



Indiana Bat Protocols

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To: indiana_bat@fws.gov

To Whom it May Concern:

Please accept this e-mail as my formal comment regarding the proposed changes to the summer survey guidance for Indiana Bat (*Myotis sodalis*).

First, I would like to thank the Service and the dedicated team of professionals that worked to develop the current draft, and contingency draft, protocols. Even in the absence of White Nose Syndrome, these protocols have been in need of revision for some time.

While acoustics offer a great deal of potential for the future survey of bats, the technology to accurately identify bats to species level currently does not exist. There is no software that has demonstrated an ability to determine the extremely fine distinctions between the call of the Indiana Bat and more common species like Little Brown Bat. Until a proven method is available that would facilitate species level identification, I feel it is premature to employ acoustics for this purpose.

If the Service wishes to include acoustics prior to the development of proven software, then it should be supplementary and should be considered secondary to netting surveys for determining presence/absence of Indiana Bat from any given area.

Most of the other proposed changes (level of effort, utilization of net-nights vs. sites, ect.) are excellent and I support them.

Thank you again for considering these comments.

Sincerely,

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