



Santa Barbara Audubon Society

A Chapter of the National Audubon Society

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Date: August 31, 2018

To: City of Goleta Planning & Environmental Review and Public Works Staff

Re: Comments on Draft Monarch Butterfly Habitat Management Plan

Dear City of Goleta Planning & Environmental Review and Public Works Staff,

This letter provides comments of the Santa Barbara Audubon Society (SBAS) regarding the City's July 2018 Draft Ellwood Mesa/Sperling Preserve Open Space Monarch Butterfly Habitat Management Plan (MBHMP). SBAS works to connect people with birds and nature through education, science-based projects, and advocacy. SBAS has been a voice for the natural world in the Santa Barbara area for more than 50 years and has over 1100 members, including hundreds in the City of Goleta.

SBAS is very supportive of the City's draft MBHMP and its efforts to protect and enhance the eucalyptus groves that are sites of historical monarch butterfly aggregations. We also appreciate the MBHMP's efforts to balance the multiple, complex, and interactive elements of the plan in a way that serves the long-term interests not only of monarchs, but of wildlife in general and the wide array of migratory, wintering, and breeding birds that find sustenance at Ellwood. As amplified below, we believe this is best accomplished through restoration efforts (by which we mean planting of natives) designed to create a diverse ecosystem that augments the value that the existing eucalyptus groves provide for monarchs and other wildlife.

We offer the following additional points that we encourage the City to consider as it finalizes this plan.

1. The MBHMP encompasses a significant riparian system (i.e., channels, tributaries) that has been heavily and negatively impacted by human activity as well by neglect. While the MBHMP mentions modest efforts to address riparian degradation, we believe that a more concerted focus on restoration and rehabilitation of this important habitat would benefit the monarch aggregation sites as well as the local ecosystem as a whole.
2. Expanding on the above point, we believe the key to successful restoration efforts is a carefully targeted approach to the selection and design of native restoration sites. This might result, for example, in restoration efforts limited to within 50-100 feet of existing waterways, that is, wetter areas where some native vegetation (e.g., coast live oak and toyon) already exists. (One strategy here might be to remove competing eucalyptus and design restoration around these natives; additionally, dead eucalyptus would need to be removed so as to allow sunlight to reach the restoration areas.) The attached annotated map suggests such possible areas. More precise siting ideally would be informed by bringing expert (hydrologic, geologic) knowledge to bear on more detailed mapping of the seeps and springs that occur along the Ellwood segment of the More Ranch Fault (see attached), many of which are now degraded, weakly expressed, or entirely obliterated. This fault is known to host persistently wet riparian habitats, which, among other attributes, makes it one of National Audubon's Important Bird Areas (IBAs). Principles underlying this recommendation include the facts that:

- monarchs may aggregate in vegetation other than eucalyptus;
 - the habitat structure requirements needed to achieve correct micro-climate conditions can be achieved through native as well as eucalyptus plantings;
 - restoration with natives provides habitat opportunities for many more plants and animals than restoration with eucalyptus alone; consequently, a balance between the two makes for an ideal solution; and
 - carefully sited and designed native habitats have the greatest likelihood of being self-sustaining and supportive of diverse insect and bird life.
3. Consistent with the above, and as another facet of a comprehensive restoration strategy, we encourage the plan to provide for the gradual replacement of dead eucalyptus outside monarch aggregation areas with appropriately selected native trees.
 4. The continued degradation of the Ellwood Mesa trails and habitat due to unleashed and off-trail dogs, along with owners' failure to pick up after their dogs, represents a specific jeopardy to at least two MBHMP goals: Trail Management Program Goal 5 ("To develop and maintain public access trails that provide a safe and meaningful experience for visitors while also limiting impacts on habitats and wildlife..."; p. 14) and Waste Management Program Goal 6 ("To maintain a waste-, trash-, and debris-free butterfly habitat management area"; p. 15). This issue is not addressed in the draft MBHMP. We urge the City to incorporate into its final plan specific actions, such as improved and more widespread signage and, most importantly, a renewed commitment to leash and waste pickup law enforcement, designed to curtail this largely controllable source of habitat degradation.
 5. The final plan, especially the Habitat Enhancement and Restoration Program (Section 14), should include an assessment of the impacts of all proposed actions on potentially affected downstream habitats, such as North Campus Open Space (NCOS) and Coal Oil Point Reserve (COPR).
 6. We wish to highlight the value that local (and many visiting) birders place on the birding "hotspot" known as "the Coronado seep" — a small drainage-fed depression area located within the MBHMP at the foot of Coronado Drive. This spot is a magnet for migrating songbirds (especially during fall) in need of water. We request that any future work done in connection with the MBHMP be mindful of the need to protect and preserve the water-providing aspect of this particular spot.
 7. The "Program Status" paragraph at the end of Section 14 states: "An Implementation Plan that describes work activities to occur each year will accompany this MBHMP." We applaud this element of the plan and trust it will be annually circulated for public review and comment well in advance of the work commencement date. This will ensure that it serves as an effective mechanism for public communication and feedback and for project monitoring and accountability.

SBAS appreciates the opportunity to comment on this project. Please do not hesitate to contact us if further clarification on any of these points is desired.

Sincerely,



Cherie Topper, Santa Barbara Audubon Society Executive Director

Ellwood Restoration – Possible Target Areas



Illustration of More Ranch Fault (MrR) Location Within the Mission Ridge Fault System¹

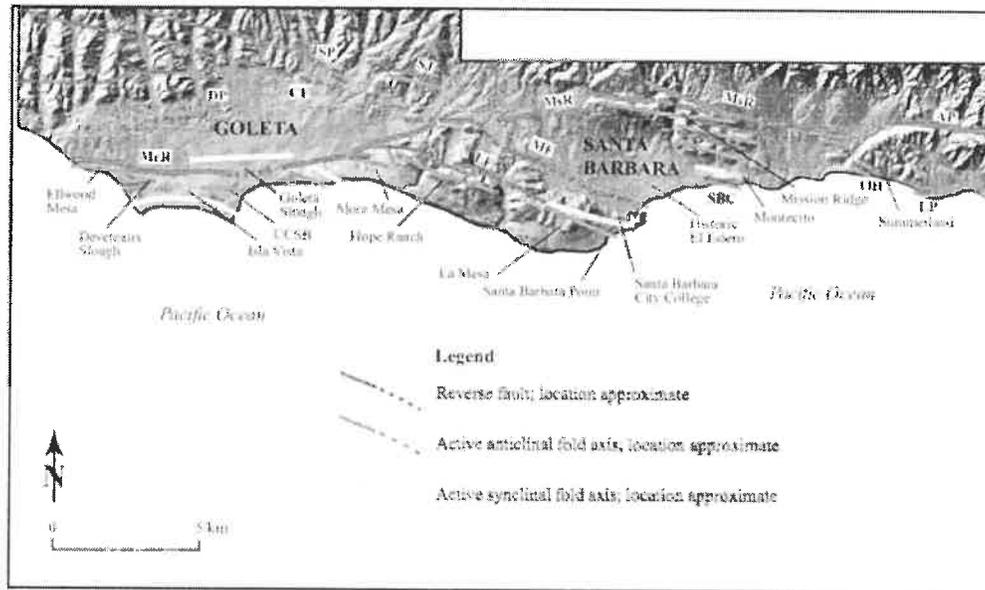


Figure 2. Seismic sources of the onshore Santa Barbara Fold Belt showing south-dipping, reverse faults, some of which are blind, with associated north-verging, hanging wall anticlines and footwall synclines. The Mission Ridge Fault System is subdivided into the More Ranch (MrR), the Mission Ridge (MrR), and the Arroyo Parida (AP) segments. Additional onshore reverse faults include the Dos Pueblos (DP), the Carreros (CF), the San Jose (SJ), the San Pedro (SP), the Lavigna (LF), the Mesa (MF), the Santa Barbara Cemetery (SBC), the Ortega Hill (OH), and the Leon Point (LP) faults.

¹ From E.A. Keller & L.D. Gurrola, *Earthquake Hazard of the Santa Barbara Fold Belt, California* (July 2000 Final Report). Santa Barbara, CA: UCSB Institute for Crustal Studies.

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.

Deborah Lopez

From: Ken Knight <kennethknight@cox.net>
Sent: Tuesday, September 04, 2018 8:01 AM
To: Deborah Lopez
Cc: Paula Perotte; Stuart Kasdin; Roger Aceves; Michael Bennett; Kyle Richards
Subject: Comments on 9/4/18 Council Meeting Agenda item E-1

Dear Mayor and Council,

My suggestions for strengthening the Plan are as follows;

1. Provide greater detail on the estimated amount of water and irrigation infrastructure needed for both newly planted young trees and strategic mature Blue Gum Eucalyptus to survive and thrive.
 - Underestimating water needs is a major reason why restoring the redwoods at Stow Grove has been so difficult. A 5 year irrigation plan may be necessary if the current drought continues. Irrigation water may not be available or prohibitively expensive.
2. Provide a more detailed assessment of the ongoing costs and level of service needed to maintain a reasonable level of risk to the public using the area.
 - The nature of Blue Gum Eucalyptus trees will require a level of ongoing maintenance similar to and exceeding that provided to street trees.
3. Provide an estimated survival rate of newly planted trees, and a follow up process to replant and maintain those trees.
 - This is a very challenging area to plant. It will be difficult to replant and irrigate after initial planting efforts have been completed.
4. Update the 2001 UC Cooperative Extension planting standards used in the Plan to 2018 planting standards, such as International Society of Arboriculture Best Management Practices for planting trees.
 - There have been great advances in planting methodologies over the last 17 years that have not addressed in the Plan including soil testing, root shearing before planting and techniques for planting in dry, compacted soils.

Ken Knight
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kennethknight@cox.net

September 3, 2018

Mayor and Council members,

Everyone had great hopes for the Monarch Butterfly Habitat Management and Implementation Plans and what we got is very disappointing. The number one goal of the Implementation Plan should be the preservation and improvement of the habitat. Instead of maintaining, replacing, and improving the eucalyptus groves this plan is more interested in the removal of trees and the public use of the Ellwood Mesa Monarch Butterfly Habitat.

The Monarch Butterfly Habitat is an important and valuable environmental resource to be preserved and is not for the entertainment of the public. Public safety should be maintained by keeping the public from any area that might present a safety threat.

One of the worst parts of the Monarch Butterfly Habitat Management and Implementation Plans is that the Public Works Department has been given the responsibility for most of the Monarch Butterfly Habitat Management and Implementation Plans. This is placing the very people who tried to cut down 100's of eucalyptus trees in charge of their care. The plans should be the responsibility of the Planning and Environmental Review Department with any work done by Public Works staff or qualified contractors.

There is not enough Council and public review of the actions of staff in implementing the plan. Too many inappropriate and unapproved actions have been taken that damaged the habitat in the last two years. There needs to be better protections put in place to stop tree removal and pruning without Council review.

The plans are weak without specific protections for the butterflies and trees. There is far too much use of the wording "managed, as feasible", which further weakens the plans. There are no protections in these plans to keep a large number of trees from being cut down at any time without the Council's or public's knowledge or approval.

There seems to be a continuing push from staff to restore eucalyptus trees with native plants, not eucalyptus trees. At the workshop the public strongly supported any restoration to be with the more appropriate eucalyptus trees.

There is also too much emphasis on clearing understory and removing fallen trees which are much needed by the other wildlife in the groves. I see this as no improvement or very little over current flawed plans.

I am concerned that the plans fail to adequately protect our special eucalyptus trees and Monarch butterflies. The plans need to concentrate on the butterflies, eucalyptus trees, and all wildlife including birds. This is a very special habitat that needs very special protection and care and these two documents don't treat it with adequate care.

Barbara

LAW OFFICE OF MARC CHYTILO, APC

ENVIRONMENTAL LAW

September 3, 2018

Mayor Paula Perotte and City Council
City of Goleta
130 Cremona Dr. #B
Goleta, CA 93117

By email to dlopez@cityofgoleta.org

RE: Ellwood Draft Monarch Butterfly Habitat Management Plan and 2018 Implementation Plan

Dear Mayor Perotte and Councilmembers:

This office represents the Friends of the Ellwood Monarchs (FOTEM), a community group formed in response to various threats to the Ellwood eucalyptus forest which is critical overwintering habitat for Monarch butterflies. We have reviewed the Draft Monarch Butterfly Habitat Management Plan (MBHMP) and 2018 Implementation Plan (2018 IP) and offer the following comments. Our suggested language changes are indicated in ~~strikethrough~~ and underline.

1. Scope of the Open Space Plan Area

The Draft MBHMP identifies the Ellwood Mesa Open Space Plan as establishing the goal and policies that guide the MBHMP. (Draft MBHMP, p. 5.) The Ellwood Mesa Open Space Plan refers to the sections of the Ellwood-Devereux Coast Open Space and Habitat Management Plan (City of Goleta et al. 2004) applying to the Goleta properties, as approved by Council on June 24, 2004. (Id.)

The Ellwood-Devereux Coast Open Space Area comprises land controlled by the City of Goleta, Santa Barbara County, and the University of California. The City's part of the Open Space Area includes the Ellwood Mesa (the property acquired by the City and now called "The Sperling Preserve"), the Santa Barbara Shores Park (acquired upon incorporation by the agreement in Ballot Measure H), the Coronado Butterfly Preserve, and the un-named City-owned open space¹ west and north of the Coronado site that crosses Santa Barbara Shores Dr. and extends north to Hollister between Santa Barbara Shores Dr. and Pebble Beach Dr. (Ellwood-Devereux Coast Open Space Plan Area, Figure 1, attached hereto as Attachment 1.)

Since this last area is not given a specific name in the OSHMP, we have called it "Area S." Area S is demarcated in blue, identified as "Goleta Jurisdiction", and included within an identified "Goleta Open Space Neighborhood Area". (Id.) The City Council's June 24, 2004 resolution does not alter the Open Space Plan Area with respect to the Goleta Open Space Neighborhood Area.

¹ Named in the General Plan Open Space Element as Santa Barbara Shores (Small), Santa Barbara Shores Open Space (Small), and Campus Glen Open Space.

(See Resolution No. 04-37, attached hereto as Attachment 2.) Moreover, the Draft MBHMP Outline (9/17/13) that has been published on the City's website for a number of years depicts the "Ellwood Mesa Open Space Area Boundary" as including Area S. (Attachment 3, available at <http://www.cityofgoleta.org/home/showdocument?id=9739>.)

The Ellwood-Devereux Coast Open Space and Habitat Management Plan explains the biological significance of the eucalyptus groves in this area, and their designation as ESHA despite the fact that no known monarch aggregation sites exist as follows: "Unoccupied eucalyptus groves within the City of Goleta in areas adjacent to the overwintering sites that contain suitable conditions to support overwintering butterflies are also considered ESHAs because they could be used at any time in the future, and because they provide additional habitat in the event that the occupied groves are damaged." (P. 21.) The damaged conditions currently manifesting in and around the Ellwood Open Space aggregation sites underscores the importance of protecting the Area S eucalyptus grove which, according to the tree surveys the City had performed, are in relatively good health (See City Staff Report for 2/20/18 Council hearing, p. 5). Including Area S within the Draft MBHMP boundaries is the best way to ensure it is managed and restored in a manner that ensures its continued availability for monarch butterfly use².

We request that Council direct staff to expand the boundary of the MBHMP to include Area S, consistent with the Ellwood-Devereux Coast Open Space and Habitat Management Plan and its Monarch Goal 1 which guided preparation of the Draft MBHMP: "[to p]rotect and maintain existing monarch butterfly populations in the Open Space Plan Area, and manage the habitats to be self-sustaining." (Draft MBHMP, p. 5.) One or a part of one of the parcels that make up Area S could be considered a neighborhood park since it has a playground, picnic table, and lawn. The parcel with these park amenities 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.

2. Clarify Policy 1-1 to Ensure the MBHMP Reflects Current Data Regarding our Local Monarch Population

Policy 1-1: The City shall review, and revise as necessary, the MBHMP to reflect current data, butterfly conservation science, and management techniques regarding the local monarch population

It is critical that the MBHMP be informed by data, science, and information regarding management techniques **that is applicable to our local monarch population**. The MBHMP is partly based on the Xerces Management Guidelines (2015), which includes recommendations that restoration

² The proposed use of this area for off-site mitigation as part of the Ekwil-Fowler extension project nearly resulted in the removal of the eucalyptus trees designated as monarch ESHA and replacement with native riparian species, without consideration of the potential impacts to monarchs or the proposal's consistency with the Ellwood-Devereux Coast Open Space and Habitat Management Plan. While acknowledged to be a mistake, the correction of which is underway, this "near-miss" underscores the necessity of including this area within the MBHMP Area.

plantings should include only native trees, citing a Griffiths and Villablanca (2015) study that found that in some instances monarchs moved to native trees in mixed groves. However the study is expressly limited to “overwintering sites located on the central coast of California *north* of Santa Barbara County” and its recommendations “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.” (Griffiths and Villablanca, p. 47 (emphasis added).)

Currently, no native trees endemic to the Santa Barbara region are known to support stable overwintering monarch aggregations (*Monarch Butterfly Overwintering Sites in Santa Barbara County, California*, Meade, 1999). Based on the available data and science (we have not yet been able to access the recent study of SB County sites funded by the City, SB County, and USFWS) there is no basis for replacing the species, historically and continuously used in the Ellwood aggregation sites and dominating the adjacent monarch habitat with native plants--either quickly by wholesale removal of eucalyptus in any part of the eucalyptus forest, or gradually by replacing removed dead or distressed tree with natives.

Although the MBHMP has policies that support maintaining the entire eucalyptus forest and re-planting of eucalyptus to replace removed trees, the Restoration Plant table in Appendix 3 does not include any type of eucalyptus. We request that a Restoration Plant list includes any species of eucalyptus that might be considered for planting to replace removed trees or for enhancement of the structure and function of the monarch habitat.

3. Clarify that Protection of Monarch Habitat is the Plan’s Priority

While the overarching purpose of the MBHMP is the protection of monarch butterfly habitat, not all of the policy language contains sufficient clarity regarding this overarching purpose. Changes such as the below recommended change to Policy 1-2 clarify that it is not protection of the environment in general, rather protection of monarch butterfly habitat specifically that is the MBHMP’s charge.

Policy 1-2. During implementation of the programs, goals, policies, and actions described in this MBHMP, and during the planning and implementation of other projects that may affect monarch butterfly habitat within the Ellwood Mesa Open Space, protection of monarch butterfly habitat ~~the environment~~ shall be given the utmost consideration.

Moreover, Program 14 has policies that as currently written threaten the monarch ESHA. The terminology of “restoration of the Devereux Creek corridor” will imply to some the substitution of native trees for eucalyptus 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 with native riparian forest along the creek corridor 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 clarify and provide a map.*

Action 14-3.1 calls for the **establishment of a riparian forest** along the banks of Devereux Creek composed of native riparian tree species. This seems to be a very different action than simply using some native plants in or around the eucalyptus forest for windbreak, to fill out the understory, to provide nectar, or other functions that benefit the monarchs. This action seems to call for the substitution of one type of ESHA (native riparian forest) for another (monarch ESHA) and essentially strip Ellwood of its most important monarch habitat. This policy seems to directly contradict Policy 14.5 and others.

This plan should maintain and enhance the entire Ellwood eucalyptus forest that is designated monarch ESHA. If the eucalyptus is not maintained it will NOT be monarch ESHA (as the creek corridor between Ellwood West and Ellwood Sandpiper is not designated as monarch ESHA because it was restored as a native riparian forest in 1997). This plan cannot claim to be protecting monarch ESHA and at the same time replacing the very vegetation that caused it to be called monarch ESHA.

Please clarify these actions in Program 14.

4. Expressly Include Activities Undertaken by Utilities and Other Non-City Entities and Clarify Minimum Requirements

Action 1-2.1. Whenever vegetation removal, ground disturbance, construction, or other activities with the potential to significantly disrupt habitat values are proposed including activities undertaken by utilities and other non-City entities within the MBHMP coverage area, environmental protection measures shall be implemented. These measures shall be determined in coordination with a qualified biologist, and ~~should normally~~ shall include at a minimum pre-activity surveys for nesting birds or other wildlife, pre-activity surveys for monarch butterfly aggregations, presence of an environmental monitor during construction, and other protections, as deemed appropriate. The City will monitor these activities to ensure that environmental protection measures are used and that activities are limited to those permitted.

The City of Goleta is not the only entity that may undertake activities within the MBHMP coverage area. For example, Southern California Edison (SCE) undertakes activities including tree limbing to reduce fire hazards associated with their lines. It is important that the MBHMP expressly apply to utilities and other non-City entities that may now, or in the future, undertake activities within the MBHMP that may significantly disrupt monarch habitat.

Additionally, it is important that the MBHMP be clear that certain minimum requirements including pre-activity surveys for nesting birds, other wildlife, and monarch aggregations, and the presence of an environmental monitor during construction, will be in place prior to all activities with the potential to significantly disrupt habitat values. City oversight should be a critical component of Action 1-2.1, to ensure that the above protective measures are not only required but also implemented correctly on the ground.

5. Empower Planning and Environmental Review Department with Oversight of the MBHMP

~~Policy 1.3. Because many of the MBHMP actions are related to trail improvements, tree work, and related project implementation monitoring and reporting, the City's Public Works Department shall oversee the implementation of the MBHMP.~~

Policy 1.3. Because the MBHMP's purpose is to provide a programmatic approach to management of the habitats that support the monarch butterfly seasonal aggregations, and because many of the MBHMP actions require detailed knowledge of butterfly biology, the City's Planning and Environmental Review Department shall oversee the implementation of the MBHMP.

As drafted, Policy 1.3 does not accurately characterize the nature of the MBHMP action items, and improperly identifies the City's Public Works Department as the appropriate entity to *oversee* the MBHMP.

The Action items included in the MBHMP do not themselves effectuate any trail improvements or tree work. Instead, the City has deliberately structured the MBHMP such that its action items do not themselves constitute "development" that would require a CDP (including trail improvements and tree work). Instead, trail improvements, tree work, and other development would only be authorized in the context of each Implementation Plan and accompanying CDP approved by the Coastal Commission.

The Action items do however require detailed knowledge of butterfly biology and habitat conditions, and planning expertise in the development of each annual Implementation Plan (*see* Action 1-4.1.) In light of this, Planning and Environmental Review Department is a more appropriate entity than Public Works to *oversee* implementation of the MBHMP.

6. Strengthen Language Regarding Monarch Butterfly Habitat Protection

Goal 10. To ~~facilitate~~ ensure the ongoing use of Ellwood Mesa by the monarch butterfly.

Policy 10-1. The City shall ~~encourage~~ implement management strategies that facilitate the use of Ellwood Mesa by monarch butterflies.

Policy 10-2. Preservation of aggregation sites on Ellwood Mesa shall be a the focus of management activities, ~~as feasible~~, and in coordination with Program 9, Catastrophic Event Response Program.

Specific changes to Action 1-2.1 (above) to clarify that activities with the potential to significantly disrupt habitat values *shall* at a minimum include pre-activity surveys and other measures which are standard and should be required for all such activities. The current

language “should normally include” is too permissive to provide any meaningful assurance that activities will be adequately conditioned and monitored.

Policy 20-3: Create a Monitoring Report, updated annually, ~~when feasible~~, resulting from the information obtained during the implementation of the various policies and actions called for in this MBHMP.

Action 20-3.1: Track the implementation of this MBHMP in the form of a Monitoring Report, ~~preferably~~ updated on an annual basis, and presented at a public workshop.

The stronger language, suggested in the above edits, clarifies the City’s obligation under the MBHMP to prioritize monarch butterfly habitat protection, and ensures that the obligation cannot be shirked in the future under vague claims of “infeasibility”.

7. Mitigation Fees

Action 2-2.2 allows payments of compensatory mitigation fees into the Butterfly Fund, for projects with “limited impacts on monarch butterfly habitat.” It is critical that the City not allow projects that impact monarch butterfly habitat. Action 2-2.2 should be revised to clarify that payment of compensatory mitigation fees are only allowed where projects have implemented all available measures to *avoid* impacts to monarch butterfly habitat, or to directly mitigate impacts on-site where appropriate, before projects may turn to compensatory mitigation.

8. Bolster the 2018 IP to Include Additional Replanting

The 2018 IP is intended to include mitigation for the previous removal of 29 eucalyptus in 2017 authorized under an emergency permit from the Coastal Commission. We’re concerned that the 2018 IP appears to include the absolute bare minimum, and should be revised to include additional eucalyptus planting proximate to the area where each of the 29 eucalyptus were removed under the 2017 emergency permit, in addition to the proposed planting near Ellwood North.

Replanting ratios of 2:1 or greater are commonplace, and ensure that valuable growth time is not lost should some replanted trees die or fail to thrive. **We request that Council direct City Staff to revise the IP to increase the proposed 1:1 replanting ratio.**

In addition, the location of the replanted trees is problematic. While we understand that the proposed replanting in the Ellwood North area carries certain benefits for the Ellwood North aggregation area, it does not directly mitigate for the trees lost. We encourage the City Council to direct Staff to revise the 2018 IP to include additional replanting of eucalyptus proximate to the locations where each of the 29 eucalyptus were removed.

