

Public Comments and DNR Responses to Proposed Guidance Rehabilitation Guidance for Bats in Wisconsin

The DNR received comments from the following individuals and or organizations:

EM	Eric McMaster
PP	Peggy Popp
WHS	Wisconsin Humane Society

The Rehabilitation Guidance for Bats in Wisconsin (Guidance) was developed by the Department to allow rehabilitation of bats in Wisconsin following the cessation of bat rehabilitation when white-nose syndrome was discovered in the state in spring, 2014 per Wisconsin's White-nose Syndrome Implementation Strategy.

This policy is based on actions stated in Wisconsin's White-nose Syndrome Implementation Strategy and draft National guidelines for rehabilitation of bats infected with white-nose syndrome.

The Guidance was posted on the Proposed Program Guidance website on October 22 and comment period ended 21 days later on November 12.

EM Comment 1: Page 5, Carcass Disposal, 2nd bullet point: Disposable items, aka trash, is specified that it needs to be sprayed with disinfectant before discarding but bat carcasses only need to be double bagged? Is this correct?

DNR response: No, the USFWS video on "How to dispose of a dead bat" recommends that disposable gloves be used and the bag should be sprayed with disinfectant prior to discarding, which is the Department's position. The proper edits have since been made in the Document to accurately address this concern.

EM Comment 2: Page 7 Appendix A White-nose syndrome Pre-screening: For the UV test, the document should specify if the UV is long wave (common blacklight), mid wave, or short wave.

DNR Response: The protocol on page 7 does indicate that UVA long-wave light is recommended.

EM Comment 3: Page 4, Disinfection Protocols item 4: The document says to change the furnace filter monthly. How about specifying the use of an air filter that will trap spores and changing when dirty? Most filters use the MERV scale.

DNR Response: The Document has since recommended that home filters have at least an 8 rating on the Minimum Efficiency Rating Value (MERV) chart and should be replaced according to suggested lifetime of filter.

EM Comment 4: Page, Appendix D: Would prefer using a radius from a known or suspected site instead of county lines.

DNR Response: The Department sought input from rehabilitation community on preferences and feasibility. Appendix D has been updated to reflect the opinions of those who provided input while maintaining boundaries to minimize human-assisted transportation of bats.

PP Comment 1: My primary interest is infants and juveniles. How likely are infants to be infected with the fungus? Should/could they receive a special dispensation or set of rules?

DNR Response: The guidance will allow for the rehabilitation of all bat species in the active months (5/1-9/30) which overlaps when infants and juveniles might be found. Studies have shown the causative fungus to be environmentally persistent and researchers in New York were able to isolate the fungus from juveniles in bat houses. Given this information, juveniles could act as carriers of the fungus.

PP Comment 2: Page 2, Admission for care, 2nd bullet point: At this time, rehabilitators are allowed to admit only those bats captured in their designated region (see Appendix D). If a facility receives a call from a region not their own, the facility should locate and contact a closer rehabilitator to admit the animal. It makes more sense to me to seek out the closest available licensed rehabbers rather than the arbitrary regions, especially given the strict quarantine rules and restriction that the animal be released within 2 miles of origination

DNR Response: The Department sought input from rehabilitation community on preferences and feasibility. Appendix D has been updated to reflect the opinions of those who provided input while maintaining boundaries to minimize human-assisted transportation of bats.

PP Comment 3: Page 3 Quarantine, Isolation, and Handling Procedures: The bat quarantine area must be a separate, contained room housing only cave bats (e.g. little brown bat, Northern long-eared bat, big brown bat, and eastern pipistrelle [tricolored bat]). Outside flight-conditioning cages should be separated from other species by a minimum of 20 ft. Is it important the bats be separated only from other bats, or from all animal species?

DNR Response: Bats should be kept separate from other animals, even separated (by rooms) between different cohorts (tree vs. cave bats). It is important to properly disinfect and/or change clothing between animals.

