

KARNER BLUE BUTTEFLY HABITAT CONSERVATION PLAN DRAFT Public Involvement Documentation

The Department of Natural Resources has chosen to develop a Habitat Conservation Plan to support its request for an Incidental Take Permit for the Karner blue butterfly. Further, the Department chose to develop this Plan as a Statewide comprehensive effort. The expansive nature of this plan prompts the need for both public and peer input throughout the development process.

Peer input was arranged through the formation of work groups that were solicited to assist with the planning process. A Karner Blue Butterfly Working Group was asked to act as a science advisory body. A Karner Blue Butterfly Management Partners Workgroup was asked to act as a management advisory body. In addition, peers were encouraged to comment whenever their contributions had merit.

Meaningful public input was more difficult to secure. In addition to the difficulty in discovering effective mechanisms to reach out to stakeholders, they were found to have great interest in butterflies in general but limited understanding of the biology and needs of the Karner blue butterfly. Thus, a strategy of education and outreach was combined with requests for input into the planning process.

To provide education and outreach, websites, brochures, releases to the print media, tours, and talks were offered. These offerings were effective in raising the level of understanding for stakeholders with a demonstrated interest in the butterfly. However, the general public continues to have limited understanding of this species.

Public input has been welcomed throughout the development of the plan. This input is continuously incorporated to varying degrees, but in-depth evaluation and integration of this input is structured to occur at the conceptualization of the project, the selection of alternatives, the offering of the final draft, and at the completion of the plan. This report documents the integration of public input evaluated as part of the selection of alternatives.

60-day Comment Period

A 60-day comment period in February and March 2004 was identified to gather public input for alternative selection for the Plan. Two meetings were held as a part of this comment period to provide information on the butterfly and the planning process and to provide a mechanism to facilitate comments. Similar information was released Statewide to the media for coverage. Workgroup members were also solicited to contact peer group leaders with this information.

Comments were requested in print form for easier tracking and evaluation. A total of 15 comment responses were received: 10 by e-mail, 2 at the public meetings, and 3 by US mail. These comments were summarized, and responses were offered in relation to alternative selection (see below).

Alternatives

Alternatives were crafted with input from the public and peer groups. These alternatives were characterized and grouped into those selected for detailed evaluation and those receiving no further evaluation (see below). These alternatives will be used to guide development of the Plan.

SUMMARY OF COMMENTS AND RESPONSES

Comment: A concern was expressed about the continuing decline of oak savanna and the habitats this ecosystem supports. This concern was particularly focused around its impact on endangered and threatened species including the Karner blue butterfly.

Response: Both the Department and the Karner Blue Butterfly Recovery Team view this concern as critical. Both the Reduced-scope and Comprehensive HCP alternatives contain objectives that address this concern.

Comment: A concern was expressed that exotic invasive plant species are compromising habitat. Yet, adult butterflies are nectaring on plants like orange hawkweed and spotted knapweed. Suggestions were made to reduce the occurrence of exotic plants in these habitats but to do so gradually so existing butterfly populations are not significantly impacted.

Response: This concern is addressed in both the Reduced-scope and Comprehensive HCP alternatives. In addition, coordination with the Michigan Invasive Plants Council is enabling a full range of responses to this concern.

Comment: A concern was expressed that land development was impacting habitat both by reducing the amount and fragmenting the remainder. A suggestion was made to minimize land development or to better control it.

Response: Both the Department and the Karner Blue Butterfly Recovery Team acknowledge the role that development has played in compromising habitats. However, minimizing development does not address the habitat degradation that occurs through ecological succession to a closed-canopy condition. The current use of incentive programs to preserve and enhance habitat while also preserving the land base on which the programs are applied may be a more effective tool in this regard.

Comment: One commenter suggested that Karner blue butterfly occupied areas and habitat be clearly identified so land users could recognize and respect them.

Response: The Department has discovered in past releases of location information on sensitive species that harm has come to that species as a result. The Department's current practice is not to make such information generally available. Also, the most common means of identifying such areas locally has been done through posting with signs. Vandalism of signs has been common especially on public lands making this technique less than optimal in identifying these areas to the land user. Nevertheless, this suggestion might be applied under certain circumstances as a part of either the Reduced-scope or Comprehensive HCP alternatives with concurrence from the US Fish and Wildlife Service and will be passed on to the property managers.

