

## Jennifer Blackman

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**From:** Emma Pelton <emma.pelton@xerces.org>  
**Sent:** Thursday, May 11, 2023 7:59 AM  
**To:** BCPUD  
**Cc:** Mia Monroe  
**Subject:** Fwd: [EXTERNAL] Thoughts on Butterfly Habitat in Zone 5 (2915)  
**Attachments:** BEP Letter to WRA\_03272023.pdf

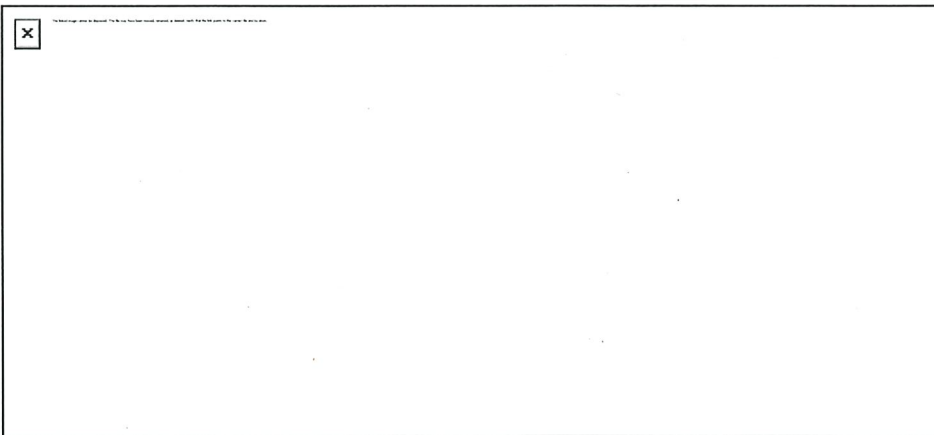
To BCPUD staff, perhaps best directed to Jennifer Blackman,

My name is Emma Pelton and I am a conservation biologist with the Xerces Society, leading our western monarch efforts. I was recently alerted by Mia Monroe (cc-ed) to an effort by the Bolinas Eucalyptus Project to remove a eucalyptus grove known to host monarch butterflies: BPUD, site 2915 in our records ([westernmonarchcount.org](http://westernmonarchcount.org)). This site is regularly monitored as part of our Western Monarch Count project and thousands of butterflies have been reported in the past and over 400 were observed this season. This makes BPUD one of the most important overwintering sites in the Bolinas area and a significant site in the state.

A recent report by WRA commissioned by the Bolinas Eucalyptus Project rightly points out the site as falling in the coastal zone and qualifying as ESHA due to the use by overwintering monarchs. However, the BEP group responded with pushback (letter attached) including asserting "*This site is not an Environmentally Sensitive Habitat Area (ESHA), at least in terms of Monarch Butterflies.*" BEP's assertion is at odds with the consultants' and Xerces' understanding of how Marin LCP classifies monarch overwintering sites (pg. relevant to Marin County include 34-38).

Thus, I wanted to alert you to the assertion by the group and perhaps we can find a way to clarify the status of this site and other monarch overwintering sites within Bolinas which may also be of interest/concern to the BEP group. Another point of clarification I hope we can make is that mitigation is very difficult for monarch overwintering sites as there are almost no examples of successful creation of overwintering habitat and the science behind why monarchs select the trees and groves they do is still evolving; thus, "alternative" sites for monarchs is not a biologically feasible replacement for the loss of existing, long-documented habitat.

Screenshot of the coastal zone in relation to known monarch overwintering sites in Bolinas below:



We understand the importance of reducing catastrophic wildfire risk and community safety, but want to ensure the destruction of ever-dwindling monarch overwintering habitat is not an inadvertent casualty. There aren't always perfect solutions, but we have been helping other landowners think about fire risk reduction while also

keeping groves standing and incorporating native trees and shrubs (which generally are additive, not a replacement to eucs) to the benefit monarchs and other wildlife and to achieve goals to restore a native plant component to sites. I think that sort of work can certainly be achieved at this site as well.

Also, the monarch butterfly is currently a candidate species under the federal ESA with an anticipated listing in FY 2024 which could impose legal constraints on removing or otherwise negatively impacting the species' overwintering habitat. CDFW already considers the species a Special Status Invertebrate and this site location should already be mapped in CNDDDB. We would be happy to provide more information if needed and we strongly encourage solutions to protect and restore this site which will involve the eucalyptus grove remaining at this location.

Apologies if any of this is "preaching to the choir" as I understand you all have been working with Mia Monroe and others on protecting and monitoring the habitat for some years. I just wanted to lay out a few points in writing which you are welcome to share as relevant with the BEP group or consultants if it's helpful.

