

April 17, 2024

Zachary Ormsby, Field Manager
Bureau of Land Management
Central Coast Field Office
940 2nd Ave., Marina, CA
93933-6009

RE: Monarch Overwintering Habitat Protection and Environmental Assessment Relevant to Proposed Access Alternatives for Knoll Parking for Cotoni-Coast Dairies Proposed Northern Parking and Trailhead

Dear Field Manager Ormsby:

I am a consulting biologist with 22 years of professional experience and 17 years locally in Santa Cruz County, California. I have conducted monarch autumnal and overwintering roost surveys for public and private clients since 2007. My firm, EcoSystems West Consulting Group is contracted to support environmental review for the County of Santa Cruz Planning Department for various aspects of resource protection, and has done so for over 25 years. I have been requested by Friends of the North Coast (FONC) to review BLM's March 19, 2024 Environmental Assessment for its proposed Northern Parking and Trailhead project at Cotoni-Coast Dairies National Monument, particularly in regard to monarch overwintering habitat protection and Proposed Access Alternatives for Knoll Parking.

In preparing this letter I reviewed the most relevant parts of BLM's March 19, 2024 Environmental Assessment (EA) for its proposed Northern Parking and Trailhead project and the Community's Preferred Access for Knoll Parking (visual attached), as well as BLM's RMPA Vegetation/Riparian Zone Map (attached), photos of the area where Alternative 1 proposes to construct and Access Road from Cement Plant Road to the knoll top parking area, and a video and photographs of the route proposed as FONC proposed Alternative Roadway for travel between Cement Plant Road at the Barn site level around the inland side of the knoll, up the draw to the knoll-top parking lot.

Monarch Overwintering Habitat Site 3009

On November 10th and 11th, 2022, at the request of Friends of the North Coast and Davenport North Coast Association, I, EcoSystems West biologist Justin Davilla, visited a potential monarch overwintering roost site (XERCES Site 3009) at Cement Plant Road and Warrenella Road in Davenport, Santa Cruz County, California. The site is comprised of a parallel hedgerow of eucalyptus and scattered Monterey cypress on either side of Cement Plant Road. On both days, approximately 38 to 50 individuals were observed clustering in the trees on the northeast side of Cement Plant Road bordering the recently graded BLM trailhead parking area. Subsequently, Groundswell

Ecology (Bill Henry) investigated the site on November 21 and 22, 2022 using a drone to video the site and document monarch clusters. Mr. Henry prepared a Western Monarch Overwintering Habitat Assessment documenting 183 monarchs in several clusters on both sides of Cement Plant Road, and identified potential harm from BLM's August 2022 tree removal, root disturbance, and clearing down to bare mineral soil under the remaining trees. Groundswell Ecology notified property owners BLM and Caltrans, as well as Xerces Society for Invertebrate Conservation. On November 22, 2022, I was copied on an email from Xerces stating they had notified BLM of both the Ecosystems West (Davilla) and Groundswell Ecology (Henry) observations and confirmed that this site "qualifies as an overwintering site."

This grove of trees exhibits many of the attributes that overwintering monarchs require as a stable roost site. The trees along Cement Plant Road are well protected from prevailing northwest winds and southerly winds accompanying winter storms by the dense grove of trees between Cement Plant Road and Highway One. The grove has the high-arched structure and eastern orientation that captures the sun as it rises in the morning creating a steadily warming environment for overwintering butterflies as they emerge from daily torpor when temperatures reach approximately 55 degrees Fahrenheit. There are ample nearby water sources including Agua Puerca Creek and artificial ponds, although monarchs readily consume dew and water accumulated in small puddles, flower staminodes, and other ephemeral sources. Nectar plants are located nearby including in the open grasslands northeast the eucalyptus grove as well as in landscaped gardens at nearby residences in Newtown Davenport approximately ¼ mile southeast of the parking area. However, overwintering monarchs typically nectar directly on winter flowering eucalyptus and invasive climbing ivy plants including English ivy and cape ivy.

