

March 11, 2013

ATTN: FWS-R2-ES-2012-NI95
Lynn M. Lewis
Assistant Regional Director
U.S. Fish and Wildlife Service
620 South Walker Street
Bloomington, IN 47403-2121

**Re: Comments on the Draft Revised Indiana Bat Summer Survey Guidelines
[Docket No. FWS-R2-ES-2012-NI95]**

Submitted Electronically via Email

To Whom It May Concern:

Clean Line Energy Partners (Clean Line) appreciates the opportunity to provide to the U.S. Fish and Wildlife Service (Service) comments on the Draft Summer Survey Guidelines for the Indiana Bat (*Myotis sodalis*) (Docket No. FWS-R2-ES-2012-NI95).¹ After careful review of the guidelines, we offer the following comment.

In Appendix B (pg. 11), the Service outlines the proposed methodology and protocol for summer acoustic surveys. In reference to the deployment of acoustic monitoring units, the Service states that surveyors “should” deploy detectors/microphones “(e) at least 328 feet (100 meters) from artificial high-frequency emitters (e.g., wind turbines, high-tensile power-lines, and micro-wave towers) (Johnson et al 2012)²”.

A review of this cited study did not reveal any correlation between the potential high-frequency emissions associated with transmission lines nor did it conclude results justifying a 328-foot avoidance buffer for any of these sources. We respectfully request the Service to clarify this guidance by: 1) justifying the need for a buffer through the best available science or commercial data; 2) clarifying the purpose of such a buffer; and, 3) commenting on allowable exceptions regarding the situations where and when high-frequency emission interference may be mitigated through the proper use of post-processing digital software.

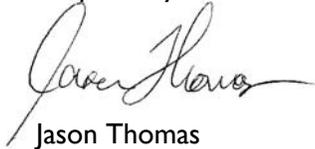
We believe this 328-foot restriction will severely limit the use of this protocol on future proposed linear projects because they are often planned to be placed adjacent to existing linear infrastructure (such as other transmission lines) to minimize potential adverse effects and fragmentation of habitat areas.

¹ 78 Fed. Reg. 1879. Endangered and Threatened Wildlife and Plants; Draft Revised Indiana Bat Summer Survey Guidelines (January 9, 2013)

² Johnson, Joshua B., Ford, W. Mark, Rodrigue, Jane L., Edwards, John W. 2012. Effects of acoustic deterrents on foraging bats. Res. Note NRS-129. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 5 p.

We appreciate the opportunity to comment on the Indiana bat summer survey guidance. We look forward to the Service's response to these comments as well as future opportunities to provide feedback as new information is acquired.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jason Thomas". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jason Thomas
Director, Environment