

Date: September 3, 2018

To: Mayor Paula Perotte
Mayor Pro-tem Stuart Kasdin
Councilmembers Roger Aceves, Kyle Richards, Michael Bennett
Planning Manager Anne Wells

From: Cynthia Brock, Friends of the Ellwood Monarch

Re: **Comments on MONARCH BUTTERFLY HABITAT MANAGEMENT PLAN**

Terminology and mapping

There is no clear and consistent definition of the various parcels included—or not included—in the “Ellwood Mesa Open Space Plan.” The only map in the plan shows the location of center of major monarch overwintering sites, but doesn’t identify the different parcels of land.

In order to communicate clearly, there needs to be a common reference for what to call each parcel. The parcels have different histories, different uses, and different deed restrictions.

There was a time that we referred to the Ellwood Mesa property as the acquired 137-acre property that became the Sperling Preserve, but the “Ellwood Mesa” is not referenced or mapped in the General Plan.

The term Ellwood Mesa seems to be used in this plan and by staff sometimes to refer to Santa Barbara Shores Park, sometimes to mean the combination of Santa Barbara Park and the Sperling Preserve, and sometimes to just mean the general area. This name seems to be used in all three ways in the opening paragraph of the MBHMP.

The General Plan Open Space Element refers to the “Ellwood/Devereux Open Space Area” (Figure 3-3). Table 3-1 identifies the parcels in that open space area as Santa Barbara Shores Park (No. 34), the Sperling Preserve (No. 30), the privately owned Coronado Preserve (No. 32), the Campus Glen open space, the Santa Barbara Shores (Small) (No. 33), and the Santa Barbara Shores Open Space (Small) (also No. 33). All of these parcels have areas designated as monarch ESHA in Goleta’s General Plan and in the Ellwood/Devereux Open Space Habitat Management Plan.

Staff has sometimes used the name Santa Barbara Shores Park to refer to the “Santa Barbara Shores (Small) and the Santa Barbara Shores (Small) Open Space.”

This careless and inconsistent use of terminology can cause mis-communication and possibly worse— SCE cutting down trees in “SBS (Small) Open Space” when their CCC permit is only for Santa Barbara Shores Park. (Of course, Edison’s application for their Emergency Permit calls it “Santa Barbara Shores COUNTY Park!”)

Please map and clarify the terminology in the Plan. It should match what is in the General Plan. If you use the name Ellwood Mesa or the Ellwood Mesa Open Space Plan it should be defined in relationship to the named parcels in the General Plan, with only one definition for each name.

Boundaries of the plan.

The area covered by the Monarch Butterfly Habitat Management Plan (MBHMP) should encompass all monarch ESHA on City-owned properties that were included in the Ellwood/Devereux Open Space Habitat Management Plan (OSHMP).

Instead, it only includes monarch ESHA in the Santa Barbara Shores Park and in the Sperling Preserve. Left out are Santa Barbara Shores (Small), Santa Barbara Shores Open Space (Small), and the Campus Glen Open Space.

We have been given two reasons why these properties have been excluded. The first reason given by staff and consultants was that those properties were not included in the Ellwood/Devereux OSHMP. This is simply not true (Figure 1-1. Joint Proposal Area and Jurisdictional Boundaries).

These three excluded parcels were included in the map that was part of the 2-page “draft” that was on the City’s web site for years, titled “Ellwood Mesa Butterfly Habitat Areas.”

The second reason given was that the area is actually a “park” with different uses than the open spaces, and therefore shouldn’t be included. However, in the General Plan, the Santa Barbara Shores (Small) and Santa Barbara Shores Open Space (Small) and the Campus Glen Open Space are all designated as either “Regional Open Space” or “Neighborhood Open Space.” not as Regional or Neighborhood Parks.

And only one of these three parcels, which I think is Santa Barbara Shores (Small), could be considered a neighborhood park since it has a playground, picnic table, and lawn. This parcel could be excluded from the MBHMP area, or could be referenced in the plan as requiring different treatment from the rest of the area that is mainly eucalyptus forest.

These open space areas should be included not only because they are part of the Ellwood/Devereux Open Space, or because of how they are designated in Goleta’s General Plan, but simply because they are part of the Ellwood monarch ESHA and should be protected and maintained in the same way that monarch ESHA in Santa Barbara Shores Park and the Sperling Preserve are treated. What could be the reason to exclude them? If these areas are not included in the BMHMP, how will they be managed and protected?