Comment: A concern was expressed that Karner blue butterfly management not be restricted to public lands. Such an approach would ultimately further restrict their distribution and render them more vulnerable.

Response: The Department agrees and notes that this consideration prompted proposal of the Comprehensive HCP alternative.

Comment: One commenter suggested that local organizations should be formed to bring those with an interest in Karner blue butterflies together for the greater good of the butterfly.

Response: This suggestion has value, and groups are already active that include conservation of the butterfly in their mission. Perhaps a function of the plan is to alert readers to the groups that are active in this regard.

Comment: Commenters outlined a need for information, technical assistance, and funding support for creating and enhancing habitat on private property.

Response: The Department recognizes this need and is encouraging the application of existing incentive programs and the development of additional incentive programs to meet this need. Currently programs directed to this need are available with the Department of Natural Resources, Natural Resources Conservation Service and associated County Soil and Water Conservation Districts, US Fish and Wildlife Service, and various non-governmental organizations. This comment is noted to support the Comprehensive HCP alternative.

Comment: Commenters asked for locations where they could view the butterfly.

Response: The Department recognizes the educational and aesthetic value in the opportunity to observe the butterfly in its natural habitat. To this end and with concurrence from the US Fish and Wildlife Service, the Department encourages opportunities for public contact with the resource that result in minimal risk to the resource itself. This comment is noted to support either the Reduced-scope or Comprehensive HCP alternatives.

Comment: One commenter wished to know if Karner blue butterflies existed close to his property. This information was to be used in assessing the likelihood that the butterfly would colonize his property if managed appropriately.

Response: While the Department's general practice is not to provide location information on sensitive species, it recognizes that the needs of specific cases can provide justification for the sharing of such information when tied to objectives for the greater good of the butterfly subject to concurrence from the US Fish and Wildlife Service. This comment is noted to support the Comprehensive HCP alternative.

Comment: Concerns were expressed that habitat should be developed elsewhere in Michigan where Karner blue butterflies could subsequently be established to buffer their existence in the long-term.

Response: The Department agrees and has included provisions in both the Reduced-scope and Comprehensive HCP alternatives to first stabilize metapopulations in locations

where they presently exist and then to expand their distribution to other favorable sites with concurrence from the US Fish and Wildlife Service. This comment is noted to have greater opportunity for application in the Comprehensive HCP alternative.

Comment: Concern was expressed regarding damage to habitats from ORVs.

Response: The Department agrees and has included provisions in both the Reduced-scope and Comprehensive HCP alternatives intended to reduce the impact of ORVs on public lands where maintenance of oak savanna is an objective. Further, educational efforts have been devised to alert landowners to the harm to oak savanna from soil disturbance that can occur with repeated ORV use. This comment is noted to support both the Reduced-scope and Comprehensive HCP alternatives.

Comment: Concerns were expressed regarding the need for education on the needs of the Karner blue butterfly and its habitat in order to win public support for recovery efforts.

Response: The Department agrees and maintains an Education and Outreach Effort intended to raise awareness of the plight of this butterfly and the Oak Savanna Ecosystem and promote public involvement in recovery. This comment is noted to support both the Reduced-scope and Comprehensive HCP alternatives.

Comment: One commenter suggested that the support of groups with an interest in Lepidoptera be enlisted for help with recovery.

Response: The Department agrees and has already made contacts in this regard. This effort is ongoing, and additional joint initiatives are expected.

Comment: Concern was expressed that Oak Savannas be managed with fire as this was the historic means of maintaining them.

Response: The Department agrees and takes note of the fact that there is a long history in Michigan of managing public lands with prescribed burning. This practice is expected to continue especially with reference to managing Oak Savannas. This comment is noted to support both the Reduced-scope and Comprehensive HCP alternatives.

Comment: A suggestion was made to utilize GIS and new technologies in evaluating locations in Michigan where comprehensive management for the Karner blue butterfly might be applied.

Response: The Department and its contractor are currently using GIS enabled techniques to refine both population and habitat survey efforts for the butterfly. Additional applications are being planned. This comment is noted to have greater application with the Comprehensive HCP alternative.

Comment: Concern was expressed that whatever is done for the butterfly be timely as habitat continues to shrink and butterfly numbers continue to decline.

Response: The Department agrees and is incorporating this as a significant consideration in alternative selection.

