



United States Department of the Interior

FISH AND WILDLIFE SERVICE



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To Whom It May Concern:

The U.S. Fish and Wildlife Service (Service) is providing recommendations regarding assessing roadway transportation structures for use by bats in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont (collectively, New England). The positions in this letter are based on the Service's "Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines" (USFWS 2024; Guidelines) and the best available information on use of bridges and culverts by bats in New England. We are submitting these comments pursuant to section 7 and section 10 of the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.). This letter applies to projects involving bridge and culvert work that may affect the Indiana bat (*Myotis sodalis*; IB), northern long-eared bat (*Myotis septentrionalis*; NLEB), or tricolored bat (*Perimyotis subflavus*; TCB).

This letter only addresses the likelihood of the IB, NLEB, or TCB using a bridge or culvert in New England. This letter can support effects determinations pursuant to section 7 or 10 of the ESA but does not by itself constitute compliance with the ESA. Agencies and project proponents still need to evaluate other potential direct effects (e.g., tree removal) or indirect effects (e.g., light, noise, habitat fragmentation) of an activity on the species or their habitats.

There is no standard definition of bridges or culverts across New England states. For the purposes of this document, we are using the Federal Highway Administration's definition of a bridge at 23 CFR 650.305¹. Generally, a bridge has a span greater than 20 feet, and a culvert has a span of 20 feet or less.

Summary of Conclusions

We determined that the likelihood of IB, NLEB, and TCB using most bridges and culverts in New England is discountable. Therefore, except for the structures and locations listed in Table 1,

¹ <https://www.ecfr.gov/current/title-23/chapter-I/subchapter-G/part-650/subpart-C/section-650.305>. Accessed February 4, 2026.

bridge and culvert surveys are not needed in New England to determine whether IBs, NLEBs, or TCBs are using those structures. See Appendix A for a flow chart survey decision tool.

Table 1. Surveys are necessary in the counties and the structure types identified in this table to discount the presence of IB, NLEB, and TCB. Note: There are no geographic exceptions in Maine and Rhode Island; only structural exceptions apply in these states.

Structure	Exception	Counties and structures where assessments are still needed
Bridges	<u>Geographic exceptions</u> survey all bridges in these counties. (also see figure B1 in Appendix B):	- MA Counties: Nantucket - NH Counties: Belknap, Merrimack, and Rockingham - VT Counties: Addison, Bennington, Chittenden, Franklin, Grand Isle, and Rutland
	<u>Structural exceptions</u> Survey these bridge types regardless of location	- Covered bridges - Wood/timber as a component of construction - Stone/masonry construction
Culverts	<u>Geographic exceptions</u> survey all culverts in these counties. (also see figure B2 in Appendix B):	- CT County: Fairfield - MA Counties: Nantucket - NH Counties: Coos, Hillsborough, Merrimack, and Rockingham - VT Counties: Caledonia, Chittenden, Essex, Franklin, Grand Isle, Lamoille, and Orleans
	<u>Structural exception</u> survey these culvert types regardless of location	“Cave-like” culverts—those that are long enough that they remain dark in the middle during daylight hours and maintain relatively stable temperatures. Likely greater than 200 feet long.

Background, Methods, Results, and Discussion

Bats have been documented using bridges and culverts as maternity sites, hibernation sites, temporary resting sites during foraging, and during periods of staging and swarming (Keeley and Tuttle 1999, USFWS 2022, Detweiler and Bernard 2023). Activities occurring on, under, or nearby bridges and culverts may affect bats using the structures. Accordingly, the Guidelines recommend assessing these structures to determine presence or probable absence of bat species listed, or proposed to be listed, under the ESA. The extent to which bats use bridges and culverts, and the timing of that use, is species-specific and spatially and temporally variable.

From 2021 through 2024, the state departments of transportation (DOT) in all New England states conducted protocol-level assessments of 1,075 bridges and culverts for use by bats (MassDOT 2025). These included structures that spanned water, roads, rail, and other features. The assessments detected bats in 39 bridges and zero culverts. The assessments detected 1 TCB in a bridge in Vermont and no IB or NLEB in any structure. Table 2 summarizes the results of protocol-level assessments reported by the DOTs from 2021 through 2024. Appendix C contains maps showing the distribution of the bridge and culvert assessments in New England.

