

California Department of Parks and Recreation

**BIG BASIN REDWOODS STATE PARK GENERAL PLAN
SUPPLEMENTAL EIR**
for the
**Reimagining Big Basin Redwoods State Park
Facilities Management Plan and
General Plan Amendments**

April 2026 | Final Supplemental Environmental Impact Report

State Clearinghouse No. 2001112104



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GENERAL PLAN SUPPLEMENTAL EIR**
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**Reimagining Big Basin Redwoods State Park
Facilities Management Plan and
General Plan Amendments**
for California Department of Parks and Recreation

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TABLE OF CONTENTS

1.	Introduction	1-1
1.1	Final Supplemental EIR Organization	1-1
1.2	Environmental Review Process	1-2
2.	Response to Comments	2-1
2.1	List of Commenters	2-1
2.2	CEQA Requirements Regarding Comments and Responses	2-2
2.3	Topical Responses	2-3
2.4	Comments and Responses	2-15
3.	Revisions to the Draft Supplemental EIR	3-1
3.1	Introduction	3-1
3.2	Draft Supplemental EIR Revisions	3-1

List of Figures

Figure 2-1	Old Growth Setbacks Relative to Proposed Park Zones and Sites	2-8
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List of Tables

Table 2-1	List of Commenters	2-1
-----------	--------------------------	-----

List of Appendices

Appendix C:	Biological Resources Standard Project Requirements (Revised)
Appendix D:	Marbled Murrelet Literature Review (2012-2025) (Revised)
Appendix E:	Draft Supplemental EIR Comment Letters

TABLE OF CONTENTS

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1. INTRODUCTION

This Final Supplemental Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended (Public Resources Code Sections 21000 et seq.), and the CEQA Guidelines (California Code of Regulations Sections 15000 et seq.).

According to the CEQA Guidelines Section 15132, a Final EIR shall consist of:

- (a) The draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies comments on the draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft Supplemental EIR for the proposed Reimagining Big Basin Redwoods State Park Facilities Management Plan and General Plan Amendments (proposed project) for Big Basin Redwoods State Park (BBRSP, park) during the public review period, which began Friday, October 17, 2025, and closed Monday, December 1, 2025. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated Draft Supplemental EIR comprise the Final Supplemental EIR, in accordance with CEQA Guidelines Section 15132.

1.1 FINAL SUPPLEMENTAL EIR ORGANIZATION

Chapter 1, Introduction. This chapter describes CEQA requirements and the content of this Final Supplemental EIR.

Chapter 2, Response to Comments. This chapter provides a list of agencies, organizations, and individuals commenting on the Draft Supplemental EIR; comments received during the public review period; and responses to comments.

Chapter 3, Revisions to the Draft Supplemental EIR. This chapter contains revisions to the Draft Supplemental EIR as a result of the comments received by agencies and interested persons, as

1. INTRODUCTION

described in Chapter 2, and/or errors and omissions discovered subsequent to release of the Draft Supplemental EIR for public review.

This document contains material and revisions that will be added to the text of the Draft Supplemental EIR. California Department of Parks and Recreation (Department, State Parks) staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft Supplemental EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft Supplemental EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in CEQA Guidelines Section 15088.5.

1.2 ENVIRONMENTAL REVIEW PROCESS

Pursuant to CEQA Section 21080(d) and CEQA Guidelines Section 15063, State Parks has determined that the proposed project could result in potentially significant environmental impacts and that a Supplemental EIR would be required. In compliance with CEQA Section 21080.4, State Parks released the Notice of Preparation of a Supplemental EIR for the proposed project to the public on June 16, 2025. The Notice of Preparation was posted to the Office of Land Use and Climate Innovation's State Clearinghouse and shared with interested agencies and people on June 23, 2025, for a 30-day State agency review period. A public scoping meeting was held on Thursday, July 10, 2025, at 6:00 p.m.

The Draft Supplemental EIR was made available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting Friday, October 17, 2025, and ending Monday, December 1, 2025.

This Final Supplemental EIR will be presented to the California State Park and Recreation Commission (Commission) for consideration of the certification as the environmental document for the proposed project. The public hearing will be held on July 2, 2026.

2. RESPONSE TO COMMENTS

Section 15088 of the California Environmental Quality Act (CEQA) Guidelines requires the lead agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft Supplemental Environmental Impact Report (EIR) and to prepare written responses.

This chapter provides all comments received on the Draft Supplemental EIR and the lead agency's responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes.

2.1 LIST OF COMMENTERS

Table 2-1, *List of Commenters*, lists the agencies, organizations, and individuals that provided comments on the Draft Supplemental EIR during the public review period.

Table 2-1 List of Commenters

Number Reference	Commenter	Date of Comment
Agencies		
AG1	California Department of Transportation (Caltrans)	December 1, 2025
AG2	California Department of Fish and Wildlife (CDFW)	December 3, 2025
Organizations		
ORG1	Audioguide.app	November 15, 2025
ORG2	Sierra Club	November 30, 2025
ORG3	Center for Biological Diversity (Center)	December 1, 2025
ORG4	Pacific Seabird Group (PSG)	December 1, 2025
Individuals		
IND1	Leslie Keedy	October 17, 2025
IND2	Matt Baldzikowski	December 1, 2025
IND3	Susan Kirks	December 1, 2025

2. RESPONSE TO COMMENTS

2.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review of and comment on Draft EIRs should be

. . . on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. . . . CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

The CEQA Guidelines further advises,

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence. (sec. 15204[c])

Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility. (sec. 15204[d])

This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section. (sec. 15204[e])

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be provided to those agencies at least 10 days prior to certifying the EIR.

2.3 TOPICAL RESPONSES

This section provides responses to reoccurring themes raised during the public review period for the Draft Supplemental EIR. To minimize duplication and provide a more comprehensive discussion, “topical responses” have been prepared. Each topical response begins with a summary of the relevant comments received. Responses to individual comments reference these topical responses as appropriate. Topical responses in this Final Supplemental EIR address the following issues:

1. Standards for Response to Comments
2. Old Growth Area and “Unburned Refugia”
3. Alternatives Analysis
4. Other Parks

2.3.1 Topical Response 1: Standards for Response to Comments

Often during review of an EIR, the public raises issues that relate to qualities of the project itself or the project’s consequences or benefits to the community, personal well-being and quality of life, and economic or financial issues (referred to here as “project merits”), rather than the environmental analyses or impacts and mitigations raised in the EIR. Several of the comments provided in response to the Draft Supplemental EIR express an opinion for or against aspects of the project itself, but do not address the adequacy of the analysis or conclusions in the Draft Supplemental EIR. Rather, these opinions relate to the merits of the project.

Consistent with State CEQA Guidelines Section 15204, *Focus of Review*, when submitting comments on Draft EIRs, the focus of review and comment of EIRs should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. Furthermore, Section 15204(c) outlines that reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence. The

2. RESPONSE TO COMMENTS

EIR is not meant to address the merits of the project and, as outlined in Section 15064, should instead focus on whether the project may have a significant effect.

Therefore, in accordance with State CEQA Guidelines Section 15204, the California Department of Parks and Recreation (Department, State Parks) is not required to respond to comments that express an opinion about the project merits and do not relate to environmental issues covered in the Draft Supplemental EIR. Although such opinions and comments on the project merits received as part of the EIR process do not require responses in the EIR, as previously noted, they do provide important input to the process of reviewing the project overall. Therefore, merits- and opinion-based comment letters are included in the EIR to be available for consideration by the decision makers at the merits stage of the project. State Parks may consider these letters and issues as part of their deliberations on the merits of the project and whether to adopt, modify, or disapprove the project.

2.3.2 Topical Response 2: Old Growth Area and “Unburned Refugia”

Comments from the Center for Biological Diversity (Center) and Pacific Seabird Group (PSG), a 501c3 non-profit organization composed of professional seabird researchers and managers dedicated to the study and conservation of seabirds (see Comment Letters ORG3 and ORG4, respectively) call for restricting public facilities and access in the old growth areas of Big Basin Redwoods State Park (BBRSP, park) because of their importance as nesting habitat for marbled murrelet; the vulnerability of this species, which has been magnified by the damage and loss of suitable habitat as a result of the CZU fire; and the potential direct and indirect effects of human activity on habitat suitability. Of particular concern are areas in old growth forest that they state were unburned—which actually burned but at relatively lower intensities—and may serve as essential nesting habitat for marbled murrelet given the high- and medium-intensity burn from the CZU fire in other areas of previously occupied habitat. These low- and medium-intensity burn areas occur in four areas on the valley floor along Blooms and Opal Creek and the east side of Middle Ridge. These areas have been mapped and are referred to as “Unburned Refugia” by PSG and the Center.

As indicated in the CZU Fire Burn Severity Map (see Figure 2-3, *CZU Fire Burn Severity Map*, in the Draft Supplemental EIR), very little of the park actually remained unburned by the CZU fire, but some locations did experience less intense crown or canopy damage within old growth habitat, which are captured in the four polygons mapped by PSG (see Exhibit 2 of Comment Letter ORG4).

Chapter 3, *Biological Resources Environmental Analysis*, of the Draft Supplemental EIR provides a detailed summary of the status of marbled murrelet at BBRSP and the larger Zone 6, corvid

2. RESPONSE TO COMMENTS

research and monitoring, and recent research and observations of human-related disturbance on this species.