Purpose and goals of the plan.

Since the purpose of the plan is to maintain and enhance the included areas as monarch butterfly habitat for migrating, overwintering butterflies, some language

should be included that explains the monarch butterfly life cycle and habitat needs during their overwintering phase to those not familiar who might be reading and interpreting the plan in the future.

General Plan CE4.2 provides some description of some elements that defines monarch ESHA. This could be expanded in the plan. Scientists have observed that monarchs will usually aggregate in groves that provide tall, non-deciduous trees; with a canopy that is open enough to allow sunlight to penetrate; but with enough density to provide shelter from winds; winter-blooming trees and understory plants to provide nectar throughout the overwintering period. The OSHMP (Section 4.4.1.1) provides some good language describing the characteristics of successful monarch habitat.

Explaining these factors would make it more clear why some tree species and understory plants are best for the butterflies, while others are not. And why decisions should be made about planting that takes these needs into account.

If further research on monarchs provides more information about other factors, the MBHMP can be amended to include that information and the management plan amended to reflect that.

Strength of language in the plan

Some sections of the plan use language that is unnecessarily vague and weak. For instance:

Action 1-2.1 says, "...should *normally* include pre-activity surveys...*as deemed appropriate.*" Why would it ever be inappropriate to do a pre-activity survey before doing "activities with the potential to significantly disrupt habitat values?" It should say, "Shall include pre-activity surveys..."

Policy 20-3 says a Monitoring Report should be updated annually when *feasible.*" Why wouldn't it be feasible? That word should be removed.

Action 20-3.1 says to "track the implementation of this plan in the form of a monitoring report *preferably* updated on an annual basis." Take out "preferably" and add "presented in a public workshop."

Policy 8-1 speaks of a review for need for updates...at least every five years. But Action 22-1.3 talks about reviewing the plan every fifth year "*as feasible.*" Is this the same review or a different one? This second mention of a review implies that it might be an even longer interval before there is such a review and evaluation. Even if this is done every five years, that is still not very often.

*Please make these policies consistent and assure that the plan is reviewed **at least every five year.***

Ambiguity

Is the treatment different for “aggregation areas,” “roosts,” “trees supporting seasonal monarch butterfly aggregation sites,” “aggregation site buffers,” or the eucalyptus forest beyond the buffers.

Several of these policies and actions refer to managing aggregation sites, and not the entire ESHA. Others are like Policy 16-2 that says, “The City shall manage eucalyptus trees supporting monarch butterfly aggregation sites in the context of all eucalyptus habitat at Ellwood Mesa.” I am not sure what “in the context” means. Does it mean that all eucalyptus habitat will be maintained?

It should be made clear that all eucalyptus forest designated as monarch ESHA should be maintained, not just “aggregation sites.” A first principle of the plan should be “do no harm” to the Ellwood Habitat Complex that comprises all of the eucalyptus woods, windrows, and groves in the Ellwood area. In a 1999 report, Dr. Meade says, “The viability of any one of the monarch butterfly aggregation sites is likely tied to the presence, and health, of the habitat throughout the entire complex.”

The locations of aggregation sites are not something that is fixed and definite through time. The actual trees used for roosting aggregations often shifts over time; and sometimes recognized sites fall into disuse while other areas begin to be used for aggregation. This makes it desirable to maintain the entire eucalyptus forest.

It is interesting to note that different documents identify different sites and different numbers of sites as monarch aggregation sites on City-owned properties in the Ellwood area. **The Ellwood/Devereux OSHMP** (2004) identifies four sites—North, Sandpiper, Main, and Ocean Meadows (Figure 4.1-1). **The Goleta General Plan** (2006) shows five sites on city-owned property—North, Sandpiper, West, Main, and Ocean Meadows (Figure 4-1). The **Community Wildfire Prevention Plan** (2012) identifies only three aggregation sites—North, Sandpiper, and Main (Figure 12). but wisely acknowledges that “aggregation locations may shift.”

Funding

Action 2-2.2 allows payments of compensatory mitigation fees to help fund the plan when a development project has impacts on monarch habitat. This is concerning because it suggests that a developer would be allowed to harm monarch habitat and just pay mitigation fees. And perhaps the City would welcome this as a way to fund the plan.