Table 2. Summary of surveyed structures across New England from 2021-2024.

Structure type	Number of structures assessed	Number of structures with bats	Percentage of structures with bats	Number of IB, NLEB, or TCB detected
Bridge	856	39	4.6	1 TCB (Vermont)
Culvert	219	0	0	0
Totals	1,075	39	3.6	1 TCB

The Massachusetts Department of Transportation (MassDOT) also collected and analyzed DNA samples from 23 of the 39 bridges at which bat use was detected. Twenty-one bridges were positive for big brown bat (*Eptesicus fuscus*), while little brown bat (*Myotis lucifugus*) and eastern small-footed bat (*Myotis leibii*) were present at 1 bridge each. The DNA samples were negative for IB, NLEB, and TCB (MassDOT 2025).

The New England DOTs continued surveying in 2025, but limited data has been compiled and summarized at the time of this letter. MassDOT reported surveying 13 bridges and 15 culverts in Barnstable and Dukes Counties, respectively, in 2025. The surveys detected no bats using culverts and big brown bats at 2 bridges².

In coordination with state wildlife agencies and the DOTs, the Service reviewed the DOTs' results, any other available protocol-level assessments, and available anecdotal information. The available information suggests that bats use bridges and culverts infrequently in New England and that use by IB, NLEB, or TCB is extremely rare. We determined that the likelihood of IB, NLEB, and TCB using most bridges and culverts in New England is discountable. This is based on the lack of IB, NLEB, and TCB observed, especially in culverts; the high number of assessments; the broad geographic distribution of the assessments; and the consistent results across three years of assessments. We describe the exceptions to this determination below.

There are uncertainties that preclude us from including all bridges and culverts in our determination. First, there are geographic gaps in the distribution of bridge and culvert assessments in areas that are known to be occupied by IB, NLEB, and/or TCB. We listed these areas in Table 1 and displayed them in Appendix B. For bridges and culverts in these areas, we need additional assessments showing no use by IB, NLEB, and TCB before determining that the likelihood of presence of these species is discountable.

Second, bridges and culverts of certain physical dimensions or construction materials are either known to be used by bats, not represented in the available assessment data, or have very small sample sizes. These include covered bridges; bridges with wood timbers as a component of construction; bridges made in whole or in part of stone/masonry; and very long culverts that are dark in the middle during daylight hours and maintain stable temperatures, creating cave-like conditions. For these types of bridges and culverts, we need additional assessments showing no use by IB, NLEB, and TCB before determining that the likelihood of presence of these species is discountable.

² Email from D. Paulson (MassDOT) to D. Simmons (USFWS) on December 22, 2025.

Based on the assessment above, and considering the exceptions in Table 1, continued assessment of bridges and culverts pursuant to the Guidelines is unnecessary to avoid adverse effects on, or take of, the IB, NLEB, and TCB. This determination:

- is not inclusive of any other potential direct effects (e.g., tree removal) or indirect effects (e.g., light, noise) of an activity on the species or their habitats, and
- only applies to bridge and culvert structures in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont.

Most bat species occurring in New England have been affected by white-nose syndrome (WNS) and may be in decline because of WNS and other stressors. We reiterate that the survey results summarized above indicate that the tricolored bat, big brown bat, little brown bat, and eastern small-footed bat have been detected using bridges for roosting in New England. We recommend that project proponents, as part of a proactive conservation strategy, implement measures to avoid and minimize effects on bat species not protected by the ESA.

We will review new information on use of bridges and culverts by bats annually, or as it becomes available, and amend this letter as applicable. This letter remains valid until any of the reinitiation criteria at 50 CFR 402.16³ are met.

This letter can be used as documentation of coordination with the Service's Maine Field Office and New England Field Office regarding the need for bridge and culvert assessments. We recommend retaining a copy of this letter in your files as a record of your coordination with the Service regarding project effects on listed species.

Thank you for your cooperation. Please contact the Maine Field Office at mainefieldoffice@fws.gov, and the New England Field Office at 603-223-2541 or newengland@fws.gov, for further assistance.