The analysis in the Draft Supplemental EIR included a review of the effects of the CZU fire on habitat suitability for marbled murrelet at BBRSP. As indicated in Figure 3-7, *Important Murrelet Areas*, in the Draft Supplemental EIR, the Old Growth Area and Overnight Area are within the Important Murrelet Areas from the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6*, which serves as the marbled murrelet adaptive management plan for the BBRSP and other park units in Zone 6. Surveys and monitoring have verified that these old growth stands in BBRSP historically provided important nesting habitat for marbled murrelet and that some areas in the Old Growth Area are assumed to continue to be used for nesting in the core areas of forest habitat that underwent less severe intensity burns during the CZU fire.

The CZU fire burned over 97 percent of the BBRSP and dramatically altered its conditions, including loss of much of the complex old growth canopy that is important for marbled murrelet. The effects of the CZU fire on marbled murrelet nesting habitat in the park are substantial and—while there has been a recent decline in inland murrelet activity that could be attributed to the loss of nesting habitat—the full effect on the population may take years to be fully realized.

Appendix B, *Scoping Comments*, of the Draft Supplemental EIR contains the detailed comments that PSG provided on July 18, 2025, in response to the Notice of Preparation, as well as the comments provided by the Center on July 17, 2025, and by the California Department of Fish and Wildlife (CDFW) on July 18, 2025 (among other comment letters). All three of these letters provided important information and recommendations that were considered as part of the analysis in the Draft Supplemental EIR, refinement of the Standard Project Requirements (SPRs) developed to address potential adverse effects of the proposed project, and restrictions on public access and facility improvements. This included consideration of the mapping of the low-to moderate-severity burn areas referred to by PSG as “Unburned Refugia” by PSG in its July 18, 2025, letter and of the importance of establishing a no tree removal buffer of 100 meters and restricting facilities away from these areas. Recommendations from the 2024 Terrestrial Habitat Management Recommendations for Marbled Murrelets (THMRMM) that PSG and the Center requested be included as mitigation in the Draft Supplemental EIR include the following restrictions and management controls:

- A. No campgrounds, trails, waste management areas, or other public facilities be located within 0.8 kilometers (0.5 miles) of murrelet breeding habitat;
- B. Signs be posted in existing campgrounds or public facilities located in habitat, saying no feeding of wildlife, no excessive noise (particularly around dawn and dusk), and no eating while hiking on trails;

2. RESPONSE TO COMMENTS

- C. Use of existing campgrounds or recreation facilities be re-evaluated if existing habitat located within 0.8 kilometers becomes occupied by nesting murrelets;
- D. Long-term monitoring of predator densities be conducted at campgrounds and facilities near occupied habitat areas and, if necessary, mitigation measures be put in place along with development of an adaptive management plan;
- E. Wildlife-proof trash cans be used in all campgrounds and picnic areas and wildlife-proof food lockers installed at all campsites;
- F. Dishwashing stations be installed in all campgrounds;
- G. Hazard trees in or near habitat be evaluated and treated in consultation with a wildlife biologist;
- H. Trees proposed for removal or pruning in or near habitat be reviewed by a qualified forest health protection pathologist or a certified arborist;
- I. Human infrastructure threatened by hazard trees be considered for removal, relocation, and/or seasonal closure before removing the tree;
- J. Removal of active or historic marbled murrelet nest trees be avoided;
- K. Removal of large branches that may later support nests or nest sites or contribute to habitat characteristics be avoided wherever possible;
- L. Impacts to surrounding trees when felling hazard trees be avoided or minimized;
- M. Potential hazard trees be trimmed to create snag habitat, rather than felled entirely;
- N. All visual disturbance, sudden noises, novel noises, and noises > 90 dB associated with construction and other activities be avoided near nest sites throughout the breeding season and during dawn and dusk activity periods year-round;
- O. Burning not be conducted near murrelet nesting habitat during the nesting season.

The proposed project is designed to minimize and reduce potential impacts associated with recreational use to marbled murrelet as compared to the pre-fire park facilities. The proposed changes to recreational facilities as part of the proposed project would generally go beyond the management recommendations described in the 2024 THMRMM by relocating the majority of the park's campgrounds outside the Old Growth Area and substantially reducing structures and facilities in the Old Growth Area. The proposed project would also rebuild facilities to allow natural processes and management to occur throughout BBRSP, including increased use of prescribed fire to reduce the likelihood of future high-severity fires that could further reduce the complex canopy important for marbled murrelet. These key components of the proposed project would improve conditions for marbled murrelet as suitable habitat returns following the effects of the CZU fire, with additional controls and restrictions on recreational use in old growth habitat when compared to pre-fire conditions.

2. RESPONSE TO COMMENTS

Most of the 2024 THMRMM recommendations provided by PSG and the Center have been implemented as part of past and current management activities by the Department; are required to be reactivated as part of the “Crumb Clean” program and other practices; are consistent with best management practices from the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6*; are guidelines from the 2013 Big Basin Redwoods State Park General Plan (2013 General Plan), Hazard Tree Program, and other guidance; or are consistent with the Department’s SPRs. SPRs BIO-23, BIO-24, BIO-25 and BIO-26 have been revised to include specific language from these existing best management practices and the 2024 THMRMM recommendations, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, and Appendix C, *Biological Resources Standard Project Requirements (Revised)*, of this document.

Regarding the 100-meter buffer recommended by PSG around areas referred to as “unburned refugia,” a strict no-tree-removal buffer cannot be imposed because the Department needs to maintain flexibility in order to comply with applicable wildfire management policies (which may include fire fuel reduction, vegetation management, and prescribed burns) and the Hazard Tree Program (which may include hazardous tree removal). However, pursuant to SPR BIO-25, suitable nesting and screen trees would only be removed if they are Hazard Trees. Furthermore, as stated in SPR BIO-25, when Hazard Trees are evaluated for removal, options for addressing the hazard while allowing for retention of the tree will be considered.

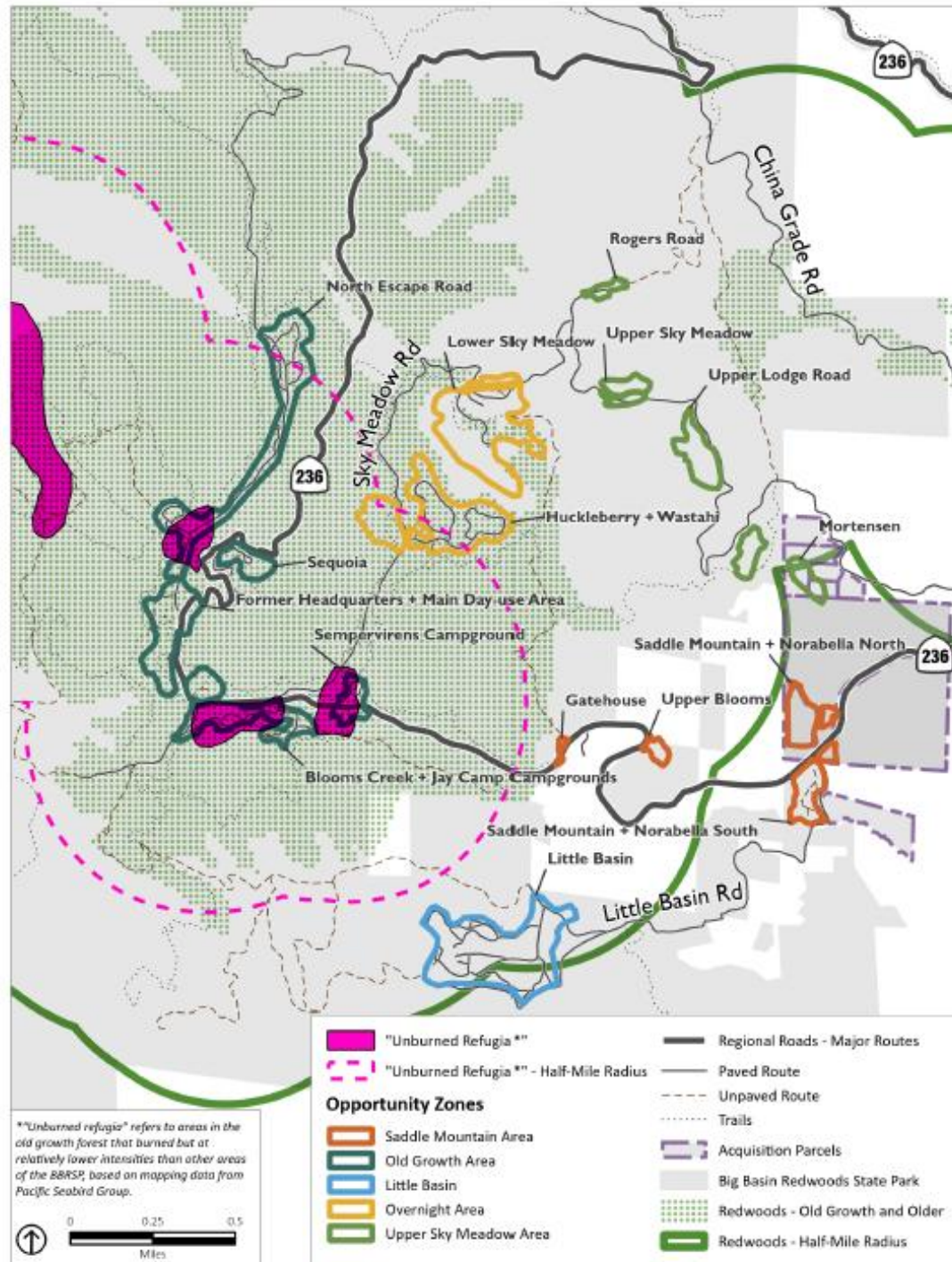
Additionally, the recommendation by PSG and the Center to provide no campgrounds, trails, waste management areas, or other public facilities within 0.8 kilometers (0.5 miles) of marbled murrelet breeding habitat is considered infeasible as it would essentially preclude public access to the old growth forest that spurred the formation of the BBRSP in the first place.

