



Indiana Bat, FW3 <indiana_bat@fws.gov>

Indiana Bat Summer Survey Guideline Comments

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

Please see attached excel spreadsheet for comments from Tennessee Wildlife Resources Agency wildlife diversity biologists on the draft Indiana bat summer survey guidelines.

Thanks,

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TWRA_Draft Indiana Bat Summer Survey Guidance comments.xlsx

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Tennessee Wildlife Resources Agency Comments on Draft Indiana Bat Summer Survey Guidance.

Document	Page #	Comment
Rangewide Indiana bat summer Survey Guid General Statement		These protocols will tend to make developers and organizations that can afford to pay into Indiana bat mitigation funds shift away from doing the surveys which could be more costly and time consuming than paying into mitigation fund which some states have been developed by U.S. Fish and Wildlife Service. This will ultimately reduce conservation of the the species.
Rangewide Indiana bat summer Survey Guid General Statement		These protocols will make it much more difficult for biologist and resource managers to manage early successional habitat for other species of concern by making it difficult to conduct prescribed fires, timber management, and other activities to create and maintain early successional habitat.
Rangewide Indiana bat summer Survey Guid	3,7	If the Service is concerned with male habitat would it not make more sense to buffer known hibernacula by 5 miles and require monitoring of 3inch plus trees near those sites where males are more likely to be found?

Rangewide Indiana bat summer Survey Guic

3,7

On page 109 of the draft Indiana bat recovery plan it states that “Roost sites are more limiting for adult females than for males”. However this survey guidance places emphasis on male roost sites when it states that potential roost sites live trees and/or snags greater than 3 inches in diameter at breast height are potential roost sites. The only published information on the use of trees 2.5 inches in diameter at breast height is the thesis by Gumbert (2001). In this study a male bat on Daniel Boone National Forest near a priority three cave utilized a 3inch diameter tree. These small diameter trees only have a life expectancy of 1 or 2 years when they might be used by a male Indiana bat. Which means protecting them would have little value in protecting critical habitat for Indiana bats

With the draft recovery plan stating that roost sites are more limiting for adult females than males it would be more sensible to target protection and surveys around areas containing trees more suitable for maternity colonies rather than starting with trees suitable only for a lone male. . From the 2007 draft Indiana Bat Recovery plan (pg 110) “Although the presence and density of primary roost trees is essential for maternity colonies individual roost are ephemeral. Maternity colonies are evolutionarily adapted to the loss of individual maternity trees.” This would mean that potential roost sites would need to be trees 15 inches and up (draft Indiana Bat Recovery Plan, pg 61 smallest average diameter that includes a primary roost tree) with multiple alternate suitable trees with in the landscape.

Rangewide Indiana bat summer Survey Guic

3,7

This survey guidance does not place any value any emphasis on the landscape configuration and its value to Indiana bats. Activities which occur in a forested landscape under these guidelines would potentially require more work than activities that occur in a more open agricultural landscape yet based on this the potential for harm to Indiana bats would occur in northern latitudes in small fragmented and isolated woodlands and riparian areas.

Rangewide Indiana bat summer Survey Guic	5	How is the Service going to determine which type of Indiana bat population is using the site, maternity or males, if no bat is captured? Is this going to be based on number of acoustic hits? What makes one acoustic survey with no captures a maternity colony or a male? If no policy is put in writing then this can be interpreted to widely by different offices. For instance in areas away from the core of the range assuming any hit is a maternity colony will result in over protection to lone male passing through.
Rangewide Indiana bat summer Survey Guic	14	If automated acoustic software are currently less than 40% accurate in categorizing calls between species, how can it be justifiable to go this route. A coin toss has higher odd than current software used on field data.
Rangewide Indiana bat summer Survey Guic	18	The number of trap nights for a single positive acoustical hit seems excessive compared to the potential importance of that lone bat in particular because of the weakness of the current accoustical software.It seems more appropriate to apply the increased effort in areas that traditionally harbored higher densities of MYSO, but what about areas that have always had considerably lower densities during the summer?
Rangewide Indiana bat summer Survey Guic	33	It is very concerning that the U. S. Fish and Wildlife Service is making recommendations to removal of a snag tree at night which could be potentially result in injury/death due to the decayed nature of these hazard trees. There is no recommendation that removal of hazard trees without emergency surveys can safely be done outside of the primary maternity period (May through July) . As stated above roost trees are ephemeral therefore removing a tree between September and May would reduce potential of killing Indiana bats without creating to much additional stress on bats. The ephemeral nature of snags means that at any time these trees could be knocked down by a wind storm and is more likely to have occurred when the bats are at their hibernacula.
Rangewide Indiana bat summer Survey Guic	33	It would seem to me that the recommendation to remove a hazardous tree at night would violate OSHA rules.

Rangewide Indiana bat summer Survey Guic

33

With emergency surveys it is stated that if no bats are observed emerging and the tree cannot be felled at night then as soon as possible after sunrise on the following day. Does this mean that in order to make sure that no bats return to the tree the observer is required to stand by the tree to make sure no bats return before sunrise? We know bats switch trees and therefore the logic behind not observing bats in the evening does not follow the biology of Indiana bats which means they could have moved from an alternative roost to this roost early in the morning.

2013 Contingency Plan

Step 2

This is confusing if you use > 35 kHz calls and assume presence of Indiana bats then you go to step 4. Step for then becomes doing double work which includes additional surveys and analysing those surveys to species. Why are you not require the original data to be analyzed for Indiana bats with current software?