



Minnesota Department of Natural Resources

Division of Ecological and Water Resources, Box 25

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Correspondence # ERDB 20100605-0009

Suzanne Steinhauer, State Permit Manager
Energy Facility Permitting
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Re: Black Oak / Getty Wind Acoustic Report

Dear Ms. Steinhauer,

The Minnesota Department of Natural Resources (DNR) has reviewed the *Acoustic Bat Studies for the Black Oak and Getty Wind Resource Area – Final Report* submitted by Black Oak Wind, LLC and Getty Wind, LLC in compliance with their Public Utilities Commission (PUC) Site Permits. If possible, the DNR would also like to receive the raw data collected during any acoustic surveys that are required by the PUC. The following comments on the report are provided for clarification purposes.

Introduction

The Introduction states that all seven bat species in Minnesota are migratory. The four cave bats are not considered migratory as they hibernate in caves, mines, or buildings. Only the silver-haired bat (*Lasionycteris noctivagans*), hoary bat (*Lasiurus cinereus*), and red bat (*Lasiurus borealis*) migrate south for the winter.

Results

Only 0.8% of the acoustic detections were identifiable bat calls. This seems to be a low percentage. Is it possible that the detectors/microphones were not properly deployed and thus recorded more wind and noise? Checking the detectors more than once/month would decrease the amount of data lost to noise and/or equipment failure (see below).

The report (page 6) states that they acoustically detected evening bats (*Nycticeius humeralis*). This species is not known to occur in Minnesota. It does, however, have a call structure similar to the big brown bat (*Eptesicus fuscus*), a species that does occur in Minnesota.

Equipment failure resulted in a total of 180 lost detector nights (page 6). The east tower was nonoperational 40% (80 detector nights) of the time due (page 7). It is difficult to interpret the implications of this equipment failure on describing peak activity or species composition without further details. Presumably, given the above numbers, equipment failure occurred at all of the towers? When did the failure(s) occur? Was it a one-time event or did the equipment fail periodically throughout the survey period? Along these lines, the percentages reported in Table 1 are misleading as the acoustic equipment at each of the towers was not collecting data for the same duration.

It would be useful if Table 1 also reported the number of unidentified bat calls that were detected. Excluding unidentified bat calls from the species composition results implicitly assumes that the unidentified calls are proportionally distributed among species / species groups, and this may not be a valid assumption.

Discussion

The report (page 9) states that “The overwhelming majority of the calls recorded were from the big brown / silver-haired bat group and the peak activity levels were much higher in July than those recorded throughout the year, likely indicating that one or both of these species was migrating through the area at the time.” Big brown bats are much more numerous in Minnesota so it is likely that majority of these bat calls were from big brown bats, which are not migratory. Also, rather than being due to migration, the peak activity in July is likely due to increased feeding activity that corresponds to mothers having pups and/or the pups becoming volant. Minnesota’s tree bats migrate later in the season (typically September).

The DNR appreciates the opportunity to review the acoustic report. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Joyal".

Lisa Joyal
Endangered Species Review Coordinator

cc: Jamie Schrenzel, DNR
Melissa Doperalski, DNR