The four large eucalyptus that were removed late summer 2022 were in a location that may have provided additional over-wintering habitat and/or wind protection to the overwintering roost(s). However, this cannot be evaluated directly as these trees were removed prior to obtaining contemporary baseline data on the overwintering population prior to removal. The Xerces Society has provided information that as many as 5000 monarchs occupied this location in the late 1980s, but overall, the Western monarch population has decreased significantly from more than 3 million to less than 300,000 currently. Although classified as an invasive species by the California Invasive Plant Council (2024) and USDA (2022), these eucalyptus trees comprised "Especially Valuable Habitat" (EVH) as defined under Section 30107.5 of the California Coastal Act. Because of their designation as EVH, eucalyptus supporting monarch overwintering monarchy roosts are considered Environmentally Sensitive Habitat Areas (ESHA) under the Coastal Act. This was further confirmed after reviewing photographs provided by

FONC of these four trees prior to, and during their removal. The removal of these eucalyptus trees has the potential to adversely affect the suitability of the grove on the east side of Cement Plant Road to support overwintering Monarchs. It also makes avoidance of damage or destruction to the remaining trees a greater necessity so as to maintain the ongoing suitability of the grove to monarch butterflies. Removal of overwintering monarch roost habitat in the Coastal Zone would typically be evaluated by Coastal Commission staff as part of their Consistency Determination process for projects with a federal lead agency (BLM). In general, removal or direct impacts to ESHA in the Coastal Zone are only permissible for uses "dependent on those resources." Moreover, development in areas adjacent to ESHA are required to be "sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas." Categories of resources dependent uses are not listed in the Coastal Act. It is unclear what element of the driveway access to the Knoll Parking Area is "resource dependent requiring removal of trees for access when a viable alternative has been proposed to avoid this impact, or direct impacts to other sensitive habitats, including Agua Puerca Creek and its associated riparian corridor.

Lastly, Monarchs are not formally listed as "threatened" or "endangered" under the Federal Endangered Species Act (FESA), but USFWS have declared them to be "candidate" species warranting protection and announced it is likely they will be listed in the next year or two. Nevertheless, removal of the trees without adequate analysis of "candidate species" is not permitted under NEPA, BLM, or Coastal Commission policies.

The project proponent has acknowledged potential impacts to monarch roost habitat at the Knoll Parking Area from the preferred alternative as follows:

Effects of Alternative 1 [Preferred Alternative]:

At least four large eucalyptus (blue gum) trees on the east side of Cement Plant Road would have to be removed to construct the driveway for the double loop site design resulting in moderate (direct) adverse impacts on monarch butterfly habitat. Indirect impacts to monarch butterfly that may occur include the potential for incidental trampling or crushing of individuals by maintenance vehicles or equipment, or temporary disturbance of habitat.

Blue gum is not the native overwintering habitat tree of monarch butterflies, nor is blue gum the preferred tree species for overwintering (Griffiths and Villablanca 2013, 2015). Blue gum is essentially an artificial habitat for the species. Of the California native tree species identified as overwintering habitat for monarch, coast redwood, Douglas fir, and coast live oak are the ecologically appropriate

overwintering trees at C-CD. Enhancement of monarch butterfly habitat at C-CD should focus on replacing non-native blue gum eucalyptus with native coast redwood, Douglas fir, and/or coast live oak. Although both Monterey pine and Monterey cypress are native to the Monterey Peninsula, and Monterey pine is native at Año Nuevo, neither of these tree species are locally native to C-CD and should not be planted there. Removal of blue gum trees and their replacement with more beneficial native species is, in fact, a proactive conservation action for monarch butterfly and being able to achieve this goal through the mechanism of providing recreational opportunity is a rare conservation “win-win.”

To reduce potential adverse impacts on the species, various (interim) programs and projects that work towards the recovery of monarch butterflies can be put in place through interagency coordination with the “conservation recommendations” of the Service and local agencies and/or non-governmental organizations. This allows the Service to work with BLM and other partners on “voluntary monarch conservation” to improve monarch habitat and address potential effects to populations of the butterfly on the North Coast of Santa Cruz County (USFWS reference: <https://www.fws.gov/initiative/pollinators/monarchs>) This process emphasizes coordination with State Parks and other partners to obtain the best available information on species status and recommendations for conservation; and provides the foundation for planning and implementing conservation efforts that are most likely to be effective in improving the status of the species.