To show the implications of applying this half-mile setback restriction on the public access in BBRSP, Figure 2-1, *Old Growth Setbacks Relative to Proposed Park Zones and Sites*, is provided to show the half-mile setback from the areas mapped as “unburned refugia” by PSG, as well as from areas mapped as old growth and older forest.

As shown in Figure 2-1, a half-mile setback from the areas referred to as “unburned refugia” would encompass all of the Main Day Use Area and most of the Old Growth Area. These areas are the primary access point for most park visitors to experience the old growth forest in the park, walk the Redwood Loop Trail, and access the park’s trail system, including the Skyline-to-the-Sea Trail and trail to Berry Creek Falls. The area also includes over a mile of State Highway 236 and the park’s existing wastewater treatment plant. Eliminating all trails and other public facilities within this setback would eliminate the shuttle drop-off, the small day-use parking area, restrooms, and road and trail access in the Old Growth Area. Elimination of these public facilities would restrict all public access to see and experience the old growth redwoods, which would be inconsistent with the proposed project goals, the 2013 General Plan, the classification of the park unit as a State Park, and the park’s purpose.

2. RESPONSE TO COMMENTS

Figure 2-1 Old Growth Setbacks Relative to Proposed Park Zones and Sites



2. RESPONSE TO COMMENTS

When applied to all known old growth and older forest habitat, this setback would encompass most of the Focus Area and much of the BBRSP (see Figure 2-1). This includes several miles of State Highway 236, a major portion of the regionally important Skyline-to-the-Sea Trail, water and wastewater treatment facilities for the BBRSP, all of the Old Growth Area and Overnight Area, most of Little Basin and Upper Sky Meadow, and even parts of the Saddle Mountain Area of the BBFMP. This would essentially preclude most of the visitor experience historically available in the BBRSP. Further, it is infeasible to fully prevent people from entering this area so, even if visitor-serving facilities were not provided, visitors may use the area anyway. Additionally, the Department does not have jurisdiction over State Highway 236. Regardless of the proposed project, this highway would still be a source of noise within the old growth forest, as described in Appendix A, *Notice of Preparation and Initial Study*, of the Draft Supplemental EIR in Section XII, *Noise*.

The primary basis for the half-mile setback recommendation by PSG and the Center for restrictions on public access into marbled murrelet nesting habitat is the anthropogenic effects of public access on corvid abundance and a concern that this access results in a decrease in nesting success and habitat suitability for marbled murrelet. While marbled murrelet has evolved with the threat of predation by corvids and other predators, human food subsidies at campgrounds (particularly if uncontrolled by measures such as the park's Crumb Clean campaign), have been shown to directly influence jay populations and inflate the abundance of corvids in the surrounding area, which in turn presumably increases the threat to marbled murrelet when nesting in proximity to areas of public access (West and Peery 2017; West et al. 2019).

As discussed on page 3-45 of the Draft Supplemental EIR, the analysis in the Draft Supplemental EIR included a comprehensive review of data on marbled murrelet to expand upon the annotated bibliography contained in the 2013 General Plan and involved a review of available data from 2012 to present (2025). This literature review was contained in Appendix D, *Marbled Murrelet Literature Review (2012-2025)*, of the Draft Supplemental EIR, which included a chronological listing of each study and a brief summary or excerpt of salient information. As noted above, the recommendations from the PSG's 2024 THMRMM were considered during refinement of the Reimagining Big Basin Redwoods State Park Facilities Management Plan (BBFMP) and preparation of the analysis in the Draft Supplemental EIR; however, the document was inadvertently omitted from the list of reviewed documents in Appendix D of the Draft Supplemental EIR. Appendix D has been updated as part of this Final Supplemental EIR to reference the PSG's 2024 THMRMM, along with several other reports and studies relevant to marbled murrelet (see Appendix D, *Marbled Murrelet Literature Review (2012-2025) (Revised)* of this Final EIR).

The literature review conducted during preparation of the Draft Supplemental EIR confirmed assumptions on corvid abundance in areas of public access and that numerous studies have demonstrated how jay populations benefit from food subsidies within campgrounds. In

2. RESPONSE TO COMMENTS

response to inflated corvid populations, State Parks implemented a corvid management program that involved education, enforcement, and infrastructure improvements beginning in 2013, and research has indicated that jays became less abundant and consumed less human food subsidies as a result.

However, very limited information is available regarding how human-caused disturbance affects murrelets. Recent research and observations have focused on how noise (i.e., unwanted sound in an environment) can disturb murrelets by altering the behavior of nestlings and adults attending nests. Murrelets are generally sensitive to sound (Smith et al. 2023), and disturbance-causing noise could result in adverse impacts to murrelets when they are performing critical behaviors, such as feeding nestlings (USFWS 2020). If a nestling is fed an intermediate- or low-quality diet, it is estimated that just one missed feeding can adversely impact the nestling's development and survival (Nelson and Fitzgerald 2024). But these studies remain inconclusive over declines in marbled murrelet populations as a whole and whether there is a direct effect from increases in corvid predation or human-induced disturbance, perhaps in part because of the challenges in locating active nests in occupied habitat given the elusiveness of marbled murrelet (Felis et al. 2023; White et al. 2024).

As concluded in the Draft Supplemental EIR, it remains unclear whether visitor use associated with the BBFMP would have a substantial adverse effect on marbled murrelet. While a major focus of the 2013 General Plan guidelines for natural resource management is on protecting and improving conditions for marbled murrelet, and the 2014 settlement agreement between the Center and the Department laid out detailed controls and management strategies to reinforce those objectives, the available science is still inconclusive regarding both the factors influencing the stability of the marbled murrelet population in Zone 6 and the effects that visitor use and park activities have on the suitability of occupied habitat in BBRSP. This uncertainty is further compounded by the devastating effects of the CZU fire on habitat suitability in the BBRSP for marbled murrelet and the loss and destruction of potential nest trees and canopy screening, which is believed to be important in avoiding predation by corvids. A detailed review of the status and success of the numerous goals and guidelines related to marbled murrelet from the 2013 General Plan is provided on pages 3-58 to 3-62 of the Draft Supplemental EIR.

As previously stated, one of the primary goals of the proposed project is to relocate most of the overnight camping facilities outside of the old-growth forest habitats to further minimize potential adverse effects on marbled murrelet nesting habitat. This shift in the location of overnight camping facilities is consistent with the 2013 General Plan guidelines and will presumably improve conditions for marbled murrelet as suitable habitat returns following the effects of the CZU fire. Together with implementation of the SPRs that call for continued monitoring, restrictions on construction and management activities that could affect occupied habitat, and a comprehensive program to address the direct and indirect effects of public access on the suitability of marbled murrelet nesting habitat in the old growth forests of BBRSP, implementation of the proposed project would decrease the effects from human activity to

2. RESPONSE TO COMMENTS

marbled murrelet nesting habitat when compared to pre-fire conditions or if the park were to be rebuilt without the changes included in the proposed project. However, the uncertainty that led the Department to conclude that potential impacts on marbled murrelet were significant and unavoidable in its 2013 General Plan EIR remains under the proposed project. As concluded under Impact BIO-1 on page 3-63 of the Draft Supplemental EIR, due to the uncertainty in the scientific understanding of marbled murrelet and its status in the project area, potential impacts remain significant and unavoidable.

In summary, further restrictions on public access and facilities within the half-mile setbacks called for in recommendations by PSG and the Center are considered infeasible as they would preclude public access and visitor services to most of the Focus Area in the BBRSP, a primary responsibility of State Parks. Balancing the sometimes-conflicting issues of resource protection and public enjoyment of the BBRSP has been an important consideration during refinement of the BBFMP, particularly with regard to concerns over the protection of nesting habitat for marbled murrelet and the provision of limited access to the old growth redwood forest that characterizes the BBRSP.

2.3.3 Topical Response 3: Alternatives Analysis

Many comments expressed concerns regarding the extent of alternatives evaluated in the Draft Supplemental EIR and asserted that not all feasible alternatives that could avoid impacts to marbled murrelet were considered. Some comments state that the Draft Supplemental EIR failed to analyze an alternative that would avoid the negative impacts to marbled murrelets by fully protecting the “unburned refugia” and restricting all public access and facilities outside of these areas and a surrounding buffer of a one-half mile. This requested buffer distance is based on recommendations from the 2024 THMRMM by PSG. Additionally, other comments state that the Draft Supplemental EIR failed to analyze an alternative that would be similar to the proposed project, but without Sequoia Group Camp, the trail camp on North Escape Road, or picnic areas in the Old Growth Area.