Comment: Comments were received endorsing the Department's current process and commending the approach.

Response: The Department appreciates these positive comments on the process.

ALTERNATIVES SELECTED FOR DETAILED EVALUATION

1) No Action Alternative

Under the No Action Alternative, no changes to current management would occur. A Section 10(a)(1)(B) permit would not be issued at the state level, and projects involving take would be prohibited under Section 9 of the ESA. Such an approach would potentially subject landowners and local governments to civil and criminal penalties for unauthorized take of Karner blue butterflies. Furthermore, occupied Karner blue butterfly habitat would most likely not be maintained or improved since this alternative precludes the modification of any occupied Karner blue butterfly habitat. The combination of multiple ownership and intermittent Karner blue habitat patterns encourages irregular development that is efficient for neither land use activities nor conservation. Natural plant succession would occur in occupied habitat eventually making it unsuitable for the Karner blue butterfly.

2) Reduced-scope HCP

Under this alternative, a subset of land managers hosting a majority of the occupied habitat on their lands (e.g. DNR, TNC, DOT) would prepare a HCP and apply for an ITP. Conservation efforts occurring under direction of this HCP would be focused on restricted sites on these lands. Legal land use activities and development projects on the remaining occupied habitats would proceed on an individual, project-by-project basis under existing local, state, and federal regulations.

3) Comprehensive HCP (Proposed Alternative)

Under this alternative, a coalition of management partners representing a majority of the land management opportunity for the Karner blue butterfly in Michigan would be invited to come together in preparing a HCP and applying for an ITP. Conservation efforts would be directed to all lands with potential habitat and willing landowners and would be broadly focused toward (1) developing an ecologically and economically sound solution integrating Karner blue butterfly conservation with economic and other land uses; (2) encouraging multiple species and oak savanna ecosystem management planning; (3) assuring, on a landscape basis, no-net-loss of Karner blue butterfly habitat attributable to land use that would otherwise be legal; and (4) providing for Karner blue butterfly metapopulation dynamics on landscapes managed to maintain the necessary dynamic processes.

ALTERNATIVES NOT SELECTED FOR DETAILED EVALUATION

1) HCP with Mitigation Banking

This alternative proposes that impacts to the Karner blue butterfly and its habitat from land management activities be mitigated through permanent habitat maintenance, restoration, or creation. The need for mitigation would largely come from private lands that are already highly fragmented and heavily impacted by direct and indirect impacts of development and land management practices. Establishing mitigation banks and ensuring connectivity between habitats on so many parcels would be very difficult, very costly, and likely ineffective for the long-term conservation of the butterfly. A conservation strategy that recognizes that habitat moves around on the landscape and is concentrated on public lands and large private holdings is deemed to be ultimately more effective. Moreover for the incidental take anticipated as a result of proposed management for Oak Savanna, the take of individuals is expected to result from short-term effects that have long-term benefits to habitat and butterfly populations. This taking is more appropriately mitigated through other alternatives.

2) HCP with Refuges

This alternative proposes that Karner blue butterflies be conserved through provision of permanent refuges within which the butterfly could be perpetuated. While the provision of refuges does provide assurances that lands are set aside for conservation of the butterfly, management is also required to maintain them in a vegetative state that meets the habitat needs of the butterfly. The use of refuges to conserve the butterfly also concentrates it at limited sites and thereby increases risk from catastrophic occurrences. Moreover, this butterfly has historically occurred in metapopulations that existed on the landscape as multiple subpopulations in discrete but temporal habitat sites connected to each other by corridors for recolonization as needed of these habitat sites. The opportunity to manage using temporal refuges such as core areas is recognized as a part of a viable strategy that is employed in both the Reduced-scope and Comprehensive HCP alternatives.

3) HCP with Land Use Restrictions

This alternative proposes that Karner blue butterflies be conserved through provision of habitat resulting from restrictions in statute or zoning that limit development or land use. While this approach has been considered under the guise of greenspace, ordered community development, and clustered subdivision development, dedication of lands in this manner on a landscape scale has not been used to conserve a rare organism. Establishing the legal framework for implementing this alternative may be sufficiently involved that the alternative may not provide a timely solution. Considering the need to manage habitats in a vegetative state that meets the habitat needs of the butterfly and the need for this habitat to occur at multiple interconnected sites on a landscape, conservation through this alternative is unlikely to succeed.