Sincerely yours,

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Acting for
Amanda Cross
Field Supervisor/Project Leader
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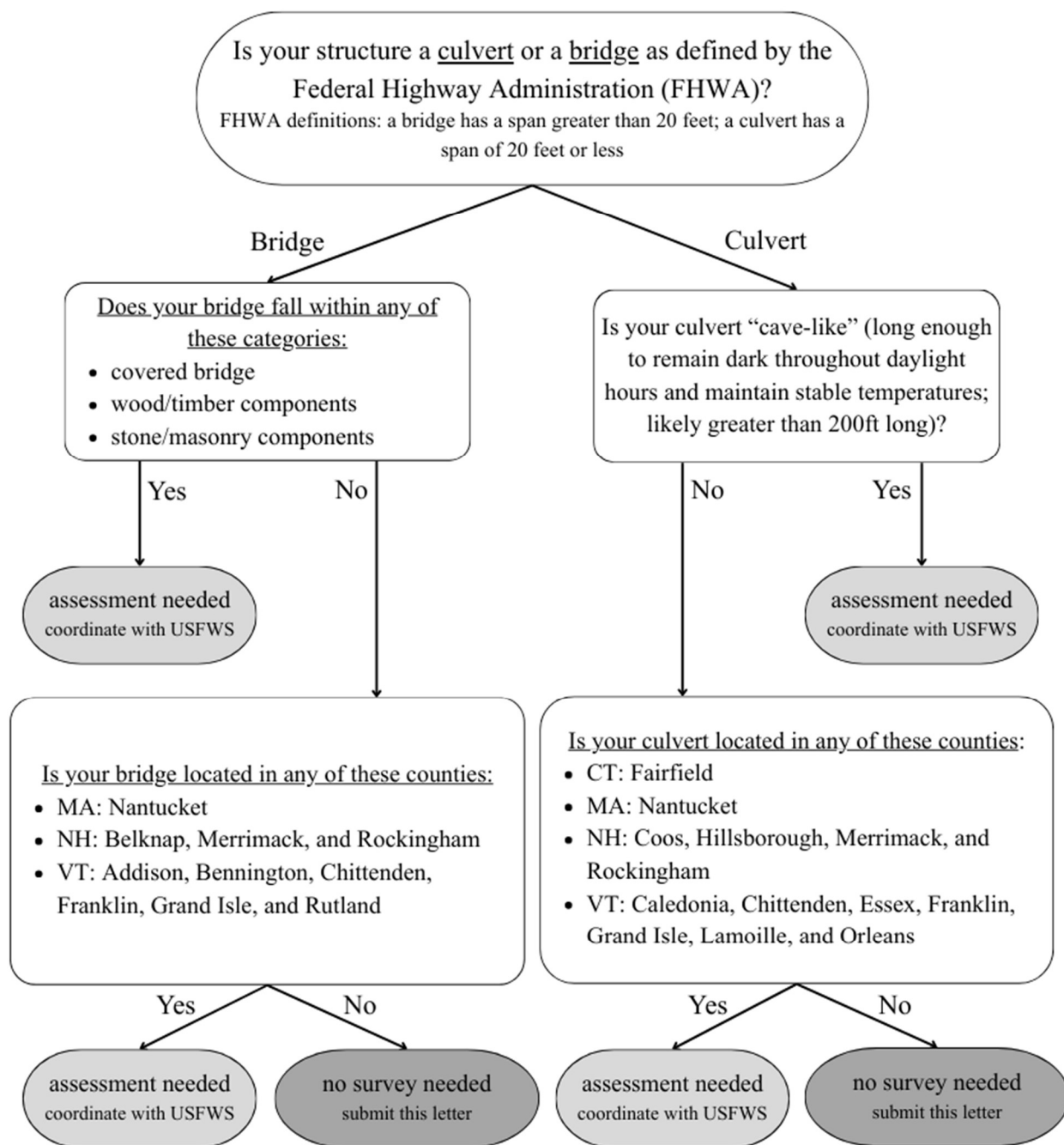
Audrey Mayer
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³ <https://www.ecfr.gov/current/title-50/chapter-IV/subchapter-A/part-402/subpart-B/section-402.16>

Literature Cited

- Detweiler, L.W. and Bernard, R.F. 2023. Wildlife Use of Anthropogenic Structures: A Comprehensive Review of Bridge Use by Bats, *Acta Chiropterologica* 25(1), 135-157.
- Keeley, B. W. and M. D. Tuttle. 1999. Bats in American Bridges. Bat Conservation International, Inc., Austin, TX. Resource Publication No. 4. 41 pp.
- [MassDOT] Massachusetts Department of Transportation. 2025. Results Summary for Roadway Structures Assessed for Bat Use. 14 February 2025. Boston, Massachusetts.
- [USFWS] U.S. Fish and Wildlife Service. 2022. WHITE PAPER: Recommended Minimum Culvert Dimensions for Bat Roost Surveys in Western North Carolina. USFWS, Asheville Field Office, Asheville, NC. 11 pp.
- [USFWS] US Fish and Wildlife Service. 2024. Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines. U.S. Fish and Wildlife Service, Region 3, Bloomington, MN. 95 pp.