Please clarify how this would not create a conflict of interest in the project approval process.

Native Plants

Consider inclusion of native plants if the plant provides a service that actually improves conditions for monarch butterflies and improves the sustainability of the groves because that is the purpose of this plan. Either native or non-native plants

can provide the things that butterflies and the groves need. Adding other goals complicates the plan and makes it more expensive to execute.

The plant list in Appendix 3 doesn't indicate when the native plants included are blooming and could provide nectar for the butterflies. There are few native plants that provide winter nectar; some that provide fall nectar. The butterflies generally begin to leave in February, so spring or summer blooming plants won't be useful for this function. It will be important to know whether native plants that are used will actually be useful to the butterflies, and provision of winter nectar is an important attribute.

Riparian forest and "the gaps"

Program 14 has policies that threaten the monarch ESHA. Even though language in most of the policies and actions only specifically names understory plants and mid-story native plants, the very terminology of "restoration of the Devereux Creek corridor" will imply to some people the elimination of non-native plants and the substitution of native trees in the very areas where eucalyptus provide optimum habitat for butterflies. The major aggregation sites, except for Ellwood North, are IN the Devereux Creek corridor. Replacing the eucalyptus there will result in the loss of monarch habitat.

Policy 14.2 speaks about "Gaps in the eucalyptus groves" being considered for "restoration alternatives." Where are the gaps that this policy refers to?

Please provide a map.

There are no significant "gaps" in the eucalyptus groves except for the areas along the creek in Santa Barbara Shores Park between Ellwood West and Ellwood Sandpiper that was restored with native plants after the 1997 Soil Remediation Project and a small meadow with a pine tree along the east side of the Santa Barbara Shores extension. Both areas are already planned for enhancement as an off-site mitigation for the Ekwil-Fowler Road Extension Project. Is this what this Policy 14.2 is referring to?

Some commenters at the stakeholders meeting seem to think that the "gaps" are (or should be) the parts of the eucalyptus groves that are "not designated as aggregation sites," and suggested that those gaps should be available for "active restoration of non-aggregation areas with native trees."

Please make sure the language in this section cannot be interpreted in this way.

Action 14-3.1 calls for the **establishment of a native riparian forest** along the banks of Devereux Creek composed of native riparian tree species. This action would result in the replacing one type of ESHA (monarch habitat) with another (native riparian forest).

This plan should maintain and enhance the entire eucalyptus forest that is designated monarch ESHA. If the eucalyptus is not maintained it will NOT be monarch ESHA. These areas were defined as monarch ESHA because of the eucalyptus forest. This plan cannot claim to be protecting monarch ESHA and at the same time not protecting the very plants that caused it to be called monarch ESHA!

Please remove or limit the policies that call for establishment of native riparian forest in any areas that are now eucalyptus monarch habitat. Please make it clear that "restoration" of the Devereux Creek corridor" does not mean replacing eucalyptus with native trees.

Eucalyptus

The entire document talks about maintaining a sustainable eucalyptus habitat, but never mentions the species of eucalyptus that will be used. However the Ellwood/Devereux OSHMP calls for replacement of removed trees with "blue gum saplings."

If other types of eucalyptus will be considered for restoration, a table should be added that shows those different types and compares their attributes like size, growing habit, nectaring time, whether they are known to be used for aggregation, etc.

Our monarch habitat, as almost all sites in Santa Barbara County are, is mostly blue gum eucalyptus. There should be some explanation of how the non-deciduous blue gums enhance the microclimate, provide the structure, shelter, and open canopy that overwintering aggregations need. In addition to providing shelter for monarch colonies, blue gum eucalyptus serves as a source of nectar during the winter when most native plants do not bloom.

The Monarch Projects' Conservation and Management Guidelines for Preserving the Monarch Butterfly Migration and Monarch Overwintering Habitat in California, authored by Lincoln Brower and 10 other respected monarch researchers including Sakai, Calvert, Pyle, Frey, and others, made the strongest possible case for the importance of maintaining eucalyptus groves.

Just for instance, it says,

"Removal of Eucalyptus trees from current Monarch overwintering sites in California would make the sites unusable, and could cause the virtual collapse of the western North American migratory Monarch population."

"Native habitat revegetation should not be accomplished at the expense of the unique coastal monarch overwintering habitats."