Section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project, of the State CEQA Guidelines states:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no

2. RESPONSE TO COMMENTS

ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Chapter 4, *Alternatives*, of the Draft Supplemental EIR describes the alternatives to the proposed project that were considered and rejected and those that were selected for analysis. In response to comments requesting an alternative similar to the proposed project but without Sequoia Group Camp, the trail camp on North Escape Road, or picnic areas in the Old Growth Area, the Reduced Facilities Alternative was added to Section 4.3, *Alternatives Considered but Rejected*, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document. While the Draft Supplemental EIR does not evaluate every conceivable alternative to the proposed project, the Draft Supplemental EIR does, consistent with the State CEQA Guidelines, identify and evaluate a range of alternatives to the proposed project, several of which would, in contrast to the assertions of commenters, fully avoid old-growth habitat. Specifically, the Supplemental EIR describes the following alternatives:

- **Alternate No Project Alternative: No Rebuild.** As described in Chapter 4, *Alternatives*, of the Draft Supplemental EIR, an alternate “No Project Alternative” was considered under which BBRSP would remain in its existing condition. No new activities would occur to rebuild the park or restore it to its pre-fire conditions, aside from the safety improvements, minimal hazard abatement and restoration, and facilities already completed to partially reopen the park. As described on page 4-3 of the Draft Supplemental EIR, this alternative was not selected for analysis because it would not meet any of the project objectives and would not achieve the vision in the 2013 General Plan that is currently in effect. This alternative would not include rebuilding of campgrounds, picnic areas, staging areas, and trails that were destroyed during the CZU fire.
- **Alternate Site Alternative.** As described in Chapter 4, *Alternatives*, of the Draft Supplemental EIR, an alternative was considered under which the proposed project would be implemented on a different site. As described on page 4-4 of the Draft Supplemental EIR, this alternative was not selected for analysis because it would not meet the central purpose of the proposed project, which is to rebuild the BBRSP due to the damage that occurred from the CZU fire. This alternative would not rebuild the BBRSP in its current location.
- **Reduced Facilities Alternative.** As shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, the Lead Agency considered an alternative under which most of the proposed project would be implemented, but with reduced facilities in the Old Growth Area. This alternative was not selected for analysis because it is similar to an alternative analyzed in the Draft Supplemental EIR (Alternative C, *Old Growth Redwoods Avoidance Alternative*), but would not remove as many of the proposed project’s facilities from the old growth habitat as would be removed in Alternative C. In other words, the Reduced Facilities Alternative would include fewer facilities than the proposed project and more facilities than Alternative C. As such, the Reduced Facilities Alternative would not contribute any new considerations that would expand the range of alternatives evaluated in the Supplemental EIR. Therefore, the Reduced Facilities Alternative was not selected for analysis.

2. RESPONSE TO COMMENTS

- **Alternative B, Natural Preserve Alternative.** As described in Chapter 4, *Alternatives*, of the Draft Supplemental EIR, Alternative B was selected for analysis in the Draft Supplemental EIR and is similar to the alternative requested by many of the commenters. As described on pages 4-13 to 4-14 of the Draft Supplemental EIR, the purpose of Alternative B would be to protect the habitat within BBRSP that is important for biological resources, including nesting habitat for marbled murrelet in old growth habitat. Under Alternative B, the Focus Area of the proposed project within BBRSP would be reclassified as a Natural Preserve to protect the old growth redwood habitat and surrounding ecosystems. Under Alternative B, all existing facilities would be removed from the Focus Area. The BBRSP would not contain any day-use, overnight facilities, or parking infrastructure. Under Alternative B, campgrounds, picnic areas, and staging areas that were destroyed by the CZU fire in the Focus Area, including old growth habitat, would not be rebuilt. Therefore, this alternative would result in reduced visitation when compared to the proposed project. As stated on page 4-33 of the Draft Supplemental EIR, Alternative B is the environmentally superior alternative but would not meet most of the proposed project's objectives. This alternative has also been revised to remove all trails from the Focus Area, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, consistent with the recommendations of PSG in the 2024 THMRMM. This revision to Alternative B does not change the conclusions of the alternatives analysis in the Draft Supplemental EIR and does not change how this alternative's environmental impacts compare to those of the proposed project, nor does this revision change this alternative's ability to meet the proposed project's objectives.
- **Alternative C, Old Growth Redwoods Avoidance Alternative.** As described in Chapter 4, *Alternatives*, of the Draft Supplemental EIR, Alternative C was selected for analysis in the Draft Supplemental EIR. As described on page 4-22 of the Draft Supplemental EIR, the purpose of Alternative C would be to locate all development farther from areas with a greater potential to contain desirable marbled murrelet habitat. Alternative C would not incorporate development in areas with old growth redwood habitat; this would restrict facility development at the Old Growth Area and Overnight Areas opportunity zones. Thus, the Redwood Ecology Interpretation Center, the campfire center, approximately 170 campsites and 38 cabins, and approximately 250 parking stalls under the proposed project would not be included in Alternative C. Former campgrounds, picnic areas, and staging areas that were destroyed by the CZU fire in the old growth habitat in the Focus Area would not be rebuilt under this alternative, which would be mostly consistent with the recommendations of PSG in the 2024 THMRMM. Additional campsites, parking areas, and the interpretation and campfire centers could be provided at Saddle Mountain or the Upper Sky Meadow Area. As stated on page 4-44 of the Draft Supplemental EIR, Alternative C would significantly reduce the number of facilities provided at BBRSP when compared to the proposed project and would only partially meet some of the proposed project's objectives.

Further, some commentors imply that specifically requested alternatives, such as removing camping and picnic areas from the old growth habitat, would reduce impacts to marbled

2. RESPONSE TO COMMENTS

murrelet to less-than-significant levels. As discussed on page 3-63 of the Draft Supplemental EIR, given the uncertain nature of marbled murrelet research, a conclusive determination on the effects of the proposed project on this species cannot be made and is therefore assumed to be significant and unavoidable. Pages 3-62 to 3-63 of the Draft Supplemental EIR state:

2013 General Plan EIR concluded that, given the speculative nature of marbled murrelet research, a conclusive determination on the effects of implementing the 2013 General Plan could not be made. It was unclear what was impacting marbled murrelet at the time but, conversely, that there was no clear evidence demonstrating that the decline was as a result of park visitors in the old-growth forest. This lack of definitive information led the Department to make overriding findings for a significant unavoidable impact on the marbled murrelet population as a result of implementing the 2013 General Plan.

The comprehensive literature review [see Appendix D, *Marbled Murrelet Literature Review (2012-2025) (Revised)* of this Final EIR] conducted during preparation of this Supplemental EIR updates the review performed during preparation of the 2013 General Plan. As noted above, it provides no more definitive understanding of the complex factors affecting the status of marbled murrelet at BBRSP and throughout its range in Zone 6, including the effects of visitor use at BBRSP. The devastating loss and damage to forest habitat because of the CZU fire only complicates the challenges with understanding factors influencing the status of marbled murrelet at the park.

The conclusion in this Supplemental EIR that potential impacts on marbled murrelet are considered significant and unavoidable applies to any project in the Focus Area that includes improvements and activities in the old growth habitat; this determination is based on a variety of factors, including the uncertainty of available science, challenges facing the species, and the role of State Parks to balance resource protection and visitor services. The conclusion that potential impacts on marbled murrelet would be significant and unavoidable would apply to the alternatives provided in Chapter 4, *Alternatives*, of the Draft Supplemental EIR and other alternatives recommended by commentors, such as to specifically relocate the Sequoia Group Campground and trail camp out of the Old Growth Area and remove picnic areas from the Old Growth Area. Assertions by commentors that additional restrictions on proposed uses in the old growth habitat would mitigate potential impacts on marbled murrelet nesting habitat to a less-than-significant level are not based on measurable thresholds and disregard the greater context of anthropogenic effects and uncertainty regarding factors contributing to the vulnerability of this species in Zone 6. Thus, this Supplemental EIR identifies and evaluates a suitable range of alternatives to the proposed project, though none would reduce impacts on marbled murrelet to a less-than-significant level.

2.3.4 Topical Response 4: Other Parks

Some comments requested that State Parks minimize impacts on marbled murrelet at nearby parks and nesting areas outside of BBRSP, in part to address adverse effects of the proposed project on marbled murrelet habitat. Comments included a recommendation to strengthen protections for marbled murrelet habitat in other locations in US Fish and Wildlife Service Conservation Zone 6, including Butano and Portola State Parks. Under this scenario, effective protections may need to include relocating campgrounds and picnic areas out of old-growth habitat in these parks. Though these other park units within the Santa Cruz District are under the jurisdiction of the Lead Agency, restoration efforts outside of BBRSP are not within the scope of the proposed project or the project site evaluated in the Draft Supplemental EIR. Thus, these comments do not address the adequacy of the analysis in the Draft supplemental EIR, and no response is warranted.

As indicated in the discussion of the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6* discussed on pages 3-18 and 3-19 of the Draft Supplemental EIR, one of the best management practices includes working with the surrounding community outside of the State Parks to implement actions to reduce availability of food subsidies. This coordination continues as part of the marbled murrelet research and management called for in SPR BIO-26. However, this coordination effort with the surrounding community is not within the scope of the proposed project or the project site evaluated in the Draft Supplemental EIR.

2.4 COMMENTS AND RESPONSES

This section includes a reproduction of and response to each comment received during the public review period for the Draft Supplemental EIR. Comments are presented in their original form in Appendix E, *Draft Supplemental EIR Comment Letters*, and annotated to identify each comment number. Citations included in comment letters can be found in Appendix E.

