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State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
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December 3, 2025

Will Fourt, Senior Parks and Recreation Specialist
California Department of Parks and Recreation
303 North Big Trees Park Road
Felton, CA, 95018
Reimagining.BigBasin@parks.ca.gov

Subject: Reimagining Big Basin Redwoods State Park Facilities Management Plan and General Plan Amendments, Draft Supplemental Environmental Impact Report, SCH No. 2001112104, Santa Cruz County

Dear Will Fourt:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Supplemental Environmental Impact Report (EIR) from the California Department of Parks and Recreation (CDPR) for the Reimagining Big Basin Redwoods State Park Facilities Management Plan and General Plan Amendments Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1] CDFW previously submitted comments in response to the Notice of Preparation of the draft supplemental EIR.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86). CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting rivers, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally

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subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final supplemental EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION SUMMARY

Proponent: California Department of Parks and Recreation

Objective: The proposed Project includes amendments to the Big Basin Redwoods State Park General Plan and the adoption of the Reimagining Big Basin Redwoods State Park Facilities Management Plan. The proposed General Plan amendments include text changes to provide clarity and consistency between the 2013 General Plan and the Facilities Management Plan. The General Plan amendments would also expand the park boundary to include new parcels. The proposed Facilities Management Plan guides the stewardship, management, and use of existing and future facilities, consistent with the 2013 General Plan and other relevant planning documents. Additionally, the proposed Project would guide the rebuilding of facilities lost in the 2020 CZU Lightning Complex fire and the construction of new facilities and infrastructure. This includes 19 identified sites in five proposed zones, including visitor-serving facilities; overnight facilities; tribal facilities; transportation-related facilities; utilities infrastructure; administrative facilities; and staff residences. The Project also includes road and circulation improvements, the introduction of a shuttle program, utility upgrades and replacement, habitat restoration, and an improved emergency response and evacuation plan. The objectives of the Big Basin Facilities Management Plans are as follows: prioritize forest health; provide equitable, diverse, and evocative visitor experiences; diversify transportation and access opportunities; practice land stewardship; include Indigenous perspectives; promote landscape connectivity; design with reverence and resilience; engage the park community and build partnerships

Docusign Envelope ID: 69AA5061-5407-45CC-ABCE-ADEBBD25CBEF

supporting objectives. Primary Project activities include grading, demolition of existing structures, tree removal, soil compaction, and ground disturbing activities.

Location: Big Basin Redwoods State Park is in the western, coastal portion of the Santa Cruz Mountains between State Route (SR)-1 and SR-9, which both run north to south. The majority of the park is in the County of Santa Cruz and a small northern portion is in the County of San Mateo. The park is surrounded by other parks and open-space with communities along SR-9. Big Basin Redwoods State Park encompasses approximately 18,200 acres; however, the proposed Project focuses specifically on areas along SR-236 and Sky Meadow Road, encompassing approximately 5,500 acres in the eastern part of the park.

Timeframe: Activities will be implemented over five to fifteen years, or longer dependent on funding.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist CDPR in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Project Description and Related Impact Shortcoming

Would the Project have a substantial adverse effect, either direcrtly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?

COMMENT 1: Marbled Murrelet

Section 3.1, Page 3-58

Issue: The supplemental EIR indicates CDPR will coordinate with CDFW and the USFWS prior to initiating construction activities that may affect marbled murrelet (MAMU) and/or their nesting habitat. However, formal coordination with CDFW and USFWS is not proposed to review survey results, habitat assessments, and/or proposed avoidance measures prior to initiating construction activities. Additional early coordination with CDFW is needed to ensure consistency with state regulatory requirements and to ensure significant impacts to MAMU will be avoided from project activities.

Evidence impact would be significant: The CZU Fire burned over 97 percent of Big Basin Redwoods State Park and 61.4 percent of known murrelet habitat in Zone

Docusign Envelope ID: 69AA5061-5407-45CC-ABCE-ADEBBD25CBEF

6 (Singer and Rinkert 2025; SCMBC 2025). Almost half of the accessible potential nest trees have died and most will not likely provide optimal habitat for a year or two until foliage can grow (page 3-62). The Project proposes redevelopment in areas that were previously occupied by MAMU, which may delay and prevent habitat recovery. Habitat for MAMU may become suitable again and occupancy can vary annually. Brief or intermittent disturbance such as grading, heavy equipment operation, and vehicle traffic can disrupt MAMU breeding behavior and can result in nest abandonment and reduced feeding rates (USFWS 2020).

Recommendation and Mitigation Measure BIO-28: CDFW recommends the supplemental EIR update the beginning sentence of BIO-28 to require additional CDFW coordination prior to initiating construction activities as follows: *"Formal consultation with CDFW and the U.S. Fish and Wildlife Service (USFWS) shall be required to review and approve proposed MAMU survey methodologies, habitat assessments, and avoidance measures prior to initiating any project activity occurring during the marbled murrelet breeding season that may affect marbled murrelet and/or their nesting habitat."*

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the draft supplemental EIR to assist CDPR in identifying and mitigating Project impacts on biological resources.

Docusign Envelope ID: 69AA5061-5407-45CC-ABCE-ADEBBD25CBEF

Questions regarding this letter or further coordination should be directed to Alexis Harrison, Environmental Scientist, at (707) 815-2778 or Alexis.Harrison@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Land Use and Climate Innovation (SCH No. 2001112104])

REFERENCES

CDFW (California Department of Fish and Wildlife). 2025a. California Natural Diversity Database. *California Natural Community List.*

PSG (Pacific Seabird Group). 2024. A revised protocol for surveying Marbled Murrelets in Forests. *Pacific Seabird Group Technical Publication Number 6*. https://pacificseabirdgroup.org/psg-publications/technical-publications/.

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Smith, A. B., M. Kissling, A. M. Capuano, S. B. Lewis, and T. A. Mooney. 2023. Aerial hearing thresholds and ecoacoustics of a threatened pursuit-diving seabird, the marbled murrelet *Brachyramphus marmoratus*. *Endangered Species Research* 50:167–179.

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