



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington DC, 20004



In Reply Refer To:

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Memorandum

To: Regional Directors

From: Assistant Director - Ecological Services

Subject: Research as a Mitigation Option for Wind Power HCPs Affecting White-nose Syndrome-impacted Bats

This memo serves to establish that funding research is an acceptable mitigation option for wind power Habitat Conservation Plans (HCPs) that cover bat species affected by white-nose syndrome.

While research is generally not an acceptable form of mitigation for most impacts to fish, wildlife, and their habitats, the recent 2023 FWS Mitigation Policy (501 FW 2, Appendix 1) states that “(i)n rare circumstances, research or education that is directly linked to reducing threats, or that provides a quantifiable benefit to the species, may be included as part of a mitigation package” (Part 6.6.3.2, pg. 14). Research related to the cause, effects, and remediation of white-nose syndrome on affected bat species, or to technology that can reduce the effects of wind power projects on white-nose syndrome impacted bats, present such circumstances.

To have the most impactful conservation for white-nose syndrome-susceptible bats, we need to continue our efforts to better understand the disease, their major threat, and our search to develop effective tools and strategies to combat it. Therefore, additional research into understanding and managing white-nose syndrome is necessary. Additionally, research that increases our understanding of the impact of white-nose syndrome on susceptible bats, including population trends and distribution of survivors in the summer, for example, will help refine and improve conservation measures. The Service has long recognized the importance of funding research relating to white-nose syndrome for recovery of the bats affected by this devastating disease and for years has funded white-nose syndrome research through our annual appropriations. We have a well-established, national program for identifying research needs and funding high quality research projects through multiple grant programs.

Emerging technology and techniques to reduce fatalities at wind energy facilities are also being developed and tested. More research into these new technologies and their effectiveness is appropriate as mitigation for bat species affected by white-nose syndrome, provided a

commitment exists to implement the improved methods resulting from the research. Some promising examples include smart curtailment strategies (using technology to optimize wind turbine operations and minimize bat fatalities) and improved bat deterrents (to aid in the development of reliable minimization measures).

We are forming a team consisting of subject-matter experts and representatives from affected Regions and Headquarters to develop sideboards for research to assist applicants and practitioners as well as to ensure consistency. The team will also develop guidance to incorporate into the HCP handbook. In the interim, the Service's White-nose Syndrome Program can provide assistance and coordination related to research funding as mitigation for pending wind HCPs. Please contact Jeremy Coleman, National White-nose Syndrome Coordinator (jeremy_coleman@fws.gov) for additional information.

Please contact Elizabeth Maclin (elizabeth_maclin@fws.gov) with any questions related to using research as a mitigation option for wind power HCPs affecting white-nose syndrome-impacted bats.