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Sent: Thursday, May 18, 2023 1:53 PM
To: kathryn_bulliner@fws.gov
Cc: Webster, Elizabeth <Elizabeth.Webster@stb.gov>
Subject: CPKC Bat Inspection Protocol

Good afternoon, Kathryn.

In the Surface Transportation Boards approval of Canadian Pacific's acquisition of Kansas City Southern, the Board included 90 mitigation measures for the protection of the environment. One of the measures requires us to consult with the US Fish and Wildlife Service on the inspection protocol to be used to inspect bridges and culverts for bat usage prior to removal during the bat roosting season (April 1 through October 31 each year).

Canadian Pacific Kansas City Railroad (CPKC) is seeking the US Fish and Wildlife Service's concurrence that the Department of Transportation's bridge and structure inspection protocol (attached as reference) will be appropriate to use on our bridges and culverts.

Please let me know if you have any questions or would like to discuss.

Thanks,

Joe

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APPENDIX D: Bridge/Culvert and Structure Bat Assessment Form

Bridge/Culvert and Structure Bat Assessment Form Instructions

- This form will be completed to document bat occupancy or bat use of bridges, culverts, and other structures. This form (or a different form with the same information) shall be submitted to the appropriate personnel within the DOT and USFWS for recordkeeping (or uploaded into the Information, Planning, and Consultation (IPaC) Determination Key for use of the Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana Bat and Northern Long-Eared Bat) prior to conducting: any activities below the deck surface either from the underside or from above the deck surface that bore down to the underside; any activities within the culvert where bats may be located; any activities that could impact expansion joints; any activities involving deck removal on bridges; or any activities involving structure demolition for bridges, culverts, and/or other structures.
- Assessments must be completed within two (2) years of conducting any work (see the above bullet), regardless of whether assessments have been conducted in the past. Assessments conducted during the bat active season is the preferred time of year; however, we recognize this is not always possible. Assessments must be completed in appropriate weather conditions, suitable for the assessor to observe common signs of bat use.
- Evidence of bat use may include visual observation (live and/or dead), presence of guano, presence of staining, audible observation, and/or odor observation. Presence of one or more indicators is sufficient evidence that bats may be using the bridge, culvert, and/or other structure.
- If bat use of a bridge, culvert, and/or other structure is noted, additional studies may be undertaken during bat active season to identify the specific bat species utilizing the structure, or protected bat species presence can be assumed, in order to comply with threatened and endangered species regulations. Bat active season dates, typically between April and November, vary regionally and by species, so assessors should consult with their local USFWS Field Office for more specific active season dates.
- For use of the Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana Bat and Northern Long-Eared Bat – If the bridge/culvert or structure is 1,000 feet or more from suitable bat habitat¹ (e.g., an urban or agricultural area without suitable foraging habitat or corridors linking the bridge to suitable foraging habitat), check the appropriate box and fill out the table below. **No further assessment is required.**

Date & Time of Assessment	DOT Project #	Route/Facility Carried	County
Federal Structure ID	Structure Coordinates (latitude and longitude)	☐ This bridge/culvert or structure is 1,000 feet or more from suitable bat habitat ² Name: _____ Signature: _____	

- Any questions pertaining to assessments or this form should be directed to the local USFWS Field Office.

¹ Refer to the USFWS's summer survey guidance for the definition of suitable habitat (<http://www.fws.gov/midwest/endangered/mammals/inba/inbasummersurveyguidance.html>).

² This condition is only for use of the Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana bat and Northern long-eared bat.

