing a final rule by April 2, 2015, to list it as endangered.

Sincerely,

Allegheny Defense Project
Ryan Talbott, Executive Director
Kane, PA

Animal Welfare Institute
Cathy Liss, President
Washington, DC

Center for Biological Diversity
Mollie Matteson, Senior Scientist
Richmond, VT

Conservation Congress
Denise Boggs, Executive Director
Livingston, MT

Defenders of Wildlife
Jamie Rappaport Clark, President and CEO
Washington, DC

Endangered Species Coalition
Leda Huta, Executive Director
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Friends of the Bitterroot
Larry Campbell, Conservation Director
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Friends of the Clearwater
Gary Macfarlane,
Ecosystem Defense Director
Moscow, ID

Friends of the Cloquet Valley State Forest
Kristin Larsen, Executive Director
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Indiana Forest Alliance
Jeff Stant, Executive Director
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International Fund for Animal Welfare
Jeff Flocken, IFAW Regional Director -
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Juniata Valley Audubon Society
Laura Jackson, President
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Kentucky Heartwood
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Massachusetts Forest Watch
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National Speleological Society
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Natural Resources Defense Council
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RESTORE: The North Woods
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Save Our Allegheny Ridges
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Wild South
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