



Indiana Bat, FW3 <indiana_bat@fws.gov>

Fwd: Review of the Indiana Bat Summer Survey Guidelines

1 message

King, Andrew <andrew_king@fws.gov>
To: FW3 Indiana Bat <indiana_bat@fws.gov>

Fri, Feb 22, 2013 at 9:42 AM

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From: **Chevance, Nicholas** <nicholas_chevance@nps.gov>
Date: Wed, Feb 13, 2013 at 10:35 AM
Subject: Review of the Indiana Bat Summer Survey Guidelines
To: Scott_Pruitt@fws.gov, Andrew King <andrew_king@fws.gov>
Cc: Timothy Pinion <timothy_pinion@nps.gov>, Niki Nicholas <niki_nicholas@nps.gov>

OFFICIAL CORRESPONDENCE SENT VIA ELECTRONIC MAIL

National Park Service

Midwest Region

601 Riverfront Drive

Omaha, Nebraska 68102

NO HARD COPY TO FOLLOW

1.D(MWR-PCL/PC)

DEC-13/0006

February 13, 2013

Memorandum

To: Field Supervisor, U.S. Fish and Wildlife Service, Ecological Services Field Office
Attention: Andrew King, Endangered Species Biologist

From: Regional Director, Midwest Region

Subject: Review of the Indiana Bat Summer Survey Guidelines

The Department of the Interior (Department) assigned the National Park Service, Midwest Regional Office, the responsibility of preparing the National Park Service's comments on the subject document. Attached is a comment letter containing the consolidated comments from the National Park Service.

Please contact Regional Environmental Coordinator Nick Chevance, Midwest Regional Office, Planning and Compliance, at 402-661-1844, if you have any questions about these comments.

-s- Michael T. Reynolds

Attachment

Sent via e-mail by Nick Chevance date February 13, 2013



Consolidated Comments final Indiana bat survey Guidance 2-13-13.docx

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DEC-13/0006 – Consolidated Comments on the Draft Revised Rangewide Indiana Bat Summer Survey Guidelines – January 2013

General comments:

We thank the U.S. Fish and Wildlife Service (USFWS) and their Field Office (FO) in Bloomington, Indiana, for the opportunity to review the revised guidelines for Indiana bat summer habitat surveys. We offer the following recommendations and questions for your consideration.

Generally, commenters from the Southeast Region of the National Park Service (NPS) expressed concern with the time and expense required to implement these guidelines over a large project area, particularly on the scale common for prescribed fire efforts. The concern is that the effort required in the guidelines may preclude certain fire and habitat management activities that are otherwise viewed as having overall benefits to Indiana bat summer habitat. It is encouraging to see on page 3, in the description of Phase 1, that “project modifications (e.g., inclusion of appropriate avoidance and minimization measures) may be possible at this phase in consultation with the USFWS FO(s) so that no additional surveys are needed.” Many applicants will likely choose to implement projects that include avoidance and minimization (A&M) measures, rather than go through all phases of the guidelines. To that end, it will be essential to have standard A&M measures available for project applicants to review as they decide whether to step through the phases of these guidelines, or instead to incorporate A&M measures into project activities. We recommend that USFWS, in coordination with partners including the NPS, develop and make available standard A&M measures for certain land management activities, such as prescribed fire implementation, hazard tree removal, and other tree-clearing activities. We recognize that project-specific coordination will be required, even with standard A&M measures.

It would be helpful to add some context in the title for when application of the guidelines is necessary, perhaps modifying the title to something like “Rangewide Indiana Bat Summer Survey Guidelines for Endangered Species Act Consultation.”

On page 1, the guidelines describe “the first step for determining presence of Indiana bats at a given site is to determine whether there is any existing occurrence data available for the vicinity of the project.” We would like some clarity on how “vicinity” is defined, how close should occurrence data be to the project site to be considered in the vicinity, and similarly, how “site” is defined for the purposes of these guidelines (is it the project footprint plus some buffer).

