

PUBLIC SUBMISSION

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Regulations Governing the Inspection and Grading of Manufactured or Processed Dairy Products – Record Keeping (Subpart B).

Comment On: AMS-DA-17-0062-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals

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General Comment

WIND-POWER TURBINES ARE BAD FOR FARMERS...by threatening.... populations of insectivorous bats in North America. Bats are voracious predators of nocturnal insects, including manycrop and forest pests. There are no continental-scale monitoring programs for assessing wildlife fatalities at wind turbines, so the number of bats killed across the entire United States is difficult to assess. By 2020 an estimated 33,000 to 111,000 bats will be KILLED ANNUALLY by wind turbines in the Mid-Atlantic Highlands alone . Mortality from factors is substantial and will likely have long-term cumulative impacts on both aquatic and terrestrial ecosystems. the economic consequences of losing so many bats could be substantial.

Loss of bats could lead to... agricultural losses ...estimated at more than the value of bats may be as low as... \$3.7 billion/year and as high as \$53 billion/year..... These estimates include the... reduced costs of pesticide applications that are not needed to suppress the insects consumed by bats . Save More Money by helping with impacts of pesticides on ecosystems,... which can be substantial ,... or other secondary effects of predation, such as ,,,reducing the potential for evolved resistance of insects to pesticides ,,,and genetically modified crops,,,,, , bats can exert top down suppression of forest insects. For example, a single colony of 150 big brown bats (*Eptesicus fuscus*) in Indiana has been estimated to eat nearly 1.3 million pest insects each year, possibly contributing to the disruption of population cycles of agricultural pests . Other estimates suggest that a single little brown bat can consume 4 to 8 g of insects each night during the active season. published estimates of the value of pest suppression services provided by bats ranges from about \$12 to \$173/acre (with a most likely scenario of \$74/acre) in a cotton-dominated agricultural landscape in south-central Texas. The value of bats to the agriculture industry is estimated nearly \$23 billion per year, but may range from \$3.7 billion to \$53 billion a year. Brazilian free-tailed bats (*Tadarida brasiliensis*) form enormous summer breeding colonies, mostly in caves and under bridges, in south-central Texas and northern Mexico. Their prey includes several species of adult insects whose larvae are known to be important agricultural pests, including the corn earworm or cotton bollworm (*Helicoverpa zea*). We estimate the bats' value as pest control for cotton production in an eight-county

region in south-central Texas. Our calculations show an annual value of \$741 000 per year, with a range of \$121 000-\$1 725 000, compared to a \$4.6-\$6.4 million per year annual cotton harvest. Bats feed on some of the most damaging crop pests - including the moths of cutworms and armyworms - which helps to protect food crops naturally. Farmers appreciate the pest control provided by bats and many look forward to having bats return to their farms each year,

Urgent efforts are needed to educate the public and policy-makers about the ecological and economic importance of insectivorous bats and to provide practical conservation solutions. North America are under severe pressure from major new threat. bats of several migratory tree-dwelling species are being killed in unprecedented numbers at wind turbines across the continent . Why these species are particularly susceptible to wind turbines remains a mystery, and several types of attraction have been hypothesized . Wind is Not clean If it removes important Bat that helps the environment with lower use of pesticides, and cost to farmers are too great for use windmills that generating occur less than 30% of the time. There is NO market for electricity that cannot be delivered on demand. The "demand" that exists is nothing more than legislated policy artifice - in the absence of mandated fines, penalties and/or endless subsidies the wind industry would have never got going at all. Endless streams of massive subsidies for a meaningless power source fits the "unsustainable" . taking billions from farmers to produce to give to wind farms is a waste money and totally nonsense.