Appendix A. Flow-chart survey decision tool.



Appendix B. Counties in which additional bridge and culvert assessments are needed.

Figure B1: Counties in grey need additional bridge assessments regardless of structure design or construction materials. **There are no highlighted counties in Connecticut, Maine, and Rhode Island.**

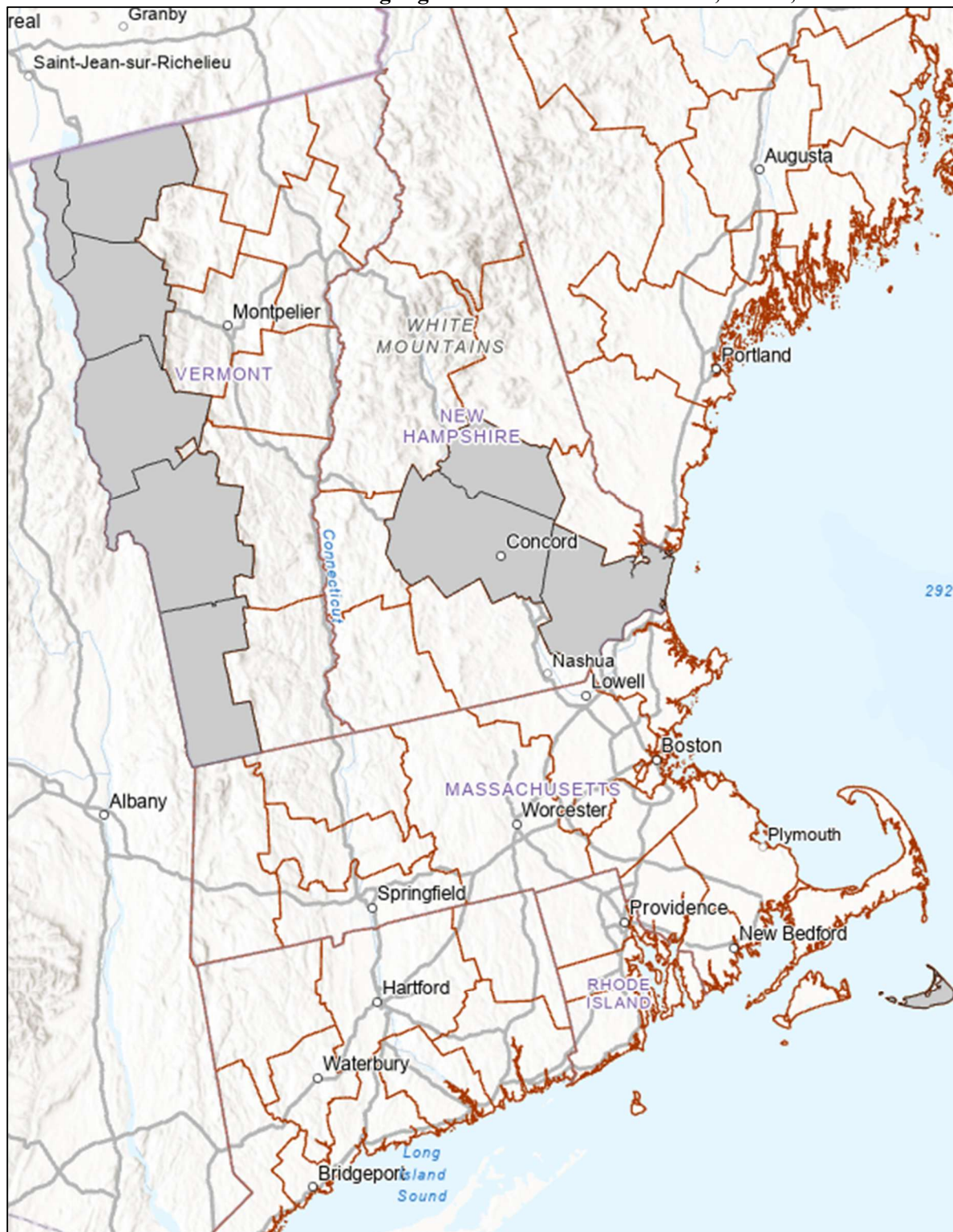