"If the habitat is in eucalyptus let it stay eucalyptus. Monarch scientists don't know how to replace one species with another and sustain the habitat. It is not worth losing a monarch habitat to gain one grove of native trees."

Although this book was published in 1993, there has been no research I know of that indicates this has changed.

Advocates for replacing the eucalyptus with native plants, whether all at once by removing the eucalyptus from certain areas, or gradually by replacing eucalyptus as they die or decline with native trees, often cite the Griffiths and Villablanca paper, 2015, *Managing monarch butterfly overwintering groves: making room among the eucalyptus* (called a "monarch preference study") that studied 5 sites in San Luis and Monterey Counties. All five sites had various mixes of eucalyptus species and Monterey Pines, Monterey Cypress, and Redwoods. Sometimes, in some sites, monarchs moved to the native conifers when the weather was inclement.

This study, while very interesting, doesn't prove (or even suggest) that butterflies would prefer a grove without any eucalyptus to these mixed groves, or that they would prefer a mixed grove to one that is completely or mostly eucalyptus. It may suggest that interplanting some native conifer species is desirable, but it doesn't support replacing eucalyptus with native plants in any part of eucalyptus forest that is monarch habitat.

The other major problem, of course, is that these "native conifers" that the butterflies were observed using are NOT NATIVE to points south of the studied areas. Santa Barbara County has a considerably drier and warmer climate than San Luis or Monterey Counties, and those trees are not indigenous and don't do well here.

The authors themselves in their conclusion recognize the limitations of their study, acknowledging that their results don't apply in areas to the south:

"At overwintering sites located on the central coast of California **north of Santa Barbara County**, planting native conifers such as *P. radiata* and *H. macrocarpa* would be appropriate where trees have fallen or have been removed, or are likely to be removed. This recommendation would **not be appropriate for Southern California** since we have not evaluated data from that region and because the native conifers are not suited to that climatic region." (my emphasis added)

This plan should make it clear that the intention is NOT to REPLACE blue gum eucalyptus with native trees in any part of the eucalyptus grove—not in the "gaps" or along the edge of the groves, or on the banks of the creek.

Mitigation Ratio

Policy 12-2 says, "replace removed trees at a one-to-one ratio." This implies a survival rate of 100%, which is unrealistic even under the most favorable conditions. Most mitigation plans that I am familiar with require a three-to-one, a six-to-one, or even a ten-to-one ratio for replacing trees. Even if new trees that don't survive are subsequently replaced, we may lose years of growth until replanting is carried out. It will take many years of growth before the new trees replace the

function of the old trees, so the safer route for the long term is to replace the removed trees at a higher ratio.

A one-to-one ratio seems inadequate to restore the structure and function of the groves in a reasonable amount of time. Some of the trees that have been—and will be—removed are massive; many are multi-trunked. Replacing one huge tree with one small tree will not replace the function adequately in any reasonable amount of time.

The one-to-one ratio assumes that the number of trees standing in the forest right now is the optimum number. What about the trees that have already been lost, and perhaps removed previously before this plan was put into place? More trees may be needed to restore and enhance the groves' structure and microclimate.

Consider a higher mitigation ratio, or plan to plant additional trees when needed to re-create optimal structure and desirable density of the forest.

Fire safety

At the public workshop a map was handed out that indicated fuel reduction zones along the groves that are close to structures, but also in the eastern windrow that contains the Ocean Meadows aggregation site where there are no structures near. The second paragraph on page 11 says, "In habitat areas that are not adjacent to structures, fuel treatment consist of mowing along the outside edge." That seems inconsistent with the map.

Please reconcile this and provide a new map if applicable.

To reduce threat of fire the Plan should include a feasibility study of undergrounding some or all of the power lines that are adjacent to monarch ESHA.

The worst threats of fire may be caused by people, not by the trees in the eucalyptus grove. There are several ways to make fires less likely and make it easier to fight any brush fire that may break out in the area.

Increased patrolling of the area for people violating the "No Smoking" and "No Campfires" rules, *especially at night*, could reduce the risk of fire. Apparently, the City is constrained to give "homeless encampments" a 72-hour notice before taking any action. But if there is a fire or evidence that there has been one—whether it is an "urban camper" or kids—there should be a way to take immediate action to eliminate the threat.

