



Missouri State[™]

U N I V E R S I T Y

January 29, 2013

TO: U.S. Fish and Wildlife Service

Rangewide Indiana Bat Summer Survey Guidelines: Request for an extension of the comment period.

Because of the controversial, and in some cases scientifically un-tested nature of the methods that may be required by these guidelines, many of us have been working on individual and joint responses to these guidelines. It is my opinion that the 30 day comment period is not sufficient for many of us to adequately respond. In addition, the USFWS presented these guidelines and responded to questions at the NEBWG meeting in early January, and plan to do the same at the SBDN meeting in mid-February and again at the MWBWG meeting in early April. These two information sessions and associated question and answer periods fall outside the allowable comment period of 30 days. I am requesting an extension of an additional 30 day to include the SBDN meeting, and if possible, an extension to include the MWBWG meeting. Interest level is high and I believe these sessions are critical for the understanding and eventual acceptance of these new guidelines. I also believe that there will not be an acceptable automated acoustic identification program available before the summer survey period begins so an extension of the comment period will not affect the use of the guidelines this year. However I disagree with the sole use of detectors in the contingency plan for the determination of presence without tested and approved methodologies. Research is being presented and manuscripts written that should be incorporated into any guidelines that require the use of acoustic identifications as a stand-alone tool for the presence or assumed absence of Indiana bats.

Although the new guidelines are designed to determine whether Indiana bats are present or likely absent, the real goal should be to determine the probability of absence. In a scientific sense, the null hypothesis should be that Indiana bats are not present on a site and all efforts should be aimed at testing this hypothesis. The present guidelines seem to focus on the determination of presence, and if not documented, absence is assumed. The increased netting requirements and flexibility (which I agree with for the most part) will increase the ability to test the null hypothesis, but the acoustic models and filters that are available or in the process of modification seem to focus on presence. For example, Britzke's filters (KY model) focus on identifying the pulses that best represent pulses from a 'typical' MYSO sequence, and if one is identified, there is a good chance that MYSO are present. However these filters will miss over 50% of known MYSO sequences from Britzke's own call library. Biologically speaking, false positives will result in more surveys and research; however, false negatives will result in no further surveys with serious consequences for the species including habitat destruction or actual take. Thank you for your consideration in this matter.

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