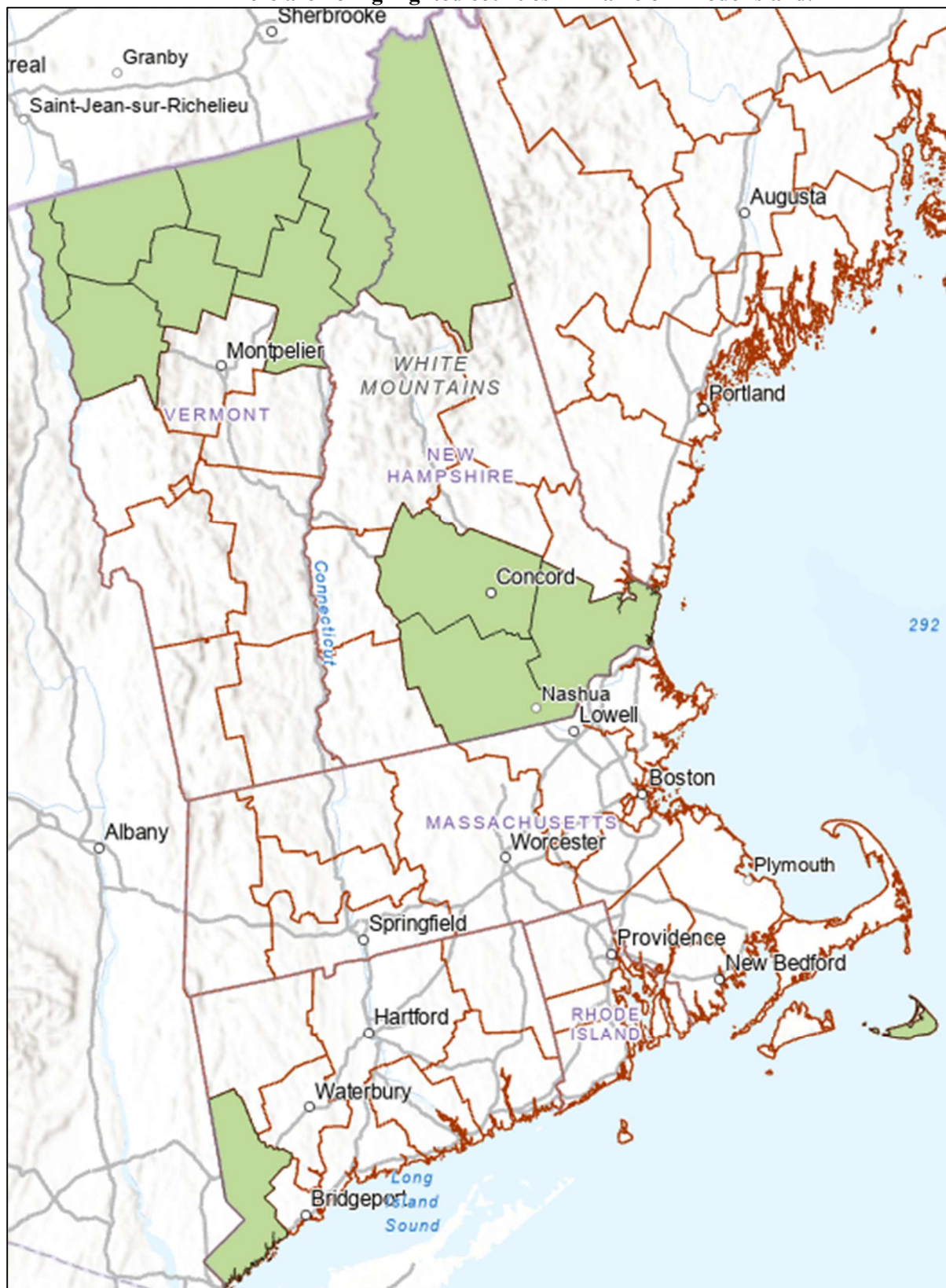


Figure B2: Counties in green need additional culvert assessments regardless of structure design or construction materials. **There are no highlighted counties in Maine or Rhode Island.**



Appendix C. Figures showing distribution of culvert and bridge assessments by the New England DOTs from 2021 through 2024.