I'm also more than happy to have a call or connect by email if we can be of assistance.

Thank you,  
Emma

----- Forwarded message -----

From: **Monroe, Mia** <[Mia\\_Monroe@nps.gov](mailto:Mia_Monroe@nps.gov)>

Date: Wed, Mar 29, 2023 at 11:53 AM

Subject: Re: [EXTERNAL] Thoughts on Butterfly Habitat in Zone 5 (2915)

To: BEP <[info@bolinaseucalyptusproject.org](mailto:info@bolinaseucalyptusproject.org)>

Cc: muirmia <[muirmia@comcast.net](mailto:muirmia@comcast.net)>, [emma.pelton@xerces.org](mailto:emma.pelton@xerces.org) <[emma.pelton@xerces.org](mailto:emma.pelton@xerces.org)>

Thank you for your letter to me as well as your response to others. I appreciate your sense of urgency, the other compelling concerns for the safety of Bolinas human residents.

I will send you a response soon as i have a different interpretation of the data as well as site #2915's value to monarchs i'd like to share.

Which sites to the south do you feel could be suitable for monarchs?

mia

Mia Monroe  
**Marin Community Liaison**  
Outdoor Recreation Planner  
Planning and Environmental Division  
Golden Gate National Recreation Area  
National Park Service

415-561-4964  
415-725-1630 mobile

mia monroe is teleworking ...she may be reached at 415-725-1630....thank you.

*I live and work on the traditional and ancestral land of the Huimen Coast Miwok.*

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**From:** BEP <[info@bolinaseucalyptusproject.org](mailto:info@bolinaseucalyptusproject.org)>  
**Sent:** Wednesday, March 29, 2023 11:17 AM  
**To:** Monroe, Mia <[Mia\\_Monroe@nps.gov](mailto:Mia_Monroe@nps.gov)>  
**Subject:** [EXTERNAL] Thoughts on Butterfly Habitat in Zone 5 (2915)

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Hi Mia,

We hope you have been well and are not too soggy in this weather. We are feeling a bit waterlogged :) )

Please see attached a letter to WRA, the County, and Jennifer Blackman.

We absolutely have an interest and a responsibility for encouraging monarch habitat where possible. Our group, highly experienced with Bolinas environs, including professional ecologists among us, do not believe that trees within our project area, hosting monarchs for a short time this past season, represents a stable site.

As we are sure you realize, the Xerxes count, ongoing since 1997, indicates that only 1.3 % of all monarchs counted in Bolinas were observed within our project area, #2915 on their map and spreadsheet.

We hope you understand that to leave a group of tall and what would be fully exposed blue gums smack dab in the middle of our restoration project is contrary to our ultimate mission. Our main objectives are public safety and restored native ecology. To leave standing any grouping of Eucalyptus within our project's boundaries would threaten both these objectives.

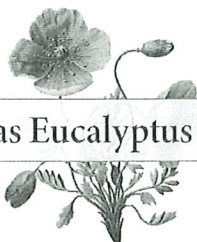
Perhaps most importantly, there *ARE* sites to the south of our project area that have the potential to host far more monarchs. We urge you to encourage our plan to its full potential, while working with you to enhance other nearby and previously more frequently used Monarch sites.

Remember the location just south of our project? It could have a very inviting south face with a wind protected cove created by removing one or two trees. Another potentially excellent habitat where significant numbers of butterflies used to roost was on a large Toyon at the Francis McDormand property just on the southern edge of BPUD lands.

As the above letter points out, the necessity of eucalyptus removal at our proposed location are urgent public health and safety concerns. We too are monarch enthusiasts and want to help in any way we can, but it is our hope that a minor site in an unstable location does not impede a critical safety project and highly valuable restoration.

Best wishes,

on behalf of the *Bolinas Eucalyptus Project*



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## Bolinas Eucalyptus Project

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BEP Members

Jon Cozzi, Chairman

Jonna Alexander-Green

Rudi Ferris

Janice Tweedy

Howard Dillon

Wayne Paulson

Sera Mac

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**Emma Pelton**

(she/her)

Senior Conservation Biologist

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Portland, OR

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Hello Aaron and Matt,

Thank you for a synopsis of WRA's working Monarch Butterfly data and proposed survey. We appreciate that effort. However, as your clients, the *Bolinas Eucalyptus Project* must express our apprehensions with some of the directions this work has taken.

When our citizen's group first formed, the primary and urgent concern was for the safety of major roads and critical evacuation routes. That concern has only grown stronger given this winter and significant changes in the project area. Have you seen the job site recently?