Finally, 2018 IP does not directly replace the blue gum eucalyptus removed in 2017 with other blue gum eucalyptus. Rather, mostly ironbark are proposed for replanting. While we understand there may be certain benefits to ironbark in terms of its relative drought resistance, it has

different characteristics than blue gum which are typically taller and provide a valuable source of nectar for overwintering monarchs. We request that at a minimum 29 blue gum be replaced proximate to the removal locations, in addition to the ironbark replanting proposed.

9. Conclusion

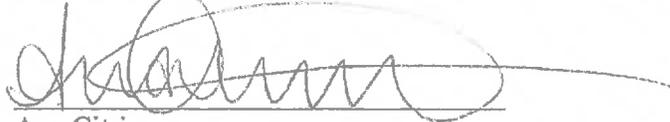
It is important that the MBHMP's scope is properly defined, both in terms of its geographic coverage, and applicability. Further, it is important that the MBHMP's goals, policies, and actions are as clear as possible that preservation of monarch butterfly habitat is the highest priority, and that oversight of the Plan is entrusted in the City department with the expertise in biological resources.

The 2018 IP should include additional eucalyptus replanting proximate to the area where each of the 29 eucalyptus were removed under the 2017 emergency permit, in addition to the proposed planting near Ellwood North.

We respectfully request that Council direct City Staff to incorporate the above changes in revisions to the draft MBHMP.

Respectfully submitted,

LAW OFFICE OF MARC CHYTILO



Ana Citrin
For FOTEM

- Attachment 1: Ellwood-Devereux Coast Open Space Plan Area, Figure 1
- Attachment 2: Resolution No. 04-37
- Attachment 3: Draft MBHMP Outline (9/17/13)

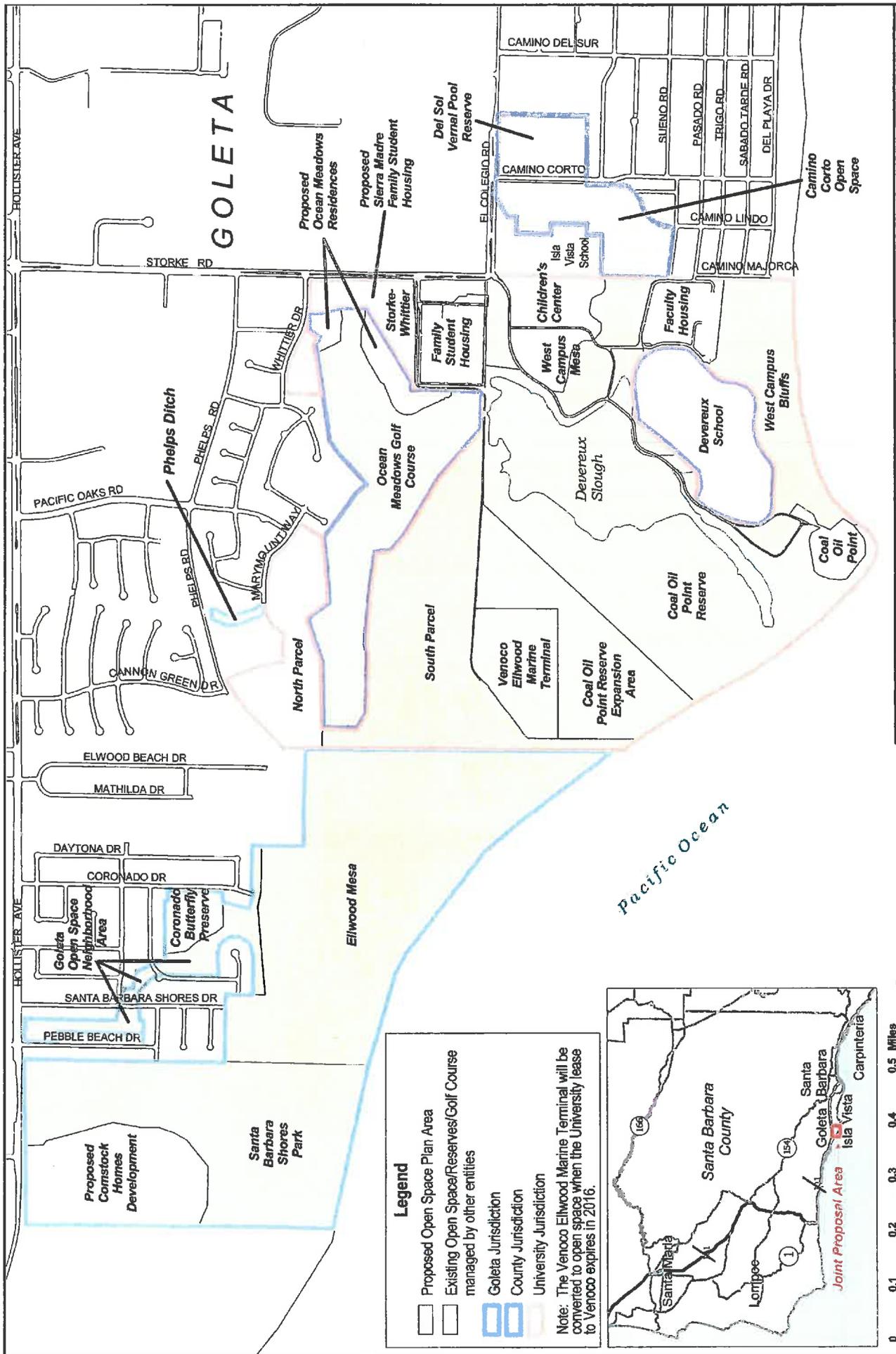


Figure 1. Overview of the Open Space Plan Area

Elwood-Devereux Coast Open Space and Habitat Management Plan

March 2004

**City of Goleta Ellwood Mesa/Sperling Preserve Open Space
Draft Monarch Butterfly Habitat Management Plan**

EXECUTIVE SUMMARY

INTRODUCTION

Background
Policy
Purpose
Methods

THE MANAGEMENT PLAN

A. ADMINISTRATIVE PROGRAMS

- 1.0 Municipal Management Program
- 2.0 Fiscal Program
- 3.0 Interagency Cooperative Program
- 4.0 Community Wildfire Protection Program
- 5.0 Trail Management Program
- 6.0 Waste Management Program
- 7.0 Aesthetic Resources Management Program
- 8.0 HMP Update and Amendment
- 9.0 Catastrophic Event Response Program

B. NATURAL RESOURCES MANAGEMENT PROGRAMS

- 10.0 Monarch Butterfly Management Program
- 11.0 Wildlife Habitat Management Program
- 12.0 Tree Management Program
- 13.0 Integrated Pest Management Program
- 14.0 Habitat Enhancement and Restoration Program
- 15.0 Invasive Plant Management Program
- 16.0 Ecosystem-wide Management Coordination Program

C. OUTREACH

- 17.0 Community Advisory and Docent Program
- 18.0 Interpretive Program
- 19.0 Education Program

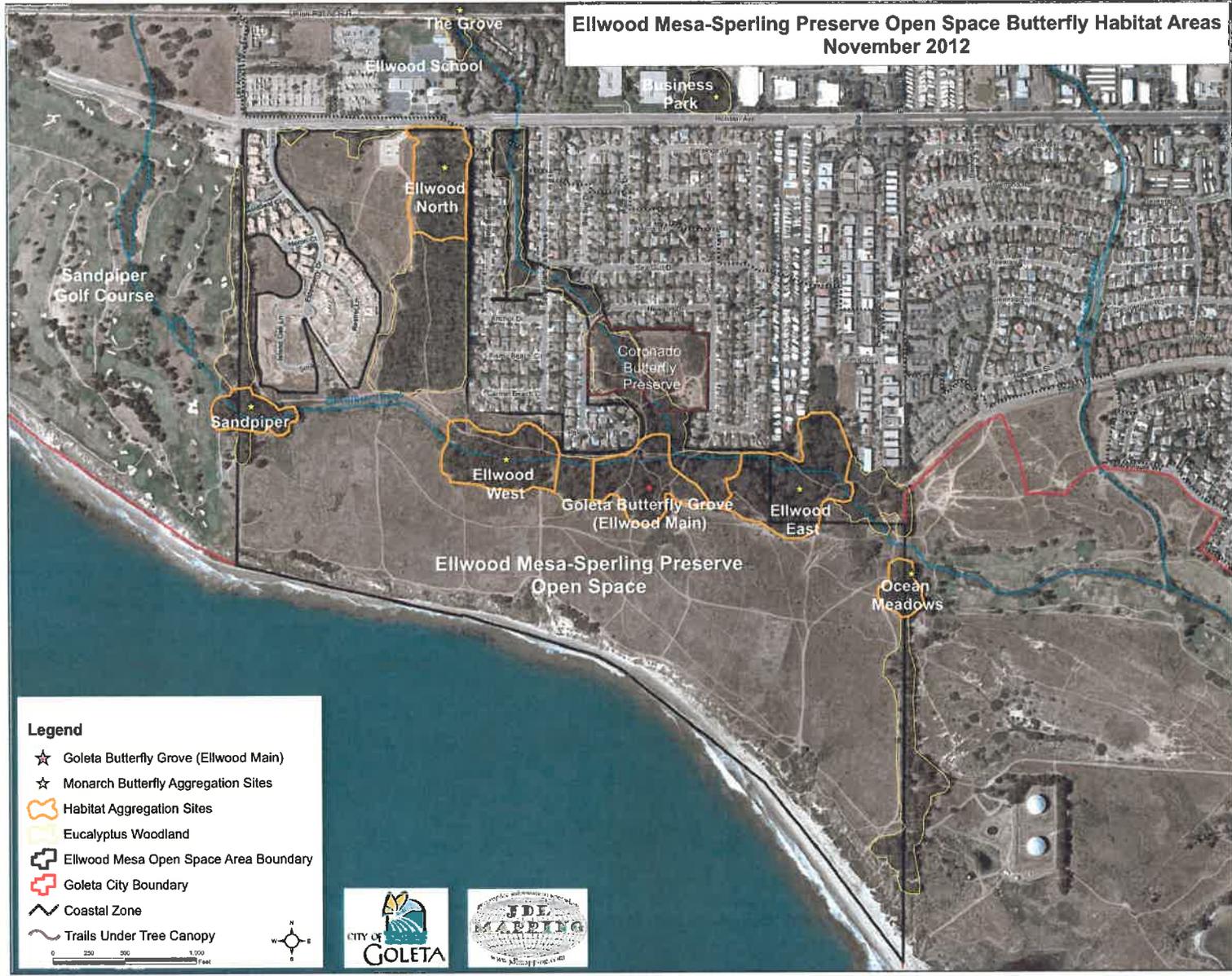
D. MONITORING, RESEARCH AND ADAPTIVE MANAGEMENT PROGRAMS

- 20.0 Monitoring Program
- 21.0 Research Program
- 22.0 Adaptive Management Program

E. IMPLEMENTATION PRIORITIES, SCHEDULE, AND ESTIMATED COSTS

F. CONCLUSION

**Ellwood Mesa-Sperling Preserve Open Space Butterfly Habitat Areas
November 2012**



Legend

- ☆ Goleta Butterfly Grove (Ellwood Main)
- ☆ Monarch Butterfly Aggregation Sites
- 🍷 Habitat Aggregation Sites
- 🟡 Eucalyptus Woodland
- 📐 Ellwood Mesa Open Space Area Boundary
- 🇺🇸 Goleta City Boundary
- 🌊 Coastal Zone
- 🌳 Trails Under Tree Canopy



RESOLUTION NO. 04-37

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
GOLETA ADOPTING THE ELLWOOD-DEVEREUX COAST
OPEN SPACE AND HABITAT MANAGEMENT PLAN AS IT
APPLIES TO LANDS SITUATED WITHIN THE BOUNDARY
OF THE CITY OF GOLETA, SUBJECT TO CERTAIN
REVISIONS**

WHEREAS, in March 2003 the City of Goleta entered into a Memorandum of Understanding with the University of California, Santa Barbara, and the County of Santa Barbara to modify and implement various recommendations within the *Joint Proposal for the Ellwood – Devereux Coast*, a report issued by the University and County in 2002;

WHEREAS, the three entities have participated in the preparation of the proposed *Ellwood-Devereux Coast Open Space and Habitat Management Plan* (hereafter “Open Space Plan”);

WHEREAS, a key component of the proposed Open Space Plan is a land exchange between the City of Goleta and the Santa Barbara Development Partnership / Comstock Homes (SBDP/CH) to transfer potential residential development from the environmentally-sensitive Ellwood Mesa Property, owned by SBDP/CH, along the ocean bluffs to a less-sensitive 36-acre site within the existing City-owned Santa Barbara Shores Park;

WHEREAS, in February of 2003 the City of Goleta entered into a Memorandum of Understanding with Santa Barbara Development Partnership and Comstock, Crosser & Associates Development Company, Inc. setting forth protocols and structure for submission and processing of various development applications for a residential development on a 36-acre portion of the City-owned Santa Barbara Shores Park property and for a property exchange whereby the City would obtain title to the 137-acre Ellwood Mesa property in exchange for the 36-acre portion of Santa Barbara Shores Park;

WHEREAS, the City Council has, by separate action taken on June 21, 2004, approved Resolution 04-27 and thereby certified an Environmental Impact Report addressing all components of the project, including the *Ellwood-Devereux Coast Open Space and Habitat Management Plan*;

WHEREAS, the City Council has, by separate action taken on the 24th day of June, 2004, adopted Resolution 04-31, thereby approving an Addendum for the EIR, findings pursuant to the California Environmental Quality Act (CEQA), a Statement of Overriding Considerations pursuant to CEQA and the City’s implementing guidelines, and a mitigation monitoring program;

WHEREAS, the City Council has, by separate action taken on the 6th day of July, 2004, approved Resolution 04-32 and thereby repealed the *Ellwood Beach – Santa Barbara Shores Specific Plan*;

WHEREAS, by separate action taken on the 19th day of July, 2004, the City Council has approved an ordinance to rezone the Ellwood Mesa property and several other parcels situated within the boundaries of the Open Space Plan from residential zoning to the Recreation (REC) zoning district, a district that has as its purpose to provide open space for various forms of outdoor recreation, including passive and coastal-dependent recreation;

WHEREAS, on April 12, 19, and 22, May 10 and 18, and June 21, 24 and July 6, 2004 the City of Goleta Planning Agency and City Council jointly held a duly noticed public hearing to consider the proposed Open Space Plan and various related matters, at which times all interested persons were given an opportunity to be heard;

WHEREAS, the City Council has considered the entire administrative record, including all written and oral testimony offered at the public hearing; and

WHEREAS, the City Council intends that the Open Space Plan shall have the status of a park master plan, and shall not have the effect of a regulatory document.

NOW THEREFORE BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF GOLETA DOES HEREBY DETERMINE AS FOLLOWS:

SECTION 1: Recitals.

The City Council hereby finds and determines that the foregoing recitals, which are incorporated herein by reference, are true and correct.

SECTION 2: Findings

The City Council hereby makes the following findings:

1. The City of Goleta is a recently-incorporated city, having incorporated on February 1, 2002. The California Government Code, at § 65360, allows newly incorporated cities a period of 30 months, along with any OPR-approved time extensions, to prepare and adopt a general plan. As of the date of this action, the City has not adopted its first general plan. In such circumstances, § 65360 further provides that the City is not subject to the

requirement that its decisions be consistent with the general plan, provided that certain requirements are met. The City Council hereby finds that:

- a. There is a reasonable probability that the proposed *Ellwood-Devereux Coast Open Space and Habitat Management Plan* will be consistent with the general plan proposal currently being considered. The City intends to incorporate various provisions of the *Ellwood-Devereux Coast Open Space and Habitat Management Plan* into its first general plan and local coastal land use plan.
 - b. There is little or no probability of substantial detriment to or interference with the future adopted general plan if the proposed Open Space Plan is ultimately inconsistent with the future general plan.
 - c. The proposed Open Space Plan complies with all other applicable requirements of state law and City ordinances.
2. The portion of the Open Space Plan within the boundaries of the City of Goleta is consistent with the applicable policies of Chapter 3 of the California Coastal Act in that:
- a. The site is located between the sea and the first public road parallel to the shoreline.
 - b. The proposed Open Space Plan conforms to the public access and public recreation policies of Chapter 3 of the California Coastal Act in that it proposes to relocate and expand the existing coastal access parking lot at Santa Barbara Shores Park. The number of coastal access parking spaces will be more than doubled, from 15 spaces in the existing lot to about 45 in the proposed relocated lot.
 - c. The proposed Open Space Plan conforms to § 30211 of the Coastal Act in that it will not interfere with the public's right of access to the sea, but will increase the existing public access to the shoreline by securing public ownership of the 137-acre Ellwood Mesa property, which is located along the coastal bluffs. New trail segments are proposed to connect the relocated parking lot to the existing informal trail network within Santa Barbara Shores Park and the Ellwood Mesa. Existing informal trails will be maintained except where segments traverse sensitive habitats such as vernal pools.
 - d. The proposed Open Space Plan conforms to § 30212 of the Coastal Act in that it will provide additional vertical access to the shoreline and coastal bluffs. The Open Space Plan is part of a larger project that includes public acquisition by the City of Goleta of the Ellwood Mesa property. This acquisition will provide the general public with both increased vertical access and increased lateral access, along both the blufftop and the sandy beach areas below the bluffs.
 - e. The proposed Open Space Plan advances the policy set forth in § 30221 of the Coastal Act in that it will protect 137 acres of existing,

privately-owned oceanfront land known as the Ellwood Mesa property for passive recreation and open space through acquisition of those lands by the City of Goleta.

- f. The proposed Open Space Plan conforms to § 30231 of the Coastal Act in that the proposed parking lot is designed to maintain water quality by minimizing grading and by use of a permeable concrete surface or other surfacing material that will minimize stormwater runoff, and trail improvements are designed to minimize runoff and erosion.
- g. The proposed Open Space Plan conforms to § 30240 of the Coastal Act in that the proposed parking lot and trails have been sited to avoid and protect environmentally sensitive habitat areas and to provide buffers adjacent to such resources. The planned trail system is based on the network of existing informal trails, with closure of those existing trail segments that traverse sensitive habitat areas such as vernal pools. The plan intends that such habitats will be restored at the sites of trail closures.
- h. The proposed Open Space Plan conforms to § 30251 of the Coastal Act in that the parking lot is sited at an elevation lower than Hollister Avenue in order to protect the scenic and visual qualities of the site, in particular the views from Hollister Avenue seaward to the Channel Islands. The parking lot will be landscaped to provide for an attractive appearance from Hollister Avenue.

SECTION 3: Action to Approve the Open Space Plan, Subject to Revisions

The City Council hereby adopts the *Ellwood-Devereux Coast Open Space and Habitat Management Plan* as it applies to lands located within the boundaries of the City of Goleta, subject to the revisions set forth in Exhibit A, attached and incorporated herein by this reference.

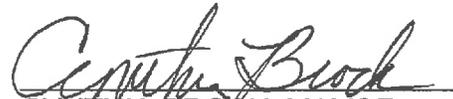
SECTION 4: Effective Date

The adoption of the *Ellwood-Devereux Coast Open Space and Habitat Management Plan* within the City of Goleta shall take effect immediately upon recordation of a deed vesting title to the Ellwood Mesa property with the City of Goleta.

SECTION 5: Amendments

Amendments to the Open Space Plan shall be adopted by Resolution of the City Council and approved by a majority vote of the Council. There shall be no limit on the number of amendments that may be considered in any calendar year.

PASSED, APPROVED AND ADOPTED this 19th day of July, 2004.


CYNTHIA BROCK, MAYOR

ATTEST:

APPROVED AS TO FORM:


CYNTHIA M. RODRIGUEZ
CITY CLERK


JULIE HAYWARD BIGGS
CITY ATTORNEY

STATE OF CALIFORNIA)
COUNTY OF SANTA BARBARA)
CITY OF GOLETA) ss.

I, CYNTHIA M. RODRIGUEZ, City Clerk of the City of Goleta, California, DO HEREBY CERTIFY that the foregoing Resolution No. 04-37 was duly adopted by the City Council of the City of Goleta at a regular meeting held on the 19th day of July, 2004, by the following vote of the Council:

AYES: COUNCILMEMBERS BLOIS, CONNELL, HAWXHURST, MAYOR
 PRO TEMPORE WALLIS AND MAYOR BROCK.

NOES: NONE.

ABSENT: NONE.

(SEAL)


CYNTHIA M. RODRIGUEZ
CITY CLERK

EXHIBIT A TO RESOLUTION 04-37

LIST OF REVISIONS TO THE OPEN SPACE PLAN

REVISIONS CONSIDERED AT THE JULY 13 MEETING

1. VARIOUS PAGES. Maps in the following figures shall be revised to incorporate the parcels within the 36-acre development envelope proposed to be donated by Comstock Homes to the City of Goleta for open space preservation: Figure 5, Figure 6, Figure 12, Figure 14. Other maps should be updated as applicable.
2. PAGE 8. Table 1, "Estimated Acreage in the Open Space Plan Area, by Jurisdiction and Subarea" shall be revised to incorporate the additional land areas within the 36-acre development envelope proposed to be donated by Comstock Homes to the City of Goleta for open space preservation.
3. PAGE 11. Table 2, "Estimated Acreage in the Open Space Plan Area, by Habitat Type" shall be revised to incorporate the additional land areas within the 36-acre development envelope proposed to be donated by Comstock Homes to the City of Goleta for open space preservation.
4. MAP FOLLOWING PAGE 58. Figure 19, "Conceptual Layout for Santa Barbara Shores Parking Lot" shall be revised to reflect the final parking lot design approved by the City.
5. PAGE 18. Change Habitat Policy 6 to read: "Use genetic stock for seeds and plants from the Ellwood-Devereux watershed in all native habitat enhancement and restoration on University- and City-owned lands. Use genetic stock for seeds and plants from the South Coast from Carpinteria to Gaviota in County-owned lands."
6. MAP FOLLOWING PAGE 38. Change legend for native grassland restoration to a narrow line pattern to be consistent with the way it is depicted on the map.
7. MAP FOLLOWING PAGE 48. Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference. Add proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
8. PAGE 50. Change Table 5, "Trail Lengths (feet) by Jurisdiction and Trail User," to include a total that is the sum of "proposed trails" and "trails to be closed." The total for Goleta is 77,790. The table should be further

revised to include proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.

9. MAP FOLLOWING PAGE 50. (Figure13) Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference. Add proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
10. FIGURE 14, FOLLOWING PAGE 50. Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference. Add proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
11. FIGURE 15, FOLLOWING PAGE 50. Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference.
12. PAGE 55. Change Table 8, "Lengths (feet) of Trail Design Options" to include proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
13. PAGE 59. Change Table 10, "Summary of Open Space Parking Facilities," to indicate up to 45 parking spaces at the Santa Barbara Shores Parking lot, and delete the statement in parenthesis: "~~(with up to 35 more if needed)~~"
14. PAGE 64. Change the first bullet under "Uses that May Require a Notification or Permit" to read as follows: "Small Special events ~~such as walk-a-thons, competitive bicycle and track and field races,~~ or public gatherings"
15. PAGE 64. Add under "Prohibited Uses" the following bullet: "All temporary or ongoing commercial uses, including commercial recreation uses"

ADDITIONAL REVISIONS DIRECTED AT JULY 13, 2004 MEETING

16. PAGE 6. In paragraph 1 of Section 2.2.1, change the last sentence to read as follows: "These transactions will increase the size of the open space area from 116.16 to about 230 acres through the addition of the Ellwood Mesa property."

17. PAGE 19 (and thereafter). Add the historical autumnal and overwintering monarch sites that may no longer be active to the applicable habitat maps. Add language to Policy 3 regarding enhancements to these habitat areas to help re-establish their use by the monarchs as follows: "Initial improvements may focus on inactive sites in order to evaluate the effectiveness of such interventions prior to their application to active sites."
18. PAGE 22. Change the second sentence of the first paragraph of Section 3.2.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
19. PAGE 22. Section 3.2.5, change the first bullet to read: "Existing public access around the perimeter of the Sandpiper aggregation site would be maintained. Pedestrian access is provided by a trail connecting to Hollister Avenue along the boundary with the Sandpiper Golf Course and by Trail 24. Bicyclists would be routed around the perimeter on Trail 24 rather than having access through the center of the aggregation site."
20. PAGE 30. Change the second sentence of Section 3.4.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
21. PAGE 34. Change the second sentence of Section 3.5.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
22. PAGE 37. Change the second sentence of Section 3.6.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
23. PAGE 40. Change the second sentence of Section 3.7.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
24. PAGE 44. Change the second sentence of Section 3.8.3 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
25. PAGE 47. Change Public Access Policy 1.2 to read: "Integrate the trail system with existing separately-managed open space areas and with existing and proposed residential development."
26. PAGE 48. Add a new Public Access Policy 4.3 to read: "Provide at least one continuous trail extending from the public parking lot at Hollister Avenue to the coastal bluff top that is for exclusive use by pedestrians, in order to provide a coastal access opportunity that avoids safety issues"

associated with joint use by bicycles and/or equestrians.” Change the trail map in Figure 12 to show trail 23 as this pedestrian-only trail.

