

## CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST DISTRICT  
89 SOUTH CALIFORNIA ST., SUITE 200  
VENTURA, CA 93001  
(805) 585-1800



January 10, 2019

Peter Imhof  
City of Goleta  
130 Cremona Drive, Suite B  
Goleta, CA 93117

RE: Coastal Development Permit Application No. 4-18-1223

Dear Mr. Imhof,

On December 12, 2018 our office received the follow-up Coastal Development Permit (CDP) application for the emergency work completed in December 2017 under Emergency CDP G-4-17-0048 for the removal of 29 dead eucalyptus trees that were hazardous to public safety due to their proximity to public trails in the eucalyptus grove at the Ellwood Mesa Open Space. Staff has reviewed the submittal pursuant to Sections 13053.5 through 13056 of the Administrative Code and has deemed CDP No. 4-18-1223 to be incomplete at this time. In order to process the CDP application in accordance with the provisions of the Coastal Act and the Administrative Code, the following items are necessary:

1. *Ellwood Mesa Habitat Management Plan*. Condition #4 of Emergency CDP G-4-17-0048 requires the City to submit a complete regular CDP application for an Ellwood Mesa Habitat Management Plan to address the tree removal mitigation as well as restoration of the aggregation sites within the groves and a strategy for re-opening public trail segments in coordination with habitat management strategies and requirements. Staff has reviewed the submitted Implementation Plan; however, as described in detail below, additional information is necessary to ensure that the Implementation Plan meets the requirements of Condition #4.

The submitted Implementation Plan only addresses mitigation for the 29 eucalyptus trees that were removed and trimmed pursuant to Emergency CDP G-4-17-0048 and proposes this mitigation near the North Ellwood butterfly aggregation site. Since the removed trees were located throughout the grove, please explain why restoration of those other areas of the grove is not proposed. Additionally, the proposed mitigation site contains several trees that were previously identified as dead by the City's arborist. Since the application does not propose tree removal, please explain why these existing dead trees are not proposed to be removed, and how the new trees would be interspersed among them.

Further, the subject application proposes to replace the 29 removed and trimmed eucalyptus trees with 63 additional eucalyptus trees. Please clarify how the number of mitigation trees was calculated. The Implementation Plan also states that replacement of the eucalyptus trees with native trees is not proposed because "it would not maintain the desired abundance and quality of monarch butterfly overwintering habitat." However, this statement is not further

explained and evidence for this statement was not provided. Please provide an alternatives analysis that evaluates (1) replacement of the removed and trimmed eucalyptus trees with native tree species and (2) replacement with a mixture of native and non-native tree species.

In addition, Condition #4 requires the City to provide a strategy for re-opening public trail segments in coordination with habitat management strategies and requirements. The Emergency CDP allowed for the temporary closure of trail segments within the eucalyptus grove until a Habitat Management Plan was approved through a follow-up permit and the fall hazard posed by the remaining dead and/or dying trees near those trail segments was abated. The proposed Implementation Plan does not include removal of any additional trees within the grove nor does the Plan propose restoration of the grove near those trail segments. Please explain whether or not the hazard posed by the dead and/or dying trees that caused closure of trail segments throughout the grove has been abated. Please also provide a plan, including a timeline, for re-opening all trail segments that have been closed. Further, as the proposed Implementation Plan states, the tree inventory conducted in 2017 by a qualified arborist determined that 1,260 trees within the assessed area on City property were dead. Please address these remaining dead and/or dying trees, as well as the management strategies that will be implemented to ensure that these trees do not adversely impact the public trails in the future, within the subject Implementation Plan.

Given the large number of trees identified as dead or dying throughout the grove, please also provide an evaluation of how the proposed mitigation and restoration plan fits within the context of the other restoration plans that have been approved in the area, including the Biological Mitigation and Monitoring Plan for the Ekwill Street and Fowler Road Extensions Project and the North Campus Western Border Tree Removal and Restoration Plan.

Overall, the submitted plan does not contain the information necessary to meet the requirements of Condition #4 of Emergency CDP G-4-17-0048. As described above, in addition to addressing the 29 trees that were trimmed or removed, the subject plan must comprehensively analyze tree removal, mitigation, and restoration of all aggregation sites within the grove, as well as strategies for re-opening and maintaining future use of all public trail segments both currently and into the future.

2. *Native species.* The proposed Implementation Plan includes a planting palette with native species of shrubs and groundcover that are proposed to be planted as part of the restoration project. However, the proposed planting palette only includes a few native nectar producing species suitable for monarch butterflies. Since one of the goals of the proposed project is to protect and enhance habitat for monarch butterflies, as many native nectar producing species as possible should be included in the planting palette. Several native species that bloom from fall through early spring have been identified by the Xerces Society to support monarch butterfly populations. These include, but are not limited to, hollyleaf cherry (*Prunus ilicifolia*), arroyo willow (*Salix lasiolepis*), bladderpod spiderflower (*Cleome isomeris*), and California brittlebush (*Encelia californica*). Please provide a planting palette that includes late blooming native nectar producing species suitable for monarch butterfly habitat at Ellwood Mesa.

3. *Streams*. Please update the figures in the proposed Implementation Plan to show the location of Devereux Creek and other streams or drainages within and/or adjacent to the Ellwood Mesa eucalyptus grove.
4. *Digital Copies*. Please provide digital copies of the proposed Implementation Plan and figures.

Depending on what additional information is submitted in response to the is letter, we may need more clarification and possibly more information as a result of our review of the information to schedule this proposed project for Commission action. If you have any questions regarding your application, please contact me at (805) 585-1800.

Sincerely,



Michelle Kubran  
Coastal Program Analyst

Cc: Anne Wells, Planning & Environmental Review Department  
J. Ritterbeck, Planning & Environmental Review Department