

CALIFORNIA COASTAL COMMISSION

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F13a

UCS-NOID-0004-22 (Hazardous Tree Replacement)

September 8, 2022

CORRESPONDENCE



Re: F13a-9-2022

To the CA Coastal Commission:

Sierra Club CA Water-Coastal Committee is concerned that the proposed UCSB tree removal project may adversely impact trees that may be used by western monarch butterflies, particularly for roosting and/or overwintering. We ask that the Commission require biological assessment and monitoring for monarchs, as well as for nesting bird populations, to guarantee their protection. Western monarch populations have declined precipitously (see below from Xerxes Society).

“In 2018 and 2019, the number of monarchs overwintering in California dropped to 1% of the historic population size. In 2020, that number dropped even further to less than 0.01% of the historic size, volunteers counted less than 2,000 monarchs during the annual Western Monarch Thanksgiving Count. For every 2,250 monarchs there were 30 years ago, there is only one left flying today. The significant problems afflicting western monarchs are habitat loss (overwintering and breeding areas), pesticide use (herbicides and insecticides), and climate change (including increased drought severity and frequency). Research into monarch losses is active and ongoing, but the depth and abruptness of the recent declines means that we need to act now based on the available evidence.”

<http://www.xerxes.org/publications/fact-sheets/how-you-can-help-western-monarchs>

From the USFWS:

“In December 2020, after an extensive status assessment of the monarch butterfly, we determined that [listing the monarch under the Endangered Species Act is warranted but precluded](#) at this time by higher priority listing actions. With this finding, the monarch butterfly becomes a candidate for listing; we will review its status each year until we are able to begin developing a proposal to list the monarch.

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Our [Information for Planning and Consultation \(IPaC\) project planning tool](#) identifies the monarch as a candidate species, and project developers, particularly federal agencies, may choose to voluntarily add conservation actions to conserve monarchs to their projects.”

<https://www.fws.gov/initiative/pollinators/monarchs>

From the CA Dept of Fish and Wildlife:

“In California, monarchs are included on the California Department of Fish and Wildlife's (CDFW) [Terrestrial and Vernal Pool Invertebrates of Conservation Priority list \(PDF\)](#)

and identified as a Species of Greatest Conservation Need in California's [State Wildlife Action Plan](#). California law (Fish and Game Section 1002) prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit (SCP) issued by CDFW.

This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing.

Actions to Support Monarchs

CDFW is an active participant in the Western Association of Fish and Wildlife Agencies (WAFWA) effort to enhance western monarch conservation with the other member states of Washington, Oregon, Idaho, Utah, Arizona, and Nevada.

The 50-year [Western Monarch Conservation Plan](#), adopted in 2019, establishes population size and habitat conservation goals, strategies. See [WAFWA's Monarch Working Group](#).”

<https://wildlife.ca.gov/Conservation/Invertebrates/Monarch-Butterfly#:~:text=Conservation%20Status%20of%20Monarch%20Butterflies&text=In%20December%202020%2C%20the%20U.S.,to%20be%20listed%20in%202024.>

While there are some policies and procedures referenced in the Staff report in regard to monarchs, a concern is that cutting trees by UCSB is proposed for the fall months, when monarchs may be present. I have personally witnessed monarchs roosting in October in eucalyptus trees along the Central coast. Please require that any tree removal by UCSB be done when there are neither birds nesting, nor monarchs inhabiting the designated trees. We request this as a condition of approval.

Thank you for your consideration,

Leslie Purcell
Member, Sierra Club CA Water – Coastal Committee
9-2--2022