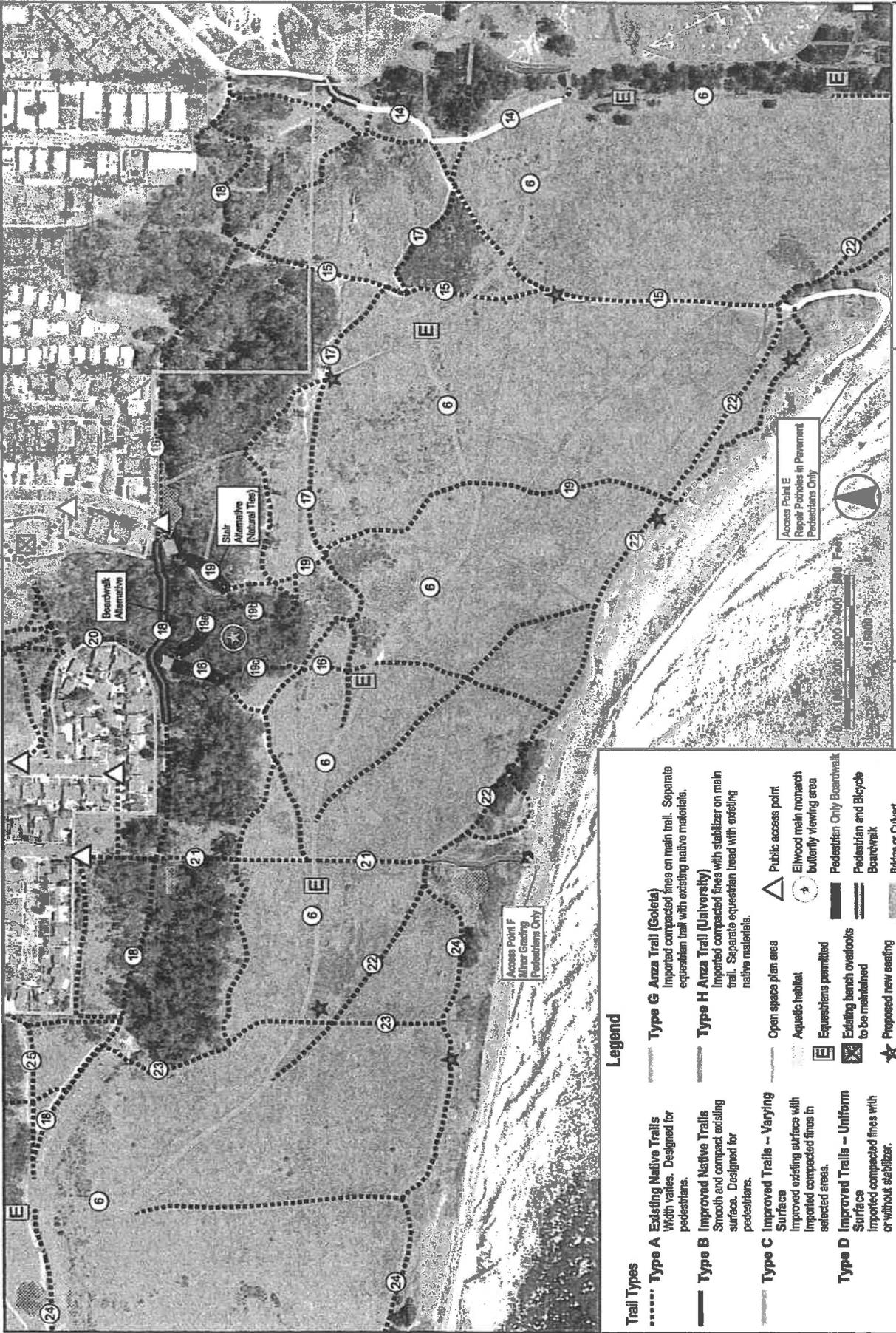
27. PAGE 56. Add the following as the last sentence in Section 4.4: “In the City of Goleta, public access points shall be designed to allow pedestrian access but to prevent the passage of motorcycles and other similar motorized vehicles, where feasible.”
28. PAGE 61. Change the last paragraph to read: “As an alternative to improvements to the Anza Trail (trail 6), the City of Goleta may consider a boardwalk or prefabricated span bridge along the Windrow Trail (trail 14). The boardwalk would span Devereux Creek and connect to a multi-user trail on Goleta property at the end of Phelps Road. This alternative would provide all-weather pedestrian and bicycle access to the Anza Trail from Hollister Avenue.
29. PAGE 64. Under the heading “Uses that May Require a Notification or Permit,” change the 1st bullet to read: “Small-scale special events or public gatherings,” and the 4th bullet to read: “Scientific studies that involve handling or tagging of butterflies or studies in restricted habitat areas”
30. PAGE 64. Under the heading “Prohibited Uses,” add bullets for the following: fireworks; amplified music; radio-controlled motorized equipment, such as model airplanes and model cars; organized competitive sporting events, such as track and field events and bicycle races; and large special events or public gatherings
31. PAGE 71. Under the heading “Erosion and Sedimentation Control Management Options, add a new bullet at the top of the page to read: “Design trail improvement and other projects to avoid modifications to natural drainage patterns; in particular, the Anza trail improvements shall be designed to maintain existing sheet flow of storm water runoff to Devereux Creek to sustain the eucalyptus woodland at the Ellwood Main monarch aggregation site.” Change the heading to add “Drainage” as the first word in the heading.
32. PAGE 73. Change the 2nd sentence in the 2nd paragraph to read: “The access gate at the southerly terminus of Santa Barbara Shores Drive, which provides access to the Ellwood Mesa portion of the open space area for emergency vehicles, will be owned and maintained by the City of Goleta.
33. PAGE 76. Under Section 6.1.1, “Management Coordination,” delete the 2nd paragraph as follows:

~~A proposed organization chart is presented in Figure 27 for the three jurisdictions responsible for implementing the Open Space Plan. This management framework identifies jurisdictional authority and responsibility for each sponsoring agency while allowing subarea managers to coordinate programs and projects as needed.~~

34. FIGURE 27, FOLLOWING PAGE 76. Delete the figure.
35. PAGE 77. Change the first sentence of the last paragraph before Section 6.1.2 to read: "A Joint Review Committee, comprised of one or more representatives from each of the three sponsoring entities, shall be established and will meet on an as-needed basis to provide a forum for discussion and resolution of ongoing issues related to implementation of the Open Space Plan."

EXHIBIT B TO RESOLUTION 04-37

**MAP SHOWING CORRECTED TRAIL LOCATIONS IN THE
ELLWOOD MESA PORTION OF THE OPEN SPACE PLAN**



Attachment 11. Map Showing Corrected Trail Locations in the Ellwood Mesa Portion of the Open Space Plan

Elwood-Devereux Coast
Open Space and Habitat Management Plan

July 2004

Legend	
Trail Types	
Type A Existing Native Trails Width varies. Designed for pedestrians.	Type G Ariza Trail (Goleta) Imported compacted fines on main trail. Separate equestrian trail with existing native materials.
Type B Improved Native Trails Smooth and compact surface. Designed for pedestrians.	Type H Ariza Trail (University) Imported compacted fines with stabilizer on main trail. Separate equestrian trail with existing native materials.
Type C Improved Trails - Varying Surface Improved existing surface with imported compacted fines in selected areas.	Type E Existing Venoco Road Class II or III bike lanes.
Type D Improved Trails - Uniform Surface Imported compacted fines with or without stabilizer.	Type F Public Roads Class II or III bike lanes.
Open space plan area	Public access point
Aquatic habitat	Ellwood main monarch butterfly viewing area
Equestrians permitted	Pedestrian Only Boardwalk
Existing bench overlooks to be maintained	Pedestrian and Bicycle Boardwalk
Proposed new seating or overlook	Bridge or Culvert
Existing bench access points to be maintained	Stairs (natural ties)
	Existing trails to be closed

Ellwood-Devereux Coast Open Space and Habitat Management Plan, Devereux Creek Layout

-----Original Message-----

From: Ken Knight [<mailto:kennethknight@cox.net>]

Sent: Tuesday, September 04, 2018 8:01 AM

To: Deborah Lopez <dlopez@cityofgoleta.org>

Cc: Paula Perotte <pperotte@cityofgoleta.org>; Stuart Kasdin <skasdin@cityofgoleta.org>; Roger Aceves <raceves@cityofgoleta.org>; Michael Bennett <mbennett@cityofgoleta.org>; Kyle Richards <krichards@cityofgoleta.org>

Subject: Comments on 9/4/18 Council Meeting Agenda item E-1

Dear Mayor and Council,

My suggestions for strengthening the Plan are as follows;

1. Provide greater detail on the estimated amount of water and irrigation infrastructure needed for both newly planted young trees and strategic mature Blue Gum Eucalyptus to survive and thrive.
 - Underestimating water needs is a major reason why restoring the redwoods at Stow Grove has been so difficult. A 5 year irrigation plan may be necessary if the current drought continues. Irrigation water may not be available or prohibitively expensive.
2. Provide a more detailed assessment of the ongoing costs and level of service needed to maintain a reasonable level of risk to the public using the area.
 - The nature of Blue Gum Eucalyptus trees will require a level of ongoing maintenance similar to and exceeding that provided to street trees.
3. Provide an estimated survival rate of newly planted trees, and a follow up process to replant and maintain those trees.
 - This is a very challenging area to plant. It will be difficult to replant and irrigate after initial planting efforts have been completed.
4. Update the 2001 UC Cooperative Extension planting standards used in the Plan to 2018 planting standards, such as International Society of Arboriculture Best Management Practices for planting trees.
 - There have been great advances in planting methodologies over the last 17 years that have not addressed in the Plan including soil testing, root shearing before planting and techniques for planting in dry, compacted soils.

Ken Knight
69 Calaveras Avenue
Goleta CA 93117
(805) 252-1952 (cell)
kennethknight@cox.net

September 3, 2018

Mayor and Council members,

Everyone had great hopes for the Monarch Butterfly Habitat Management and Implementation Plans and what we got is very disappointing. The number one goal of the Implementation Plan should be the preservation and improvement of the habitat. Instead of maintaining, replacing, and improving the eucalyptus groves this plan is more interested in the removal of trees and the public use of the Ellwood Mesa Monarch Butterfly Habitat.

The Monarch Butterfly Habitat is an important and valuable environmental resource to be preserved and is not for the entertainment of the public. Public safety should be maintained by keeping the public from any area that might present a safety threat.

One of the worst parts of the Monarch Butterfly Habitat Management and Implementation Plans is that the Public Works Department has been given the responsibility for most of the Monarch Butterfly Habitat Management and Implementation Plans. This is placing the very people who tried to cut down 100's of eucalyptus trees in charge of their care. The plans should be the responsibility of the Planning and Environmental Review Department with any work done by Public Works staff or qualified contractors.

There is not enough Council and public review of the actions of staff in implementing the plan. Too many inappropriate and unapproved actions have been taken that damaged the habitat in the last two years. There needs to be better protections put in place to stop tree removal and pruning without Council review.

The plans are weak without specific protections for the butterflies and trees. There is far too much use of the wording "managed, as feasible", which further weakens the plans. There are no protections in these plans to keep a large number of trees from being cut down at any time without the Council's or public's knowledge or approval.

There seems to be a continuing push from staff to restore eucalyptus trees with native plants, not eucalyptus trees. At the workshop the public strongly supported any restoration to be with the more appropriate eucalyptus trees.

There is also too much emphasis on clearing understory and removing fallen trees which are much needed by the other wildlife in the groves. I see this as no improvement or very little over current flawed plans.

I am concerned that the plans fail to adequately protect our special eucalyptus trees and Monarch butterflies. The plans need to concentrate on the butterflies, eucalyptus trees, and all wildlife including birds. This is a very special habitat that needs very special protection and care and these two documents don't treat it with adequate care.

Barbara

LAW OFFICE OF MARC CHYTILO, APC

ENVIRONMENTAL LAW

September 3, 2018

Mayor Paula Perotte and City Council
City of Goleta
130 Cremona Dr. #B
Goleta, CA 93117

By email to dlopez@cityofgoleta.org

RE: Ellwood Draft Monarch Butterfly Habitat Management Plan and 2018 Implementation Plan

Dear Mayor Perotte and Councilmembers:

This office represents the Friends of the Ellwood Monarchs (FOTEM), a community group formed in response to various threats to the Ellwood eucalyptus forest which is critical overwintering habitat for Monarch butterflies. We have reviewed the Draft Monarch Butterfly Habitat Management Plan (MBHMP) and 2018 Implementation Plan (2018 IP) and offer the following comments. Our suggested language changes are indicated in ~~striketrough~~ and underline.

1. Scope of the Open Space Plan Area

The Draft MBHMP identifies the Ellwood Mesa Open Space Plan as establishing the goal and policies that guide the MBHMP. (Draft MBHMP, p. 5.) The Ellwood Mesa Open Space Plan refers to the sections of the Ellwood-Devereux Coast Open Space and Habitat Management Plan (City of Goleta et al. 2004) applying to the Goleta properties, as approved by Council on June 24, 2004. (Id.)

The Ellwood-Devereux Coast Open Space Area comprises land controlled by the City of Goleta, Santa Barbara County, and the University of California. The City's part of the Open Space Area includes the Ellwood Mesa (the property acquired by the City and now called "The Sperling Preserve"), the Santa Barbara Shores Park (acquired upon incorporation by the agreement in Ballot Measure H), the Coronado Butterfly Preserve, and the un-named City-owned open space¹ west and north of the Coronado site that crosses Santa Barbara Shores Dr. and extends north to Hollister between Santa Barbara Shores Dr. and Pebble Beach Dr. (Ellwood-Devereux Coast Open Space Plan Area, Figure 1, attached hereto as Attachment 1.)

Since this last area is not given a specific name in the OSHMP, we have called it "Area S." Area S is demarcated in blue, identified as "Goleta Jurisdiction", and included within an identified "Goleta Open Space Neighborhood Area". (Id.) The City Council's June 24, 2004 resolution does not alter the Open Space Plan Area with respect to the Goleta Open Space Neighborhood Area.

¹ Named in the General Plan Open Space Element as Santa Barbara Shores (Small), Santa Barbara Shores Open Space (Small), and Campus Glen Open Space.

(See Resolution No. 04-37, attached hereto as Attachment 2.) Moreover, the Draft MBHMP Outline (9/17/13) that has been published on the City's website for a number of years depicts the "Ellwood Mesa Open Space Area Boundary" as including Area S. (Attachment 3, available at <http://www.cityofgoleta.org/home/showdocument?id=9739>.)

The Ellwood-Devereux Coast Open Space and Habitat Management Plan explains the biological significance of the eucalyptus groves in this area, and their designation as ESHA despite the fact that no known monarch aggregation sites exist as follows: "Unoccupied eucalyptus groves within the City of Goleta in areas adjacent to the overwintering sites that contain suitable conditions to support overwintering butterflies are also considered ESHAs because they could be used at any time in the future, and because they provide additional habitat in the event that the occupied groves are damaged." (P. 21.) The damaged conditions currently manifesting in and around the Ellwood Open Space aggregation sites underscores the importance of protecting the Area S eucalyptus grove which, according to the tree surveys the City had performed, are in relatively good health (See City Staff Report for 2/20/18 Council hearing, p. 5). Including Area S within the Draft MBHMP boundaries is the best way to ensure it is managed and restored in a manner that ensures its continued availability for monarch butterfly use².

We request that Council direct staff to expand the boundary of the MBHMP to include Area S, consistent with the Ellwood-Devereux Coast Open Space and Habitat Management Plan and its Monarch Goal 1 which guided preparation of the Draft MBHMP: "[to p]rotect and maintain existing monarch butterfly populations in the Open Space Plan Area, and manage the habitats to be self-sustaining." (Draft MBHMP, p. 5.) One or a part of one of the parcels that make up Area S could be considered a neighborhood park since it has a playground, picnic table, and lawn. The parcel with these park amenities 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.

2. Clarify Policy 1-1 to Ensure the MBHMP Reflects Current Data Regarding our Local Monarch Population

Policy 1-1: The City shall review, and revise as necessary, the MBHMP to reflect current data, butterfly conservation science, and management techniques regarding the local monarch population

It is critical that the MBHMP be informed by data, science, and information regarding management techniques **that is applicable to our local monarch population**. The MBHMP is partly based on the Xerces Management Guidelines (2015), which includes recommendations that restoration

² The proposed use of this area for off-site mitigation as part of the Ekwill-Fowler extension project nearly resulted in the removal of the eucalyptus trees designated as monarch ESHA and replacement with native riparian species, without consideration of the potential impacts to monarchs or the proposal's consistency with the Ellwood-Devereux Coast Open Space and Habitat Management Plan. While acknowledged to be a mistake, the correction of which is underway, this "near-miss" underscores the necessity of including this area within the MBHMP Area.

plantings should include only native trees, citing a Griffiths and Villablanca (2015) study that found that in some instances monarchs moved to native trees in mixed groves. However the study is expressly limited to “overwintering sites located on the central coast of California *north* of Santa Barbara County” and its recommendations “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.” (Griffiths and Villablanca, p. 47 (emphasis added).)

Currently, no native trees endemic to the Santa Barbara region are known to support stable overwintering monarch aggregations (*Monarch Butterfly Overwintering Sites in Santa Barbara County, California*, Meade, 1999). Based on the available data and science (we have not yet been able to access the recent study of SB County sites funded by the City, SB County, and USFWS) there is no basis for replacing the species, historically and continuously used in the Ellwood aggregation sites and dominating the adjacent monarch habitat with native plants--either quickly by wholesale removal of eucalyptus in any part of the eucalyptus forest, or gradually by replacing removed dead or distressed tree with natives.

Although the MBHMP has policies that support maintaining the entire eucalyptus forest and re-planting of eucalyptus to replace removed trees, the Restoration Plant table in Appendix 3 does not include any type of eucalyptus. We request that a Restoration Plant list includes any species of eucalyptus that might be considered for planting to replace removed trees or for enhancement of the structure and function of the monarch habitat.

3. Clarify that Protection of Monarch Habitat is the Plan’s Priority

While the overarching purpose of the MBHMP is the protection of monarch butterfly habitat, not all of the policy language contains sufficient clarity regarding this overarching purpose. Changes such as the below recommended change to Policy 1-2 clarify that it is not protection of the environment in general, rather protection of monarch butterfly habitat specifically that is the MBHMP’s charge.

Policy 1-2. During implementation of the programs, goals, policies, and actions described in this MBHMP, and during the planning and implementation of other projects that may affect monarch butterfly habitat within the Ellwood Mesa Open Space, protection of monarch butterfly habitat ~~the environment~~ shall be given the utmost consideration.

Moreover, Program 14 has policies that as currently written threaten the monarch ESHA. The terminology of “restoration of the Devereux Creek corridor” will imply to some the substitution of native trees for eucalyptus 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 with native riparian forest along the creek corridor 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 clarify and provide a map.*

Action 14-3.1 calls for the **establishment of a riparian forest** along the banks of Devereux Creek composed of native riparian tree species. This seems to be a very different action than simply using some native plants in or around the eucalyptus forest for windbreak, to fill out the understory, to provide nectar, or other functions that benefit the monarchs. This action seems to call for the substitution of one type of ESHA (native riparian forest) for another (monarch ESHA) and essentially strip Ellwood of its most important monarch habitat. This policy seems to directly contradict Policy 14.5 and others.

This plan should maintain and enhance the entire Ellwood eucalyptus forest that is designated monarch ESHA. If the eucalyptus is not maintained it will NOT be monarch ESHA (as the creek corridor between Ellwood West and Ellwood Sandpiper is not designated as monarch ESHA because it was restored as a native riparian forest in 1997). This plan cannot claim to be protecting monarch ESHA and at the same time replacing the very vegetation that caused it to be called monarch ESHA.

Please clarify these actions in Program 14.

4. Expressly Include Activities Undertaken by Utilities and Other Non-City Entities and Clarify Minimum Requirements

Action 1-2.1. Whenever vegetation removal, ground disturbance, construction, or other activities with the potential to significantly disrupt habitat values are proposed including activities undertaken by utilities and other non-City entities within the MBHMP coverage area, environmental protection measures shall be implemented. These measures shall be determined in coordination with a qualified biologist, and ~~should normally~~ shall include at a minimum pre-activity surveys for nesting birds or other wildlife, pre-activity surveys for monarch butterfly aggregations, presence of an environmental monitor during construction, and other protections, as deemed appropriate. The City will monitor these activities to ensure that environmental protection measures are used and that activities are limited to those permitted.

The City of Goleta is not the only entity that may undertake activities within the MBHMP coverage area. For example, Southern California Edison (SCE) undertakes activities including tree limbing to reduce fire hazards associated with their lines. It is important that the MBHMP expressly apply to utilities and other non-City entities that may now, or in the future, undertake activities within the MBHMP that may significantly disrupt monarch habitat.

Additionally, it is important that the MBHMP be clear that certain minimum requirements including pre-activity surveys for nesting birds, other wildlife, and monarch aggregations, and the presence of an environmental monitor during construction, will be in place prior to all activities with the potential to significantly disrupt habitat values. City oversight should be a critical component of Action 1-2.1, to ensure that the above protective measures are not only required but also implemented correctly on the ground.

5. Empower Planning and Environmental Review Department with Oversight of the MBHMP

~~Policy 1-3. Because many of the MBHMP actions are related to trail improvements, tree work, and related project implementation monitoring and reporting, the City's Public Works Department shall oversee the implementation of the MBHMP.~~

Policy 1.3. Because the MBHMP's purpose is to provide a programmatic approach to management of the habitats that support the monarch butterfly seasonal aggregations, and because many of the MBHMP actions require detailed knowledge of butterfly biology, the City's Planning and Environmental Review Department shall oversee the implementation of the MBHMP.

As drafted, Policy 1.3 does not accurately characterize the nature of the MBHMP action items, and improperly identifies the City's Public Works Department as the appropriate entity to *oversee* the MBHMP.

The Action items included in the MBHMP do not themselves effectuate any trail improvements or tree work. Instead, the City has deliberately structured the MBHMP such that its action items do not themselves constitute "development" that would require a CDP (including trail improvements and tree work). Instead, trail improvements, tree work, and other development would only be authorized in the context of each Implementation Plan and accompanying CDP approved by the Coastal Commission.

The Action items do however require detailed knowledge of butterfly biology and habitat conditions, and planning expertise in the development of each annual Implementation Plan (*see* Action 1-4.1.) In light of this, Planning and Environmental Review Department is a more appropriate entity than Public Works to *oversee* implementation of the MBHMP.

6. Strengthen Language Regarding Monarch Butterfly Habitat Protection

Goal 10. To ~~facilitate~~ ensure the ongoing use of Ellwood Mesa by the monarch butterfly.

Policy 10-1. The City shall ~~encourage~~ implement management strategies that facilitate the use of Ellwood Mesa by monarch butterflies.

Policy 10-2. Preservation of aggregation sites on Ellwood Mesa shall be a ~~the~~ focus of management activities, ~~as feasible~~, and in coordination with Program 9, Catastrophic Event Response Program.

Specific changes to Action 1-2.1 (above) to clarify that activities with the potential to significantly disrupt habitat values *shall* at a minimum include pre-activity surveys and other measures which are standard and should be required for all such activities. The current

language “should normally include” is too permissive to provide any meaningful assurance that activities will be adequately conditioned and monitored.

Policy 20-3: Create a Monitoring Report, updated annually, ~~when feasible~~, resulting from the information obtained during the implementation of the various policies and actions called for in this MBHMP.

Action 20-3.1: Track the implementation of this MBHMP in the form of a Monitoring Report, ~~preferably~~ updated on an annual basis, and presented at a public workshop.

The stronger language, suggested in the above edits, clarifies the City’s obligation under the MBHMP to prioritize monarch butterfly habitat protection, and ensures that the obligation cannot be shirked in the future under vague claims of “infeasibility”.

7. Mitigation Fees

Action 2-2.2 allows payments of compensatory mitigation fees into the Butterfly Fund, for projects with “limited impacts on monarch butterfly habitat.” It is critical that the City not allow projects that impact monarch butterfly habitat. Action 2-2.2 should be revised to clarify that payment of compensatory mitigation fees are only allowed where projects have implemented all available measures to *avoid* impacts to monarch butterfly habitat, or to directly mitigate impacts on-site where appropriate, before projects may turn to compensatory mitigation.

8. Bolster the 2018 IP to Include Additional Replanting

The 2018 IP is intended to include mitigation for the previous removal of 29 eucalyptus in 2017 authorized under an emergency permit from the Coastal Commission. We’re concerned that the 2018 IP appears to include the absolute bare minimum, and should be revised to include additional eucalyptus planting proximate to the area where each of the 29 eucalyptus were removed under the 2017 emergency permit, in addition to the proposed planting near Ellwood North.

