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Agency Of Natural Resources

February 25, 2013

U.S. Fish and Wildlife Service
620 South Walker Street
Bloomington, IN 47403-2121

Subject: Indiana Bat Summer Survey Guidelines

I have reviewed the revised draft of the *Rangewide Indiana Bat Summer Survey Guidelines January 2013* and offer the following comments on behalf of the Vermont Fish and Wildlife Department. I want to complement the USFWS for its willingness to adapt to a post-White-nose Syndrome (WNS) landscape for bats. The reductions in several cave bat populations in the eastern United States require adjustments to existing survey protocols, and the USFWS has boldly proposed taking that step. The Vermont Fish and Wildlife Department suggests that our current knowledge base will be best served by a more measured transition to alternative methods of documenting presence/absence of Indiana bats.

Clearly, among bat biologists, there remains an uncomfortable level of uncertainty surrounding confidence in acoustic calls as a suitable sole technique for documenting the presence/absence of Indiana bats. Call identification of this species is extremely difficult, limited to individuals with the greatest levels of experience, and currently not available in a call identification software. For this reason, I encourage the USFWS to adopt interim guidelines that recommend both acoustic and mist-netting surveys using a protocol and reporting requirement that will significantly add to our knowledge and confidence in each of the survey methods. By compiling comparable survey data on a regional basis, more comprehensive data will be available on detection rates by survey type.

At a minimum, the General Process section of the current draft of the guidelines should emphasize the need to contact state fish and wildlife agencies to determine if they have survey guidelines or recommendations that vary from the USFWS. Recent experience suggests that Indiana bat densities in Vermont remain high enough to validate mist-netting as a survey tool (female Indiana bats were captured the first night at two survey sites in 2012). In our case, it is likely that Vermont will require both acoustic and mist-netting surveys on any project requiring Indiana bat surveys.

Overall, the specific protocols outlined in the appendices are clear, logical, and will lead to consistent approaches to surveys. The Vermont Fish and Wildlife Department offers the following specific comments/suggestions to improve upon them based on our experiences with Indiana bat habitat and populations in Vermont.



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1. The application of a three-inch threshold for a potential roost tree is more conservative than any other part of the survey guidelines. In Vermont, we have documented 173 Indiana bat roost trees, only five of which have been smaller than eight inches in diameter, and in every case for these smaller trees, no more than two bats have been observed exiting. If the level of uncertainty in acoustic call identification is acceptable to the USFWS, certainly increasing the diameter threshold of potential roost trees should be as well. Establishing thresholds to protect individual male Indiana bats is not feasible.
2. Consider habitat assessment criteria by region. In New England, we can successfully use elevation as a limiting factor to summer range that might not be able to be applied elsewhere. Perhaps there are other states like Vermont that are confident in their state delineation of Indiana bat range as well.
3. The USFWS should promote making specific call files accessible to the USFWS when they are notified within 48 hours of an Indiana bat call. This would reduce the likelihood that final reports might be produced based on results that the USFWS deems inconclusive or incorrect.
4. The USFWS should develop a bat acoustic survey certification program to train and verify surveyor expertise in Indiana bat call identification. Simply assuming that individuals capable of mist-netting Indiana bats are also as capable of proper acoustic survey methods and call analysis is not wise.
5. If acoustic survey reports are to include the acoustic analysis software program output/summary results, be sure to make it clear that that such software may include those used for visual call analyses (i.e., Analook). I also suggest that the reports include the raw calls of any animals determined to be Indiana bats.

The Vermont Fish and Wildlife Department reiterates our appreciation of the USFWS for re-evaluating the efficacy of the existing Indiana bat survey protocol. We suspect that acoustic call surveys will be the likely preferred, acceptable method for detecting presence/absence of Indiana bats, and other bat species affected by WNS. We simply caution that the lack of consensus on the matter warrants a transition period where a more comprehensive dataset can inform all interests.

Sincerely,

Scott R. Darling
Wildlife Management Program Director

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