



April 18, 2024

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<https://eplanning.blm.gov/eplanning-ui/project/2021942/570/8020246/comment>

NEPA Number: DOI-BLM-CA-C090-2023-0001-EA

Project Name: Northern Parking Area and Trailhead, Environmental Assessment

U.S. Bureau of Land Management
Central Coast Field Office
940 2nd Ave.
Marina, CA 93933

Dear Bureau of Land Management,

These comments on the Cotoni-Coast Dairies Northern Parking Area and Trailhead Environmental Assessment (EA) are submitted on behalf of the Center for Biological Diversity, a national nonprofit conservation organization dedicated to the protection of endangered species and wild places. In California and nationally, our members and staff care deeply about the survival and recovery of imperiled wildlife including the monarch butterfly, a candidate for Endangered Species Act (ESA) protection.

Cotoni-Coast Dairies is an on-shore unit of the California Coastal National Monument (CCNM) in Santa Cruz County added to the CCNM by Presidential Proclamation in 2017. We understand that BLM needs to ensure public access for recreation and visitor use of the unit, and we fully support public access to nature. We are concerned, however, that in the designs for this particular parking area, the agency is not ensuring proper care for the resources, objects, and values of the Monument.

We are dismayed that in order to put up a parking lot, the Bureau of Land Management (BLM) has already knowingly damaged a monarch overwintering site by removing trees where the monarchs cluster. We are appalled that the agency is even considering removing more monarch overwintering trees. We urge the agency not to move forward with any proposal for the parking area that would further degrade this known butterfly overwintering site.

Under Alternative 1, the agency's preferred alternative, constructing the parking lot would remove "four eucalyptus trees, **or more.**" First, the agency should not have put

forth a preferred alternative that would fell more trees in a monarch overwintering site. Further, the analysis of this alternative's affect on the monarch is inadequate because of the vagueness of the description simply putting forth "or more." Monarch's choose overwintering trees based on specific environmental factors because they need microsites with appropriate temperature and moisture conditions. Removal of trees in and around overwintering sites changes the microclimatic conditions and makes the area less suitable for monarch survival.

During the scoping process, local community groups developed an alternative for the parking area that would not harm the monarch's habitat, but the EA perfunctorily dismisses the community site design alternatives. It is disappointing that the agency did not fully consider the alternative developed by the local groups and instead wrote it off due to alleged interference with grazing operations. The justification that the "alternative was eliminated from further consideration because it would provide for visitor access in a manner that impedes livestock grazing operations" is unreasonable. The agency fails to fairly analyze the community site design or to examine the alleged impediment to grazing.

It is arbitrary and capricious that the agency is choosing to adversely modify habitat for a federal ESA candidate instead of making a minor adjustment to the area used for some grazing activities. This shortcoming is exacerbated because monarch overwintering sites are state Environmentally Sensitive Habitat Areas.

The statement in the EA that the "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"" is false. The best management practice for monarchs is to establish mature native trees before felling non-native trees that currently provide wintering habitat for the species.

The western monarch butterfly population has declined by 95 percent since the 1980s. As recently as 2020, the California overwintering population was so far below the quasi-extinction threshold that it was near migratory collapse.

The eastern monarch butterfly population's most recent count was the second lowest ever recorded and is currently less than one-third the size necessary to be out of the danger zone of extinction.

The U.S. Fish and Wildlife Service is expected to protect North American monarchs as a threatened species under the ESA in December 2024. As a current candidate species, the BLM is obligated to confer with the Service to make sure its activities do not harm the species while it is on the waiting list for protection.

To knowingly destroy monarch overwintering trees is unjustifiable, especially at the hands of a federal agency charged with ensuring proper care of the resources and values of a National Monument.

We urge BLM to reconsider the alternative put forth in the community site design concept that would protect the monarch habitat.

Thank you for taking our comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Tierra Curry". The signature is fluid and cursive, with the first name being more prominent.

Tierra Curry
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