Measures to reduce potential impacts include habitat restoration for monarch butterfly in coordination with partners. Ground-disturbing activities would be scheduled outside the peak winter flight period (approximately October 1 through March 15) and flagging or other markings would be used to avoid butterfly host plants outside of permanent impact areas.

With implementation of habitat restoration and the other project design features (PDF) described in the Attachment 1, impacts to wildlife habitat would be less than significant.

A project alternative for access to the Knoll Parking Area was evaluated as follows:

Effects of Alternative 2:

Alternative 2 would result in minor (indirect) adverse impacts on wildlife habitat from construction and use of the parking area. No additional eucalyptus trees would need to be removed to construct the driveway for the single loop site design. Ground-disturbing activities would be scheduled outside the peak winter

flight period (approximately October 1 through March 15) and flagging or other markings would be used to avoid butterfly host plants outside of permanent impact areas.

The EA fails to inform the public that the trees BLM proposes to remove as part of Alternative 1 are located at Monarch Overwintering Site 3009 identified by Xerces and the California Department of Fish and Wildlife California Natural Diversity Database (CNDDDB) listing. Nor does the EA inform the public that four monarch overwintering habitat trees were already removed by BLM in August 2022, just prior to the onset to the autumnal roost period.

The EA also states that “(a)t least four large eucalyptus (blue gum) trees on the east side of Cement Plant Road would have to be removed to construct the driveway for the double loop site design” that comprises Alternative 1. The EA concludes that this will result in “*moderate* (direct) adverse impacts on monarch butterfly habitat.” The failure of the EA to inform and show the public and the decision makers that the four trees (or more) to be removed are necessarily in close proximity to the five clusters recorded by Groundswell Ecology the November 2022 Western Monarch Overwintering Habitat Assessment conflicts with any basis for BLM to conclude that the direct adverse impacts on monarch butterfly (overwintering) habitat will be “*moderate*.” This is further problematic given that BLM does not describe the method for determining how many trees would need to be taken down and how much grading would be needed to construct this driveway which must rise an estimated 10-12 feet in elevation from Cement Plant Road to the knoll top Parking Lot (see attached photographs).

The trees planned for removal or impacted under Alternative 1 were identified to support monarchs by Groundswell Ecology’s November 2022 Habitat Assessment. If those additional trees are removed, it is unclear whether impacts will be a “*moderate*” as stated, as the response of next year’s migratory monarchs cannot be predicted. It is possible that monarchs will move to adjacent trees but it is equally likely that the grove architecture will no longer support roosting monarchs at this location. It can only be determined with certainty that the grove will undergo a significant structural change and the impacts to monarchs are undetermined, but potentially significant and unavoidable.

Furthermore, the statement that “BLM is currently working with partners at the Xerces Society and Groundswell Ecology to support ongoing efforts to restore and protect habitat for monarchs” should commit BLM to perform those efforts at this site (Overwintering Site 3009) rather than other nearby overwintering sites such as the Overwintering site near the Davenport Fire Station.

For the above reasons among others, it is my opinion that the statement in the EA that “impacts to wildlife habitat would be less than significant” is unwarranted as

Zachary Ormsby, BLM Field Manager

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applied to monarchs at Overwintering Site 3009. This is additionally true because a viable alternative has been proposed which does not require the removal of any monarch roost or wind buffer trees, as shown in the Community's Preferred Access for Knoll Parking (visual attached).

At a minimum, a Consistency Determination by the California Coastal Commission should identify the basis for impacts to monarch overwintering habitat as a resource dependent use. The determination should also evaluate the FONC alternative and provide a discussion which alternative is the environmentally superior option. As designed, the FONC access driveway would not remove additional monarch habitat trees and would be located in non-native annual grassland pasture, more than 250 feet from the edge of the dripline of the riparian canopy associated with Agua Puerca Creek. While considered to be prone to wet conditions, the pasture was not delineated as a wetland subject to federal Clean Water Act or Coastal Act jurisdiction. Moreover, both the BLM and FONC alternatives are situated within *upland* critical habitat for federal "threatened" California red-legged frogs (CRLF). Both alternatives pose limited potential to impact CRLF dispersing from Agua Puerca Creek and other nearby aquatic features and would benefit from design elements and best management practices (BMPs) to prevent CRLF from crossing the access road and parking area upon opening the parking facility.

