



November 21, 2022

Jonathan Wittwer
Friends of the North Coast
1927 Smith Grade
Santa Cruz, CA 95060

Dear Mr. Wittwer,

On November 10th and 11th, 2022 EcoSystems West biologist Justin Davilla visited a potential monarch overwintering roost site (XERCES Site 3009) at Cement Plant Road and Warnella 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 individuals were observed clustering in the trees on the northeast side of Cement Plant Road bordering the recently graded BLM trailhead parking area. This grove of trees has many of the attributes that monarchs require as a stable overwintering roost site. The trees along the 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 warm environment for overwintering butterflies as they emerge from daily torpor. There are ample nearby water sources including Agua Puera Creek and artificial ponds, as well nectaring plants east of the grove in the grasslands of San Vicente Redwoods National Monument and private gardens associated with residences in New Town Davenport to the south.

The four large eucalyptus that were removed late summer 2022 were in an ideal location to have provided additional over-wintering habitat and/or wind protection to the overwintering roost(s). Although classified as an invasive species by the California Invasive Plant Council and USDA (2022), these eucalyptus trees comprised "Especially Valuable Habitat" as habitat for monarchs under the Coastal Act and their removal would typically be evaluated by Coastal Commission staff as part of their Consistency Determination process. Eucalyptus supporting monarch habitat are also considered Environmentally Sensitive Habitat Areas (ESHA) under the Coastal Act. This was further confirmed after reviewing photographs 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.

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. That said, removal of the trees without adequate analysis of "candidate species" is not permitted under BLM or Coastal Commission policies.

Sincerely,

A handwritten signature in black ink that reads "Justin Davilla".

Justin Davilla, Biologist