Bridge/Structure Bat Assessment Form

Date & Time of Assessment	DOT Project Number	Route/Facility Carried	County
Federal Structure ID	Structure Coordinates (latitude and longitude)	Structure Height (approximate)	Structure Length
Structure Type (check one)		Structure Material (check all that apply)	
Bridge Construction Style		Deck Material	Beam Material
☐ Cast-in-place  ☐ Pre-stressed Girder 		☐ Metal	☐ None
☐ Flat Slab/Box  ☐ Steel I-beam 		☐ Concrete	☐ Concrete
☐ Truss  ☐ Covered 		☐ Timber	☐ Steel
☐ Parallel Box Beam  ☐ Other: _____		☐ Open grid	☐ Timber
		☐ Other: _____	☐ Other: _____
Culvert Type		Culvert Material	
☐ Box ☐ Pipe/Round ☐ Other: _____		☐ Metal ☐ Concrete ☐ Plastic ☐ Stone/Masonry ☐ Other: _____	
Other Structure		End/Back Wall Material	
☐ _____		☐ Concrete ☐ Timber ☐ Stone/Masonry ☐ Other: _____	
☐ _____		Creosote Evidence	
☐ _____		☐ Yes ☐ No ☐ Unknown	
Crossings Traversed (check all that apply)		Surrounding Habitat (check all that apply)	
☐ Bare ground ☐ Rip-rap ☐ Flowing water ☐ Standing water ☐ Seasonal water		☐ Agricultural ☐ Commercial ☐ Residential-urban ☐ Residential-rural ☐ Woodland/forested	
☐ Open vegetation ☐ Closed vegetation ☐ Railroad ☐ Road/trail - Type: _____ ☐ Other: _____		☐ Grassland ☐ Ranching ☐ Riparian/wetland ☐ Mixed use ☐ Other: _____	
Areas Assessed (check all that apply)			
Check all areas that apply. If an area is not present in the structure, check the "not present" box.			
Document all bat indicators observed during the assessment. Include the species present, if known, and provide photo documentation as indicated.			
Area (check if assessed)	Assessment Notes	Evidence of Bats (include photos if present)	
☐ All crevices and cracks: Bridges/culverts: rough surfaces or imperfections in concrete Other structures: soffits, rafters, attic areas	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ Concrete surfaces (open roosting on concrete)	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ Spaces between concrete end walls and the bridge deck	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ Crack between concrete railings on top of the bridge deck Gap  Railing	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ Vertical surfaces on concrete I-beams	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ Spaces between walls, ceiling joists	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ Weep holes, scupper drains, and inlets/pipes	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ All guiderails	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
☐ All expansion joints	☐ Not present 	☐ Visual - live # dead # ☐ Guano ☐ Staining	☐ Audible ☐ Odor ☐ Photos ☐ Species
Name:		Signature:	

APPENDIX D: Bridge/Culvert and Structure Bat Assessment Form Guidance

Federal Transportation Agency/State Department of Transportation (DOT) Preliminary Guidelines for Using the Bridge/Culvert and Structure Bat Assessment Form

*Adapted from the Indiana Department of Transportation 2010 Bridge Inspection Manual and the
Bernardin, Lochmueller and Associates 2007 document.*

The guidelines in this document describe favorable characteristics of bridges/culverts and structures that may provide habitat for many bat species and preliminary indicators intended to determine if any bat species are using bridges/culverts and structures. Negative surveys are considered valid for two years.

Individuals conducting reviews for bats must use the Bridge/Culvert and Structure Bat Assessment Form and must include a copy of the completed form in their project file. Individuals assessing bridges/culverts and structures should employ appropriate safety measures in conducting these reviews and avoid touching any bats. Recommended equipment include a flashlight (preferably a headlamp), hard hat, binoculars or spotting scope, digital camera, check list and a fine- to medium-point permanent marker or pen. It is advisable that individuals also consider having a dust mask, cellular phone, and boots if access beneath structures is desired. Easily removed, protective coveralls may be advisable if access requires crawling.

Favorable Characteristics

Cracks in Concrete

Cracks in the concrete are used by bats as a foothold in roosting (Photo 1). In addition, some bats may be hidden from sight in wider cracks in the concrete and behind deteriorating concrete sections in the ceiling or walls. Look for cracking along support beams and inner walls especially below a fillet (a concrete filling between ceiling and vertical beam). During inspection, sounds may be heard coming from behind such cracks and/or expansion joints.

Expansion Joints (Bridges)

Expansion joints can provide protected cover for bats (Photos 2 and 5), but do not always provide habitat, depending upon whether they are obstructed by road debris or other blockages. If possible during the assessment, individuals should use a flashlight to look into expansion joints or cracks. Guano may be present under joints if being used by bats (Photos 7 and 8).

Cave-like Environment

While assessing bridges/culverts or structures, look for dark environments that mimic cave-like conditions such as under the deck in the case of a bridge (Photos 12 and 13) or an attic in the case of a

structure. This may involve crawling under low areas so a hard hat is recommended. Such places (e.g., a concrete bunker secreted into a hillside with an open front) provide protection from wind, rain, sleet, hail and predators. Bats do not roost near the ground where predators (cats, raccoons, etc.) can reach them. Roosting is usually at least 4 ft. from the ground.

