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09/26/2012 07:55 AM

To: <midwestwindhcp@fws.gov>
cc:
Subject: Midwest Wind Energy Multi-Species Habitat Conservation Plan
Comments

Hi Rick,

Attached are comments from the Michigan Nature Association related to the Midwest Wind Energy Multi-Species Habitat Conservation Plan.

Andrew Bacon
Stewardship Coordinator

MICHIGAN NATURE ASSOCIATION
Celebrating 60 Years of Protecting Michigan's Natural Heritage

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MSHCP comments hart tongue fem sept 21 2012.doc

Docket – [No. FWS – R3 – 2012 – N179;

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Draft Midwest Energy Multi-Species Habitat Conservation Plan Within Eight-State Planning Area

Comments for submission by the Michigan Nature Association
326. E. Grand River Ave.
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The Michigan Nature Association (MNA) is a non-profit conservation organization dedicated to the acquisition, protection and maintenance of natural areas containing unique natural communities, rare species, and other components of Michigan’s natural environment. As an organization we are supportive of the present planning process and have supported protection of federally-listed bird and bat species under the Endangered Species Act of 1973 (ESA). As part of our program of protecting occupied habitat for many species listed under the ESA throughout Michigan we propose another species for protection through the Midwest Energy Multi-Species Habitat Conservation Plan (MSHCP).

The American hart’s tongue fern (*Asplenium scolopendrium var. americanum*) is a threatened species under the ESA. Within the eight state planning area this fern only occurs in small localized areas of Mackinac and Chippewa Counties in Michigan, primarily along the Niagara Escarpment. The plant is dependent on moist and humid conditions typically found among the cracks and crevices of boulders and wooded ravines in forested areas with concentrations of exposed dolomite or limestone. The microclimate for the American hart’s tongue fern sites in Michigan is ultimately protected by the existence of these habitats within a closed canopy forest. The core area for three known populations in Mackinac County is currently of high interest for wind development due to the topography of the Niagara Escarpment with numerous landowners having entered into development leases and development appearing likely in the near future. Development of this or similar areas may lead to either direct take of American hart tongue fern but more importantly the alteration of critical habitat due to the loss of forest canopy leading to the dessication of ferns, sporelings, and the bryophyte beds required for reproduction.

The recovery plan prepared in 1993 (which has not been updated) identified timber removal and residential development as threats as such activities would be expected to raise light levels and lower humidity levels to the detriment of the species. Additionally the plan states that residential or other development would, in most cases, either directly destroy the plants present or result in environmental changes that would make the site unsuitable. Although wind energy development is not specifically identified in the 1993 plan it is characterized by reference to other development and was not a perceived threat 20 years ago. The recovery objectives stated in the recovery plan includes the protection of four self-sustaining populations of the American hart’s tongue fern within Michigan which

are protected within a sufficiently large area to ensure that, to the extent possible, natural processes within its habitat can continue without adversely protecting the population. The objectives go on to state that all American hart's tongue fern populations and their habitat should be protected from present and foreseeable human-related and natural threats that may interfere with any of the populations.

The Michigan Nature Association respectfully requests that the MSHCP include protection of the American hart's tongue fern by;

1. Preventing direct take of the American hart's tongue fern for development of turbines, support infrastructure, or access.
2. Providing a buffer or setback area between turbines and fern colonies to protect the critical habitat required for the fern colonies to survive.
3. Basing the measured buffer from the edge of the forest openings created for turbine construction, operation, support, or access rather than simply from the base of the turbine.

Sincerely yours,

Andrew Bacon

Stewardship Coordinator

On behalf of the Michigan Nature Association