Responses to individual comments are provided in this chapter following the text of each corresponding comment. Comments are arranged by category, date received, and name. Categories and their corresponding abbreviations are:

- Agencies (AG)
- Organizations (ORG)
- Individuals (IND)

2. RESPONSE TO COMMENTS

2.4.1 Comments from Agencies

AG1. California Department of Transportation, December 1, 2025

Comment AG1-01

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Draft Supplemental Environmental Impact Report (SEIR) for the Reimagining Big Basin Redwoods State Park Facilities Management Plan and General Plan Amendments dated October 2025. The proposed project is being prepared to guide the rebuilding, stewardship, management, and use of existing and future park facilities due to the 2020 CZU Lightning Complex Fire (CZU fire) which destroyed all park facilities. Caltrans offers the following comments:

Response AG1-01

This comment serves as an introduction to the comments that follow. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR. Please see Responses AG1-02 through AG1-05.

Comment AG1-02

General Comments

- Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development.

Response AG1-02

This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment AG1-03

Traffic Operations and Safety

- We request to review the detailed final site plans prior to the Caltrans Encroachment Permit Application submission.
- Please include the following in the site plans for review:

2. RESPONSE TO COMMENTS

- Parking lot sizes and locations.
- Pedestrian crossing locations and enhancements across the State Highway System (SHS).
- Vehicular turn-around locations if parking is full or if visitors do not want to pay the entry fee.
- Intersection improvements on the SHS.
- Proposed measures to prevent on-street parking at undesirable locations such as along the SHS.
- Contingency plan should parking lots and shuttles be full, such as signage providing motorist real time traffic conditions and guidance information.
- Pedestrian and bike path travel along or across the SHS connecting to staff housing, parking lot, shuttle stops, trailheads, and visitor center/concession.

Response AG1-03

Given the conceptual level of design in the proposed BBFMP, the details requested by the commenter are not yet available. The requirements for Caltrans' review of site plans are noted. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no further response is required.

Comment AG1-04

Permits:

- Please be aware that if any work is completed in the State's right-of-way it will require an encroachment permit from Caltrans, and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditions and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Response AG1-04

The information regarding Caltrans' permit process is noted. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment AG1-05

Thank you for the opportunity to review and comment on the proposed project. If you have any questions or need further clarification on the items discussed above, please contact me

2. RESPONSE TO COMMENTS

Response AG1-05

This comment serves as a conclusion to preceding comments. Please see Responses AG1-01 through AG1-04.

AG2. California Department of Fish and Wildlife, December 3, 2025

Comment AG2-01

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.

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.

Response AG2-01

This comment describes the role of the California Department of Fish and Wildlife (CDFW). This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment AG2-02

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 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,

2. RESPONSE TO COMMENTS

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.

Response AG2-02

This information regarding CDFW's regulatory requirements is noted. The list of required permits and approvals has been modified to include possible additional permits required through agency consultation, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to ensure all regulatory requirements described in the comment would be followed, as applicable.

Comment AG2-03

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

2. RESPONSE TO COMMENTS

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 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.

Response AG2-03

This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment AG2-04

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 directly [*sic*] 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

2. RESPONSE TO COMMENTS

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 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.”*

Response AG2-04

Chapter 3, *Biological Resources Environmental Analysis*, of the Draft Supplemental EIR provides a comprehensive summary of the status of marbled murrelet and the effects of the CZU fire on habitat suitability, and is provided together with information on the regulatory framework protecting sensitive resources in Section 3.1, Regulatory Framework, including information on potential take under the federal Endangered Species Act and California Endangered Species Act (CESA). The Department understands the consultation process with CDFW and USFWS and routinely consults with both agencies where proposed construction and management activities have a potential for take of occupied marbled murrelet habitat. SPR BIO-3 calls for consultation with appropriate resource agencies where warranted, depending on the listing or protection status of the resource, magnitude of the impact, and other factors. To reinforce the need for formal consultation requested by the commentor, SPR BIO-28 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to clarify that consultation

2. RESPONSE TO COMMENTS

with CDFW and USFWS would be required for projects that will affect marbled murrelet or their nesting habitat during the marbled murrelet breeding season.

Comment AG2-05

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 (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

Response AG2-05

The information provided by the commenter is noted. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment AG2-06

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.)

Response AG2-06

The information provided by the commenter is noted. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

2. RESPONSE TO COMMENTS

Comment AG2-07

CONCLUSION

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

Response AG2-07

This comment serves as a conclusion to preceding comments. Please see Responses AG2-01 through AG2-06.

2.4.2 Comments from Organizations

ORG1. Audioguide.app, November 15, 2025

Comment ORG1-01

Dear Brilliant members of the Administration of Big Basin Redwoods State Park,

We, from Audioguide.app, congratulate you for the efforts of repairing and reimagining Big Basin. As part of the process of development of the State Park, we would like to introduce our technological solution to increase your visitors' experience, bring more tourists to the area, and incentivize them to return.

Audioguide.app is a solution that describes touristic spots and historical places with audio in more than 50 languages instantly. Visitors scan Smart Tags[®] with their phones and are directed to the page of the description. No need to download anything. All for free.

Response ORG1-01

The information provided by the commenter is noted. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

ORG2. Sierra Club, November 30, 2025

Comment ORG2-01

These comments are submitted on behalf of the Sierra Club. The Sierra Club is a national, nonprofit conservation organization dedicated to the exploration, protection, and enjoyment of the wild places of the earth. With over 3.8 million members, online activists, and more than 400 local groups, the Sierra Club has a longstanding commitment to conserving the marbled

2. RESPONSE TO COMMENTS

murrelet and its old-growth habitat in California and throughout the West Coast through various Sierra Club chapter members.

The Sierra Club has the following comments on the Draft Supplemental Environmental Impact Report referenced above:

3. Biological Resource Environmental Analysis

The Sierra Club maintains that the Supplemental Environmental Impact Report (EIR) should pay particular attention to impacts to the endangered marbled murrelet. We encourage all measures to avoid, minimize, and mitigate impacts to this iconic old-growth-dependent species.

Response ORG2-01

This comment serves as an introduction to the comment letter and introduces the Sierra Club. Please see Responses ORG2-02 through ORG2-07. Consistent with the suggestion of the commenter, the Supplemental EIR is focused on potential impacts to marbled murrelet.

Comment ORG2-02

Marbled Murrelet Management and Conservation Guidelines (beginning at 3-11)

Murrelet 1: Consult with DFG and USFWS prior to initiating construction activities that may affect murrelets and/or their nesting habitat.

Comment Murrelet 1: Insufficient answer. The public is not aware of DFG and USFWS methods in protecting species during construction. There is not a description of the level of authority that DFG and USFWS will have here.

Questions: What are the best practices for protecting wildlife during construction in the State Parks? Will DFG and USFWS have decision and/or veto authority over State Parks construction practices? Is consulting with DFG and USFWS merely an advisory notification or will DFG and USFWS have authority?

Response ORG2-02

All General Plan guidelines described in the 2013 General Plan were included in the Draft Supplemental EIR as background information to provide the existing generalized guidelines for marbled murrelet management in BBRSP. These existing General Plan guidelines remain applicable to activities in the BBRSP and will apply to the proposed project; the proposed project does not include revisions to these existing guidelines. Under the proposed project, General Plan Guideline Murrelet 1 would continue to be followed and is supported by SPRs that aim to protect wildlife during construction.

2. RESPONSE TO COMMENTS

As part of the analysis of the Draft Supplemental EIR, the Department's existing SPRs were refined to address the potential adverse effects of the proposed project and provide more specific requirements for implementing the General Plan guidelines and protecting marbled murrelet.

Construction-related SPRs are included in Appendix C, *Biological Resources Standard Project Requirements (Revised)*, of this document. Specifically, SPR BIO-3 requires consultation with a biologist and appropriate resource agencies should construction result in unavoidable disturbance on a sensitive biological resource; SPR BIO-22 requires that setbacks related to active marbled murrelet nests and occupied habitat be established, based on coordination with CDFW and USFWS; and SPR BIO-28 states that, prior to initiating any project activity occurring during the marbled murrelet breeding season that will affect this species and/or their nesting habitat, consultation with CDFW and USFWS would be required to review and approve proposed survey methodologies, habitat assessments, and avoidance measures. Further, the Department would adhere to guidance and requirements developed in consultation with and approved by CDFW and USFWS for any work during the breeding season within a quarter mile of assumed occupied habitat, as required under SPR BIO-28.

Please also see Topical Response 2, *Old Growth Area and "Unburned Refugia,"* which explains in more detail that the proposed project involves the following strategies: relocation of most of the overnight camping facilities to areas outside of the old-growth forest habitats; adherence to the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6*, which serves as the marbled murrelet adaptive management strategy for the BBRSP and other park units in Zone 6; implementation of the SPRs that call for continued monitoring and protection of marbled murrelet; restrictions on construction and management activities that could affect occupied habitat; and a comprehensive program to address the direct and indirect effects of public access on the suitability of marbled murrelet nesting habitat in the old growth forests of BBRSP. Together, these strategies would decrease the effects from human activity to marbled murrelet nesting habitat when compared to pre-fire conditions or if the park were to be rebuilt without the changes included in the proposed project.

Comment ORG2-03

Murrelet 2: Control corvid populations and reduce the human influences that support unnaturally high corvid populations and concentrations in certain areas, especially in the Headquarters Area and Rancho del Oso; consider corvid management through direct removal when other control measures prove inadequate, and consult with experts on appropriate methods of corvid control and/or removal. Expand existing trash management measures noted above to include food storage lockers and animal-proof, user-friendly trash bins throughout Little Basin. Expand and emphasize the existing corvid management efforts by providing additional training to state park rangers and including corvid management as part of their regular duties.