Large Rivers in Wide Floodplains (Bridges)

Many concrete bridges that span larger rivers in wide floodplains offer excellent areas for roosting. These areas tend to have an ample food supply and may also serve as historic flyways for bats during migration (i.e., March-May and September-November). These bridges may also offer opportunities for mating in late fall.

Preliminary Indicators of Bat Presence

The four indicators presented here document physical observations that can easily be made for individual structures. Each of these indicators should be considered on its own merits and the presence of even one of these on a bridge/culvert or structure is enough documentation to confirm bat usage. If questions arise regarding interpretation of these indicators, individuals should contact the local USFWS Field Office for clarification or assistance. (NOTE: Some of these indicators, visual and sound, will not be present during normal hibernation periods, as bats do not usually hibernate under bridges or within culverts. Hibernation usually occurs between September and May, but contact your local USFWS Field Office for exact dates.)

Visual

Day: Look for bats flying or roosting (hanging) during the assessment (Photo 1, 2, & 8). A flashlight or headlamp will be needed and binoculars may be necessary when viewing higher areas. If bats are present; record numbers as best as possible and their locations. Note any dead or injured bats. A sketch map would helpful (use bridge plan sheet as base for sketch).

Night: Thermal infrared cameras or emergence surveys can also be used to document bat use.

Use of presence/absence summer surveys (i.e., mist-netting or acoustics) may also be used if the following apply:

- A presence/absence summer survey is already necessary because there will be tree removal associated with the project. The results of the presence/absence summer survey for a nearby project is not sufficient. The survey should be specific for the project in question.
- Survey points over water/edge of water (if there is a small stream) should be incorporated in the study plan.
- Survey points should be identified based on the habitat on-site. If no point is within 0.25 miles of a bridge/culvert or structure, an additional level-of-effort is necessary. Either add a survey point within 0.25 miles, or conduct one of the previous mentioned techniques (bridge/culvert or structure inspection, emergence survey¹, thermal infrared cameras).
- The Service Field Office will review and approve the survey scope of work.
- If the bridge/culvert or structure is within a known maternity colony home range, a bridge/culvert or structure assessment is required.

¹ The range-wide Indiana bat summer survey guidelines provide details on how to conduct an emergence survey.

Sound

Listen for high pitched squeaking or chirping during the assessment and identify location(s) for later examination by DOT staff. This may be helpful in locating bats within deep cracks or open joints. A sketch map would be helpful.

Droppings (Guano)

Bat droppings are small (mouse-like in appearance but less regular) brown or black pellets (Photos 6 - 8). Older droppings may be gray in color. These droppings will accumulate on the ground; floor of a covered bridge/culvert or structure; or on structural components below where bats roost. Droppings may also adhere to support beams and walls below roosts.

Note bat droppings and their location. Check under likely roosting spots such as cracks, cave-like areas, and expansion joints. If guano is present, the inspector may wish to wear a dust mask. Also, it is advisable to wear rubber boots to minimize tracking of any guano into vehicle(s) and other places.

Staining

Stains may appear wet and are usually found in dark places. Look for four to six inch wide dark stains located on concrete support beams and walls immediately below the ceiling of the bridge or culvert, and beneath joints (Photos 8 - 11).

Literature Cited

Bernardin, Lochmueller, and Associates, Inc. 2007. Bridge Inspection Checklist for Bats. Unpublished. Evansville, Indiana.

Indiana Department of Transportation (INDOT). 2012. INDOT Bridge Inspection Manual. Indiana. Available at: http://www.in.gov/dot/div/contracts/standards/bridge/inspector_manual/index.htm.

Keeley, Brian W. and Merlin D. Tuttle. 1999. Bats in American Bridges. Bat Conservation International, Inc., Austin, TX. Resource Publication No. 4, 41 pp.

Images of Favorable Characteristics and Preliminary Indicators of Bat Presence



Photo 1: Bats hanging from cracks along support beams



Photo 2: Visible bats within an expansion joint



Photo 3: Example of open concrete joint used by bats



Photo 4: Guano deposits visible from bridge deck on top of pier



Photo 5: Guano deposit on pier, obscuring structural features.



Photo 6: Bat Guano on riprap



Photo 7: Staining along longitudinal joint.
Guano deposits on the ground.



Photo 8: Staining on underside of expansion joint from bat use.



Photo 9: Staining on sides of pier caps



Photo 10: Guano staining on side of pier



Photo 11: Bats roosting & associated staining



Photo 12 and 13: Bridge design mimicking “cave-like” atmosphere



Photo 14: NLEBs roosting under a timber decked bridge