Sincerely,



Justin Davilla, Ecologist

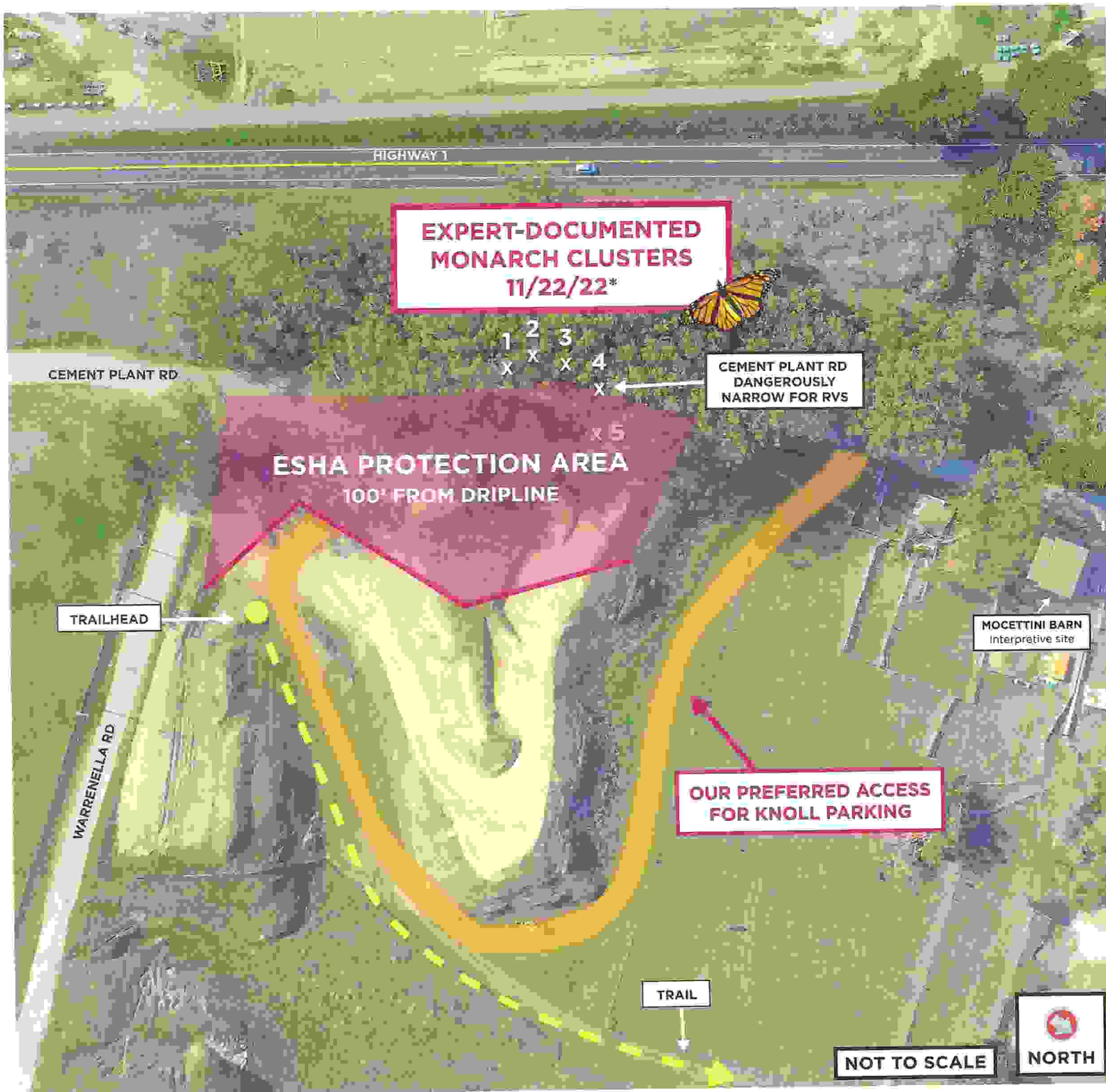
Attachments:

