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To: Sherry Barrett/R2/1 WS/DOI@FWS
cc:
Subject: Rationale for including the yellow bat as a covered species in Pima Co.'s MSCP

Sherry,

The following are my thoughts and rationale for including the yellow bat as a covered species for Pima Co.'s MSCP:

Habitat Issues: The yellow bat's primary habitat component is described as fan palms, other palms, and other leafy vegetation such as sycamores, hackberries, cottonwoods, and willows which provide roost sites. Low elevation riparian areas with broad-leaf deciduous trees are documented habitat areas. While it is true that recent locations of the yellow bat in Arizona have been from the Tucson and Phoenix urban areas, it is believed that the loss of riparian habitat may have resulted in a shift in habitat use to exotic urban habitats that support palm trees in the landscaping. However, within Pima County, naturally occurring yellow bat habitat would be in riparian areas. Yellow bats may simply be reported more often in urban areas because activities, such as palm tree trimming, make them more easily detectable. They are not easily mist netted and may be missed during bat surveys and netting in riparian areas.

Potential for Habitat Impacts and Take: Covered activities that will occur within riparian areas have the same potential to impact yellow bat habitat as for the other covered species that are riparian in nature such as the red bat, yellow-billed cuckoo, Bell's vireo, etc. In addition, Pima County likely has impacts related to the operation and maintenance of parks and roadways that contain broad-leaf trees and palms. Examples are Agua Caliente Park, Cienega Creek Preserve, the River Parkways, Colossal Cave Park, and other urban parks with mature trees in the landscaping. Removal of trees or trimming of trees, particularly palm trees, has the potential to cause take of this species.

STAT Conservation Goal: The STAT conservation goal for this species is 75% of the modeled high and medium potential habitat. The habitat model for this species only shows low and medium value habitats. The medium value habitat is primarily outside of the Tucson urban development area and probably has only a small amount of projected development. Important riparian habitat protection guidelines state that there will be 95% conservation. The scale of potential yellow bat habitat impacts, based on location of medium value habitat and the guidelines for important riparian areas, is likely far below 25%, although the numbers would have to be run. It is very likely that the STAT conservation goal could be met. It is unclear why the most recent species table indicates that the STAT goal is not met. There is no indication of acres of anticipated habitat impacts.

Special Conditions: The special conditions for this species would be very straightforward and not require the County to commit to anything beyond what they are already doing. I would suggest the following conditions:

1. Develop a management and monitoring plan for PCCL specific to bats.
2. Implement the Pima County Riparian Protection Ordinance to minimize the loss of habitat for this species.
3. Implement the Pima County Aquatic and Riparian Species Management Plan (in prep) to improve habitat conditions for this species
4. Minimize the removal of and trimming of broad-leaf trees and palm trees during operation and maintenance activities within potential yellow bat habitat.

Summary: The yellow bat should be a covered species because there is the potential for habitat impacts and take, the STAT conservation goals are likely to be met, and the special conditions being implemented by the County for other species will address the special conditions recommended for this species.

Let me know if you have any questions or comments. I will be in around 7:30 am tomorrow morning.