Replanting ratios of 2:1 or greater are commonplace, and ensure that valuable growth time is not lost should some replanted trees die or fail to thrive. **We request that Council direct City Staff to revise the IP to increase the proposed 1:1 replanting ratio.**

In addition, the location of the replanted trees is problematic. While we understand that the proposed replanting in the Ellwood North area carries certain benefits for the Ellwood North aggregation area, it does not directly mitigate for the trees lost. We encourage the City Council to direct Staff to revise the 2018 IP to include additional replanting of eucalyptus proximate to the locations where each of the 29 eucalyptus were removed.

Finally, 2018 IP does not directly replace the blue gum eucalyptus removed in 2017 with other blue gum eucalyptus. Rather, mostly ironbark are proposed for replanting. While we understand there may be certain benefits to ironbark in terms of its relative drought resistance, it has

different characteristics than blue gum which are typically taller and provide a valuable source of nectar for overwintering monarchs. We request that at a minimum 29 blue gum be replaced proximate to the removal locations, in addition to the ironbark replanting proposed.

9. Conclusion

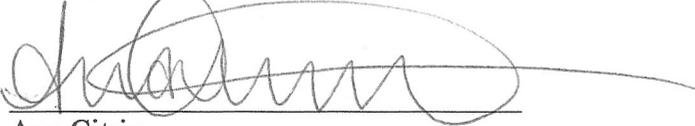
It is important that the MBHMP's scope is properly defined, both in terms of its geographic coverage, and applicability. Further, it is important that the MBHMP's goals, policies, and actions are as clear as possible that preservation of monarch butterfly habitat is the highest priority, and that oversight of the Plan is entrusted in the City department with the expertise in biological resources.

The 2018 IP should include additional eucalyptus replanting proximate to the area where each of the 29 eucalyptus were removed under the 2017 emergency permit, in addition to the proposed planting near Ellwood North.

We respectfully request that Council direct City Staff to incorporate the above changes in revisions to the draft MBHMP.

Respectfully submitted,

LAW OFFICE OF MARC CHYTILO

A handwritten signature in black ink, appearing to read 'Ana Citrin', written over a horizontal line. The signature is fluid and cursive.

Ana Citrin
For FOTEM

- Attachment 1: Ellwood-Devereux Coast Open Space Plan Area, Figure 1
- Attachment 2: Resolution No. 04-37
- Attachment 3: Draft MBHMP Outline (9/17/13)

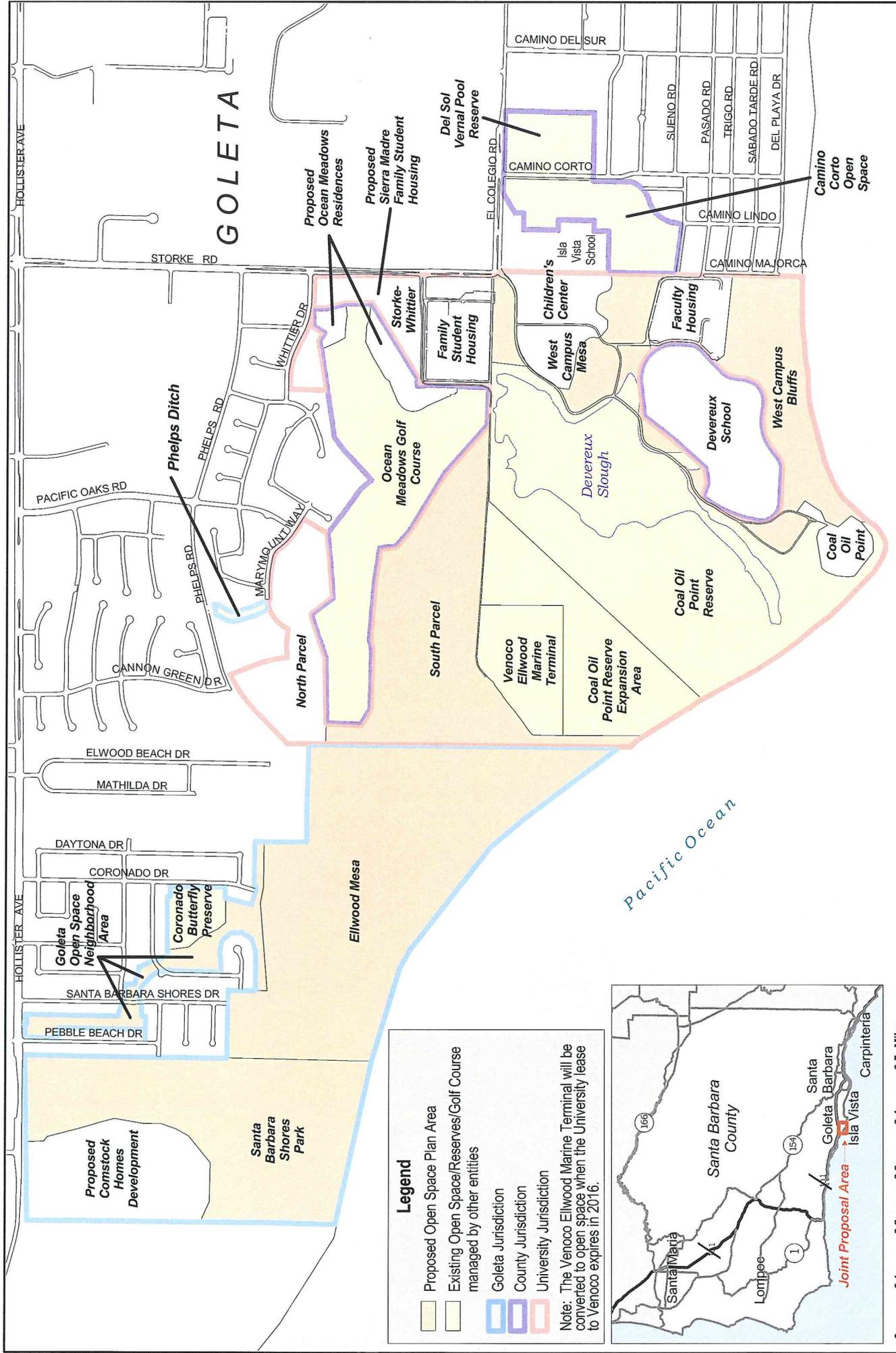


Figure 1. Overview of the Open Space Plan Area

Ellwood-Devereux Coast Open Space and Habitat Management Plan

March 2004

Scale: 0 0.1 0.2 0.3 0.4 0.5 Miles

1:15000

t:\ellwood_devereux\deliverables\jpa_bound_map.apr (OSP layout)

***City of Goleta Ellwood Mesa/Sperling Preserve Open Space
Draft Monarch Butterfly Habitat Management Plan***

EXECUTIVE SUMMARY

INTRODUCTION

Background
Policy
Purpose
Methods

THE MANAGEMENT PLAN

A. ADMINISTRATIVE PROGRAMS

- 1.0 Municipal Management Program
- 2.0 Fiscal Program
- 3.0 Interagency Cooperative Program
- 4.0 Community Wildfire Protection Program
- 5.0 Trail Management Program
- 6.0 Waste Management Program
- 7.0 Aesthetic Resources Management Program
- 8.0 HMP Update and Amendment
- 9.0 Catastrophic Event Response Program

B. NATURAL RESOURCES MANAGEMENT PROGRAMS

- 10.0 Monarch Butterfly Management Program
- 11.0 Wildlife Habitat Management Program
- 12.0 Tree Management Program
- 13.0 Integrated Pest Management Program
- 14.0 Habitat Enhancement and Restoration Program
- 15.0 Invasive Plant Management Program
- 16.0 Ecosystem-wide Management Coordination Program

C. OUTREACH

- 17.0 Community Advisory and Docent Program
- 18.0 Interpretive Program
- 19.0 Education Program

D. MONITORING, RESEARCH AND ADAPTIVE MANAGEMENT PROGRAMS

- 20.0 Monitoring Program
- 21.0 Research Program
- 22.0 Adaptive Management Program

E. IMPLEMENTATION PRIORITIES, SCHEDULE, AND ESTIMATED COSTS

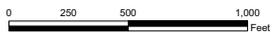
F. CONCLUSION

Ellwood Mesa-Sperling Preserve Open Space Butterfly Habitat Areas November 2012



Legend

- ★ Goleta Butterfly Grove (Ellwood Main)
- ★ Monarch Butterfly Aggregation Sites
- 🍷 Habitat Aggregation Sites
- 🍷 Eucalyptus Woodland
- ⊕ Ellwood Mesa Open Space Area Boundary
- ⊕ Goleta City Boundary
- ⚡ Coastal Zone
- 🌿 Trails Under Tree Canopy



RESOLUTION NO. 04-37

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
GOLETA ADOPTING THE ELLWOOD-DEVEREUX COAST
OPEN SPACE AND HABITAT MANAGEMENT PLAN AS IT
APPLIES TO LANDS SITUATED WITHIN THE BOUNDARY
OF THE CITY OF GOLETA, SUBJECT TO CERTAIN
REVISIONS**

WHEREAS, in March 2003 the City of Goleta entered into a Memorandum of Understanding with the University of California, Santa Barbara, and the County of Santa Barbara to modify and implement various recommendations within the *Joint Proposal for the Ellwood – Devereux Coast*, a report issued by the University and County in 2002;

WHEREAS, the three entities have participated in the preparation of the proposed *Ellwood-Devereux Coast Open Space and Habitat Management Plan* (hereafter “Open Space Plan”);

WHEREAS, a key component of the proposed Open Space Plan is a land exchange between the City of Goleta and the Santa Barbara Development Partnership / Comstock Homes (SBDP/CH) to transfer potential residential development from the environmentally-sensitive Ellwood Mesa Property, owned by SBDP/CH, along the ocean bluffs to a less-sensitive 36-acre site within the existing City-owned Santa Barbara Shores Park;

WHEREAS, in February of 2003 the City of Goleta entered into a Memorandum of Understanding with Santa Barbara Development Partnership and Comstock, Crosser & Associates Development Company, Inc. setting forth protocols and structure for submission and processing of various development applications for a residential development on a 36-acre portion of the City-owned Santa Barbara Shores Park property and for a property exchange whereby the City would obtain title to the 137-acre Ellwood Mesa property in exchange for the 36-acre portion of Santa Barbara Shores Park;

WHEREAS, the City Council has, by separate action taken on June 21, 2004, approved Resolution 04-27 and thereby certified an Environmental Impact Report addressing all components of the project, including the *Ellwood-Devereux Coast Open Space and Habitat Management Plan*;

WHEREAS, the City Council has, by separate action taken on the 24th day of June, 2004, adopted Resolution 04-31, thereby approving an Addendum for the EIR, findings pursuant to the California Environmental Quality Act (CEQA), a Statement of Overriding Considerations pursuant to CEQA and the City’s implementing guidelines, and a mitigation monitoring program;

WHEREAS, the City Council has, by separate action taken on the 6th day of July, 2004, approved Resolution 04-32 and thereby repealed the *Ellwood Beach – Santa Barbara Shores Specific Plan*;

WHEREAS, by separate action taken on the 19th day of July, 2004, the City Council has approved an ordinance to rezone the Ellwood Mesa property and several other parcels situated within the boundaries of the Open Space Plan from residential zoning to the Recreation (REC) zoning district, a district that has as its purpose to provide open space for various forms of outdoor recreation, including passive and coastal-dependent recreation;

WHEREAS, on April 12, 19, and 22, May 10 and 18, and June 21, 24 and July 6, 2004 the City of Goleta Planning Agency and City Council jointly held a duly noticed public hearing to consider the proposed Open Space Plan and various related matters, at which times all interested persons were given an opportunity to be heard;

WHEREAS, the City Council has considered the entire administrative record, including all written and oral testimony offered at the public hearing; and

WHEREAS, the City Council intends that the Open Space Plan shall have the status of a park master plan, and shall not have the effect of a regulatory document.

NOW THEREFORE BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF GOLETA DOES HEREBY DETERMINE AS FOLLOWS:

SECTION 1: Recitals.

The City Council hereby finds and determines that the foregoing recitals, which are incorporated herein by reference, are true and correct.

SECTION 2: Findings

The City Council hereby makes the following findings:

1. The City of Goleta is a recently-incorporated city, having incorporated on February 1, 2002. The California Government Code, at § 65360, allows newly incorporated cities a period of 30 months, along with any OPR-approved time extensions, to prepare and adopt a general plan. As of the date of this action, the City has not adopted its first general plan. In such circumstances, § 65360 further provides that the City is not subject to the

requirement that its decisions be consistent with the general plan, provided that certain requirements are met. The City Council hereby finds that:

- a. There is a reasonable probability that the proposed *Ellwood-Devereux Coast Open Space and Habitat Management Plan* will be consistent with the general plan proposal currently being considered. The City intends to incorporate various provisions of the *Ellwood-Devereux Coast Open Space and Habitat Management Plan* into its first general plan and local coastal land use plan.
 - b. There is little or no probability of substantial detriment to or interference with the future adopted general plan if the proposed Open Space Plan is ultimately inconsistent with the future general plan.
 - c. The proposed Open Space Plan complies with all other applicable requirements of state law and City ordinances.
2. The portion of the Open Space Plan within the boundaries of the City of Goleta is consistent with the applicable policies of Chapter 3 of the California Coastal Act in that:
- a. The site is located between the sea and the first public road parallel to the shoreline.
 - b. The proposed Open Space Plan conforms to the public access and public recreation policies of Chapter 3 of the California Coastal Act in that it proposes to relocate and expand the existing coastal access parking lot at Santa Barbara Shores Park. The number of coastal access parking spaces will be more than doubled, from 15 spaces in the existing lot to about 45 in the proposed relocated lot.
 - c. The proposed Open Space Plan conforms to § 30211 of the Coastal Act in that it will not interfere with the public's right of access to the sea, but will increase the existing public access to the shoreline by securing public ownership of the 137-acre Ellwood Mesa property, which is located along the coastal bluffs. New trail segments are proposed to connect the relocated parking lot to the existing informal trail network within Santa Barbara Shores Park and the Ellwood Mesa. Existing informal trails will be maintained except where segments traverse sensitive habitats such as vernal pools.
 - d. The proposed Open Space Plan conforms to § 30212 of the Coastal Act in that it will provide additional vertical access to the shoreline and coastal bluffs. The Open Space Plan is part of a larger project that includes public acquisition by the City of Goleta of the Ellwood Mesa property. This acquisition will provide the general public with both increased vertical access and increased lateral access, along both the blufftop and the sandy beach areas below the bluffs.
 - e. The proposed Open Space Plan advances the policy set forth in § 30221 of the Coastal Act in that it will protect 137 acres of existing,

privately-owned oceanfront land known as the Ellwood Mesa property for passive recreation and open space through acquisition of those lands by the City of Goleta.

- f. The proposed Open Space Plan conforms to § 30231 of the Coastal Act in that the proposed parking lot is designed to maintain water quality by minimizing grading and by use of a permeable concrete surface or other surfacing material that will minimize stormwater runoff, and trail improvements are designed to minimize runoff and erosion.
- g. The proposed Open Space Plan conforms to § 30240 of the Coastal Act in that the proposed parking lot and trails have been sited to avoid and protect environmentally sensitive habitat areas and to provide buffers adjacent to such resources. The planned trail system is based on the network of existing informal trails, with closure of those existing trail segments that traverse sensitive habitat areas such as vernal pools. The plan intends that such habitats will be restored at the sites of trail closures.
- h. The proposed Open Space Plan conforms to § 30251 of the Coastal Act in that the parking lot is sited at an elevation lower than Hollister Avenue in order to protect the scenic and visual qualities of the site, in particular the views from Hollister Avenue seaward to the Channel Islands. The parking lot will be landscaped to provide for an attractive appearance from Hollister Avenue.

SECTION 3: Action to Approve the Open Space Plan, Subject to Revisions

The City Council hereby adopts the *Ellwood-Devereux Coast Open Space and Habitat Management Plan* as it applies to lands located within the boundaries of the City of Goleta, subject to the revisions set forth in Exhibit A, attached and incorporated herein by this reference.

SECTION 4: Effective Date

The adoption of the *Ellwood-Devereux Coast Open Space and Habitat Management Plan* within the City of Goleta shall take effect immediately upon recordation of a deed vesting title to the Ellwood Mesa property with the City of Goleta.

SECTION 5: Amendments

Amendments to the Open Space Plan shall be adopted by Resolution of the City Council and approved by a majority vote of the Council. There shall be no limit on the number of amendments that may be considered in any calendar year.

PASSED, APPROVED AND ADOPTED this 19th day of July, 2004.


CYNTHIA BROCK, MAYOR

ATTEST:

APPROVED AS TO FORM:


CYNTHIA M. RODRIGUEZ
CITY CLERK


JULIE HAYWARD BIGGS
CITY ATTORNEY

STATE OF CALIFORNIA)
COUNTY OF SANTA BARBARA) ss.
CITY OF GOLETA)

I, CYNTHIA M. RODRIGUEZ, City Clerk of the City of Goleta, California, DO HEREBY CERTIFY that the foregoing Resolution No. 04-37 was duly adopted by the City Council of the City of Goleta at a regular meeting held on the 19th day of July, 2004, by the following vote of the Council:

AYES: COUNCILMEMBERS BLOIS, CONNELL, HAWXHURST, MAYOR
 PRO TEMPORE WALLIS AND MAYOR BROCK.

NOES: NONE.

ABSENT: NONE.

(SEAL)


CYNTHIA M. RODRIGUEZ
CITY CLERK

EXHIBIT A TO RESOLUTION 04-37

LIST OF REVISIONS TO THE OPEN SPACE PLAN

REVISIONS CONSIDERED AT THE JULY 13 MEETING

1. VARIOUS PAGES. Maps in the following figures shall be revised to incorporate the parcels within the 36-acre development envelope proposed to be donated by Comstock Homes to the City of Goleta for open space preservation: Figure 5, Figure 6, Figure 12, Figure 14. Other maps should be updated as applicable.
2. PAGE 8. Table 1, "Estimated Acreage in the Open Space Plan Area, by Jurisdiction and Subarea" shall be revised to incorporate the additional land areas within the 36-acre development envelope proposed to be donated by Comstock Homes to the City of Goleta for open space preservation.
3. PAGE 11. Table 2, "Estimated Acreage in the Open Space Plan Area, by Habitat Type" shall be revised to incorporate the additional land areas within the 36-acre development envelope proposed to be donated by Comstock Homes to the City of Goleta for open space preservation.
4. MAP FOLLOWING PAGE 58. Figure 19, "Conceptual Layout for Santa Barbara Shores Parking Lot" shall be revised to reflect the final parking lot design approved by the City.
5. PAGE 18. Change Habitat Policy 6 to read: "Use genetic stock for seeds and plants from the Ellwood-Devereux watershed in all native habitat enhancement and restoration on University- and City-owned lands. Use genetic stock for seeds and plants from the South Coast from Carpinteria to Gaviota in County-owned lands."
6. MAP FOLLOWING PAGE 38. Change legend for native grassland restoration to a narrow line pattern to be consistent with the way it is depicted on the map.
7. MAP FOLLOWING PAGE 48. Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference. Add proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
8. PAGE 50. Change Table 5, "Trail Lengths (feet) by Jurisdiction and Trail User," to include a total that is the sum of "proposed trails" and "trails to be closed." The total for Goleta is 77,790. The table should be further

revised to include proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.

9. MAP FOLLOWING PAGE 50. (Figure13) Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference. Add proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
10. FIGURE 14, FOLLOWING PAGE 50. Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference. Add proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
11. FIGURE 15, FOLLOWING PAGE 50. Change trails on the Ellwood Mesa to correspond to the Map in Exhibit B, incorporated herein by this reference.
12. PAGE 55. Change Table 8, "Lengths (feet) of Trail Design Options" to include proposed trails on the open space parcels proposed to be donated to the City by Comstock Homes within the 36-acre development envelope.
13. PAGE 59. Change Table 10, "Summary of Open Space Parking Facilities," to indicate up to 45 parking spaces at the Santa Barbara Shores Parking lot, and delete the statement in parenthesis: "~~(with up to 35 more if needed)~~"
14. PAGE 64. Change the first bullet under "Uses that May Require a Notification or Permit" to read as follows: "Small Special events ~~such as walk-a-thons, competitive bicycle and track and field races,~~ or public gatherings"
15. PAGE 64. Add under "Prohibited Uses" the following bullet: "All temporary or ongoing commercial uses, including commercial recreation uses"

ADDITIONAL REVISIONS DIRECTED AT JULY 13, 2004 MEETING

16. PAGE 6. In paragraph 1 of Section 2.2.1, change the last sentence to read as follows: "These transactions will increase the size of the open space area from 116.16 to about 230 acres through the addition of the Ellwood Mesa property."

17. PAGE 19 (and thereafter). Add the historical autumnal and overwintering monarch sites that may no longer be active to the applicable habitat maps. Add language to Policy 3 regarding enhancements to these habitat areas to help re-establish their use by the monarchs as follows: "Initial improvements may focus on inactive sites in order to evaluate the effectiveness of such interventions prior to their application to active sites."
18. PAGE 22. Change the second sentence of the first paragraph of Section 3.2.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
19. PAGE 22. Section 3.2.5, change the first bullet to read: "Existing public access around the perimeter of the Sandpiper aggregation site would be maintained. Pedestrian access is provided by a trail connecting to Hollister Avenue along the boundary with the Sandpiper Golf Course and by Trail 24. Bicyclists would be routed around the perimeter on Trail 24 rather than having access through the center of the aggregation site."
20. PAGE 30. Change the second sentence of Section 3.4.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
21. PAGE 34. Change the second sentence of Section 3.5.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
22. PAGE 37. Change the second sentence of Section 3.6.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
23. PAGE 40. Change the second sentence of Section 3.7.4 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
24. PAGE 44. Change the second sentence of Section 3.8.3 to read: "It is the intent of the three sponsoring agencies to incorporate these goals and policies into their Local Coastal Programs."
25. PAGE 47. Change Public Access Policy 1.2 to read: "Integrate the trail system with existing separately-managed open space areas and with existing and proposed residential development."
26. PAGE 48. Add a new Public Access Policy 4.3 to read: "Provide at least one continuous trail extending from the public parking lot at Hollister Avenue to the coastal bluff top that is for exclusive use by pedestrians, in order to provide a coastal access opportunity that avoids safety issues"

associated with joint use by bicycles and/or equestrians.” Change the trail map in Figure 12 to show trail 23 as this pedestrian-only trail.