Cc: Cassidy Teufel, Manager, Energy, Ocean Resources and Federal Consistency

Friends of the North Coast

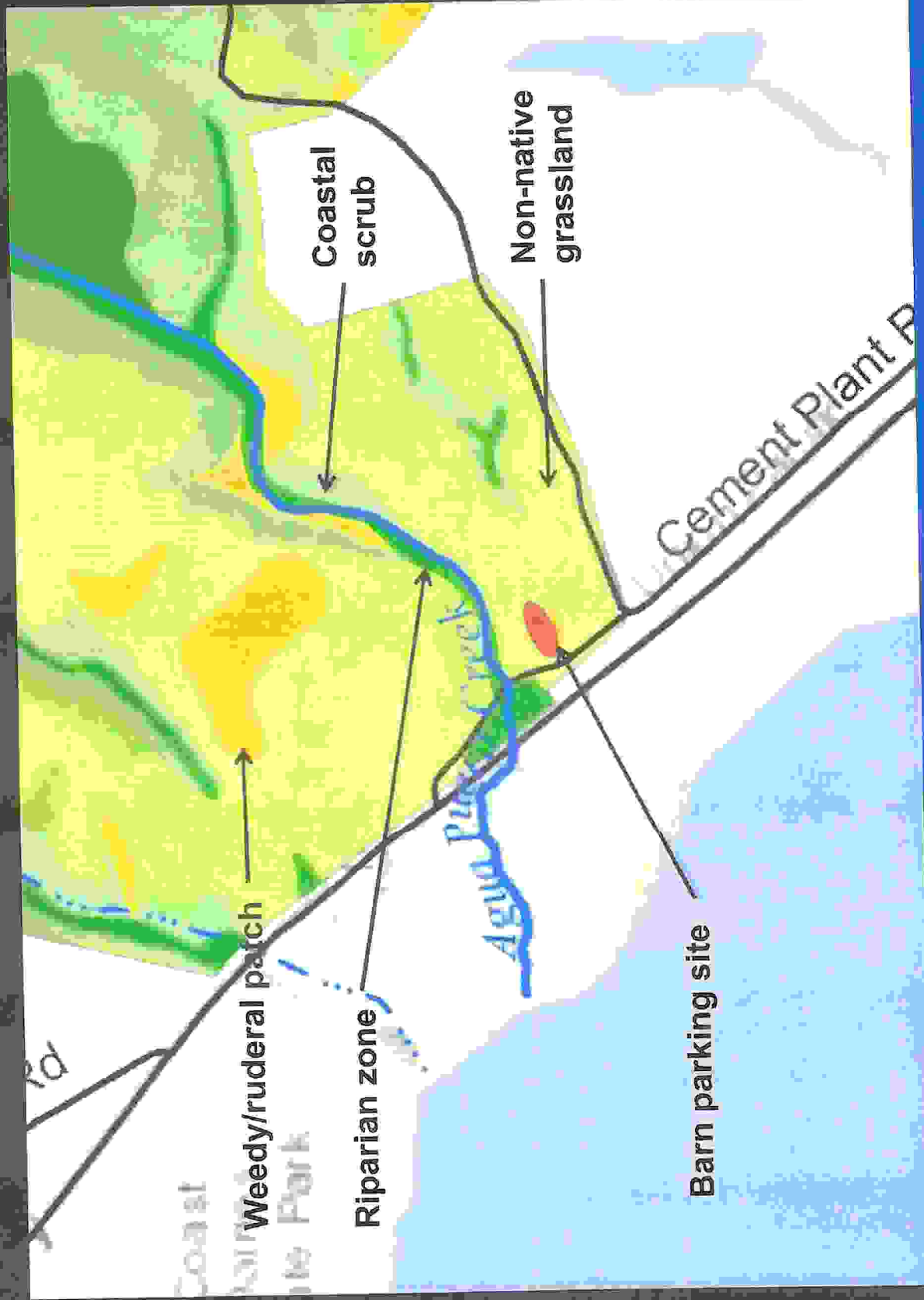
Preferred Access for Knoll Parking

Avoids Monarch Habitat and Narrow Stretch on Cement Plant Road



* Documented by Groundswell Ecology - Bill Henry

3c.i RMPA Vegetation / Riparian Zone Map: Agua Puerca Creek



NORTH COAST COALITION

DNCA, FONC, RBDA (Sempervrens Fund, Trust for Public Land, SC Farm Bureau, Big Creek Lumber, SC Puma Project)

Round Table Planning Meeting
April 26, 2023