The description of suitable summer habitat for Indiana bats presented on page 3 and in Appendix A is very broad and includes many vegetation types: “forested/wooded habitat, as well as surrounding non-forested habitats (e.g., agricultural fields, emergent wetlands, old fields, pasture).” More specificity is needed. For example, it is not clear whether non-forested habitat is always potential summer habitat for Indiana bats, or is only non-forested habitat adjacent to forested habitat suitable summer habitat. We would like to know how close non-forested habitat needs to be to forested habitat to be considered suitable summer habitat. It would add clarity to the guidelines to describe potential summer habitat for Indiana bats as forested habitat plus a

buffer of some fixed distance. Some examples of what is not suitable summer habitat for Indiana bats would be informative.

For acoustic surveys, assuming a single detector is used per site (as described in Appendix B on page 14), it is not clear whether all survey sites should be monitored during a single six-day period, or could different sites be surveyed during consecutive six-day period. If consecutive survey periods are permissible, surveying large project sites could span months and might require surveying during consecutive summers. We are also curious whether there is a time period within which all project site surveys should be completed in order to be valid; i.e., all sites should be surveyed during a single summer. If so, this requirement should be stated in the guidelines.

Under Phase 3 – Mist Netting, on page 5, according to the guidance, “if Indiana bats are not captured during mist-netting, coordinate with the local USFWS FO to determine which type of Indiana bat population (i.e., maternity colony or males) is likely to use the project site. If a maternity colony is assumed to be present, buffer positive acoustic survey sites by an assumed 5-mile radius home range.” This coordination with the USFWS FO should occur before any mist netting is planned. It should be made very clear to the applicant in those cases when there is going to be an assumption that a maternity colony is present regardless of the outcome of mist netting. Many applicants would probably choose not to commit the time and expense of mist netting if assumptions about maternity colonies are made based on acoustic survey results. Some examples of why it would be useful to the applicant to proceed beyond Phase 2 acoustic surveys would be useful given that negative mist netting results may still require the assumption that a maternity colony is present.

For clarification on the points raised above, please contact Mr. Tim Pinion, Wildlife Biologist/ Endangered Species Coordinator, National Park Service, Southeast Region, 100 Alabama Street, SW, Building 1924, Atlanta, Georgia 30303, telephone 404-507-5815.

Neither the Obed Wild and Scenic River (OBRI) nor Big South Fork National River and Recreation Area (BISO) has sufficient bat inventory data make a reasonable assertion about bat distribution or occurrence in the parks. The draft guidance directs project proponents to first review element occurrences in the vicinity of their project area, conduct habitat assessments to determine if suitable summer roosting habitat is present, and then conduct acoustic surveys followed by mist-netting if presence is confirmed by acoustic sampling. Each phase of the protocol is dependent on positive results from the previous phase.

The most recent bat information OBRI and BISO have is from Eric Britzke's mammal surveys which were conducted in fall 2003 and fall 2004 (at both parks). No Indiana bats were found at either park during his survey. The only occurrence of an Indiana bat is from a 1981 historical record at a mine adit in McCreary County, Kentucky (Barclay and Parsons 1983). The lone Indiana bat was considered a migratory individual and no similar sightings have occurred since. Further, neither BISO nor OBRI are known to have any significant hibernaculum for this species.

Based on the new summer survey guidance, the majority of both parks are potential roosting habitat for Indiana bats and both are well within the bat's range. Without any current data to

document Indiana bat occurrence, the high cost and manpower to achieve the proposed surveys and uncertainty about how much data would be required to meet USFWS needs, park operations, such as disturbed land restoration and prescribed fire, would be stopped. The potential impact to the prescribed fire program could be significant due to the large size of many fires needed for critical habitat restoration.

A programmatic approach for land managers would be preferred since burning has the potential to provide benefits to bats by creating forest openings and snag trees. Any specific guidance that would allow parks to reduce or prevent impacts to bats or bat habitats would be welcomed. An example of information that could be incorporated into burn planning would be specific dates when a winter burn could be conducted to avoid bat roosting activities. The two-year data limit could also prevent habitat restoration activities in a timely fashion.

For clarification on the points raised above, please contact Ms. Niki Stephanie Nicholas, Superintendent, Big South Fork National River and Recreation Area, Obed Wild & Scenic River, 4564 Leatherwood Road, Oneida, Tennessee 37841, telephone 423-569-9778.