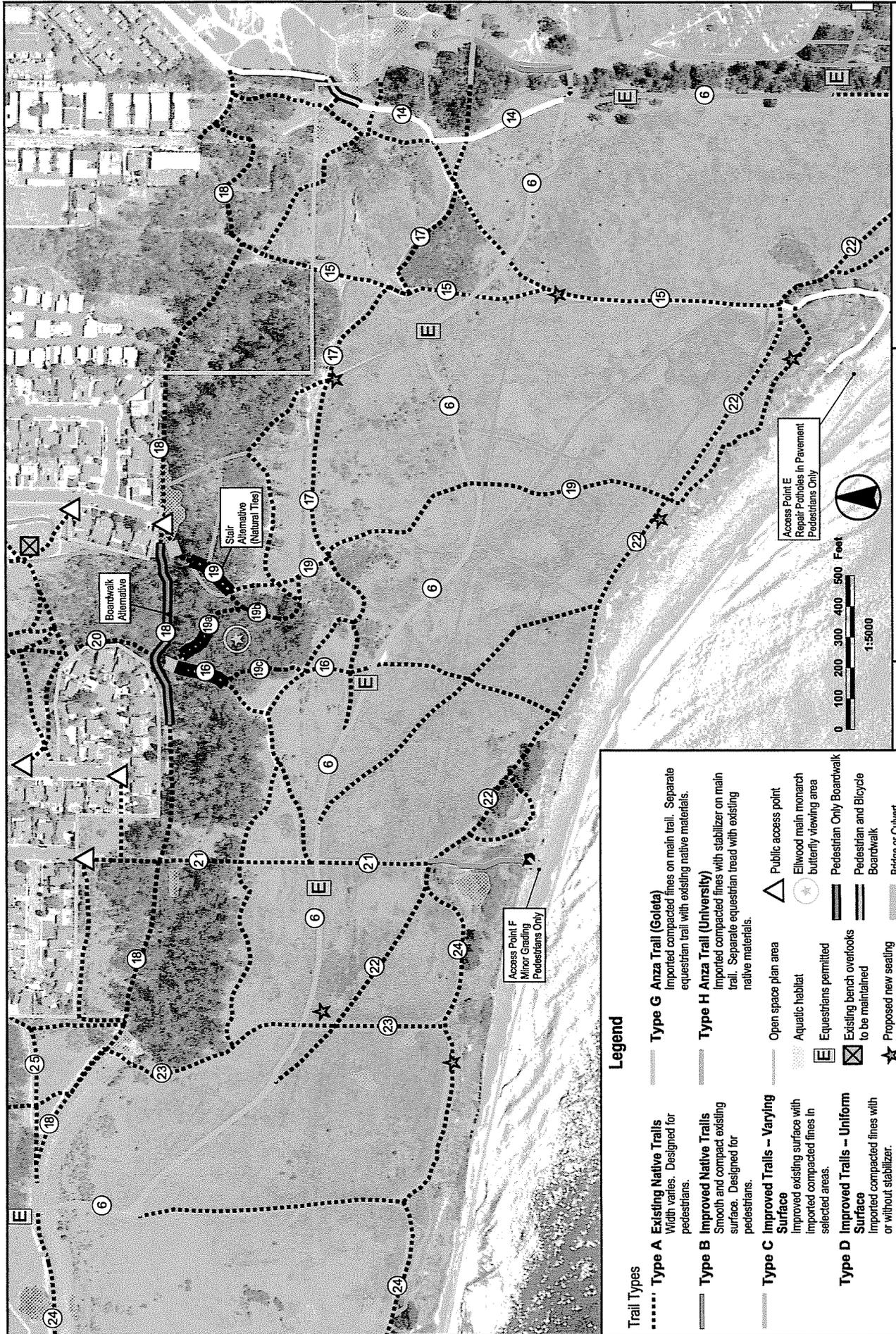
27. PAGE 56. Add the following as the last sentence in Section 4.4: “In the City of Goleta, public access points shall be designed to allow pedestrian access but to prevent the passage of motorcycles and other similar motorized vehicles, where feasible.”
28. PAGE 61. Change the last paragraph to read: “As an alternative to improvements to the Anza Trail (trail 6), the City of Goleta may consider a boardwalk or prefabricated span bridge along the Windrow Trail (trail 14). The boardwalk would span Devereux Creek and connect to a multi-user trail on Goleta property at the end of Phelps Road. This alternative would provide all-weather pedestrian and bicycle access to the Anza Trail from Hollister Avenue.
29. PAGE 64. Under the heading “Uses that May Require a Notification or Permit,” change the 1st bullet to read: “Small-scale special events or public gatherings,” and the 4th bullet to read: “Scientific studies that involve handling or tagging of butterflies or studies in restricted habitat areas”
30. PAGE 64. Under the heading “Prohibited Uses,” add bullets for the following: fireworks; amplified music; radio-controlled motorized equipment, such as model airplanes and model cars; organized competitive sporting events, such as track and field events and bicycle races; and large special events or public gatherings
31. PAGE 71. Under the heading “Erosion and Sedimentation Control Management Options, add a new bullet at the top of the page to read: “Design trail improvement and other projects to avoid modifications to natural drainage patterns; in particular, the Anza trail improvements shall be designed to maintain existing sheet flow of storm water runoff to Devereux Creek to sustain the eucalyptus woodland at the Ellwood Main monarch aggregation site.” Change the heading to add “Drainage” as the first word in the heading.
32. PAGE 73. Change the 2nd sentence in the 2nd paragraph to read: “The access gate at the southerly terminus of Santa Barbara Shores Drive, which provides access to the Ellwood Mesa portion of the open space area for emergency vehicles, will be owned and maintained by the City of Goleta.
33. PAGE 76. Under Section 6.1.1, “Management Coordination,” delete the 2nd paragraph as follows:

~~A proposed organization chart is presented in Figure 27 for the three jurisdictions responsible for implementing the Open Space Plan. This management framework identifies jurisdictional authority and responsibility for each sponsoring agency while allowing subarea managers to coordinated programs and projects as needed.~~

34. FIGURE 27, FOLLOWING PAGE 76. Delete the figure.
35. PAGE 77. Change the first sentence of the last paragraph before Section 6.1.2 to read: "A Joint Review Committee, comprised of one or more representatives from each of the three sponsoring entities, shall be established and will meet on an as-needed basis to provide a forum for discussion and resolution of ongoing issues related to implementation of the Open Space Plan."

EXHIBIT B TO RESOLUTION 04-37

**MAP SHOWING CORRECTED TRAIL LOCATIONS IN THE
ELLWOOD MESA PORTION OF THE OPEN SPACE PLAN**



T:\Ellwood_Devereux\deliverables\newtrails.mxd.spr, Devereux Creek Layout

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.

Chris Noddings

From: Karl Rider <karlrider76@gmail.com>
Sent: Sunday, September 02, 2018 9:25 AM
To: Monarch Butterfly Habitat Management Plan
Subject: Public workshop comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear commissioners,

Thank you for the efforts to tie together the many threads of interest involved in implementation of the Ellwood Management Plan.

I would like to caution on the less is more approach that was mentioned several times throughout the meeting. While there are widely divergent goals of the different shareholder groups, there could be enough consensus to move forward with active planning to implement the 2018 goals. Active management of these goals will be needed to accomplish the timeframe that was mentioned (5yrs) to be eligible for the funding if I understood correctly. Actively managed lands are more productive, more resilient to change, and allow greater opportunities for recreation. This land has been actively managed for the last 120 years and it's current use and importance is a testament to the success of actively managing land.

I encourage the commission to seek the advice of a forester, familiar with managing a similar stand type, acknowledgement of the fact that this may need to be sourced from the eucalyptus native range. The forester would be able to discuss stand management, harvest strategies, regeneration rates and timber uses of the stand. Active management of the stand can be accomplished while addressing the various stakeholders needs. In keeping with the planters goals for the stand, an avenue could be explored for utilizing the wood that could be fuel wood, building materials, chips for paths, grade control structures for riparian restoration or other uses that will enhance and help preserve the site.

I would encourage the establishment of an indigenous plant community dominated by the California fan palm, *Washingtonia filliformis*. The fan palm is adapted to the site, provides wintering protection and has a long lifespan better than 500 years in this fire dependent ecosystem. With the knowledge of what a 120 yr old eucalyptus stand looks like and it's difficulties of management, we can give future generations a more diversified landscape, able to meet the the many goals of conservation, preservation, production, safety and recreation. A diverse mosaic of vegetation types and ages is the most productive and resilient defense to a catastrophic event that is likely to effect the current monotype stand.

Thank you for the efforts to bring the stakeholders together and look forward towards working with the community on the restoration of this site.

Best regards,
Karl Rider

August 31st, 2018

Mayor Paula Perotte and City Council
City of Goleta
130 Cremona Dr. #B
Goleta, CA 93117

Dear Mayor Paula Perotte and City Council members,

We are writing to you to express our support of the Draft Ellwood Mesa/Sperling Preserve Open Space Monarch Butterfly Habitat Management Plan and 2018 Implementation Plan.¹

We are supportive of the Habitat Management Plan's programs; in particular, the Natural Resources Management Programs and Monitoring, Research, and Adaptive Management Programs which are focused on protecting monarchs and restore or enhance their overwintering habitat at Ellwood Mesa.

We also support the proposed actions of the 2018 Implementation Plan to replant eucalyptus trees to replace the 28 trees which were removed from the grove in 2017. Replacement tree planting is critical so that the microclimatic conditions that monarchs require can be restored as soon as possible. The proposed tree planting, as well as other activities such as implementing an irrigation plan, assessing the grove for hazard trees, and monitoring monarch's use of the grove align with the Xerces Society's approach to monarch butterfly overwintering site restoration which is summarized in our recently published guide for land managers: *Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat*.²

Western monarchs overwintering in coastal California have declined more than 95% since the 1980s and the migratory population faces a high risk of extinction in the next few decades.³ The Ellwood Main overwintering site is among the most important western monarch habitat – of the hundreds of sites in California where monarchs spend the winter, Ellwood Main is ranked as the fourth highest priority to conserve, based on the historic monarch population and overall degree of population decline.⁴ Other overwintering sites found within the Ellwood Complex are also important for monarchs and the entire forested area likely acts as a network of more and less suitable habitat which offers the butterflies' redundancy and resiliency to occupy the best habitat in a given year or within a season. Thus, management decisions at the Ellwood Complex have a greater potential to help – or harm – the overall western monarch population than management activities at most other western monarch overwintering sites.

We also recognize the incredible expertise that Dan Meade of Althouse and Meade and Charis van der Heide of Rincon Consultants bring to monarch butterfly habitat conservation, and encourage you to continue consulting with both parties to quickly develop and implement a habitat restoration and management plan for this site, and to address hazards posed by dead trees with minimal disruption to the monarch butterflies. In addition, the Xerces Society is deeply invested in monarch butterfly conservation, and we would be happy to provide further input on the management and restoration of monarch butterfly overwintering habitat within Ellwood Mesa.

Sincerely,



Emma Pelton
Endangered Species Conservation Biologist
The Xerces Society for Invertebrate Conservation

References Cited:

1. Draft Ellwood Mesa/Sperling Preserve Open Space Monarch Butterfly Habitat Management Plan & 2018 Implementation Plan. 2018. City of Goleta. Accessed August 29th, 2018 at <http://www.cityofgoleta.org>.
2. The Xerces Society. 2017. *Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat*. 32+vi pp. Portland, OR: The Xerces Society for Invertebrate Conservation.
3. Schultz, C. B., L. M. Brown, E. Pelton, and E. E. Crone. 2017. Citizen science monitoring demonstrates dramatic declines of monarch butterflies in western North America. Biological Conservation DOI 10.1016/j.biocon.2017.08.019.
4. Pelton, E., S. Jepsen, C. Schultz, C. Fallon, and S. H. Black. 2016. *State of the Monarch Butterfly Overwintering Sites in California*. 4+vi pp. Portland, OR: The Xerces Society for Invertebrate Conservation. (Available online at <https://xerces.org/state-of-the-monarch-butterfly-overwintering-sites-in-california/>)

Chris Noddings

From: Lisa Stratton <stratton@ccber.ucsb.edu>
Sent: Thursday, August 30, 2018 3:00 PM
To: Monarch Butterfly Habitat Management Plan
Cc: Anne Wells
Subject: RE: CCBER comments on Ellwood HMP
Attachments: CCBER_Ellwood_HMP_Figures.pdf; Ellwood HMP_CCBER_Comments_2018.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Anne and others at City of Goleta involved in planning for management of Ellwood Butterfly Grove,

Please find attached a letter and supporting documents commenting on the plan.

Overall you have done an excellent job of balancing demands.

Thank you.

Lisa

--
Lisa Stratton, Ph.D.
Cheadle Center for Biodiversity & Ecological Restoration (CCBER) Harder South, Rm 1005
UCSB, MC 9615
Santa Barbara, CA 93106

Office: (805) 893-4158
Fax: (805) 893-4222

stratton@ccber.ucsb.edu
<http://ccber.ucsb.edu>



Date: August 30, 2018

To: City of Goleta Planning & Environmental Review and Public Works Staff

Re: Comments on Draft Monarch Butterfly Habitat Management Plan

Thank you very much for giving us the opportunity to comment on the Draft Monarch Butterfly Habitat Management Plan. In reading Meade's 2013 assessment and other documents along with the management plan, I feel that you have done a good job of balancing the various issues on site and the public attachment to the Eucalyptus woodland. I have been in conversation with several other ecologists, e.g. Wayne Ferren, L. Dzid, and various Audubon members, and would like to make a couple of suggestions that I think will help you in moving forward by increasing clarity. I realize that there is an effort to be broad and not overly precise, but that broadness can make decision-making more difficult in the future and lead to on-going indecision and debate between different perspectives.

First, I would like to note some observations from Meade's 2013 study:

1. Ellwood North grove was likely used increasingly less by Monarchs from 1994 to 2011 because of the lack of management (e.g. regular logging or thinning), which effectively created too DENSE a woodland with a lack of open flight areas or gallery for the butterflies (page 20). This speaks to a need to do some active management of the overall woodland to keep these open areas.
2. The density could also have contributed to more intense competition for water between these water-loving and high water-use trees; which likely created problems during the drought. As such, it leads me to ask, why are this year's planned tree plantings slated for Ellwood North? Will they potentially fill up the very holes or galleries that might make that area more supportive of Monarch's in the future?
3. Meade also notes that one of the more highly used areas in this section was in an area where there was a tree fall and ensuing opening which allowed a Toyon to get established that became a focal point for 'basking' by the Monarchs (page 44). The point being that a thinner, safer, less fire-prone Eucalyptus Forest with native plants is a favorable condition for Monarchs; far more than an un-managed "do nothing because the public doesn't want to see anything done" philosophy that has defined management for the past 10 years.
4. My overall point is that active management is needed and that integration with natives is important. The document suggests this, but I'm not sure it is spelled out clearly enough in terms of say a map of zones for native planting or with specific desired "tree densities" or other measures that would support a clear next step in terms of defining active management goals for each September. This kind of specificity is important and should save money over time.
5. Further on this line of thinking is another comment from the 2013 document (page 23), which indicates in some areas the woodland is spreading to the south. This is an undesirable outcome because of the other habitat values on Ellwood Mesa. The



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SANTA BARBARA, CA 93106-6065

southern edge, and any spreading edges, need to be managed. This also speaks to the need for a map.

In my comments sent a few weeks ago, see attached pdf, I suggest some zones that might be suitable for prioritizing native tree planting. These are zones outside of the core aggregation areas and along the creek channels and adjacent to the homes where native plants will serve these purposes:

1. help protect against wildfire;
2. reduce water use in the creek and keep flows which will benefit diverse wildlife;
3. be more sustainable in the face of climate change;
4. support a higher diversity of native insects, birds, reptiles and herps;
5. and be less vulnerable to a single pest or disease the way the current monoculture is vulnerable.

Native understory planting should occur where there are openings in the 'aggregation' areas and in conjunction with targeted weed control activities. In addition, native trees are used by Monarchs and other butterflies and native trees, if established soon enough, can help provide the environmental amelioration benefits that support the use of the aggregation areas. As such, I think a more specific, say 5-year or 10-year action plan that addresses current die-off areas as well as strategic restoration planting in specific, mapped areas, would provide the clarity, direction, and guidance to allow for effective management of the restoration component of the plan. This is particularly important in light of the very limited window for removing dead trees and other restrictions on the timing of work in the grove and in light of the commendable commitment to using locally collected seed and plant material.

Some specific comments and suggestions:

1. Regarding the Restoration Plant list. This is mostly good, but I would remove seaside fleabane (*Erigeron glaucus*), "blue blossom" (*Ceanothus thyrsiflorus*) and dwarf coyote bush (*Baccharis pilularis* ssp. *pilularis* "pigeon point") as these are cultivars or not locally sourceable.
2. I would add *Lonicera subspicata* var. *subspicata* – native honeysuckle which grows well out here and provides nectar and fruit and can be locally sourced. I would also consider adding *Diplacus aurantiacus* (Sticky monkey flower); *Keckiela cordifolia* (Heart leaf-Penstemon), which grows well in the shade and provides nectar; and *Salvia spathacea* (Hummingbird sage).
3. Policy 14-2 says: "Gaps in eucalyptus groves shall be considered for habitat enhancement and restoration alternatives" – the subsequent actions are good – but could you add a strategic time line to this (now that funding is available) that says something like: A strategic planting plan and map will be created in 2018-19 with the goal of addressing all current and developing gaps and restoration opportunities by (say) 2024.
4. Action 12-1.10 says, "Replace removed trees at a one to one ratio with five-gallon container stock". Is that replace with natives or non-natives? Needs clarification and seems wrong given the indication that too much forest density creates problems for Monarchs –



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add a caveat that allows you to integrate considerations for density, gallery areas, etc., and identify those areas specifically. You do something along those lines in Action 12-2.1, but please link tree planting to the criteria in 12-2.

Finally, I think you and your consultants have done a good job overall with the plan and I would like to propose that the City contract with CCBER to do a number of the recommended actions. In particular, I think our staff could do a good job of conducting regular invasive plant monitoring program for the plan area. We could provide recommendations for action and oversight and/or monitoring of any work done by crews you hire to implement the work. We are concerned about weeds spreading from adjacent areas into campus and see weeds as a significant threat to the monarchs and all users of the open space. We also think we could help support a research program on insect biodiversity in and out of the grove because our director, Katja Seltmann, is an entomologist. These are just two realms outside of helping with providing plants and restoration expertise where we think we can become effective and long term, affordable partners in restoring the larger Ellwood-Devereux Open Space.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Stratton".

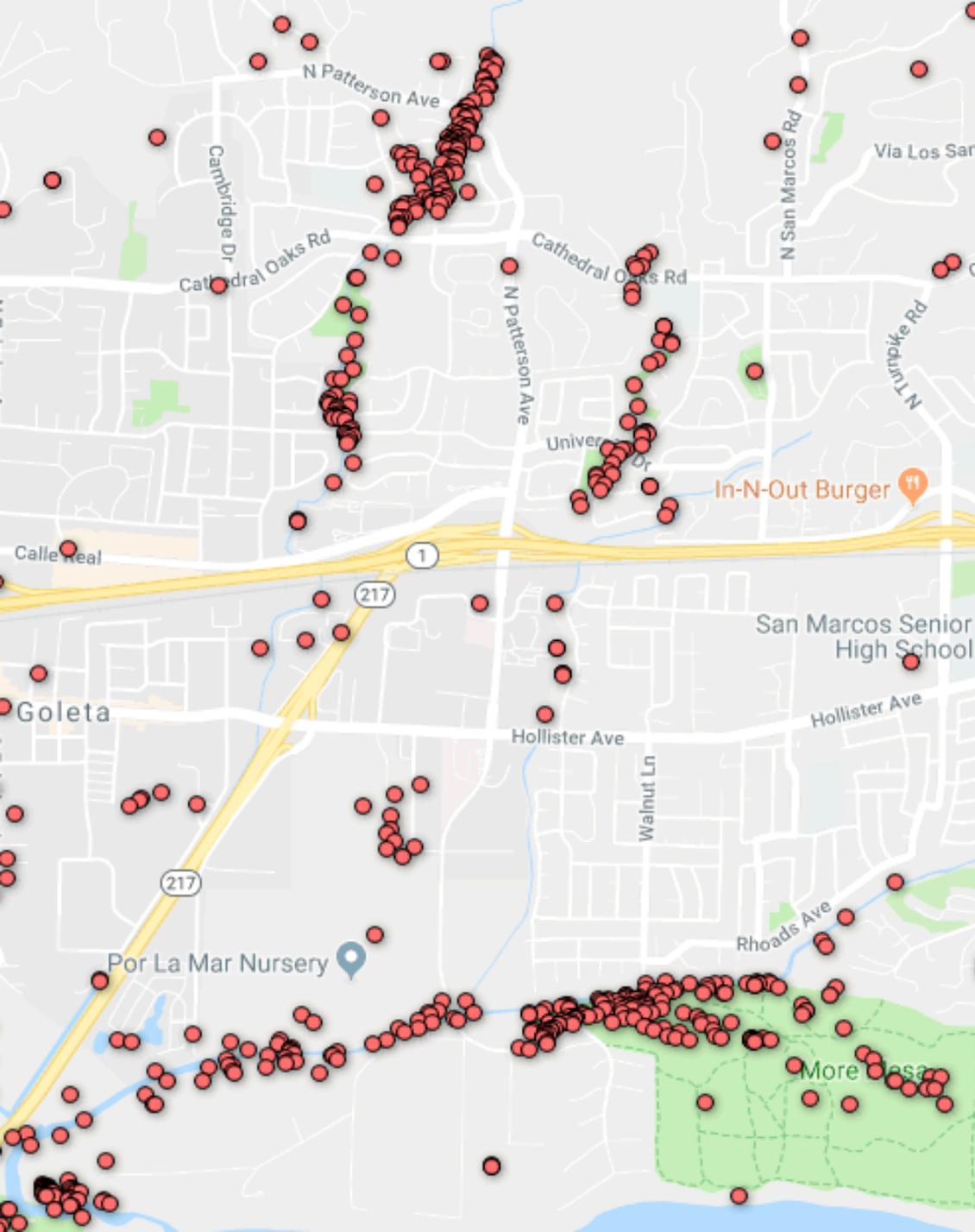
Lisa Stratton
Director of Ecosystem Restoration
Cheadle Center for Biodiversity and Ecological Restoration
University of California, Santa Barbara
Harder South (Bldg 578)
Santa Barbara, CA 93106

CCBER comments on Ellwood Grove Restoration and Management Plan

Some thoughts regarding how to make this plan more sustainable in the long term and support a higher diversity of species over time.

Consider:

- 1) Plan focused almost solely on Monarch Butterfly – needs to think more broadly about species support, sustainability, etc. See breeding records from Breeding Bird Study showing that you get nearly double the diversity of breeding birds in oaks (57 species) than in Eucalyptus (32). Also, consider examples of native riparian areas with more than 300 individuals breeding from 37 species, compared to Ellwood grove which has just 23 species and only 60 records of birds breeding in a very public, heavily birded area. Much lower support.
- 2) Eucalyptus trees have been shown to reduce creek flows through excessive transpiration, thereby reducing habitat quality. If diversify with native trees have a better chance of having sustainable creek flows which support butterflies and other wildlife.. and long term survivorship of species adapted to coastal California (e.g. oaks, sycamores, willows, toyon).
- 3) No maps provided in plan, see below for proposed focus on doing active restoration of all non-aggregation areas with native trees which can reduce fire risk, establish early to continue to provide environmental amelioration of the grove, support insects, birds, wildlife to complement Eucalyptus trees
- 4) Native trees reduce fire risk, give off water, not oils like Euc's. Plant native oaks and sycamores along all edges of groves by homes and down to creek as well as in all non-aggregation zones that could become fuel corridors. Native trees will better support other nectar providing species in understory.
- 5) Data from USFWS status of Monarch paper and Griffith and Villablanca paper demonstrate that Butterflies do not prefer Eucalyptus and that in Central CA they prefer pines and cypress and oaks disproportionately to their low cover in the groves.
- 6) Native trees will be adaptive to climate change, reduce water use in creek and overall, not require pampering proposed for planted Eucs.
- 7) Lack of management in grove is leading to proliferation of saplings, particularly along southern edge. These many smaller trees are faster growing, use more water resources, compete with the large trees that support the monarchs. Management of woodland should involve active removal of saplings and small trees and planting of native trees.



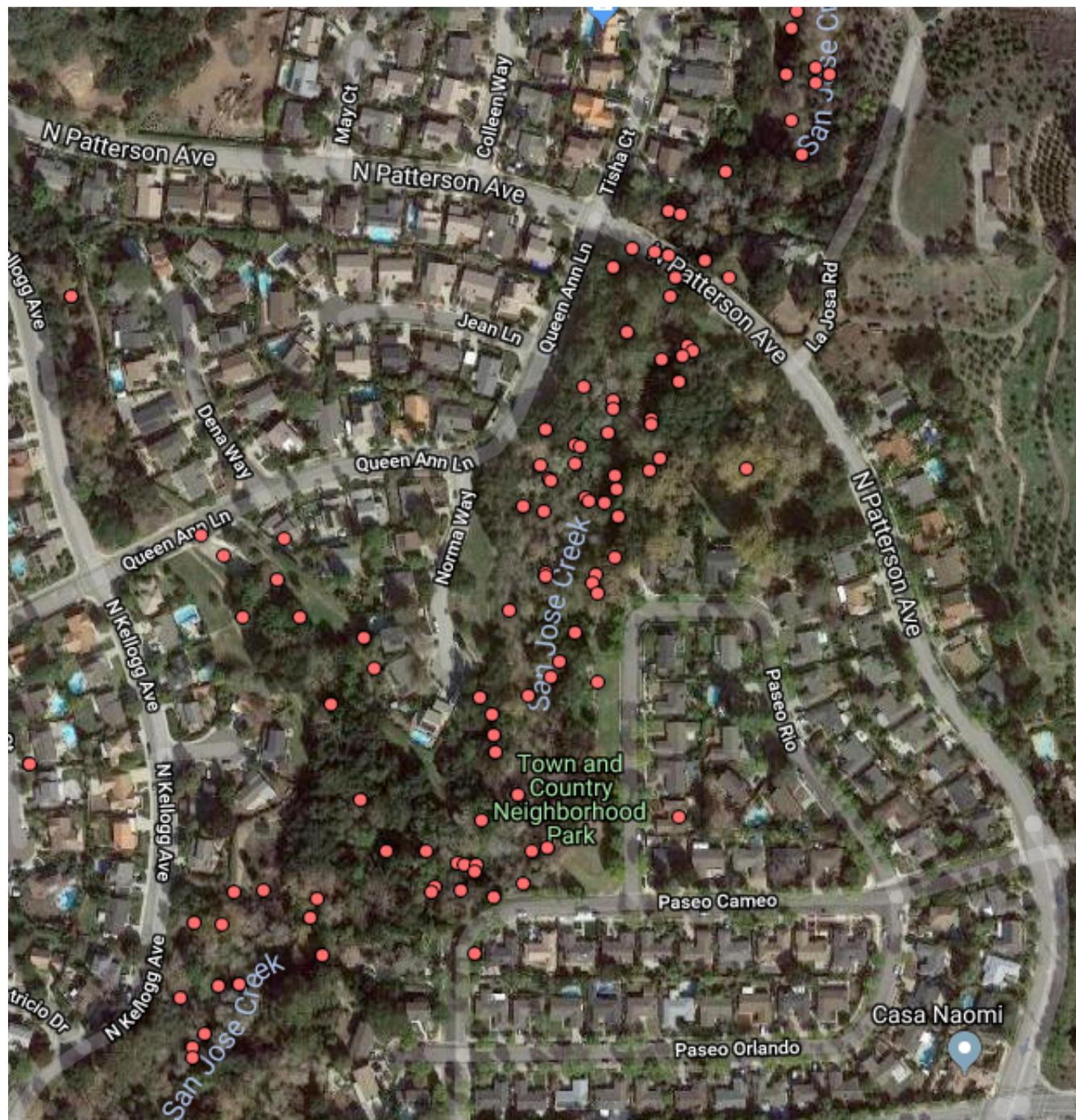
Three riparian areas, some relatively newly restored (e.g. atascadero creek by bike path, west of Patterson) that have lots of breeding records from diverse species.

