



National Caves Association

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Laurie Ross
Natural Resources Board Liaison
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Dear Laurie,

Please review the following:

1. Gregory S. Beckler, Ph.D. VP National Caves Association, WNS Committee Chair
2. National Caves Association (NCA)
3. Opposition to Request adoption of emergency Order IS- 49-1 O(E) and authorization for public hearings on proposed permanent Order IS-47-1 O, revisions to ch. NR 40, related to white-nose syndrome management in bats as written.

Reasons for opposing the above listed emergency order and revisions are listed below.

The National Caves Association is an organization made up of the premier show caves across the U.S.A. Over 9 million visitors annually are allowed to visit and become educated on these unique and special underground environments.

The owners and managers of the show caves have always been proud of the stewardship of these national treasures and have long led efforts for bat conservation. It has been through our efforts of displaying our caves and providing information on bats that have allowed the general population to appreciate the importance of bats to both the cave ecosystem and our own health.

The effect of WNS on the bat population has been devastating, both for the bats and for the cave owners. We quickly formed contacts within other organizations such as Bat Conservation International (BCI) and the National Speleological Society (NSS). See our Association's web page link to these groups: <http://cavern.com/links/>. The NCA has put together a Poster and brochure on the "Importance of Bats" with emphasis on WNS and listing both BCI & NSS as organizations to which donations can be paid for research on WNS. Each show cave has been provided this important educational tool. Many of the show caves are also collecting money from the sale of special bat merchandise and then donating it to these organizations.

All state and national organizations making rulings regarding controlling or preventing WNS can certainly use the show cave industry educational abilities to help the public understand the importance

of caves, their inhabitants (which includes bats and many other species, some of which are listed as federally endangered) and WNS.

ANY decisions made regarding WNS must not harm any of the other cave residents and ecosystem or the ability of people to understand and help stop the spread of WNS (including the use of the cave to do so).

We have reviewed all the state and federal plans which are being developed to date. Most do NOT consider blanket closures or removing bats (or the killing of bats) as control measures. All caves in these plans are not considered equal, but are identified if they even have bat populations and if they are used as a hibernaculum. These factors are then used to make scientific based decisions for preventing or containing WNS and the use of the caves by people under appropriate measures.

The main opposition to the wording of the emergency order is not enough is scientifically known to make the proposed order.

For example, although the fungus *Geomyces destructans* may well be the causative agent for WNS, it has yet to be shown to be so, even after 4 years of study. It indeed is associated with WNS, but let us not forget the early years of AIDS when strange fungal diseases emerged and only later it was determined that they were secondary effects of a compromised immune system caused the HIV virus.

Therefore, to propose severe measures to control *G.d.* when it yet has been proven to be the causative agent appears to be unscientific.

Also, if and when *G.d.* enters Wisconsin, it may well end up not just in caves, but in attics, churches, bridges, trees in peoples' back yards etc. According to the wording of the order, the DNR could take all appropriate measures to prevent the spread of *G.d.* at all these locations.

Wisconsin is the only state suggesting such approaches and with the current scientific knowledge available, we oppose this wording and order.

We suggest that the other state plans, such as Missouri, Georgia, Virginia, & Alabama be reviewed and considered as an approach. In addition, in our opinion, the most comprehensive and scientifically reasonable plan written to date, was by Tom Aley and published in NSS News, entitled:

Management Strategies for Responding to White-Nose Syndrome In

Bats , go here for a link to this article

(<http://caves.org/WNS/WNS%20February2010NEWSwmsarticle.pdf>).

Thank you.

Greg Beckler