Figure C1: Distribution of bridges assessed for use by bats 2021-2024.

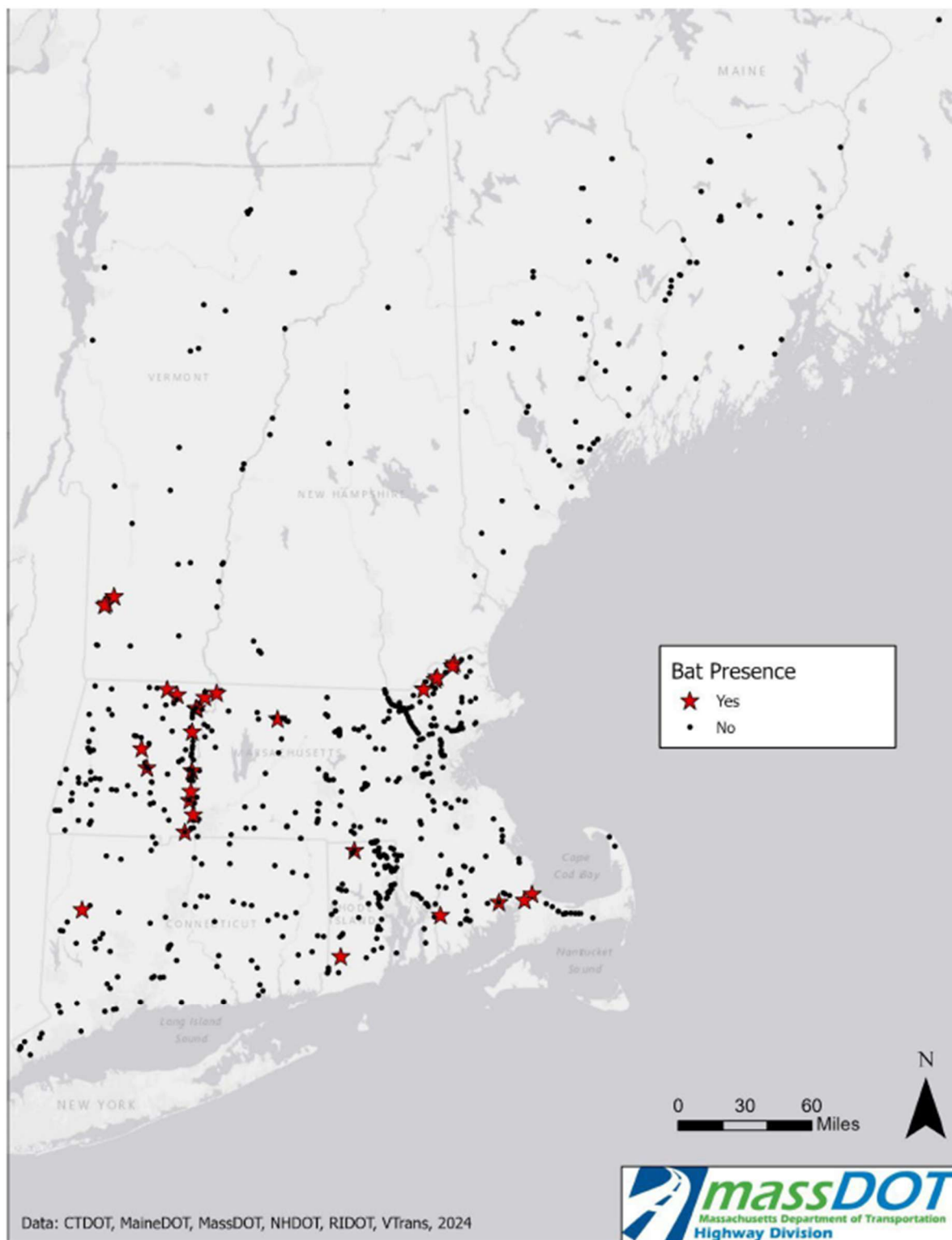


Figure C2: Distribution of culverts assessed for use by bats 2021-2024.