This figure and ensuing 3 figures from Santa Barbara Breeding Bird Study. 2018.

Google Fusion Table:

<https://goo.gl/AJQxKj>.

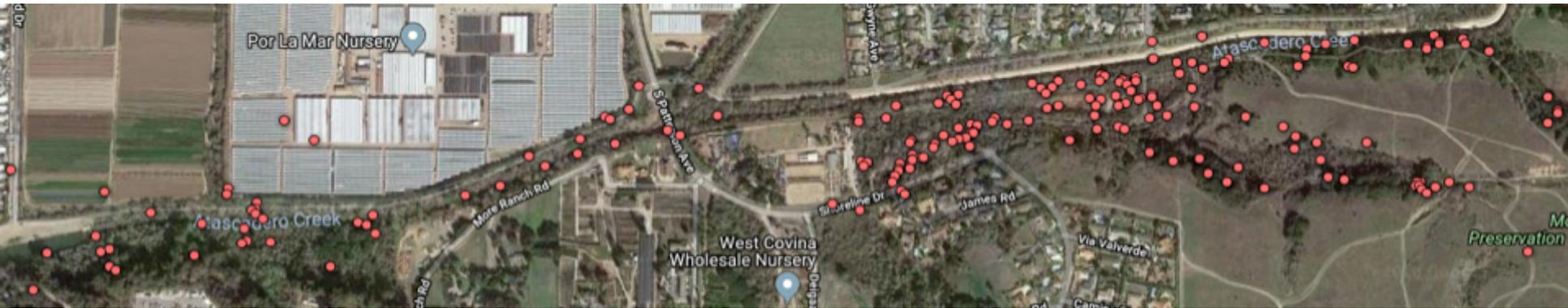
Sponsored by the UCSB Center for Biodiversity and Ecological Restoration and the Santa Barbara Audubon Society. eds: Holmgren, M., O'Loughlen, A. Accessed {August 2018}.



Close up of one riparian area with native oaks, sycamores, etc. Diverse breeding records – from clicking on them – San Jose Creek = 130 breeding records: e.g. Titmouse, flicker, song sparrow, House finch, Anna’s Humming bird, Dark eyed Junco, Scrub Jay, House wren, Yellow warbler, California Towee, Acorn , Nuttals, Downey woodpeckers, H. oriole, N. Flicker, Nuthatch, Brown headed cowbird, Black Phoebe, Orange crowned warbler.

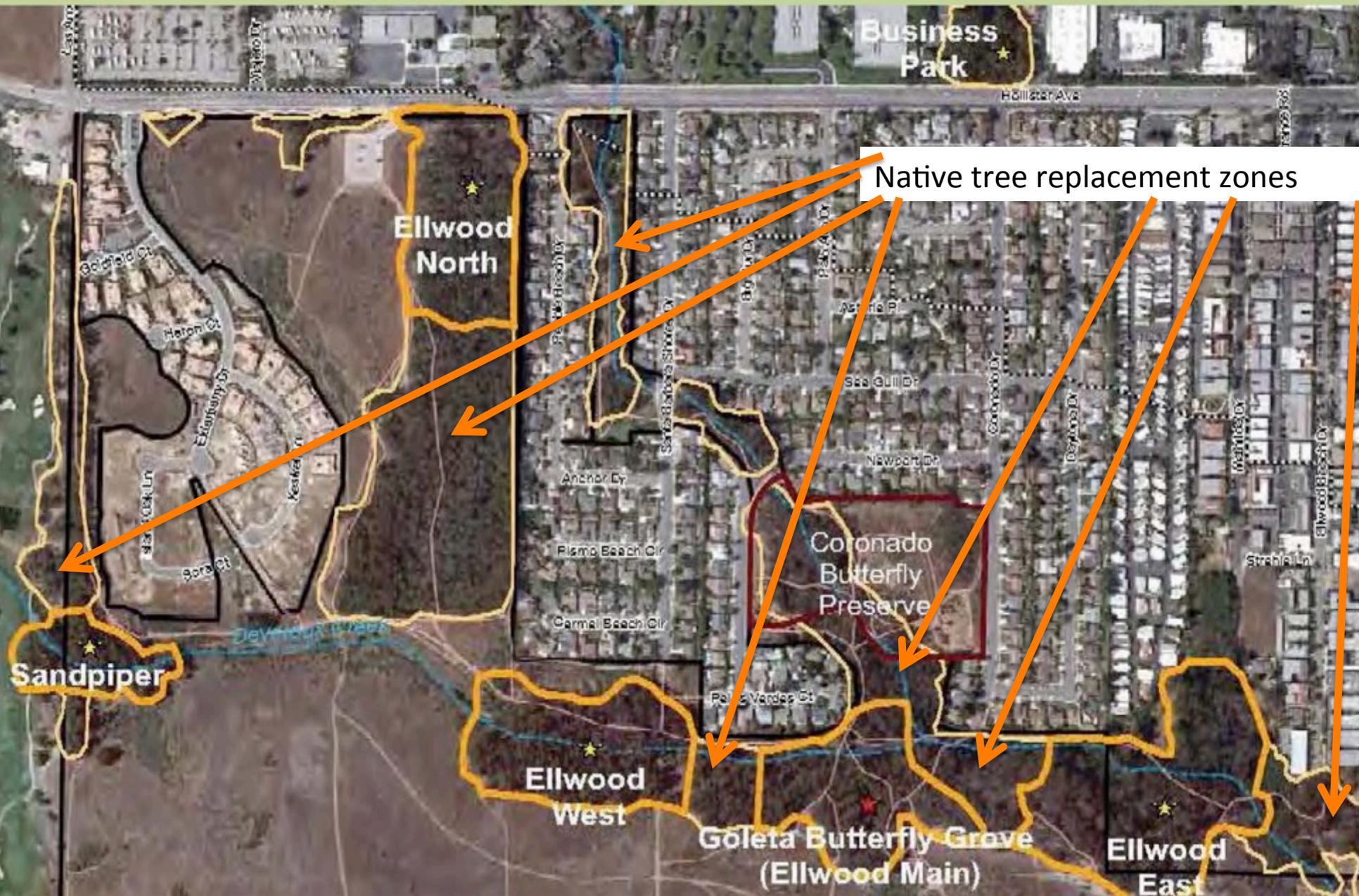
Breeding records for Ellwood grove, open to public, relatively few – 23 breeding records include: one each of Am Kestrel, Anna’s hummingbird, Blue headed grosbeak, BH Cowbird, Bushtit, Cal. Towhee, starling, Cooper’s hawk, H. oriole, H. finch, H. wren, song sparrow, Bluebird, W. kingbird, WT Kite (several).





Atascadero Creek – relatively recently restored:

37 species and 140 breeding records: OC warbler (32), Bushtit (15), Common yellowthroat (11), H. Oriole (8), Ca. Towhee (6), Munia (6), BH Grosbeak (5), Anna's Hummer (4), 4 or less: Lesser gold finch, Oak titmouse, BH Cowbird, H. finch, Spotted towhee, Allen's Hummer, Am Robin, B Phoebe, N. Mockingbird, PS Flycatcher, Red shouldered hawk, Am Crow, Am goldfinch, BC Hummer, Blue grosbeak, Ca Thrasher, Dark eyed Junco, E. collared dove, Hooted warbler, H. sparrow, RT Hawk, W bluebird, Wilson's warbler, wrentit, Yellow warbler.



Native tree replacement zones

Ellwood North

Sandpiper

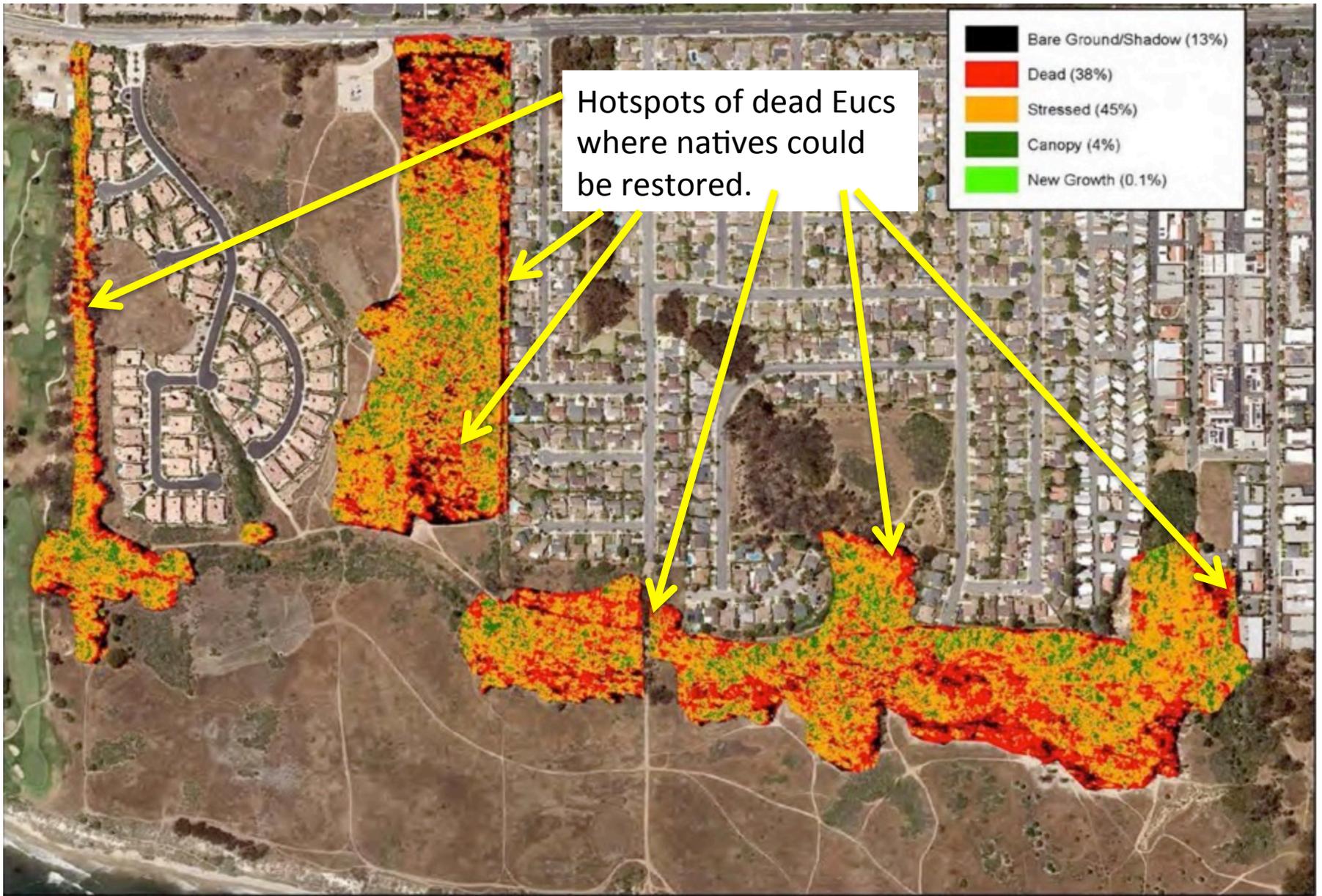
Ellwood West

Goleta Butterfly Grove (Ellwood Main)

Ellwood East

Coronado Butterfly Preserve

Business Park



0 250 500 1,000 1,500 2,000 Feet



Normalized Difference Vegetation Index
ArcMap Tool using June 26, 2017 CIR Image



Consider long term vision of areas within white circles becoming more dominated by native oaks and riparian species for all reasons stated previously.

From: [Deborah Lopez](#)
To: [Sandra Rodriguez](#)
Cc: [David Cutaia](#)
Subject: FW: PTAC meeting August 22, 2018
Date: Wednesday, August 22, 2018 9:09:02 AM

From: Chris Messner [mailto:cmessnersb@gmail.com]
Sent: Tuesday, August 21, 2018 9:35 PM
To: Deborah Lopez <dlopez@cityofgoleta.org>; Michelle Greene <mgreene@cityofgoleta.org>
Cc: Peter Imhof <pimhof@cityofgoleta.org>; Vyto Adomaitis <vadamaitis@cityofgoleta.org>; Lisa Prasse <lprasse@cityofgoleta.org>
Subject: PTAC meeting August 22, 2018

Hi Debra,
Hope all is going well, I have a letter that needs to be given to all of the PTAC Commissioners and staff ie: Bob Morgenstern, Carmon Nichols, Winnie Cai, Charles Ebeling, Ann Wells and any one else I might of missed for PTACs August 22, 2018 meeting.
Thanks, Chris Messner

.....

To: PTAC and City Staff

It has come to my attention that some city staff in the past have argued that the PTAC only covers Street Trees. This *erroneous* statement was recently put forward again. I would urge all staff who deal with tree, or open space, to actually read the City's adopted UFMP. I include specific quotes below from the UFMP. The Ellwood Mesa Grove needs to go before PTAC whether or not staff wishes that were so because the City Council has spoken.

The Urban Forest is **defined** as **all** public and private trees. Including Street Tree Systems, trees in *Parks* and other *Public Lands*

Under **Resolution No. 12-78** -and- **Ordinance No. 12-16**, the UFMP clearly calls for a public Commission to advise and develop plans for all of the Urban Forest.

Kind regards,

Chris Messner
former DRB Commissioner (8 years) and PTAC Commissioner (5 years)

City of Goleta UFMP URBAN FOREST MANAGMENT PLAN

UFMP Chapter 1.0

(first paragraph)

"The City of Goleta initiated the development of this urban Forest Management plan to

provide a guide for long term preservation and enhancement **of the urban forest within the City's jurisdiction.**"

UFMP Chapter 1.0

(paragraph 3)

"The Urban forest **consists of all public** and private trees, which include the street tree system, **trees in parks and other public lands,** **This plan deals with the City trees, focusing on those trees which line streets, walkways, parks and other City owned areas.**"

UFMP Chapter 1.0

(under Policy Goals)

1.0.1 "Implement the Urban Forest Management Plan covering **all** City areas, and **all** new land use development applications **within the City of Goleta.**"

UFMP Chapter 4.15.1

(under Guidelines)

Use UFMP adopted procedures for defining and designating the protection of Heritage/landmark trees **on city property.**

UFMP Chapter 4.15

(under **Naming a Heritage Tree**)

when considering a heritage tree designation, PTAC will also make a recommendation to the City Council on the naming of the heritage trees.

the name shall be informative:

a. Location

b. Common Name

ie: *the Stow Grove Park Redwoods*

the Ellwood Mesa Eucalyptus Grove

the Old Town Park Sycamore

(NOTE: reference of trees above are of Parks and Open Space areas)

UFMP Chapter 4.17

Public tree Advisory Commission (PTAC)

"The Public Tree Advisory Commission was adopted by City Council through Resolution NO. 12-78, on November 6, 2012 (incorporated herein as Appendix E). The Public Tree Advisory Commission should **provide advice to the Public Works Director and the City Council** on how to plan and implement a City urban forestry management program. **The mission of the commission** should include **advising, administration and management of City UFMP.**"

UFMP Appendix C

(title of Appendix C)

PUBLIC TREE PLANTING GUIDELINES

UFMP Appendix D Resolution 12-78

(under EXHIBIT "A" Duties and Responsibilities)

4. review and provide suggestions to staff on the implantation of public tree planting.
7. Coordinate with appointed City commissions and make recommendations to staff on policies, standards, guidelines and regulations for street trees **and other public trees located within City-owned open spaces.**

Chris Noddings

From: Barbara Massey <masseybarb@aol.com>
Sent: Monday, August 20, 2018 10:38 AM
To: Anne Wells; cnodding@cityofgoleta.org; Monarch Butterfly Habitat Management Plan
Subject: Ellwood Mesa Habitat Management Plan
Attachments: Ellwood Mesa Habitat Plan comments.docx

Follow Up Flag: Follow up
Flag Status: Flagged

I have attached the comments that I had prepared for the Thursday evening workshop. Although I didn't state them at the workshop I want them in the record. I think the format of the workshop was an improvement over some past workshops. Thank you for actually listening to the public.

The drinks and snack were a nice addition. I really enjoyed my cashews.

Barbara

The Ellwood Mesa/Sperling Preserve Open Space Monarch Butterfly Habitat Management Plan and Implementation Plan Comments for August 16, 2018 Workshop

Good evening

Monarch Butterfly Habitat Management Plan and Implementation Plan and the areas preservation should not be under the jurisdiction of the Public Works Department. These plans should be the responsibility of the Planning and Environmental Review Department.

I can't believe that this Plan would place almost all of the responsibility for the Monarch Butterfly Habitat in the hands of the Public Works Department. The public has seen the Public Works Departments inability to handle the management of the Monarch Butterfly habitat. The public had to bring PW's bad decisions to the attention of the City Manager and City Council. Public Works has done nothing but try to cut down 100's of eucalyptus trees and destroy the habitat. Much damage would have been done to the area if not for public intervention. The Public Works Dept. is not qualified to deal with environmentally sensitive Monarch Butterfly habitat. They don't have the necessary personnel that is environmentally trained and knowledgeable about the habitat to adequately plan and manage this important area.

The way this document is written, it seems that it still permits the cutting down of trees, planting in inappropriate areas, planting trees other than eucalyptus trees, and the ability to do anything staff wants without review. There needs to be more oversight of the habitat.

There are a number of things seriously wrong with the Management and Implementation Plans. Far too much emphasis is placed on public access to the detriment of the aggregation sites. It needs to be remembered that the Monarch Butterfly Habitat is an important and valuable environmental resource and not for the entertainment of the public.

Docents need much better training so that they follow proper procedures. They should never go into areas not approved for visitors even when there is a lack of butterflies at the approved sites. This could be used as a teaching moment to discuss what happens when an area is disturbed or when their numbers decrease.

The plans are weak without specific protections for the butterflies and the trees. There is far too much use of the wording "managed, as feasible," which further weakens any protections. There are no protections in these plans to keep a large number of trees from being cut down at any time without the Council's or public's knowledge. This is exactly what the Monarch Butterfly Habitat Management and Implementation Plans were supposed to stop. Don't place the habitat in the hands of the Public Works Department.

Barbara Massey
August 16, 2018

City of Goleta Deputy City Manager, City Clerk
PTAC Chair Commissioner Phebe Mansur

16 August 2018

PTAC Meeting 22 August 2018 Agenda item B.1 18-323
Draft Ellwood Mesa/Sperling Preserve Open Space Monarch Butterfly Habitat Management Plan and 2018 Implementation Plan

Please read this paragraph during the discussion portion of this item. If PTAC agrees, I request the questions below be passed to the authors of the draft report for consideration when developing the next draft. I leave it to PTAC to decide if any of the following should be discussed at the meeting. Thank you

Alfred Smith
PTAC Commissioner

**Draft Ellwood Mesa/Sperling Preserve Open Space Monarch Butterfly Habitat Management Plan and
2018 Implementation
Plan July 2018**

Page 12 Executive Summary

Second paragraph:

Why is the UFMP not mention as a key policy document?
Was the UFMP referenced at all when developing the plans?

Fourth Paragraph:

Recommend the executive summary provides the reader some indication of budget and schedule for each of the four bullet points. Without it, there is no way for the reader to grasp the magnitude of these plans.

Last paragraph

“With adoption and implementation of this MBHMP, the City will fulfill a major commitment to the ...”
What major commitment? Did the City make a commitment?
The sentence implies the entire MBHMP needs to be “adopted and implemented”. Is that the case?
Is there significant benefit by “adopting and implementing” something less?

Page 13 Executive Summary

Is the \$3.9M “one-year money”? That is, does it all have to be spent in the 2018-2019 fiscal year?
What is the fiscal year for this money?
Has the money arrived? If not, when is it expected?

The paragraph states that the money can only be spent on “restore, enhance, manage, and monitor” activities. This does not line up with the “Admin, Management, Outreach, Monitoring, Research, and Adaptive Management” plans identified earlier in the summary. Recommend words are added to clarify which part of the proposed plans are covered and which are not. For the ones that are not (if any), please identify estimated budgets necessary and potential sources.

Page 14 Background

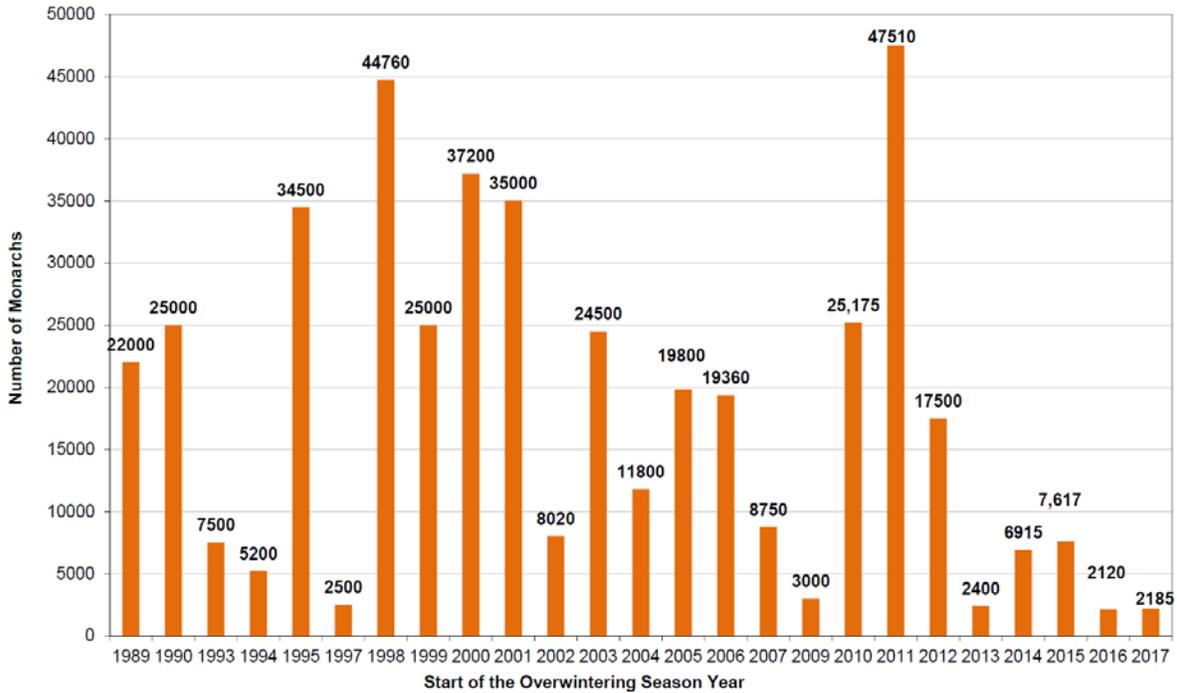
Second Paragraph

“...have numbered in the tens of thousands during some years, Making Ellwood Mesa one of the most important sites for monarch butterflies in California”

Is this statement misleading? “Status of Ellwood Mesa-Related Tree Projects, Emergency Permit And Habitat Management Plan” presented to City Council 20 Feb 2018 indicates 2011 was the last time anything like these numbers have been recorded. All years since then were less than 10,000 and three were less than 3000. Recommend a population by year chart be included in the report to give proper context.

Monarch Count Results (1989 - 2017)

Goleta Butterfly Grove (Ellwood Main) Monarch Population



Is there a reference to support the claim that “Ellwood Mesa <is> one of the most important sites for monarch butterflies in California.”? A reference would add weight to the claim.

Third paragraph

Recommend indicating who is responsible for Ellwood East and what if any support they are providing to the plans. (There is some mention later in the document, but it would help to mention it here as well.)

Last paragraph

Recommend that a footnote be added to provide the implications of of terms like “Special Animals List” and “imperiled to vulnerable”.

How did those designations influence recommendations?

Page 19 Community Wildfire Protection Plan

“...butterfly and wildland fire experts...”

Recommend a footnote to indicate who these experts were.

Methods

Suggest the main focus should also include recommended content of regular, concise reports to track progress and to whom they are delivered.

Page 21 - 58

Is it possible to indicate anticipated workload by Plan number (top level, not each sublevel)? All but one or two action items identify the Public Works Department as POC.
Is it feasible for the Public Works Dept to undertake all this work?