2. RESPONSE TO COMMENTS

Comment Murrelet 2: Insufficient information on how State Parks will identify what constitutes an overpopulation of corvids in Big Basin.

Questions: What is the “safe” number of corvid species in the Big Basin State Park? What impacts to marbled murrelet sites will need to be identified in order to trigger further control methods? What methods will you use to severely reduce these predators?

Response ORG2-03

Please see Response ORG2-02 for a description of the General Plan guidelines. Under the proposed project, General Plan Guideline Murrelet 2 would continue to be followed and is supported by SPRs that provide specific requirements for controlling corvid populations.

Human food subsidies at campgrounds have been shown to directly influence the abundance of corvids in the surrounding area. Thus, SPR BIO-23 and SPR BIO-24 provide details regarding best management practices consistent with the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6*, which serves as the marbled murrelet adaptive management plan for BBRSP. Specifically, SPR BIO-23 continues the Crumb Clean Campaign and allows for active corvid removal to reduce predation pressure; and SPR BIO-24 outlines the interpretive programs provided to visitors about the Crumb Clean Campaign, including the integration of outreach materials into parking and shuttle reservation websites and verbal communication to visitors when arriving at parking areas, visitor facilities, and campgrounds. Though there is not a specific, numerical threshold regarding a “safe number of corvid species” (as requested by the commenter) at BBRSP, under SPR BIO-26, State Parks will conduct focused studies to examine movements and use of anthropogenic food subsidies by corvids. Through these studies, State Parks will evaluate the potential conflict these uses may have to the long-term viability of nesting habitat for marbled murrelet in the surrounding area. State Parks will also utilize long-term monitoring of habitat conditions to inform the need for adaptive management over time and additional controls on visitor use and access in occupied habitat, if appropriate.

Comment ORG2-04

Murrelet 3: Improve waste patrol and cleanup in visitor-use areas.

Comment Murrelet 3: Insufficient response to provide details on what that will include.

Question: How do the State Parks plan to maintain a consistent and much higher level of cleanliness in the visitor-use area?

Response ORG2-04

Please see Response ORG2-02 for a description of the General Plan guidelines. Under the proposed project, General Plan Guideline Murrelet 3 would continue to be followed and is supported by SPRs that provide specific waste control requirements. Specifically, SPR BIO-23 provides additional details regarding the Crumb Clean Campaign, which would reduce food and

2. RESPONSE TO COMMENTS

trash subsidies and provide the framework through which State Parks will maintain cleanliness throughout BBRSP.

Comment ORG2-05

Murrelet 4: Educate visitors about the threatened status of the marbled murrelet and why they should not feed wildlife. Update the current trash education program to include “keep it crumb-free” signage and updated interpretive materials.

Comment Murrelet 4: The Sierra Club supports community environmental education, especially on ways to protect our heritage wildlife.

Questions: What measure does the State Parks intend to use for violations to the Crumb Clean guidelines? What monitoring will there be to see if the education of visitors is effective?

Response ORG2-05

Please see Response ORG2-02 for a description of the General Plan guidelines. Under the proposed project, General Plan Guideline Murrelet 4 would continue to be followed and is supported by SPRs that provide the framework for visitor education. Specifically, SPR BIO-23 provides details regarding the Crumb Clean Campaign and existing corvid management efforts at BBRSP. Consistent with the recommendations for best management practices from the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6*, SPR BIO-23 outlines how the program would be enforced by park rangers patrolling campgrounds. Additionally, as required under SPR BIO-24, State Parks would use interpretive materials to educate visitors about the threatened status of marbled murrelet and goals of the Crumb Clean Campaign.

Comment ORG2-06

Murrelet 5: Minimize disturbances, trail building, and maintenance activities in old-growth redwood habitat, including the use of loud motorized equipment, during the marbled murrelet breeding season (March–September). natural grade of the stream as much as possible to maximize fish passage. *[Sic]*

Comment Murrelet 5: Inadequate response with regard to assessing whether minimized disturbances are sufficient.

Questions: How is the proper level of minimization determined? What assessment methods are proposed to determine if this minimization is sufficient?

Response ORG2-06

Please see Response ORG2-02 for a description of the General Plan guidelines. Under the proposed project, General Plan Guideline Murrelet 5 would continue to be followed and is supported by SPRs that outline specific requirements to minimize disturbance to marbled murrelet. Please see Topical Response 2, *Old Growth Area and “Unburned Refugia.”*

2. RESPONSE TO COMMENTS

Additionally, SPR BIO-26 provides specific protocols for determining marbled murrelet occupancy and appropriate level of minimization in consultation with regulatory agencies based on the project. In addition to deploying Audio Recording Units to passively monitor marbled murrelet presence, the Department would conduct in-person Audio-Visual (AV) surveys to confirm lack of occupancy in stands with marginal habitat. Appropriate restrictions would be developed and implemented where monitoring identifies a risk to an active marbled murrelet nest, and long-term monitoring of habitat conditions would be used to inform the need for adaptive management over time. SPR BIO-28 states that if, after appropriate consultation with CDFW and USFWS, limited activities are allowed during the marbled murrelet breeding season in occupied habitat, work activities would not begin until two hours after sunrise and would cease two hours before sunset each day. Appropriate worker training, vehicle access restrictions, maintenance of a clean site through daily trash removal, and other best management practices would be used to minimize disturbance and avoid attracting corvids and other predatory species.

Comment ORG2-07

Murrelet 7: Where possible, consider relocating camping and/or picnic facilities or rotating use in areas with marbled murrelet habitat.

Comment Murrelet 7: Inadequate response. No assessment criteria or trigger level is stated. No definitive statement is made that camping would be relocated if sufficient impacts are seen. Questions: Will the mentioned relocations occur if significant impacts are observed? What assessment methods are proposed to determine if significant impacts are occurring?

Response ORG2-07

Please see Response ORG2-02 for a description of the General Plan guidelines. Under the proposed project, General Plan Guideline Murrelet 7 would continue to be followed and is supported by additional SPRs that provide the framework for relocating facilities. Please see Topical Response 2, *Old Growth Area and "Unburned Refugia,"* and Topical Response 3, *Alternatives Analysis*. Specifically, SPR BIO-26 provides details regarding long-term monitoring; focused studies; and restrictions where monitoring identifies a risk to an active marbled murrelet nest, which could include temporary restrictions on public access to campgrounds, picnic areas, staging areas, trails, and other facilities to minimize risks to active marbled murrelet nests. Additionally, the proposed project includes permanently relocating most of the campgrounds out of the areas with marbled murrelet nesting habitat and rebuilding the campgrounds around the overnight area on Sky Meadow Road.

Comment ORG2-08

It is clear from the Draft Supplemental EIR that significant impacts to marbled murrelet habitat are associated with human activity. Despite the proposed management guidelines, there is a

2. RESPONSE TO COMMENTS

lack of discussion of assessment of impacts and a possibility of triggering a substantial change to human visitation patterns.

The effectiveness of the mitigation measures remains uncertain due to incomplete scientific understanding of the factors influencing marbled murrelet populations and the impacts of the CZU fire on their habitat. Stakeholders have voiced concerns about the adequacy of current actions, recommending further refinements such as relocating the Sequoia Group Campground outside the Old Growth Area, creating larger buffer zones, enhancing corridor management programs, and strictly avoiding construction activities during the breeding season. The Draft Supplemental Environmental Impact Report ultimately concludes that the impact on the marbled murrelet is "significant and unavoidable," underscoring the need for ongoing research and monitoring to improve conservation strategies and ensure robust protection for the species.

Thank you for your service and commitment to the quality of our State Parks.

Response ORG2-08

This comment serves as a conclusion to preceding comments. Please see Responses ORG2-02 through ORG2-07. The same scientific uncertainty that led the Department to conclude that potential impacts on marbled murrelet were significant and unavoidable in its 2013 General Plan EIR remains under the proposed project. Consistent with the comment, as stated on page 3-63 of the Draft Supplemental EIR, "due to the uncertainty in the scientific understanding of marbled murrelet and its status in the project area, it cannot be determined at this time whether the proposed project's impact can be considered less than significant." However, the proposed project would relocate most of the camping out of the marbled murrelet nesting habitat, and would implement the SPRs that call for continued monitoring and restrictions on construction and management activities that could affect occupied habitat. The SPRs also include a comprehensive program to address the direct and indirect effects of public access on the suitability of marbled murrelet nesting habitat in the old growth forests of BBRSP. Given these components of the proposed project and the SPRs, implementation of the proposed project would decrease the effects from human activity to marbled murrelet nesting habitat when compared to pre-fire conditions or if the park were to be rebuilt without the changes included in the proposed project.

ORG3. Center for Biological Diversity, December 1, 2025

Comment ORG3-01

These comments on the Draft Supplemental Environmental Impact Report for the Reimagining Big Basin Redwoods State Park Facilities Management Plan and General Plan Amendments ("DSEIR") are submitted on behalf of the Center for Biological Diversity ("Center"). The Center is

2. RESPONSE TO COMMENTS

a national, nonprofit conservation organization dedicated to the protection of endangered species and wild places with more than 1.8 million members and online activists. The Center has a long history of working to protect the marbled murrelet and its old-growth habitat in California and across the range, including our 2014 settlement agreement with State Parks requiring increased protections for marbled murrelets under the Big Basin Redwoods State Park General Plan.

