



Indiana Bat, FW3 <indiana_bat@fws.gov>

Fwd: Public Comments from BRI

1 message

Niver, Robyn <robyn_niver@fws.gov>
To: indiana_bat@fws.gov

Wed, Feb 20, 2013 at 4:59 PM

----- Forwarded message -----

From: **Tim Divoll** <tim.divoll@briloon.org>
Date: Wed, Feb 20, 2013 at 4:11 PM
Subject: Public Comments from BRI
To: robyn_niver@fws.gov
Cc: Dave Yates <dave.yates@briloon.org>, Carl Anderson <carl.anderson@briloon.org>, Jonathan Fiely <jonathan.fiely@briloon.org>

Hi Robyn,

Hope you are well in the final push on the protocol. Please find our comments attached in your spreadsheet format.

Thank you, Tim Divoll

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Celebrate the 40th anniversary of the Endangered Species Act!

Public Comment Spreadsheet_BRI.xlsx
12K

Reviewer's Name & Affiliation:

Biodiversity Research Institute (BRI), 19 Flaggy Meadow Rd., Gorham, ME 04038. T. Divoll, D. Yates, C. Anderson, J. Fiely

Document Name	Page #	Comment
2013 Draft Season Contingency Plan		We also agree that the existing 2007 protocol which requires mist-netting as a primary presence/"absence" detection technique is inefficient and ineffective.
2013 Draft Season Contingency Plan		If the Service is able to authorize acoustic auto-classifying software package(s) that is(are) clearly demonstrated to identify Indiana bats (<i>M. sodalis</i>) reliably, and with a minimum acceptable rate of false negatives and false positives, and this software is available, tested, and results are repeatable by researchers and consultants who will use it in the field, then BRI feels the Service's revised Guidelines are reasonable and sensible
2013 Draft Season Contingency Plan		BRI would recommend that the Service is explicit in the potential benefits of mist netting to Project Proponents if the presence of <i>M. sodalis</i> is positively identified by acoustic detection, i.e. buffer reduction.
2013 Draft Season Contingency Plan		In lieu of (an) approved software package(s) that can confidently identify <i>M. sodalis</i> and differentiate it from species with similar vocalizations, we're concerned that the proposed summer survey guidelines and contingency plan may result in an inordinate number of false positive detections of <i>M. sodalis</i> possibly lessening the credibility of the survey process
2013 Draft Season Contingency Plan		If an inordinate amount of false positive detections begin to occur during summer surveys, we're also concerned that with no requirement for a state or federal permit to conduct acoustic surveys, a Project Proponent may have more latitude to circumvent the process by stopping surveys upon detection of <i>M. sodalis</i> , and simply not reporting, and either repeating surveys until non-detects are acquired or relocating detectors some marginal distance from the initial detections and repeating.
2013 Draft Season Contingency Plan		Should the consultant or research group conducting the acoustic sampling be able to show definitively that the <i>Myotis</i> call(s) are some other species than <i>M. sodalis</i> or <i>M. lucifigus</i> , then acoustic sampling continues until the effort level is satisfied. If either of the above species are identified, then mist-netting is triggered assuming the Project Proponent chooses to continue. We recommend under these conditions that the minimum level of effort for mist netting be under no circumstances less effort than was required under the 2007 survey protocol. Obviously, more effort would be at the discretion of the Project Proponent and the biologist(s) involved. (<i>We base our effort recommendations on our successful captures and effort required in the Northern Panhandle of W. Virginia, 2012, presentation at NEBWG 2013</i>). If <i>M. sodalis</i> is captured, then telemetry is triggered. If <i>M. sodalis</i> is not captured, then per the plan, the Project Proponent would confer with the Service's Field Office to determine potential population affected and appropriate habitat response.
2013 Draft Season Contingency Plan		We recommend that given the new emphasis on acoustic sampling and detection, some form of formal verifiable training should be required for at least one biologist or technician on the field crew of a firm conducting acoustic sampling for Indiana bats. A workshop similar in effort and scope to the trainings Joe Scezwack conducts at the NEBWG conferences for his Sonobat software would be sufficient to ensure that field personnel conducting acoustic sampling for endangered bats have the background and training to effectively deploy their detectors in appropriate habitat.
2013 Draft Season Contingency Plan		We appreciate the Service's consideration of our comments and welcome further discussion.