

**DECISION RECORD**  
**White-Nose Syndrome Adaptive Management Strategy**  
**DOI-BLM-CO-931-2014-0001-EA**

**Decision:**

The White-Nose Syndrome (WNS) Adaptive Management Strategy Environmental Assessment (EA) has been reviewed for the direct, indirect and cumulative effects of the proposed activities. We have also reviewed the project record for this analysis. The effects of the Proposed Action and alternatives are disclosed in the Alternatives and Environmental Consequences sections of the EA. The EA also outlines a response plan in the event of WNS introduction within the identified area. The strategy is intended to reduce the potential of human-assisted introduction of WNS in BLM-administered caves and abandoned mines in Colorado. We have determined that the WNS Adaptive Management Strategy and response plan as described in the EA will not significantly affect the quality of the human environment. Accordingly, we have determined that the preparation of an Environmental Impact Statement is not necessary.

It is the BLM's decision to implement the Proposed Action, as amended. The Proposed Action would apply to all known and undocumented BLM caves in Colorado and all cave management plans.

The Proposed Action uses an adaptive approach to manage caves and abandoned mine lands to respond to the dynamic nature of the fungus *Pseudogymnoascus destructans* (Pd) that causes WNS (hereafter referred to as Pd/WNS) introduction and spread. It also supports the continued collaboration between the BLM and the Colorado caving community. This alternative consists of two parts:

- 1) Efforts to reduce the likelihood of human-caused introduction of Pd/WNS into biologically important BLM-administered caves and abandoned mines:
  1. Actions included in the No Action Alternative will continue to be implemented.
    - Coordinate outreach with appropriate internal and external stakeholders.
    - Identify caves/abandoned mines with important bat resources.
    - Continue to conduct inventory of bat presence during abandoned mine lands surveys.
    - Assess need for administrative or physical closures.
    - Identify WNS surveillance locations.
    - Adhere to current containment and decontamination protocols, and applicable addendums. The most current U.S. Fish and Wildlife Service (USFWS) decontamination protocol is available at [www.whitenosesyndrome.org](http://www.whitenosesyndrome.org).
    - Participate in and support WNS research.
  2. All caves will remain open to the public unless previously closed through a land use management plan decision.
  3. All people entering any cave or abandoned mine on BLM lands will be required to follow the latest USFWS decontamination protocols ([www.whitenosesyndrome.org](http://www.whitenosesyndrome.org)). The State of Colorado has developed an addendum to the USFWS decontamination protocol that states decontamination

does not need to occur at sites that are less than 10 miles from the cave feature or site where decontamination of gear being used was last conducted. The BLM will adhere to this addendum for decontamination protocols on BLM lands (see Appendix 1).

4. Caving gear and clothing from caves or sites within states or other countries where Pd/WNS has been documented is prohibited in accordance with WNS Working Group guidelines ([www.whitenosesyndrome.org](http://www.whitenosesyndrome.org)).
5. The BLM will work closely with caving groups, other interested stakeholders and Colorado Parks and Wildlife (CPW) to identify “biologically important” (Table 1) caves and abandoned mines for bat resources. In order to identify “biologically important” caves and abandoned mines, priorities for the BLM include sharing of data (such as cave/mine locations, prior biological surveys, amount of human use, recent observations) via a BLM-administered voluntary online reporting system and collaboration to accomplish needed survey work. Without this cooperation, the BLM will have to make management determinations using limited information.

*Table 1. Criteria of caves that are considered biologically important bat sites. If either Criterion is met the site will be considered biologically important.*

**Criterion A:** A biologically important bat roost includes any hibernaculum, maternity roost, transient roost, bachelor colonial or day roost, or fall swarming sites used two or more consecutive years by bat species that are one or more of the following: gregarious roosters, hibernators, or are known to swarm in Colorado. This use can be documented by state and federal monitoring efforts.

**Criterion B:** Cave and mine roosting species that are either ESA-listed, or BLM Colorado state-listed sensitive species. Five bat species qualify under this criterion as BLM-designated sensitive species.

- 2) A response plan in the event that Pd/WNS is detected/confirmed within 100 miles of BLM Colorado-administered lands will implement needed closures in important bat habitats within the state while collaborating with key stakeholders such as CPW, Colorado Cave Survey and local Colorado cave grottos.

This applies if Pd/WNS is detected and confirmed on BLM-administered lands or other federal (Forest Service, Park Service, USFWS Refuge), state or private lands in Colorado within the buffer distance. It also applies if Pd/WNS is detected in an adjacent state near BLM-administered lands in Colorado within the buffer distance.

1. All caves and abandoned mines that have been identified as biologically important to bats will be temporarily closed through a *Federal Register* notice within 100 miles of the confirmed detection. The BLM will continue to work with CPW in implementing their WNS response plan (<http://wildlife.state.co.us/SiteCollectionDocuments/DOW/Research/WildlifeHealth/WNSResponsePlan.pdf>), which increases surveillance and monitoring within a 10-mile radius of the initial detection.

