

Emma Pelton Response to D. Ainley comments on her May 11, 2023 email:

Comment [DA1]: See my comment to DA1 and DA4 defining overwintering habitat boundaries. The proposed removal area falls within the area we and others have mapped as monarch overwintering habitat.

Comment [DA2]: Thanksgiving counts includes 1,500 monarch butterflies reported at this site in 2000. Our Access database also shows another count of ~1,500 in 1994.

Comment [DA3]: This site has hosted monarchs for many years when monitoring has occurred. This makes it a significant site. Any site hosting 400 monarchs in 2022 is in the top 25% of sites in terms of number of monarchs it supports in the entire state.

Comment [DA1 and DA4]: Defining monarch grove boundaries should be determined by monarch overwintering experts; Xerces has the most up-to-date database of overwintering habitat mapped, based on criteria developed by a working group including many state agencies and other stakeholders. In short, overwintering habitat includes more substantial portion of trees than simply ones they have been observed aggregating on.

Comment [DA5]: I am happy to provide more context of maps, tree species monarchs are known to aggregate on, etc., but I won't be detailing individual responses to some questions in this comment as they are broader issues/questions outside of the scope of the project impacts we are discussing.

Comment [DA6]: A substantial part of the decline in overwintering habitat quantity and quality is because of tree cutting for many reasons included under the reasoning of fire risk. Other factors include development, aging groves, etc. Eucalyptus being a non-native tree has also made it the target of removal efforts. I authored a blog about this issue which is available here:
<https://xerces.org/blog/vanishing-butterfly-groves-of-california>.

Comment [DA7]: We recommend protection and proper management of confirmed monarch overwintering habitat. This means it is not enough to conserve the aggregation trees only, but it is also not necessary to conserve all non-monarch overwintering habitat eucalyptus trees. One caveat is ideally multi-year surveys of potential overwintering habitat are completed to determine if and where monarchs are using potential habitat + a thorough look at past records of monarch overwintering records in the area (CNDDDB, Xerces, consultant reports, etc.).

I disagree that the Section 7 guidance should be interpreted as permission to remove a substantial portion of this monarch overwintering grove.