WHS Comment 1: Inconsistency within the document related to what bats species can be rehabilitated and which species cannot be rehabilitated.

DNR Response: The Document has now been updated to maintain consistency as to what species are allowed to be rehabilitated and during what time period.

WHS Comment 2: Page 1, par 3: What would you like the rehabilitator to do with the bat if a finder walks in with a *Myotis*?

DNR Response: Appendix F has now been added, which describes the Immediate Action for *Myotis* or *Perimyotis* arriving at facilities (11/1-4/30).

WHS Comment 3: If tests were submitted for bats (i.e. *Myotis* after their 30 day quarantine), and those tests were returned clean – how long would those bats need to be isolated before being co-mingled with other non-releasable bats (of same genus)?

DNR Response: If the individual is quarantined for the 30-day period and tests come back negative, then no additional time is needed to introduce it into a non-releasable colony.

WHS Comment 4: Page 2, Admission for care, 3rd bullet point: We suggest a clarification in the document to specify whether just cave-bat species or all bat species admit records must be submitted on the Wisconsin Wildlife Rehabilitation Database on a monthly basis.

DNR Response: All bat species information should be updated monthly in Wisconsin Wildlife Rehabilitation Database.

WHS Comment 5: Page 3, Transportation, 4th bullet point: We think some clarification of the final point under Transportation is needed, “Bats should be transferred to wildlife rehabilitators outside of the bat care facility and the box should not be opened until inside a dedicated quarantine room.”

DNR Response: Bats should be transferred to wildlife rehabilitators outside of the bat care facility and the box should not be opened until inside an exam room to determine species identification and final designated room (tree or cave bat room).

WHS Comment 6: Page 3, Quarantine: “The bat quarantine area must be a separate, contained room housing only cave bats”. We could use some clarification here – if this means quarantine of just cave bats, no foliage-roosting bats and no other species”.

DNR Response: The quarantine procedures apply only to cave bats.

WHS Comment 6: Page 3, Quarantine, 2nd sentence: “Outside flight-conditioning cages should be separated from other species by a minimum of 20 ft.” Please specify – does this mean just bat species or all animal species?

DNR Response: The outside flight conditioning cages should be separated from other bat species by a minimum of 20 ft.

WHS Comment 7: Page 3, Quarantine, 3rd bullet: “All bats entering the rehab facility from November 1 through April 30 must be held in the quarantine room for a minimum of 30 days before being transferred into a pre-release flight cage or holding cage.” We very strongly feel that an exception should be made that if the decision for release is granted, then regardless of quarantine day, all visibly-healthy bats should be released.

DNR Response: All bats entering the rehab facility from November 1 through April 30 must be held in quarantine for a minimum of 30 days before being transferred into a pre-release flight cage. Bats admitted from April 1 through April 30 may be released after April 30 if and when WDNR deems release is possible in spring.

WHS Comment 8: Page 4, Quarantine, 6th bullet: Please define what constitutes “protective clothing”.

DNR Response: Bats must only be handled using protective disposable exam gloves and wearing an outer layer dedicated as protective clothing (coveralls and/or pants, shirts and boots) that should be removed prior to exiting the room. Disposable shoe covers or rubber boots that can be cleaned and disinfected are recommended.

WHS Comment 9: Page 4, Quarantine, 7th bullet: May disposable shoe covers be used as a total replacement for foot baths?

DNR Response: In replace of foot baths, disposable shoe covers can be used and discarded when leaving the quarantine room.

WHS Comment 10: Appendix D: We would like our region (Southeast Region) to only include Ozaukee, Washington, Waukesha, Walworth, Racine, and Kenosha counties.

DNR Response: The Department sought input from rehabilitation community on preferences and feasibility. Appendix D has been updated to reflect the opinions of those who provided input while maintaining boundaries to minimize human-assisted transportation of bats.

Prepared by J. Paul White, Mammal Ecologist

Dated: November 13, 2014