In cases where more than one POC is indicated, recommend a lead is suggested.

From: [Deborah Lopez](#)
To: [Chris Noddings](#)
Subject: FW: submitting comments for Thursday night meeting, Aug 16
Date: Thursday, August 16, 2018 9:01:55 AM

From: Valerie Kushnerov
Sent: Thursday, August 16, 2018 8:31 AM
To: Deborah Lopez <dlopez@cityofgoleta.org>; Anne Wells <awells@cityofgoleta.org>; Christopher Julian <cjulian@rinconconsultants.com>; Charis Van Der Heide (external forward only) <cvdheide@rinconconsultants.com>
Subject: FW: submitting comments for Thursday night meeting, Aug 16

FYI

From: Paul Pease (via Google Docs) <paulpease@gmail.com>
Sent: Wednesday, August 15, 2018 10:15 PM
To: Valerie Kushnerov <vkushnerov@cityofgoleta.org>
Subject: submitting comments for Thursday night meeting, Aug 16

Hi:

How do I submit comments for the meeting Thursday night regarding the Ellwood Mesa Open Space/ Sperling Preserve Butterfly Management Plan?

I'd like the following to be considered or read:

Regarding the Draft Ellwood Mesa Open Space / Sperling Preserve Butterfly Habitat Management Plan and 2018 Implementation Plan.

I live in The Bluffs and absolutely love to observe the Monarchs over-wintering, especially in the area near Sandpiper as it is so serene. However, many of the non-native eucalyptus trees in that area have fallen down, taking other eucalyptus trees with them, and seem to be drying out (perhaps invaded by pests). It's not just a danger to the people walking in the area, but the dead eucalyptus trees become a rather volatile fuel source for fire. I have also seen encampments in that area with evidence of cooking campfires. Some of the recent devastating and fast-moving wildfires that have occurred in California and our community were caused by cooking campfires.

I was wondering two things:

1. Has there been a re-assessment by the Fire Department regarding a potentially dangerous wildfire that would destroy the Monarch Butterfly habitat caused by a campfire and fueled by the new eucalyptus deadwood as well as live eucalyptus oil?
2. Are there considerations for removing the dead eucalyptus danger and re-planting with more native tree species, such as oaks?

Thank you

Paul Pease

355 Island Oak Lane

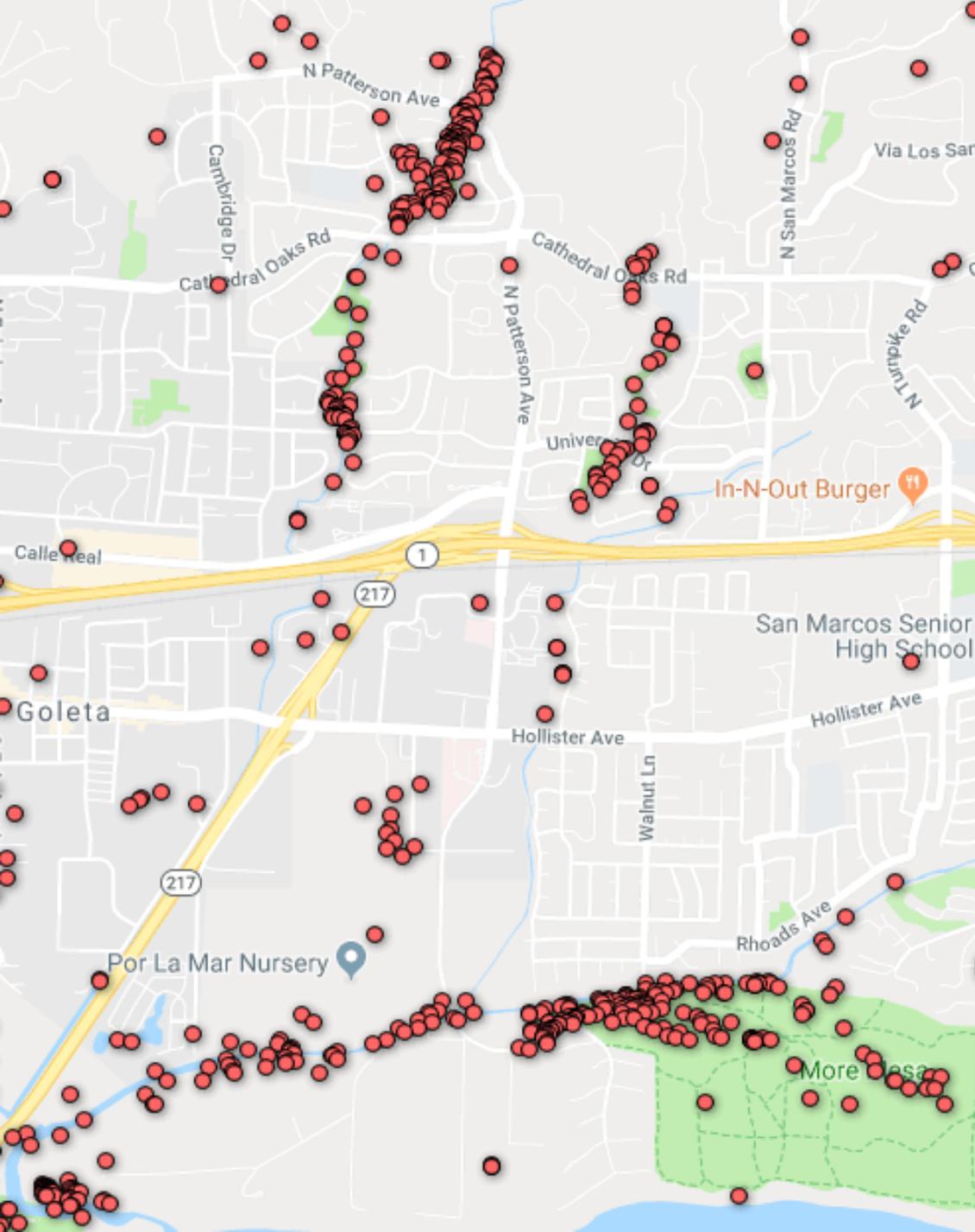
Goleta

CCBER comments on Ellwood Grove Restoration and Management Plan

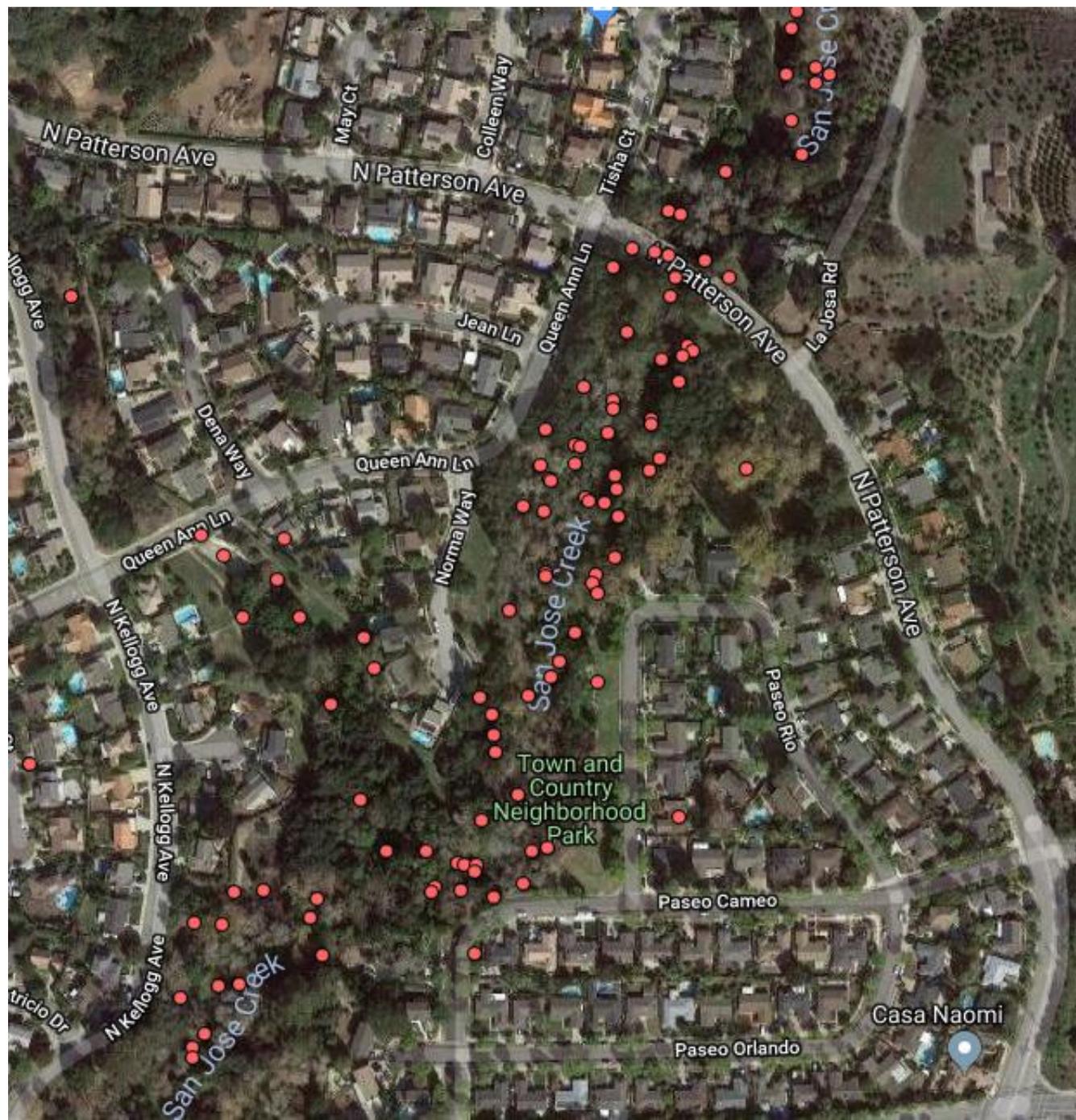
Some thoughts regarding how to make this plan more sustainable in the long term and support a higher diversity of species over time.

Consider:

- 1) Plan focused almost solely on Monarch Butterfly – needs to think more broadly about species support, sustainability, etc. See breeding records from Breeding Bird Study showing that you get nearly double the diversity of breeding birds in oaks (57 species) than in Eucalyptus (32). Also, consider examples of native riparian areas with more than 300 individuals breeding from 37 species, compared to Ellwood grove which has just 23 species and only 60 records of birds breeding in a very public, heavily birded area. Much lower support.
- 2) Eucalyptus trees have been shown to reduce creek flows through excessive transpiration, thereby reducing habitat quality. If diversify with native trees have a better chance of having sustainable creek flows which support butterflies and other wildlife.. and long term survivorship of species adapted to coastal California (e.g. oaks, sycamores, willows, toyon).
- 3) No maps provided in plan, see below for proposed focus on doing active restoration of all non-aggregation areas with native trees which can reduce fire risk, establish early to continue to provide environmental amelioration of the grove, support insects, birds, wildlife to complement Eucalyptus trees
- 4) Native trees reduce fire risk, give off water, not oils like Euc's. Plant native oaks and sycamores along all edges of groves by homes and down to creek as well as in all non-aggregation zones that could become fuel corridors. Native trees will better support other nectar providing species in understory.
- 5) Data from USFWS status of Monarch paper and Griffith and Villablanca paper demonstrate that Butterflies do not prefer Eucalyptus and that in Central CA they prefer pines and cypress and oaks disproportionately to their low cover in the groves.
- 6) Native trees will be adaptive to climate change, reduce water use in creek and overall, not require pampering proposed for planted Eucs.
- 7) Lack of management in grove is leading to proliferation of saplings, particularly along southern edge. These many smaller trees are faster growing, use more water resources, compete with the large trees that support the monarchs. Management of woodland should involve active removal of saplings and small trees and planting of native trees.



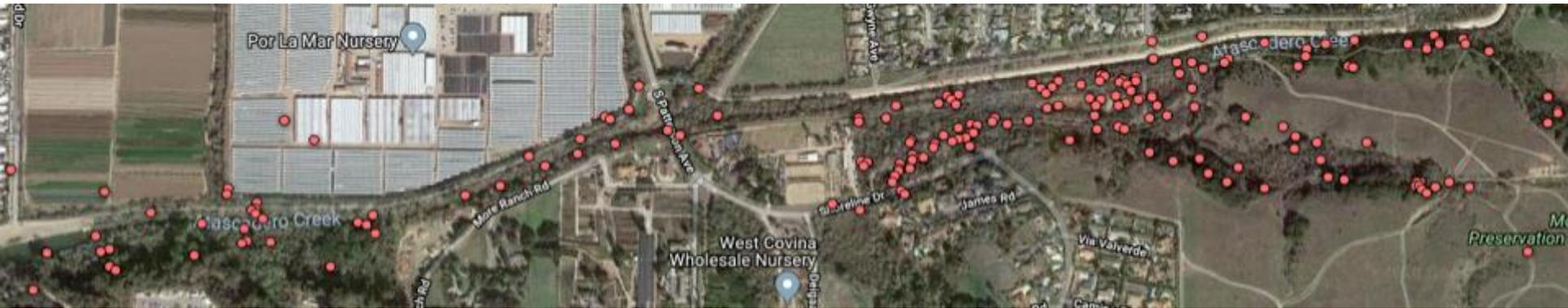
Three riparian areas, some relatively newly restored (e.g. atascadero creek by bike path, west of Patterson) that have lots of breeding records from diverse species.



Close up of one riparian area with native oaks, sycamores, etc. Diverse breeding records – from clicking on them – San Jose Creek = 130 breeding records: e.g. Titmouse, flicker, song sparrow, House finch, Anna’s Humming bird, Dark eyed Junco, Scrub Jay, House wren, Yellow warbler, California Towee, Acorn woodpeckers, H. oriole, N. Flicker, Nuthatch, Brown headed cowbird, Black Phoebe, Orange crowned warbler.

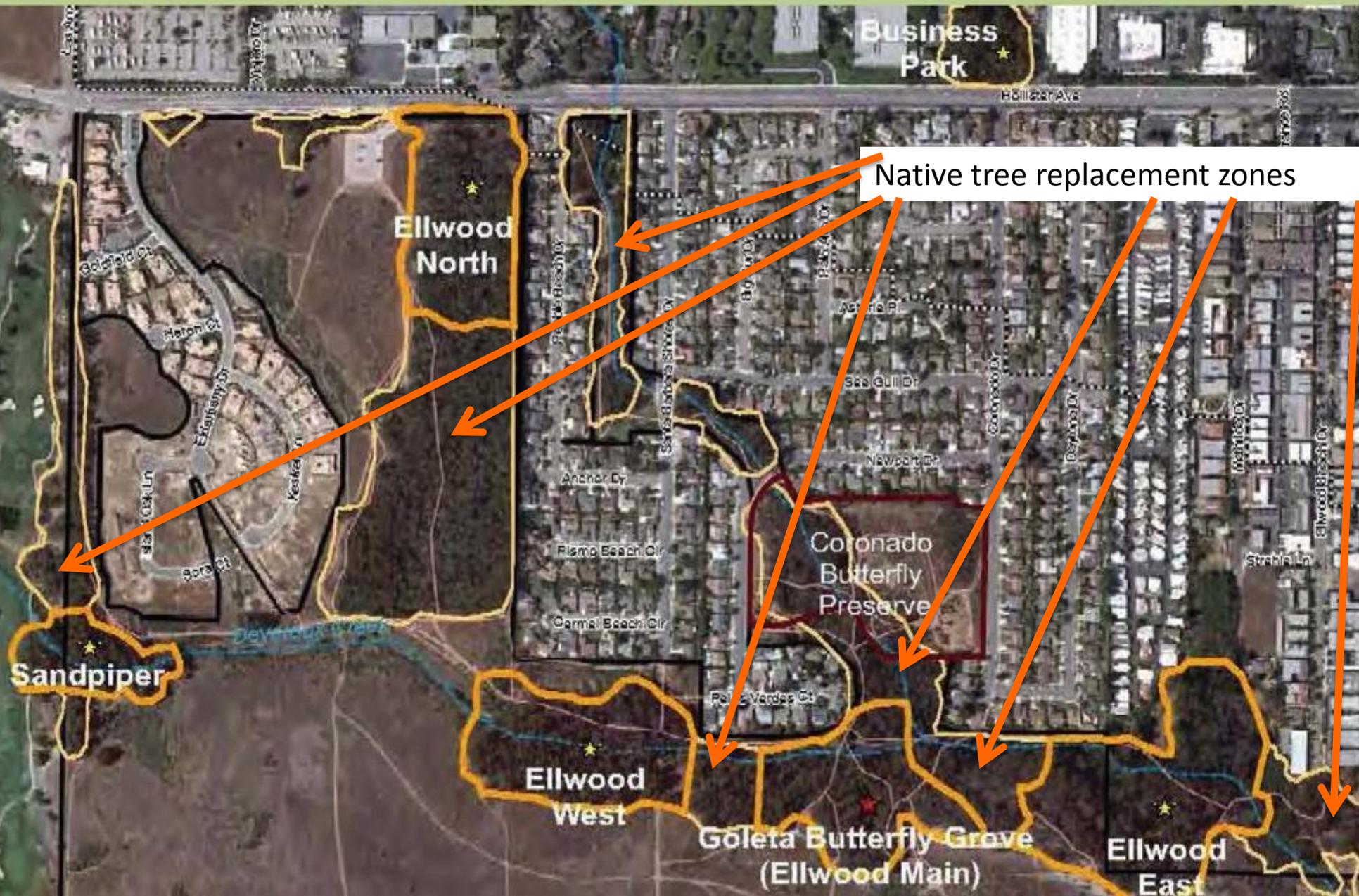


Breeding records for Ellwood grove, open to public, relatively few – 23 breeding records include: one each of Am Kestrel, Anna’s hummingbird, Blue headed grosbeak, BH Cowbird, Bushtit, Cal. Towhee, starling, Cooper’s hawk, H. oriole, H. finch, H. wren, song sparrow, Bluebird, W. kingbird, WT Kite (several).



Atascadero Creek – relatively recently restored:

37 species and 140 breeding records: OC warbler (32), Bushtit (15), Common yellowthroat (11), H. Oriole (8), Ca. Towhee (6), Munia (6), BH Grosbeak (5), Anna's Hummer (4), 4 or less: Lesser gold finch, Oak titmouse, BH Cowbird, H. finch, Spotted towhee, Allen's Hummer, Am Robin, B Phoebe, N. Mockingbird, PS Flycatcher, Red shouldered hawk, Am Crow, Am goldfinch, BC Hummer, Blue grosbeak, Ca Thrasher, Dark eyed Junco, E. collared dove, Hooted warbler, H. sparrow, RT Hawk, W bluebird, Wilson's warbler, wrenit, Yellow warbler.



Native tree replacement zones

Ellwood North

Sandpiper

Ellwood West

Goleta Butterfly Grove (Ellwood Main)

Ellwood East

Coronado Butterfly Preserve

Business Park

Hollister Ave

Goldfield Ct

Heron Ct

Elmwood Dr

Kestrel Ln

Starling Ln

Sore Ct

Devonport River

Anchor Dr

Pismo Beach Cir

Carmel Beach Cir

Palo Verde Ct

Adriatic Pl

Sea Gull Dr

Newport Dr

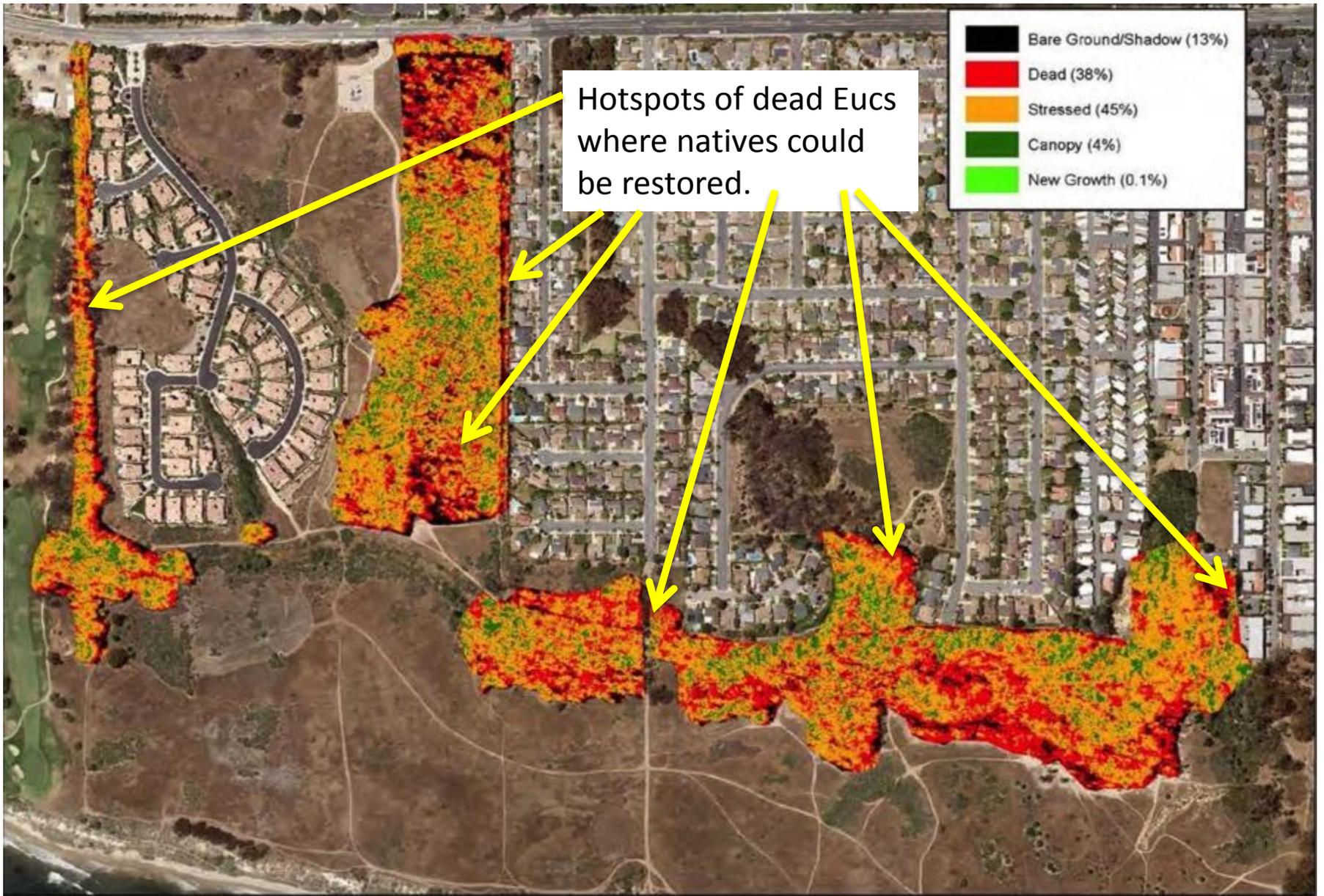
Continental Dr

Dayluna Dr

Maritime Dr

Ellwood Beach Dr

Starline Ln



0 250 500 1,000 1,500 2,000 Feet



Normalized Difference Vegetation Index
ArcMap Tool using June 26, 2017 CIR Image



Chris Noddings

From: Lisa Stratton <stratton@ccber.ucsb.edu>
Sent: Thursday, August 09, 2018 5:35 PM
To: Monarch Butterfly Habitat Management Plan
Subject: RE: Monarch plan
Attachments: Ellwood_RiparianWoodlandRestoration.pptx

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

Please find attached the comments that CCBER made at the stakeholder meeting. I hope to make more specific comments on the actual HMRP plan text to show how these suggestions are more modifications of what is proposed rather than completely re-writing the plan. Also, I think I should clarify that we don't have a vision for the long term elimination of the Eucalyptus grove, but for creating a patchwork of native areas along the edges and between the aggregation areas that will be implemented in a strategic and incremental manner as trees die to create a mixed age, diverse woodland that is sustainable in the long run and continues to support psilids for warblers, trees for hawks and woodland for butterflies WITH important nectar providing, flowering plants. Such a system would be more sustainable in the face of climate change, increased drought, increased fire, reduced water availability... and would reduce threats to residences near by without compromising function for desired pecies.

I may not have a chance to make those comments before the 16th meeting but hope to before the Sept. 5th deadline.

Sincerely,

Lisa

--

Lisa Stratton, Ph.D.
Cheadle Center for Biodiversity & Ecological Restoration (CCBER) Harder South, Rm 1005
UCSB, MC 9615
Santa Barbara, CA 93106

Office: (805) 893-4158
Fax: (805) 893-4222

stratton@ccber.ucsb.edu
<http://ccber.ucsb.edu>

From: [Kyle Richards](#)
To: [Michelle Greene](#); [Peter Imhof](#); [Anne Wells](#)
Subject: Fwd: You're Invited – Ellwood Mesa Public Workshop, 8/16
Date: Tuesday, August 07, 2018 11:11:49 AM

For your information: I'm forwarding a message from Kevin Duffy.