Marbled murrelets in U.S. Fish and Wildlife Service Conservation Zone 6 (San Francisco Bay to Point Sur in central California) are highly endangered. This genetically distinct population was estimated at only 650 individuals as of 2017¹ and between 266-408 individuals during 2018-2023.² Primary threats to this population are predation by unnaturally high densities of corvid nest predators and continued destruction and degradation of old-growth nesting habitat.³ Big Basin Redwoods State Park (“Big Basin SP”) provides critically important habitat because it supports the largest remaining stand of old-growth redwoods left in the Santa Cruz Mountains and has a high concentration of known murrelet nest trees.⁴ While the CZU Fire killed most large Doug fir trees in Big Basin SP, almost all (~97%) redwood trees in the Park survived the fire. Given the rarity of old-growth habitat and precarious status of the Zone 6 murrelet population, the old-growth habitat in Big Basin SP requires full protection. Every last mature and old-growth tree is important and must be protected. Mitigation measures to avoid or reduce impacts to marbled murrelets from nest predators, habitat degradation, and other threats must be specific, comprehensive, and robust over time.

Response ORG3-01

This comment introduces the Center for Biological Diversity (Center) and marbled murrelets in BBRSP. Chapter 3, *Biological Resources Environmental Analysis*, of the Draft Supplemental EIR provides a comprehensive summary of the status of marbled murrelet, the effects of the CZU fire on habitat suitability, and conclusion regarding the project controls and SPRs that would serve to address potential impacts on marbled murrelet. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment ORG3-02

The Big Basin Facilities Management Plan (“Facilities Plan”) will have significant adverse impacts on marbled murrelets that are not adequately avoided, minimized, or mitigated by the proposed plan or current set of avoidance and mitigation measures in the SDEIR. As State Parks is aware, it must comply with CEQA’s substantive mandate that requires effective avoidance and consideration of alternative, minimization and mitigation. “[P]ublic agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Pub. Res. Code § 21002.) While the SDEIR identifies many ways in which the Facilities Plan will significantly impact marbled murrelets, it has failed to consider all feasible alternatives that

2. RESPONSE TO COMMENTS

could avoid those impacts or to consider all feasible minimization and mitigation measures that could substantially lessen the Project's significant impacts. (Pub. Res. Code §§ 21002.1(a), (b), 21100(b)(3), (4), 21081(a)(1); 14 C.C.R. §§ 15021(a)(2), 15091(a)(1).)⁵

Response ORG3-02

The comment serves as an introduction to the comments that follow. Please see Responses ORG3-03 through ORG3-23. As discussed on page 3-63 of the Draft Supplemental EIR, given the uncertain nature of marbled murrelet research, a conclusive determination on the effects of the proposed project on this species cannot be made and is therefore assumed to be significant and unavoidable. This conclusion that potential impacts on marbled murrelet would be significant and unavoidable would apply to any project in the Focus Area that includes public access to the old growth habitat in BBRSP given the uncertainty of available science, challenges facing the species, and role of State Parks to balance resource protection and visitor services. Please also see Topical Response 3, *Alternatives Analysis*. Section 15126.6 of the State CEQA Guidelines states that an EIR shall describe a range of reasonable alternatives to the project. Section 15126.6(a) acknowledges, "An EIR need not consider every conceivable alternative to a project." It would be infeasible to identify and analyze every possible alternative that could lessen the significant effects of the proposed project. As described in Topical Response 3, *Alternatives Analysis*, Chapter 4, *Alternatives*, of the Draft Supplemental EIR describes the range of alternatives to the proposed project that were selected for analysis. Under Alternative B, *Natural Preserve Alternative*, all facilities would be removed from the Focus Area for the purpose of protecting the habitat within BBRSP that is important for biological resources, including nesting habitat for marbled murrelet in old growth habitat. This alternative closely resembles the alternative requested by the commenter. Thus, the alternative requested by the commenter is within the range of alternatives evaluated in Chapter 4, *Alternatives*, of the Draft Supplemental EIR. As described in Topical Response 3, the Department must balance conflicting issues, and selecting this alternative over the proposed project would be inconsistent with the proposed project goals, the 2013 General Plan, the classification of the park unit as a State Park, and the park's purpose.

Comment ORG3-03

We strongly support the Facilities Plan proposal to not re-build the Blooms Creek, Sempervirens, and Jay Camp campgrounds in the "Old Growth Area" and instead provide camping facilities in the "Overnight Area" outside of redwood habitat.

Response ORG3-03

The opinion of the commenter is noted. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

2. RESPONSE TO COMMENTS

Comment ORG3-04

However, the SDEIR fails to consider alternatives that would avoid significant impacts to the marbled murrelet including relocating the Sequoia Group Campground and trail camp out of the Old Growth Area, and preventing construction of picnic areas in the Old Growth Area, despite comments requesting these alternatives be considered.

Response ORG3-04

Please see Topical Response 3, *Alternatives Analysis*, and Response ORG3-02. Alternative B and Alternative C analyzed in this Supplemental EIR would both exclude the Sequoia Campground, the trail camp on North Escape Road, and the picnic areas in the Old Growth Area, as described in Chapter 4, *Alternatives*, of the Draft Supplemental EIR. The description of Alternative C has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to clarify that the picnic areas in the Old Growth Area would not be included in Alternative C. The conclusion that potential impacts on marbled murrelet would be significant and unavoidable applies to any version of reuse of the Focus Area, including the alternative recommended by the commentor to relocate the Sequoia Group Campground and trail camp out of the Old Growth Area and prevent picnic areas in the Old Growth Area, as well as the alternatives evaluated in Chapter 4, *Alternatives*, of the Draft Supplemental EIR. Concluding that these additional restrictions on proposed uses in the old growth habitat would mitigate potential impacts on marbled murrelet nesting habitat to a less-than-significant level, as suggested by the commenter, is not based on a measurable threshold and disregards the anthropogenic influences of public access to other areas under the BBFMP and uncertainty regarding factors contributing to the vulnerability of this species in Zone 6.

Comment ORG3-05

In addition, we are concerned that the SDEIR does not incorporate the recommendations in the Pacific Seabird Group's 2024 *Terrestrial Habitat Management Recommendations for Marbled Murrelets* "(PSG Habitat Recommendations)"⁶ authored by marbled murrelet experts or adequately incorporate the avoidance and mitigation measures in the July 18, 2025, letter from California Department of Fish and Wildlife ("CDFW").⁷

Response ORG3-05

Please see Topical Response 2, *Old Growth Area and "Unburned Refugia"* and Topical Response 3, *Alternatives Analysis*. Recommendations contained in the PSG's 2024 THMRMM were considered as part of the analysis in Chapter 3, *Biological Resources Environmental Analysis*, of the Draft Supplemental EIR and to refine the SPRs developed to address potential adverse effects of the proposed project. The document was inadvertently omitted from the list of reviewed documents in Appendix D of the Draft Supplemental EIR. Appendix D has been

2. RESPONSE TO COMMENTS

updated as part of this Final Supplemental EIR to reference the PSG’s 2024 THMRMM, along with other reports and studies relevant to marbled murrelet shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document.

Comment ORG3-06

As detailed below, the SDEIR is inadequate in several ways and must be revised to ensure avoidance, minimization, and mitigation measures are fully considered, and proposed alternatives and mitigation measures are strengthened to adequately avoid significant impacts and mitigate key threats to marbled murrelets.

Response ORG3-06

The comment serves as an introduction to the comments that follow. Please Responses ORG3-07 through ORG3-23. Please also see Topical Response 2, *Old Growth Area and “Unburned Refugia”* and Topical Response 3, *Alternatives Analysis*.

Comment ORG3-07

1. State Parks should avoid impacts to marbled murrelets by not constructing the Sequoia Group Campground and trail camp in the Old Growth Area.

The Center’s NOP comments highlighted the impacts to marbled murrelets that would result from the proposal to re-construct the Sequoia Group Campground with the capacity for 100 campers in the Old Growth Area. The Center recommended that State Parks re-locate the group camping capacity from the Sequoia Campground to the “Overnight Area” or another area outside of the Old Growth Area as part of the proposed project or, at minimum, include an alternative that is fully analyzed in the SDEIR to avoid impacts to marbled murrelets in this area.

These avoidance measures were not even considered in the SDEIR and, therefore, the environmental review is inadequate. Instead, the Facilities Plan retained the proposal to reconstruct the Sequoia Group Campground in the heart of the Old Growth Area: “Sequoia Campground would be reconstructed similar to its pre-fire design. This includes two group campsites, each with capacity to hold 50 people.”⁸ The SDEIR failed to analyze any alternative that could avoid the inevitable negative impacts to marbled murrelets of re-constructing this campground in old-growth murrelet habitat, and also failed to provide proposed measures that could adequately minimize or mitigate these impacts.

