



Comments on draft Indiana Bat Survey Guidelines

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Comments on the draft Indiana Bat Summer Survey Protocols

- Excerpt from "Acoustic Bat Identification Software Testing Criteria"

7. As species identifications are never perfect, all analysis programs must utilize a maximum-likelihood estimator approach to determine species presence at the site rather than relying on a single sequence. Post-hoc maximum-likelihood estimator p-values will be used to determine acceptance thresholds for final identification determination.

Considering the acoustical survey technology could identify more or less use of suitable habitat by the Indiana Bat (and other bats in the future) spurring the potential need to assess the population in an area, a quality control system should be implored to protect from overzealous researchers, surveyors or the USFS. I could not find an inclusion of using a 3rd party to verify the quality of the data collected but only statistical analysis. Responsibility of analysis was not assigned in the guidelines.

- Reports or citations of how the technology works and its rates of false positives and interference should be included in the survey guidance.
- Page 2-3 of the Rangewide Indiana Bat Summer Survey Guidelines should use more than just the determination of suitable summer habitat to justify the use of these summer survey guidelines. Maps of exact locations of known used summer habitat, roosting and maternity sites should be revealed to owners of projects so they know with confidence that their project is close enough to known sites used over a period of time to justify the expense of performing surveys.
- Alluding to my previous point, justifications should be issued by the USFWS to a project owner prior to deeming their project in need of a bat survey.
- Forest management activities, ie girdling during timber stand improvement practices & bumper trees/snags left behind after harvesting, create habitat

for the Indiana Bat therefore mitigating the need to conduct surveys. These forest management practices should be used as a mitigation bank for other projects such as land conversion & construction. This mitigation bank would create incentive for forestland owners to manage for the bat species and leave forests as forests (ie providing eco management based economies like carbon markets).

- If such cost prohibitive surveys were imposed on private forestland owners causing timber management to become less profitable then these practices will cause landowners to opt for a higher and better use for their land causing additional loss of forest habitat for the Indiana Bat.

I appreciate the opportunity to participate in this process. Please contact me if you need any clarifications to these comments or if I overlooked something in the guidelines that answers some of my concerns.

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