Best, kyle.

Get [Outlook for Android](#)

From: Kyle Richards
Sent: Tuesday, August 7, 10:25 AM
Subject: Fwd: You're Invited – Ellwood Mesa Public Workshop, 8/16
To: Kyle Richards

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

From: **Kevin Duffy** <duffykevin57@gmail.com>
Date: Tue, Aug 7, 2018 at 10:22 AM
Subject: Re: You're Invited – Ellwood Mesa Public Workshop, 8/16
To: goleta@public.govdelivery.com, Bennett Michael <mbennett@cityofgoleta.org>, Aceves Roger <raceves@cityofgoleta.org>, skasdin1@gmail.com, richards.kyle@gmail.com

Sorry to have missed this meeting. I wish you success on plans for finally implementing this plan of habitat stewardship. One VERY important point missed was the city's OBLIGATION TO ADDRESS THE PROBLEM OF Invasive, Destructive, Persistent PRESENCE OF semi-permanent CAMPERS who :

- 1) create a public health risk (hepatitis) by using this environment as a toilet.
- 2) accumulate then leave behind weathered piles of personal items , trash, and yes hypodermic needles, all of which I have photo documented and presented numerous times to city staff, council, etc.
- 3) destroy shrubs, trees , disturb natural habitat , displace wildlife by hiding camps deep in thickets.
- 4) Create a fire hazard with camp fires and smoking.

This is a significant problem for this habitat which the city seems to have been dodging despite numerous citizen notifications.

Citizens, when our city was formed , expected protection, and preservation not neglect and exploitation of this habitat.

Unfortunately in the last decade-plus the vacuum of leadership was been apparent, especially from most senior council members , for instance , the one who would just as soon remove the Monarch logo from our city letterhead and would have happily allowed the city to pave a phony fire truck access road in this ESHA for a condo developer who contributed to his election coffers.

Let's hope our council can evolve to one more proactively engaged in the better of Ellwood

Mesa its surrounding neighborhoods .

Ellwood Mesa is not HOBOTOWN.

Kevin Duffy
[495 Coronado Drive](#)

On Aug 6, 2018, at 10:01 AM, City of Goleta <goleta@public.govdelivery.com> wrote:

The City is hosting a family-friendly public workshop on the Ellwood Mesa Habitat Management Plan and Implementation Plan on Thursday, August 16 at 6:00 p.m. at Goleta City Hall Council Chambers. The workshop will include a discussion and review of the draft plans, available now at

<https://>

tinyurl.com/HabitatManagementPlan

. The City is looking for your questions, comments and feedback on the plan.

Thur

sday, August 16

6:00 p.m.

Goleta City Hall Council Chambers (

[130 Cremona Drive, Suite B](#)

)

[The Ellwood Mesa Habitat Management Plan](#)

guides the approach and methods the City of Goleta follows to manage and improve the Ellwood Mesa eucalyptus forest for the benefit of the overwintering behavior of the monarch butterfly, other wildlife, and the public's use and enjoyment. Two key local policy documents drive the protection of the monarch butterfly: the Goleta General Plan/Coastal Land Use Plan and The Ellwood-Devereux Coast Open Space and Habitat Management Plan.

[The Implementation Plan](#)

presents work tasks to be accomplished in 2018 for the maintenance and preservation of Ellwood Mesa. The focus of the work this year is to protect and enhance habitat for monarch butterflies and other wildlife and to sustain natural habitat on Ellwood Mesa to support wild species and benefit public use and enjoyment of this open space area. Actions delineated are directed toward protection and improvement of individual trees, as well as restoration of areas where trees have died.

We hope to see you at the workshop!

Questions?

[Contact Us](#)

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duffykevin57@gmail.com

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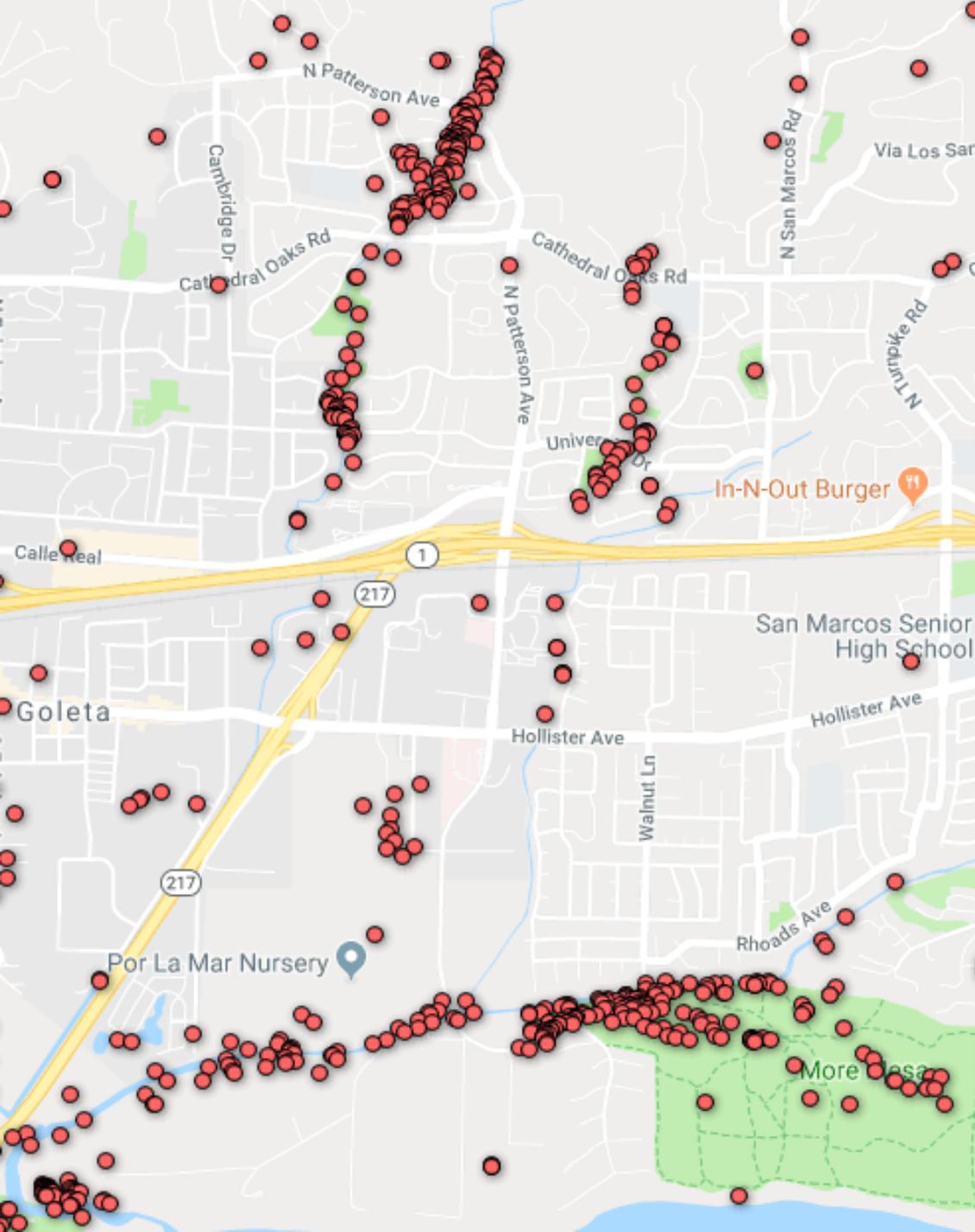
[130 Cremona Drive, Suite B - Goleta, CA 93117](#)

CCBER comments on Ellwood Grove Restoration and Management Plan

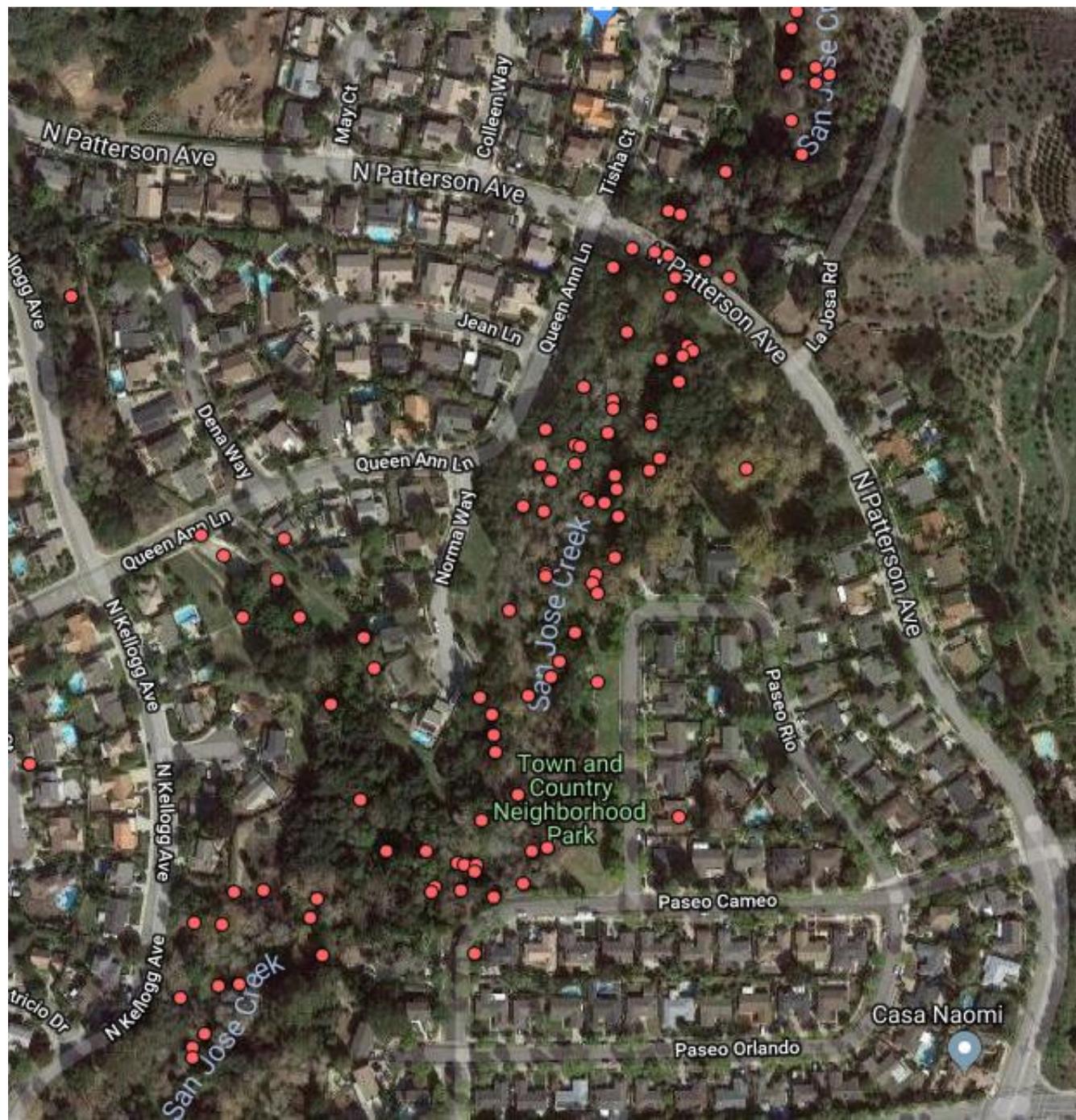
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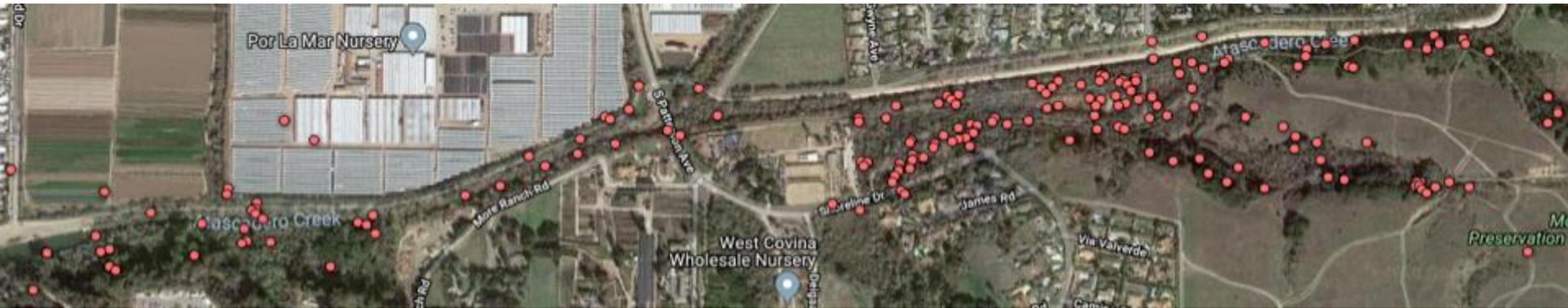
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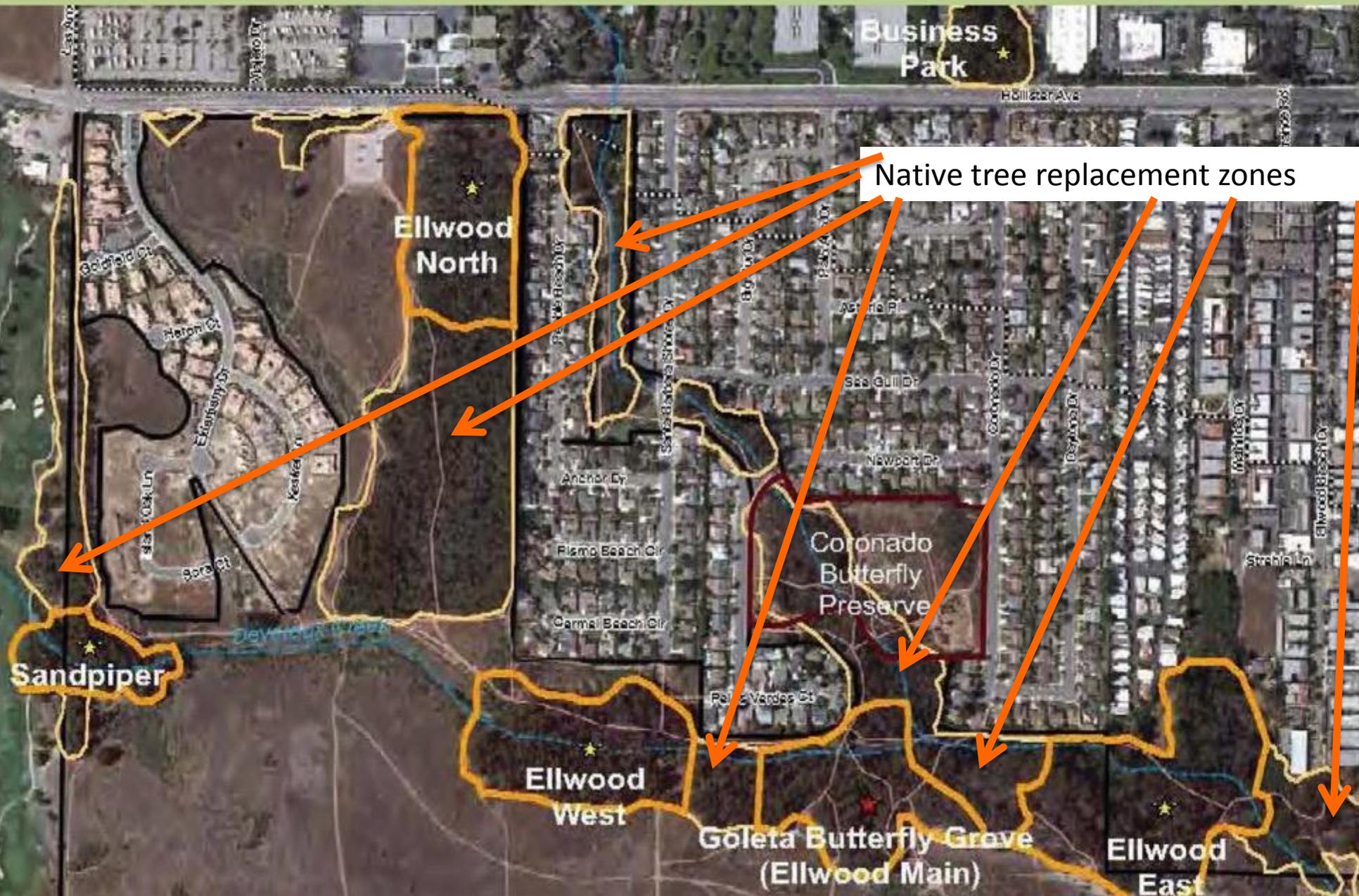


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Native tree replacement zones

Ellwood North

Sandpiper

Ellwood West

Goleta Butterfly Grove
(Ellwood Main)

Ellwood East

Coronado Butterfly Preserve

Business Park

Hollister Ave

Goldfield Ct

Hutton Ct

El Marquise Dr

Kester Ln

Starbuck Ln

Gore Ct

Anchor Dr

Pismo Beach Cir

Carmel Beach Cir

Palis Verdes Ct

Newport Dr

Sea Gull Dr

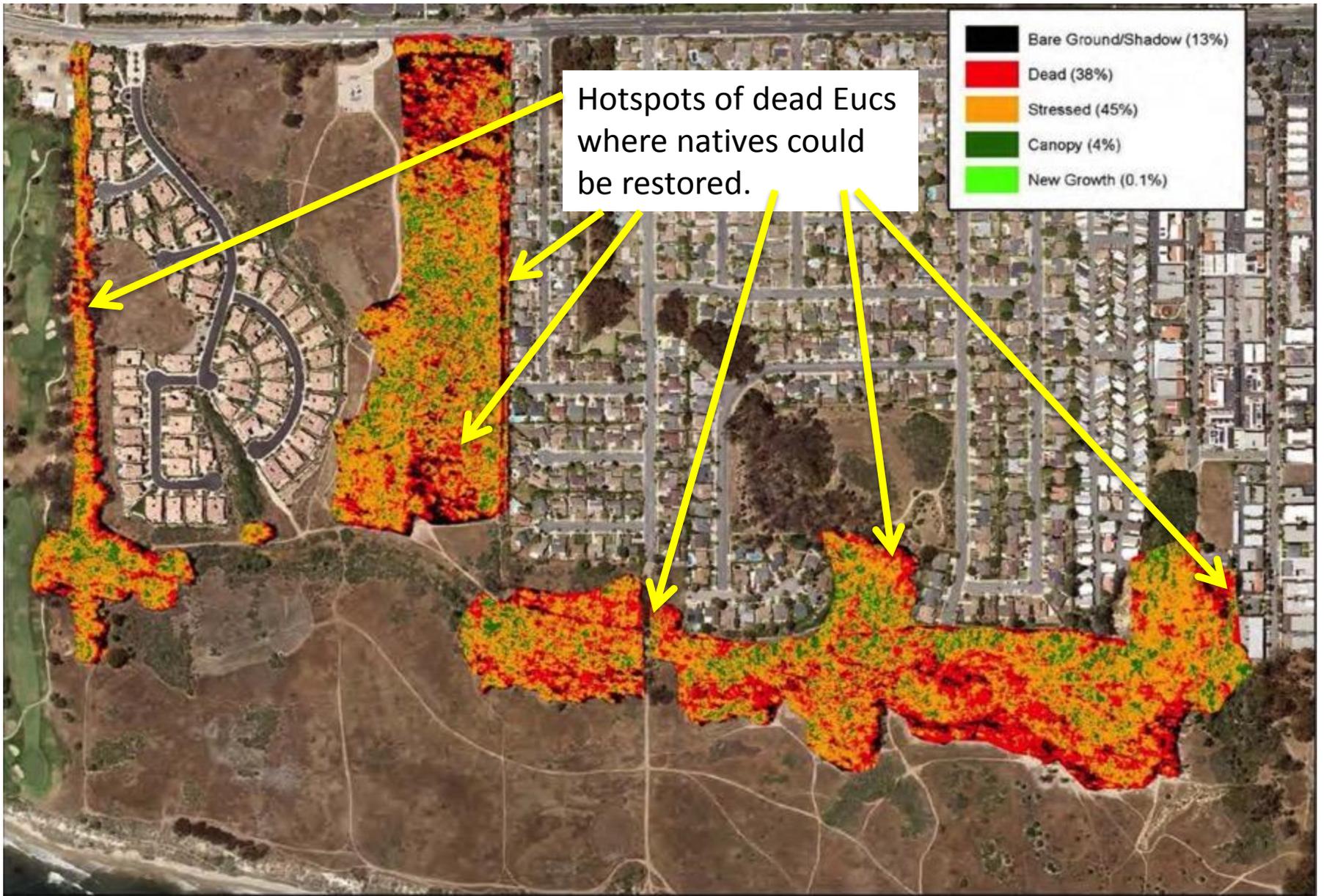
Coronado Dr

Dayluna Dr

Marlette Dr

Strehln Ln

Ellwood Bluff Dr



0 250 500 1,000 1,500 2,000 Feet



Normalized Difference Vegetation Index
ArcMap Tool using June 26, 2017 CIR Image



From: [Anne Wells](#)
To: [Monarch Butterfly Habitat Management Plan](#); [Chris Noddings](#)
Subject: FW: [EXTERNAL] Butterfly HMP Availability & Upcoming Workshop Notice
Date: Wednesday, August 15, 2018 10:21:49 AM

This probably qualifies as a public comment.

From: Lara Drizd [lara_drizd@fws.gov]
Sent: Friday, July 27, 2018 5:38 PM
To: Anne Wells
Cc: Cat Darst
Subject: Re: [EXTERNAL] Butterfly HMP Availability & Upcoming Workshop Notice

Hi Anne,

Thanks so much for giving me the chance to look over your draft Management Plan and Implementation Plan. Unfortunately I'll be out of town all of next week so I won't be able to make it to the stakeholder meeting but I've put together some comments for your consideration. These do not need to be shared at the meeting (some are just questions for clarification), but I will say that both documents look great. I'm in full support of what your group has put together and I don't think any major changes are needed. You all did an awesome job!

Below are my comments. All of the page numbers reference the MBHMP. I wasn't sure if I was able to view all of the figures in the Implementation Plan because a couple of blank pages towards the end didn't include the blank page notice.

- Pg 1 - It was unclear to me how Ocean Meadows is being treated. The Implementation Plan seems to imply that it's not on City Property. I'm guessing the difference is that it doesn't regularly have monarchs, despite the trees being in fairly good health?
- Pg 16 - Signage/Fencing - It wasn't clear to me if these activities would be done outside of the OW time period. I would just add a note that installation and maintenance of signage and fencing will be conducted in such a way as to not disturb overwintering monarchs.
- Pg 39-41 - Interpretive Program - If there's anything we can do to help with outreach and education, please let us know. Diana has already sent me her curriculum for the Monarch MOVES program which I'm currently going through. We also have a biologist in our office here who has been planting pollinator gardens with school groups for years and we could help out if you're interested in having kids involved in restoration and planting efforts.
- Pg 63 - Appendix 3 - I noticed that you included detailed instructions for tree planting efforts in the Implementation Plan. I'd just like to add that the planting methods for natives can be quite different than they are for species we typically plant in our gardens. For instance, you usually want to avoid digging a hole much larger than your pot. I might suggest adding a sentence to this paragraph here stating something to the effect of "natives will be planted according to appropriate planting methods which may vary by species."
- Pg 64 - Plant List - You might consider adding black figwort (*Scrophularia atrata*) to the list. Black figwort is an important local species (really only found in SB county), drought tolerant, and great for bees and butterflies. And it was recommended by our botanist. :)

Thanks, Anne. I hope you're enjoying your vacation and CONGRATS on getting that funding from the state!

Lara Drizd
Biologist
Ventura Fish and Wildlife Office
U.S. Fish and Wildlife Service
2493 Portola Road, Suite B, Ventura, CA 93003
Phone: (805) 677-3321 Email: lara_drizd@fws.gov

On Thu, Jul 26, 2018 at 3:02 PM Anne Wells <awells@cityofgoleta.org> wrote:

Good Afternoon Ellwood Butterfly Habitat Management Plan Stakeholders:

The Draft Ellwood Mesa Open Space / Sperling Preserve Butterfly Habitat Management Plan and 2018 Implementation Plan are available for download at:

<http://www.cityofgoleta.org/city-hall/planning-and-environmental-review/monarch-butterfly-inventory-and-habitat-management-plan>

Hard copies will be available for you on Monday at the City Hall Planning and Building counter.

In addition to our August 2 Stakeholder Meeting, we will shortly be posting a notice of a family-friendly public workshop. Stay tuned for the email notice. The date/time/location of the workshop is:

August 16, 2016 at 6 P.M.

Goleta City Hall, Council Chambers

130 Cremona Drive, Suite B

I will be on vacation, returning on August 2. If you have questions, please contact Charis at (805) 869-1677 or cvdheide@rinconconsultants.com. See you in a week!

-Anne

Anne Wells

Advance Planning Manager

City of Goleta

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