2. All closures would be in effect for one calendar year. At the end of this time, the BLM would evaluate the need to continue this closure or re-open the resource. The public will be notified of closures through *Federal Register* notices and other relevant media. Other actions may include signage or structures at BLM field offices, trailheads, closed locations or areas and BLM webpages.
3. Exemptions to the closure will include;
  - Search and rescue efforts;
  - BLM-approved research/survey/monitoring efforts; and
  - Tribal ceremonies, rituals, or other culturally important events.

All proposals for cave/mine research, survey, or monitoring must be submitted in writing to and approved by the appropriate BLM field office prior to entry. This will ensure the proposed activity is beneficial to BLM resources. All closure exemptions will be required to follow decontamination protocols as outlined in this document.

4. The BLM will prioritize coordination efforts with other agencies, landowners, and key stakeholders (including recreational caving advocates such as the Colorado Cave Survey and associated grottos) on identification of caves where people recreate to determine bat presence and biological importance in the areas closest to the detected and confirmed presence of Pd/WNS. This determination will be based on the definition of biologically important sites as defined in Part 1 of the Proposed Action. Initial determinations of biological importance will be based on current data. This information, collected through collaborative efforts, will be updated through research, future monitoring results and on-line reports.

#### **Rationale for Decision:**

The BLM developed the Proposed Action in accordance with the National Environmental Policy Act (NEPA), articulated in Section 101 of NEPA and implemented through regulations, policies and guidelines issued by the Council on Environmental Quality at 40 C.F.R. 1500. The Proposed Action alternative, as amended, would help reduce the human-assisted introduction and spread of Pd/WNS and related bat mortality, and enable the BLM to respond in a timely and effective manner in the event Pd/WNS is detected and confirmed in Colorado. The Proposed Action also encourages BLM Colorado to work closely with our state and federal partners along with the caving community. Additionally, the Proposed Action is consistent with the *National Plan for Assisting States, Federal Agencies, and Tribes in Managing White-Nose Syndrome in Bats* and other national and state WNS policies.

#### **Authorities:**

- The Federal Land Policy and Management Act of 1976, as amended, Public Law (P.L.) 94-579 (43 United States Code (U.S.C.) 1701 *et seq.*);
- The Federal Cave Resources Protection Act of 1988 (FCRPA), as amended, PL 100-691(16 U.S.C. 4301 *et seq.*);
- BLM Manual 8380;
- Cave and Karst Resources Management;
- Title 43 Code of Federal Regulations (C.F.R.), Part 37 – Cave Management;

- 43 C.F.R. § 2392.26 (all), Permits for Recreation on Public Lands;
- Visitor Services, Closure and Restriction Orders - 43 Code of Federal Regulations (C.F.R.), Section 8364.1;
- BLM Washington Office Instruction Memorandum No. 2010-181, "White-nose Syndrome," 8/19/2010;
- A National Plan for Assisting States, Federal Agencies, and Tribes in Managing White-Nose Syndrome in Bats, United States Fish and Wildlife Service, May 2011.

**Conformance and Compliance:**

This decision has been reviewed and has been found to be in conformance with all existing BLM Colorado Resource Management Plans, as amended.

**Alternatives Considered:**

The EA considered two alternatives in detail: the No Action Alternative and the Proposed Action. The No Action Alternative was not selected since it does not provide an effective response plan in the event that Pd/WNS is detected and confirmed in Colorado. An alternative to close all caves on BLM lands was considered but not analyzed in detail because the decontamination protocols provide effective prevention of human-transported Pd/WNS, there is lack of scientific consensus regarding the human-spread of Pd/WNS, and it is not consistent with current BLM cave management policy.

**Public Involvement and Comments:**

The BLM offered a 30-day public scoping period from March 28, 2013 to April 26, 2013. Throughout the scoping period, the BLM sought public input on issues and management actions that should be considered in the EA. The BLM issued a press release announcing the scoping period and sent letters requesting comments to relevant government agencies, elected officials, non-governmental organizations, recreational caving groups and industry associations.

The BLM received scoping comments from the United States Forest Service (USFS), CPW, the Colorado Cave Survey and individual members of the caving community. Letters received during the scoping period generally expressed support for an adaptive management approach and provided specific comments on management actions that the BLM should pursue. The BLM considered all scoping comments received and incorporated many actions suggested by commenters into the White-Nose Syndrome Adaptive Management Strategy and Environmental Assessment. In addition to the comments received, the BLM also met in-person with those groups that provided written comments to get additional input on the Proposed Action.

The BLM provided the public a 30-day period from April 21, 2014 to May 22, 2014, to comment on the EA. The BLM received nine comment letters from cavers in Colorado, the National Speleological Society, the Center for Biological Diversity, Bat Conservation International and CPW. The final EA reflects minor language changes based on these comments.

**Protest/Appeal Language:**

This decision shall take effect immediately upon the date it is signed by the Authorized Officer and shall remain in effect while any appeal is pending unless the Interior Board of Land Appeals issues a stay (43 C.F.R. 2801.10(b)). Any appeal of this decision must follow the procedures set

forth in 43 C.F.R. Part 4. Within 30 days of the decision, a notice of appeal must be filed in the office of the Authorized Officer at the Colorado State Office.

  
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Ruth Welch  
State Director, BLM Colorado

August 29, 2014  
Date