

Good Afternoon,

Regarding 25 Talbot Lane Site Plan Review / Approval for a Trucking/Freight Terminal on (4) parcels consisting of over 30 acres comprised of old-growth forest, wetlands, watercourses and other various wildlife habitats.

We are very concerned about the effect this may have on the species of tree roosting bats that inhabit that area. The local field office for the US Fish & Wildlife Service (USFWS) and the Connecticut Department of Energy and Environmental Protection (CT-DEEP) Wildlife Division should be consulted prior to any project approvals to determine what impact the clearing of the land will have on either the federally protected Indiana Bat, Northern Long-Eared Bat or any other species of bat considered to be “Endangered” by the State of Connecticut. Since 2007, upwards of 99% of some of the bat species here in Connecticut have been wiped out as a result of White Nose Syndrome affecting them during their winter hibernation cycle, and habitat encroachment.<sup>1</sup> See CT-DEEP Wildlife Division Fact Sheet on Bats (Sept. 2021) at 2.

Some species of bats are clearly present in and around the area of the proposed site plan, per the attached Affidavits and supporting documentation. One need only go outside at dusk to witness them foraging the area for insects as they emerge from the wooded area. It’s important to determine what species and to what extent they inhabit the parcels at issue. In particular, if there are any annual maternity roosts or hibernacula within or near the 33 Acre area prior to any clearing operations.

### **DISCUSSION:**

According to the 2015 Connecticut Wildlife Action Plan (CT-WAP), of the (9) species of bats that call Connecticut home, ALL are classified as being the "Greatest Conservation Need" (GCN)<sup>2</sup> (See CT-DEEP Bat Fact Sheet at 1). Five of those nine species are considered “Endangered” in the State of Connecticut pursuant to Conn. Agencies Regs. § 26-306-4. Two of those are Federally classified as either "Threatened" in the case of the “Northern Long-Eared Bat” (NLEB), or “Endangered” in the case of the "Indiana Bat". The Indiana Bat is on the Federal List of Endangered Species and protected by the Endangered Species Act of 1973.<sup>3</sup>

Connecticut Bats and their Status

<b>Common Name</b>	<b>Scientific Name</b>	<b>CT Status (2015)*</b>	<b>Federal Status*</b>
Big brown bat	<i>Eptesicus fuscus</i>	GCN	
Little brown bat	<i>Myotis lucifugus</i>	E, GCN	
Northern long-eared bat	<i>Myotis septentrionalis</i>	E, GCN	T

<sup>1</sup> CT-DEEP Bat Fact Sheet [https://portal.ct.gov/-/media/DEEP/wildlife/pdf\\_files/outreach/fact\\_sheets/Bats.pdf](https://portal.ct.gov/-/media/DEEP/wildlife/pdf_files/outreach/fact_sheets/Bats.pdf)

<sup>2</sup> 2015 Connecticut Wildlife Action Plan <https://portal.ct.gov/DEEP/Wildlife/CT-Wildlife-Action-Plan/CT-WAP-Current-Status#Review>

<sup>3</sup> U.S. Fish & Wildlife Service (USFWS) Indiana Bat Fact Sheet <https://www.fws.gov/midwest/Endangered/mammals/inba/pdf/inbafactsht.pdf>

Common Name	Scientific Name	CT Status (2015)*	Federal Status*
Eastern small-footed bat	<i>Myotis leibii</i>	E, GCN	
Indiana bat	<i>Myotis sodalis</i>	E, GCN	E
Tri-colored bat	<i>Perimyotis subflavus</i>	E, GCN	
Silver-haired bat	<i>Lasionycteris noctivagans</i>	SC, GCN	
Eastern red bat	<i>Lasiurus borealis</i>	SC, GCN	
Hoary bat	<i>Lasiurus cinereus</i>	SC, GCN	

\* GCN= Greatest Conservation Need  
E= Endangered  
SC= Special Concern  
T=Threatened

I'd propose that prior to any approval or endorsement of the proposed site plan, that either the town or the developer commission a mist netting survey, hibernacula survey, radio-telemetry and/or any other type of studies that may be necessary to determine the species of the bats that currently inhabit the area, prior to any clearing of the land or further development. (Commensurate with the US Fish and Wildlife Service Bat Survey Guidelines)<sup>4</sup> This is essential in order to protect any annual maternity roosts or hibernacula that may be present within or near the specified area.

Further, if the presence of any of these bats is detected, and the site plan is nevertheless subsequently approved, that adequate restrictions be imposed to only clear trees and timber during specified times of year, to mitigate any impact to those species. (i.e. during the specified winter months when the trees will likely be uninhabited).

### **Lighting & Noise Considerations:**

Bats are greatly affected by both light and noise when it comes to both foraging for food, or hibernating. (See, *Schaub et al*, "Foraging Bats Avoid Noise"; Journal of Experimental Biology (1 October 2008))<sup>5</sup>. The presence of an industrial facility where it is possible that there may be 24 hour a day lighting and noise from 3 shifts of workers, and heavy truck traffic, may greatly impact the feeding habits of the local bat population currently residing within or near the proposed site plan. (See, *E.L. Stone et al*; "Impacts of Artificial Lighting on Bats"; Mammalian Biology 80

<sup>4</sup> U.S. Fish & Wildlife Service Indiana & Northern Long Eared Bat Survey Guidelines.  
<https://www.fws.gov/midwest/endangered/mammals/inba/surveys/pdf/FINAL%20Range-wide%20IBat%20Survey%20Guidelines%203.23.20.pdf>

<sup>5</sup> *Schaub et al*, "Foraging Bats Avoid Noise"; Journal of Experimental Biology (1 October 2008)  
(<https://journals.biologists.com/jeb/article/211/19/3174/18275/Foraging-bats-avoid-noise>)

(2015) pp. 213-219)<sup>6</sup>. This may unnecessarily stress populations of bats during the critical summer months, when they are foraging and storing fat for their winter hibernation, or when the females may be nursing their pups.

### **CONCLUSION:**

In conclusion, further information is required. The Planning & Zoning Commission should delay any approvals or endorsements of the proposed site plan, until a more inclusive Wildlife Inventory can be established, and a survey can be conducted in accordance with the US Fish & Wildlife Service's Bat Survey Guidelines for CY20-21 (see attached), and the findings be included in any Environmental Impact Study used to support it. The Survey Guidelines were designed for use for both the Indiana Bat and the Northern Long-Eared Bat.

Depending on the result, an "Incidental Take" Permit may be required from USFWS prior to any clearing of trees.

Thank you for your time and consideration.

Respectfully,

Karen Viklinetz  
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<sup>6</sup> *E.L. Stone et al*; "Impacts of Artificial Lighting on Bats"; *Mammalian Biology* 80 (2015) pp. 213-219 ([https://www.researchgate.net/publication/272889669\\_Impacts\\_of\\_artificial\\_lighting\\_on\\_bats\\_A\\_review\\_of\\_challenges\\_and\\_solutions](https://www.researchgate.net/publication/272889669_Impacts_of_artificial_lighting_on_bats_A_review_of_challenges_and_solutions))