Communication from Public

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Comments for Public Posting: Hello, I'm writing to express appreciation that, following public input, the project proponent/City had a roosting bat habitat assessment conducted in the large metal shed building. I had hoped to call in for the June 30th meeting but was unable. I am a bat biologist, I have seen photos of the subject building, and it appears to have a potential to provide highly suitable bat roosting habitat. In regard to bat conservation in California, it is important to understand several things: 1) many of our bat species appear to be at risk, 2) most of our bat species are colonial and eliminating one colonial roost can risk the elimination of an entire local or regional population, 3) our bat species are long lived (15-30 years) and most have one pup per year with low survival rates, so it is very difficult for bat populations to recover from adult mortality events, 4) bats are everywhere, we just don't see them. Frequently I read CEQA impact analyses that 1) do not consider potential impacts to bats at all, 2) do not consider population scale impacts (see Mandatory Findings of Significance) for colonial bat species via the loss of a colony and/or a significant colonial roost, 3) assume that bats are not present because people use the structure and/or nobody has seen a bat at the project site, 4) may consider bats but address them inappropriately (e.g., mitigation measures require "preconstruction surveys"). Of course, each project is different, but considering the following recommendations in the future for basically any project involving structures (or trees) would result in better impact analyses and would minimize impacts to our bat species. 1. Do not assume that bats are not using a structure just because it is occupied or disturbed. All year long I assist people who have discovered that they have a colony of bats roosting in their occupied structures and they never knew it. Many bat species can and do adapt to living with human disturbance, while the humans remain unaware of the bats. 2. Structures (buildings, bridges, towers, culverts, etc.) should be evaluated by a qualified biologist (i.e., one that has significant experience identifying actual bat roosts) during the project planning stage (e.g., before or during CEQA analysis). Ideally, this habitat assessment would occur at least one year in advance of the start of construction disturbance. This would allow time for the project proponent/City to conduct appropriate seasonal surveys, if needed, and plan for appropriate mitigation

(e.g., seasonal exclusion), if necessary. Waiting to do “preconstruction surveys” (e.g., within two weeks of the start of construction, as is typical with nesting birds) leaves project proponents in a predicament if roosting bats are found. Often, at that point, the only option available is to delay the project until the end of the sensitive season (typically summer or winter). Bats are not like birds in selecting nesting/roosting habitat; birds can build a nest virtually anyplace very quickly during the nesting season. Bats often use the same roost every year for generations, and infrequently establish new significant roosts, so it is typically best to conduct a habitat assessment early. 3. Typically, fall is the best season for disrupting or eliminating a roost in a structure or tree. Construction timing for a fall exclusion or roost removal is often the easiest and cheapest mitigation approach and should be considered early in project planning. 4. Remember that bats are not one species. Different bat species have different life histories and habitat needs. Some bats must roost very near their foraging grounds (e.g., pallid bats); some bats forage many miles from their roost sites. Many bat species do not need to roost near a water source, even if that is where they may forage. A qualified biologist, one who is familiar with the different needs of different bat species, should assess potential habitat based on the bat species known to occur in a project area. General assumptions about bats and their habitat needs should not be used to assess potential project impacts to individual species. Impact assessments should be specific to species. 5. Consider cumulative impacts as a result of habitat loss. The criteria that make a roost suitable habitat are very narrow for some species, so the loss of one or more roost sites, regardless of direct bat mortality, may cause a significant impact to an entire colonial bat population. Thank you for considering bats for any future projects in the City. Regards, Kim Fettke 916-300-9451