Making sure that fire-fighting equipment could reach the groves quickly could make the difference between a small fire and a devastating fire. The gate at the end of Santa Barbara Shores Drive is the only way for a fire-truck to access major portions of the monarch groves. There is not appropriate signage on the gate: it says "Fire Access Lane, illegal vehicles will be towed." This is apparently not clear enough (no

one thinks their vehicle is “illegal” if it is licensed) because sometimes vehicles have been parked in front of the gate making it inaccessible. A large, bi-lingual “NO PARKING” sign might do a better job of keeping this fire lane clear.

The extension of Santa Barbara Shores Drive that is a major access for fire-fighting equipment. The road and the culvert underneath it should be kept in good repair so that it is always passable and structurally sound.

Fire hydrants should be installed at the western ends of Pismo Beach Circle and Carmel Beach Circle to facilitate protection of the residential/habitat interface in this area.

The document calls for removal of non-native understory plants and replacing, in some areas with “fire-resistant” native plants. Currently some of that understory in the areas where the habitat is close to structures is made up of non-native plants like ice plant, jade plants, and other succulents. Is there some comparison of the fire-resistant qualities of the recommended native plants with the fire-resistant qualities of those plants that are already there? If the non-native plants provide better fire resistance they should be allowed to remain. Removing them will reduce coverage until the new plants become established.

Signage

The General Plan calls for signage to be “low” and “unobtrusive,” The “Ellwood Main” sign at the base of the ravine, placed a few years ago is not “unobtrusive,” attractive, or appropriate. It is large, high contrast, and the materials have not stood up to time and weather. It is not “aesthetically compatible with natural conditions (Policy 7.2).”

The old signs put up by the property owner before the City’s acquisition are much better and could be a model for new signs. They are small and unobtrusive with a brown background that blends with the natural environment. They have lasted for many years in most cases.

Action 7-2.1 calls for review of the signage and fencing design, but doesn’t say who should review it. I don’t think it should be left up to the Public Works department, which may not have personnel with appropriate skills to make these judgments. Any further signage and fencing in the monarch groves should be required to be reviewed, in a public meeting, by the Design Review Board. The City itself should be held to standards as high as any commercial establishment or developer is. And the public should be given just as much of a chance to comment on these features as they would on any other project.

Most interpretive signage should be placed at the main entry points rather than in the forest. The parking lot and the Coronado Preserve are both good places for informational and directional signs.

We should consider the possibility of using simple brochures, distributed at the parking lot or other main entry points to provide information, rather than installing a profusion of signs in our natural area.

I observed a similar solution at Julia Pfeiffer State Park in Big Sur. A brochure picked up from a stand near the parking lot showed a map of the trail loop, with information about various features along the way. When you got back to your starting point there was a box to deposit your brochure in.

I think most people would deposit their brochures for re-use. And the forest wouldn't be "littered" with obtrusive signs.

Signs directing tourists who want to visit monarchs should point them only to the Ellwood Main site. Tourism can be a destructive force in the groves and its impact should be limited by channeling groups to just one area where they can be controlled by fencing, docent presence, etc. Don't provide other signals like cleared paths or seating areas that would visually direct tourists into the other aggregation sites.

Public participation

The BMHMP assigns a large role to the docents to provide feedback about the management of the groves. While this group has valuable experience in the grove, there are many other members of the public who are very concerned and also bring valid information.

The Docent program should not be the only "formal vehicle to provide public participation" and "provide recommendations to the Public Works Department.

Not everyone who is interested in the monarch butterfly wants to be or can be a docent. There are scheduling issues, limiting physical conditions, personal preferences, etc. that make docenting not the best choice for many. All who have an interest in monarchs and their habitat should be part of the public feedback process, whether they are docents, local residents, scientists and citizen scientists, Ellwood activists, teachers and students, and other natural history enthusiasts.

Policy 18-2 makes the docents (through the docent coordinator) the only input for the signage program. What about all the other interested people? Their opinions and recommendations should also be sought.

Add methods to solicit recommendations from other interested persons.

Oversight

The BMHMP and IP should not be under the jurisdiction of the Public Works Department. These plans should be overseen by the Planning and Environmental Review Department, although Public Works and Neighborhood Services will carry out many of the actions.

The Public Works Department doesn't have the necessary focus to deal with what is essentially a planning process or the personnel qualified to deal with environmentally sensitive habitat.

Thank you for consideration of these comments.