



Comments on Draft Revised Indiana Bat Summer Survey Guidelines

Leput, David W LRB <David.W.Leput2@usace.army.mil>

Mon, Mar 11, 2013 at 2:08 PM

To: "indiana_bat@fws.gov" <indiana_bat@fws.gov>

Cc: "Tarasiewicz, Melissa J LRB" <Melissa.J.Tarasiewicz@usace.army.mil>, "Crawford, Margaret A LRB" <Margaret.A.Crawford@usace.army.mil>, "Kozlowski, Diane C LRB" <Diane.C.Kozlowski@usace.army.mil>, "Keppner, Harold T LRB" <Harold.T.Keppner@usace.army.mil>

1) Throughout the document it states that the reports should be sent to the USFWS for review. We recommend that it state that the reports also be sent to the Federal Action agencies, if applicable, since the Federal Action agencies are required to complete an effects determination when there is a Federal Action. Are the USFWS offices adequately staffed to be able to review and approve these additional documents (our USFWS offices do not currently review habitat reports) to meet Federal Action agencies processing deadlines? More specifically, we are concerned about delays that may result due to the increased volume of submittals.

2) (Page 3, Paragraph 3) We recommend that the USFWS consider revising this section to state that if a Federal Action Agency is involved that the habitat reports only be sent to the lead Federal Action Agency. We feel the Federal Action Agencies are able to determine suitable Indiana bat habitat and this would reduce USFWS workload which would help prevent delays in Federal Action Agency processing times particularly when there are "no effect" determinations.

3) (Page 4, Figure 2) We do not feel one can "Assume presence of maternity colony" unless there are potential maternity roost trees within the Action Area. We recommend the USFWS define "potential male roost trees" and "potential maternity roost trees" and require habitat surveys to provide an estimate on the number of potential male bat roost trees and potential maternity colony roost trees. We feel this would be a relatively minor addition to the habitat survey and would provide strong information on the quality of the habitat. This would aid the Federal Action Agencies and/or USFWS in determining appropriate effects to the species.

4) We recommend the guidelines include a statement that clarifies the guidelines do not supersede local Section 7 of ESA procedural agreements between USFWS FOs and Action Agency offices.

 **smime.p7s**
6K