



Indiana Bat, FW3 <indiana_bat@fws.gov>

Proposed Draft Revised Rangelwide Indiana Bat Summer Survey Guidelines

1 message

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Mon, Jan 28, 2013 at 5:48 PM

To: indiana_bat@fws.gov

Dear Sir or Madam:

I write in response to the referenced proposed guidelines. I have reviewed them and am very concerned. I am not a scientist and cannot speak to some of the more technical aspects of the proposed rules. However, as a commercial real estate developer, my company, as well as many others, would be very negatively impacted by these rules. Between the exponential change in minimum tree size to the ill-advised, non-peer reviewed acoustic detection standards, the cost (in terms of dollars as well as time) for potential developments will likely increase substantially having not just a chilling effect but perhaps a fatal impact on new development. It appears as though the new rules set up a “default” finding that there are Indiana Bats on-site (without scientifically-sound evidence to support it), putting the costly and time-consuming burden of proving otherwise upon developers. Before the concerns of developers, who are sometimes painted as being anti-environment, are dismissed I hope that you and others will keep in mind the positive impact that developments have on communities by generating jobs, income taxes and real estate taxes and by spurring consumer spending. Given the current economy, these benefits are even more important.

Like most developers, we appreciate the environment and respect the role of USFSW and others in protecting it. We simply want fair, objective standards for determining impacts from developments. Those proposed are anything but and I hope that USFWS will take a more reasoned, scientific and objective approach to these issues than what is proposed.

Sincerely yours,

