



Dollars spent by an agency on a particular subject are not an appropriate yardstick for measuring a project's suitability, worth, or conservation benefit. The first and primary consideration is whether or not the work's implementation causes harm to the resource it purports to be addressing. Given that in many regions of the country, there is no reliable information of bat population size or distribution, this should be a critical component of the decision making process. The current blanket approach, where all areas are considered to be equal, is without scientific merit, unconscionable, and demonstrates an apparent lack of any understanding of bat ecology.

We know hibernacula disturbance during the hibernation period is detrimental to bats. Such disturbance can take the form of ill-timed agency surveys, collection of various types of data or material, and visits by members of the public for innocent or harmful purposes. Disturbance can cause death from exposure, starvation, and abandonment of potentially critically important habitat. To consider bat hibernation in South Dakota the equivalent of hibernation in more temperate regions of the country demonstrates an unbelievable disconnect from climatic reality.

Hibernacula disturbance works against bat conservation. In some instances, it may serve to reduce populations to levels from which they may not be able to recover. This is particularly true given that, currently, no meaningful management recommendations will result from any results obtained, aside from updating the U.S. Fish and Wildlife Service's White-nose Syndrome map. Let those qualified in relevant fields (e.g., animal diseases, mycology, etc.) AND in conjunction with qualified bat biologists/ecologists, do their work. Widespread disturbance will serve to make the problem worse.

State wildlife agencies, among others responsible for wildlife and habitat stewardship, evaluate many requests for research and management purposes. While each project proponent believes their work is justified, potential benefits must be weighed against possible harm to the resource in a way that also evaluates cumulative effects of other activities or threats. Land managers responsible for bat habitat should re-read the first line of this message and seek out qualified guidance, ask questions regarding methodology, timing, and alternatives that might provide the data being sought without putting the resource at risk.

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