



Indiana Bat, FW3 <indiana_bat@fws.gov>

Fwd: Fw: 2013 draft revised indiana bat guildlines_Jeremy Jackson

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To: FW3 Indiana Bat <indiana_bat@fws.gov>

Mon, Feb 25, 2013 at 1:53 PM

Jeremy Jackson

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02/12/2013 02:09 PM

cc:

Subject: 2013 draft revised indiana bat
guildlines_Jeremy Jackson

Thank you for the opportunity to submit comments on the 2013 Indiana bat draft revised guidelines.

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(See attached file: *Public Comment Spreadsheet from Jeremy Jackson.xlsx*)



Public Comment Spreadsheet from Jeremy Jackson.xlsx

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Document Name	Page #	Comment
Draft Revised Rangewide Indiana Bat Summer survey Guidelines January 2013	3	The habitat conditions are too conservative. 3 to 5 inches DBH would typically be considered early successional habitat and not deemed by most bat researchers as suitable habitat. If we are going to include everything an Indiana bat has roosted in, we also need to protect power-line poles, houses, and other man-made features that have cracks and crevices, because Indiana bats have been observed in these structures as well. Why even do a habitat assessment, just say conduct a desk top review and say if there are trees or anything bigger than a shrub on the property, it's suitable for Indiana bats. This whole section needs to be redone, with input from bat researchers on what constitutes truly suitable habitat for Indiana bats female Indiana bats..
Draft Revised Rangewide Indiana Bat Summer survey Guidelines January 2014	6	Refer to my comments regarding federal permitting Page #17

Document Name	Page #	Comment
Draft Revised Rangewide Indiana Bat Summer survey Guidelines January 2013	17	<p>The document states "A qualified biologist(s)10 must (1) select/approve mist-net set-ups in areas that are most suitable for capturing Indiana bats, (2) be physically present at each mist-net set-up throughout the survey period, and (3) confirm all bat species identifications." and defines a qualified biologist as "A qualified biologist is an individual who holds a USFWS Recovery Permit (Federal Fish and Wildlife Permit) for federally-listed bats in the state/region in which they are surveying and/or has been authorized by the appropriate state agency to mist-net for Indiana bats. Region 5 does not require Federal Permits for surveying for Indiana bats or other T&E bat species. This process should be uniform throughout the United States for all T&E species. Specifically related to this guidance, the federal permitting process should be required in all states. Especially, in a region that has had the greatest decline of Indiana bats. I know of several cases where bat researchers were denied Federal Collecting Permits in Region 3, because the USFWS determined that they did not have sufficient experience to be considered as an expert with Indiana bats. However, these same individuals were authorized to survey for Indiana bats in Region 5 by respective state agencies. Not only is the review process different between Federal and State agencies, but the federal agencies are required to monitor the amount of "Take" that is occurring with Indiana bats and this is managed through the federal permit process. States are processing permits without regard to this process and the amount of potential "Take" is probably not being coordinated through the US FWS. There is no need for Region 5 to create a mechanism for reviewing and approving federal collecting permits. They would simply need to adopt the already existing policy/regulatory requirements of the US FWS. A similar process occurred in the State of Kentucky, where researchers where allowed to survey for Indiana bats; however, the USFWS rightfully took back control of the permitting process. States should still require their own permits as do states in other regions of the USFWS, such as region 3 and 4. There is no doubt that conservation of the species is the mission of the US FWS and as such a federal permit process was created to assist in managing this effort and therefore a federal collecting permit should be required to survey for all endangered species and related to this guidance, especially Indiana bats. This would cost Region 5 more to start implementing the federal permit process like region 3 and region 4, but cost should not be a factor in doing what is right or wrong, just like the USFWS would not be concerned about the economic burden this guidance is placing on the private sector.</p>

Document Name	Page #	Comment
Draft Revised Rangewide Indiana Bat Summer survey Guidelines January 2013	17	<p>Persons on federal collecting permits associated research (i.e. students at academic institutions with an permit for educational uses) should not be allowed to conduct bat studies in the private sectors unless they have went through their own federal permit process and obtain the appropriate permits (please refer to the previous states for reasons why). Students are added to their professors/advisors or college institutions permit for educational purposes. This process is easier and not as rigorous as obtaining their own scientific permit authorizing them to conduct Indiana bat surveys on their own. The education permit is easier, because the it allows professors to place students on their permits rapidly because of a short field season combined with relatively short degree programs. Students would be in their second year of a Masters program before getting a permit and they typically will not have the experience, which is why they are going to school. The federal guidance requires the permitted person to be at the net. the education permit does not. However, people have been using the education permit to conduct surveys, either own their own or through their advisor. This standard should be enforced through out the range of the Indiana bat.</p>
Draft Revised Rangewide Indiana Bat Summer survey Guidelines January 2014	22	<p>Document states "Capture and handling are stressful for bats. Emphasis should be on minimizing handling and holding bats to as short a time as possible to achieve field study objectives. Indiana bats should not be held for more than 30 minutes after capture, unless the individual is targeted for radio-tracking. Bats targeted for radio-tracking should be released as quickly as possible, but no longer than 45 minutes after capture, or as allowed in federal and state permits. See Kunz and Kurta (1988) for general recommendations for holding bats." There should be a clause in this paragraph related to inclement weather. It is very likely that someone could be in the process of placing a transmitter on an Indiana bat and a storm develops all of a sudden with high winds and heavy rains. In these situations, I feel researchers should be able to make a judgment to what is in the best interest of the bat at that moment. For the safety of the bat, the researcher should be able to keep the bat until after the storm has passed.</p>
Draft Revised Rangewide Indiana Bat Summer survey Guidelines January 2015	Whole document	<p>I think overall this was a very good document and its obvious the developers made a great attempt to develop a robust and meaningful document. I thank you for your efforts.</p>