



Indiana Bat, FW3 <indiana\_bat@fws.gov>

**Request to extend the comment period for the “Draft Revised Rangewide Indiana Bat Summer Survey Guidelines (January 2013)” as identified in the Notice of Availability in the Federal Register /Vol. 78, No. 6/Wednesday, January 9, 2013/Notices, pp. 1879-1880**

1 message

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To: indiana\_bat@fws.gov, lynn\_lewis@fws.gov

Tue, Jan 29, 2013 at 10:58 PM

To Whom It May Concern,

I am writing to request an extension of 60 days (until April 8, 2013) for the comment period for the Draft Revised Rangewide Indiana Bat Summer Survey Guidelines (Jan 2013) as identified in the Notice of Availability in the Federal Register/Vol 78, No. 6./Wednesday, January 9, 2013/Notices, pp. 1879-1880.

I possess a federal permit for the capture of Indiana bats and was trained under Dr. Lynn Robbins in Missouri. I have extensive experience conducting Indiana bat summer habitat surveys, as well as leading field teams to capture and radio track Indiana bats. In addition to my training and work with Missouri State University, I have been a team leader for Western EcoSystems Tech, Inc (WEST), Environmental Solutions and Innovations (ESI) and Bat Call Identification, Inc (BCID).

I understand a 30 day period is being considered, however 30 days is not sufficient. Since the notice was published I have worked by myself and with others to review the guidelines and determine what comments to submit. 30 days does not provide enough time for me, and other interested biologists, to review information on the guidelines, confer with others, develop suggestions, and write up comments.

The 30-day window also narrowly limits the public’s ability to comment. It took FWS nearly a year to respond to voluminous comments of the previous draft guidelines, while making limited changes that I do not believe adequately address the issues raised. It is unreasonable to expect that 30 days is sufficient for the public to review and provide comments on the new draft. Additionally, there is no reason to believe that a time extension will cause hardship to FWS.

The FWS is required by the ESA to make decisions based on the “best scientific and commercial data available.” The proposed guidelines directly affect the data available for ESA compliance decisions. Therefore it is extremely important that these guidelines be adequately reviewed and analyzed, and that alternative methods be suggested when necessary. However, I cannot accomplish this in the time allotted.

Areas in the guidelines that need to be addressed include:

- The effectiveness of bat detectors and software for ID of species
- Use of a combination of sampling techniques for better results.
- Length of the survey season

Thank you very much for your time and consideration.

Shannon Romeling, M.S.  
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