Over this location there have been approximately 30 blown-down eucalyptus and this has increased the danger as well as compromising any marginal monarch habitat that the site may have offered. As trees blow down, this opens wind corridors that will create further problems, a well-known effect that arborists and foresters frequently cite.

Dangerous blue-gum eucalyptus have been the source of generational problems on both Mesa and Olema-Bolinas roads---whether trees and limbs falling on cars or people, or electrical wires causing frequent power outages--and most terrifying--potentially starting a fire within a large, ailing, and flammable stand of trees scientifically well-known for their strongly pyrophytic character.

We attained 500 petition signatures demanding to make these thoroughfares and evacuation routes safer for our community and the many thousands who visit here. This effort was perhaps the largest and most successful signature drive Bolinas had ever seen.

Therefore, it is inscrutable to us that you failed to cite the most important LCP policy in regard to threatening trees within our project area--and particularly after these past winter storms and a season of strong Northwesterly Spring winds approaching---not to mention Diablo wild-fire winds in late Summer and Fall.

Policy C-BIO-10

*Roosting and Nesting Habitat. Prohibit the alteration or removal of groves of trees that provide colonial nesting and roosting habitat for monarch butterflies or other wildlife, **except where the trees pose a threat to life or property.***

Also, please note that the U.S. Fish & Wildlife Service has a similar policy for roosting Western Monarchs:

*b. Avoid the removal of trees or shrubs within 1/2 mile of overwintering groves, **except for specific grove management purposes, and/or for human health and safety concerns.***

It is important to know that the vast majority of Blue Gum in our project area threaten not only crucial roads as well as vulnerable and potentially perilous power lines, but they also threaten pedestrian and bicycle paths and property leased from BCPUD and used as a livestock operation.

These policy exemptions, plainly designed for a situation like this, clearly override any theoretical monarch benefit that this strictly marginal habitat may offer. This is illustrated with data going back to 1997: Since Xerces began surveying, our project area has only contributed 1.2 % of all the monarchs counted in Bolinas. This site is not an Environmentally Sensitive Habitat Area (ESHA), at least in terms of Monarch Butterflies.

Monarch use within the project area is presently moot given the necessary application of the exemption within LCP policy C-BIO-10. Yet WRA doesn't mention this. Furthermore, given that Supervisor Rodoni and others encouraged your employment, we envisioned that WRA would be working as advocates for a timely and critically necessary health and human safety project as well as a potentially wonderful native bio-system restoration. Such a restoration would indeed focus on creating monarch and other butterfly habitat, and it should focus on Red Legged Frog habitat too.

In that case, wetland buffers with eucalyptus seem counterproductive. We are seeking to restore this area so it can become a future ESHA, and to be clear, in its current state it is not an ESHA. Please note these other policies in the LCP.

9 Policy C-BIO-5: Ecological Restoration.

*Encourage the restoration and enhancement of degraded ESHAs and the creation of new ESHAs, **and streamline regulatory processes whenever possible to facilitate the successful completion of restoration projects.***

Policy C-BIO-6: Invasive Plants.

**Where feasible, require the removal of non-native, invasive plant species such as pampas grass, brooms, ice plant, thistles and other invasive plant species**

on the list maintained by the California Invasive Plant Council in the areas of development **and revegetate those areas with native plants as specified in Coastal Permit approvals.** Ensure that required landscaping avoids use of non-native, invasive trees and plants in accordance with Policy C- DES-9 Landscaping.

It is unfortunate that it has become necessary to express these concerns. The *Bolinas Eucalyptus Project's* members are staunch environmentalists, but we find it incongruent that a highly questionable monarch habitat is impeding your ability to address the present danger our community lives with while concurrently hindering the progress of a highly beneficial restoration project

In our view, the monarch habitat survey you suggest is unnecessary and will stall crucial safety work and, indeed, is clearly over-ridden by C-BIO-10. This is also the opposite of "*streamlining regulatory processes*" that C-Bio-5 recommends.

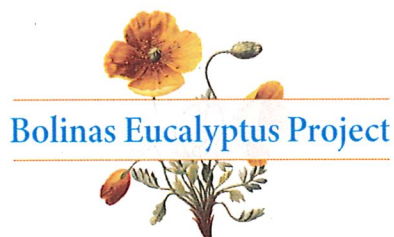
The project area is a human safety and property threat right now, but it is not being approached with the alacrity and seriousness it clearly deserves.

(PS. Our forester's report will be forthcoming)

Respectfully,

Jon Cozzi

on behalf of the *Bolinas Eucalyptus Project*



BEP Members

Jon Cozzi, Chairman

Jonna Alexander-Green

Rudi Ferris

Janice Tweedy

Howard Dillon

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