Abundant scientific studies – including State Parks’ 2017 *Marbled Murrelet Landscape Management Plan for Zone 6* (“MMLMP”) – establish that campgrounds in Big Basin SP pose a threat to marbled murrelets by supporting unnaturally high densities of murrelet nest predators, primarily Common Ravens and Steller’s Jays, due to the availability of anthropogenic

2. RESPONSE TO COMMENTS

food sources.⁹ State Parks' MMLMP states that evidence "suggest that campgrounds in Big Basin Redwoods State Park serve as 'source' habitats for Steller's jays on the landscape, which ultimately impact murrelets..."¹⁰ Further, "moving campgrounds and associated anthropogenic food resources out of marbled murrelet nesting habitat during the breeding season may be an effective long-term management strategy for reducing subsidies to jays in these areas."¹¹ Importantly, a study by Brunk et al. (2021) in Big Basin SP found that "Steller's jay density is high in subsidized campground areas" and "limiting anthropogenic subsidies can successfully reduce generalist predator populations" (i.e., Steller's jay populations).¹²

Not only is the proposed Sequoia Group Campground within the heart of old-growth habitat, but it is also within a half mile of three of the four stands of unburned old-growth in Big Basin SP.¹³ The importance of fully protecting these remaining unburned old-growth habitat "refugia" cannot be over-stated. Yet the proposed re-opening of the Sequoia Group Campground will almost certainly increase food subsidies and nest predator densities in the Old Growth Area, including these unburned habitat refugia. As stated in the MMLMP, Steller's jays in the Santa Cruz Mountains "move up to 2 km (1.24 miles) to visit campgrounds and picnic areas."¹⁴ This campground will also increase harmful noise impacts to marbled murrelets.¹⁵

Response ORG3-07

Please see Topical Response 2, *Old Growth Area and "Unburned Refugia,"* Topical Response 3, *Alternatives Analysis*, and Response ORG3-04. As described in Chapter 4, *Alternatives*, of the Draft Supplemental EIR, two alternatives (Alternative B and Alternative C) were evaluated that would not include camping at Sequoia Campground.

Comment ORG3-08

The SDEIR also states that a trail camp will be re-constructed in the Old Growth Area: "A small trail camp with water, vault restroom, and dishwash station would be located approximately 0.75 miles beyond the road's southern access gate."¹⁶ The SDEIR impermissibly provides no further information about the trail camp, including the number of sites, and provides no alternatives, making it impossible to fully assess the impacts of the trail camp or how these impacts can be avoided.

Response ORG3-08

The section describing facilities at North Escape Road, under "Old Growth Area" of Section 2.3.2, *Proposed Park Facilities*, has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide additional details regarding the proposed trail camp and picnic areas along North Escape Road. For a discussion of alternatives without these facilities, please see Topical Response 3, *Alternatives Analysis*. As described in Chapter 4,

2. RESPONSE TO COMMENTS

Alternatives, of the Draft Supplemental EIR, two alternatives (Alternative B and Alternative C) were evaluated that would not include the trail camp.

Comment ORG3-09

Importantly, the PSG Habitat Recommendations recommend avoiding placing campgrounds within a half-mile of murrelet habitat to reduce impacts from nest predators and recreation:

“Reduce, and where possible avoid, the placement of recreational features within and near (e.g., within 0.8 km [0.5 mi] of) habitat, including but not limited to construction of new *campgrounds*, picnic areas, off-highway vehicle staging areas, trailheads, and trails.”¹⁷

Reconstructing the Sequoia Group Campground and trail camp in the heart of the Old Growth Area and within a half-mile of unburned habitat refugia is counter to these PSG recommendations and would negatively impact marbled murrelets. The proposal to institute Crumb Clean measures at these campgrounds as minimization and mitigation measures, does not relieve State Parks of the need to first examine alternatives that would *avoid* the significant impacts to the marbled murrelets, by relocating the campground and trail camp at least one half-mile from marbled murrelet old-growth habitat. The efficacy of the Crumb Clean campaign in reducing predation of marbled murrelet eggs and chicks is still undetermined and cannot be relied on to reduce significant impacts of siting campgrounds within the Old Growth Area.

The SDEIR is flawed in failing to assess the impacts to marbled murrelets of placing campgrounds in Old Growth Area and failing to consider an alternative that prevents the construction of any campgrounds in the Old Growth Area.

Response ORG3-09

Please see Response ORG3-04. Please also see Topical Response 2, *Old Growth Area and “Unburned Refugia”* and Topical Response 3, *Alternatives Analysis*.

Comment ORG3-10

2. State Parks should avoid impacts to marbled murrelets by not building picnic areas in the Old Growth Area.

State Parks in the Facilities Management Plan proposes to build multiple picnic areas in the Old Growth Area.¹⁸ The SDEIR states that “two group picnic areas would be reconstructed with vault toilets, potable water, dishwasher stations, and wildlife-proof trash and recycling containers along North Escape Road and at Gazos Road near the intersection with North Escape Road, with visitor parking included at each location.”¹⁹ In addition, “the former Blooms Creek Campground would also have a “dry walk-in picnic areas with wildlife-proof trash and recycling containers.”²⁰ No alternatives are provided in the SDEIR that would avoid the significant impacts of these proposals on marbled murrelets.

2. RESPONSE TO COMMENTS

Scientific research shows that picnic areas provide food subsidies for murrelet nest predators, lead to increased corvid densities, and negatively impact murrelets. For example, State Parks' MMLMP states that "[a] key to reducing corvid impacts will likely require reducing predation rates in state and county parks that contain unnaturally high raven and jay densities due to the availability of anthropogenic food sources in campgrounds, *picnic areas*, and day use areas."²¹ The PSG Habitat Recommendations state that "[w]hile campgrounds are a known problem, other developments such as trailheads, off-highway vehicle staging areas, target shooting lanes, and *picnic areas* are also of concern."²²

The PSG Habitat Recommendations recommend *avoiding* placing picnic areas within a half-mile of murrelet habitat: "Reduce, and where possible avoid, the placement of recreational features within and near (e.g., within 0.8 km [0.5 mi] of) habitat, including but not limited to construction of new campgrounds, *picnic areas*, off-highway vehicle staging areas, trailheads, and trails"²³ State Parks' proposal to build multiple picnic areas in the Old Growth Area is directly counter to this recommendation. In addition, many of these picnic areas would be within a half-mile of three of the four unburned old-growth habitat refugia for murrelets. Similar to campgrounds discussed above, any proposal to implement Crumb Clean measures at picnic sites as minimization and mitigation measures, does not relieve State Parks of the need to first examine alternatives that would *avoid* the significant impacts to the marbled murrelets, by not building the picnic sites, or by locating the picnic sites at least one half-mile outside of marbled murrelet habitat old-growth habitat. The efficacy of the Crumb Clean campaign in reducing predation of marbled murrelet eggs and chicks is still undetermined and cannot be relied on to reduce significant impacts of siting picnic areas within the Old Growth Area.

The SDEIR is flawed in failing to assess the impacts to marbled murrelets of placing picnic sites in Old Growth Area and failing to consider an alternative that prevents the construction of any picnic sites in the Old Growth Area.

Response ORG3-10

Please see Response ORG3-04. Please also see Topical Response 2, *Old Growth Area and "Unburned Refugia"* and Topical Response 3, *Alternatives Analysis*. As described in Chapter 4, *Alternatives*, of the Draft Supplemental EIR, two alternatives (Alternative B and Alternative C) were evaluated that would not include picnic areas in the Old Growth Area.

Comment ORG3-11

3. Bio-23 must be more specific to provide effective mitigation.

Mitigation Measure Bio-23 states "To improve habitat conditions for marbled murrelet, appropriate management activities such as the Crumb Clean Campaign and improved waste

2. RESPONSE TO COMMENTS

patrol and cleanup in visitor-use areas will continue to be implemented by DPR to control corvid food sources and the risks these species pose to marbled murrelet breeding success.”²⁴

This mitigation measure is too vague. Reducing food and trash food subsidies for corvid predators is a priority conservation action for marbled murrelets, and the mitigation measures must be specific. Mitigation measures should include the Best Management Practices in the MMLMP regarding Food and Trash Subsidies and Enforcement, which include the following:

Reduce/Eliminate Food and Trash Subsidies

- All trash receptacles should be animal proof
- Trash receptacles should not be allowed to overflow (emptied regularly)
- Garbage trucks will housed where animals cannot gain access
- Animal proof food storage lockers will be installed in all campsites
- Dishwashing stations will be installed in all campgrounds
- Water spigots will have grates installed which allow food to fall out of reach of predators
- Water spigots will have a no dishwashing sign on them
- The Camp-dishes 101 sign will be placed throughout the campground²⁵

Enforcement

- Campgrounds will be patrolled by park rangers first thing in the morning for enforcement
- Campgrounds will be patrolled by interpretive rangers in the evening cooking hour for interpretive education ²⁶

Response ORG3-11

The best management practices referred to by the commentor are listed in the review of the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6* on pages 3-18 and 3-19 of the Draft Supplemental EIR. These best management practices are implemented as part of on-going practices of the Department and would continue as part of implementation of the proposed project. Further, SPR BIO-23 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide the requested additional details regarding best management practices to control corvid food sources and the risks these species pose to marbled murrelet breeding success, as well as the other practices related to active corvid removal, forest management, noise management and working with the surrounding community to implement actions to reduce the availability of food subsidies and their influence on corvid population abundance and distribution.

Comment ORG3-12

4. Bio-24 must be more specific to provide effective mitigation.

Mitigation Measure BIO-24 states “Interpretive programs to educate visitors about the threatened status of marbled murrelet and why they should not feed wildlife will continue.”²⁷

This mitigation measure is too vague and should include the Best Management Practices in the MMLMP regarding Interpretive Messaging, which include the following:

Interpretive Messaging

- Begins during campsite check-in, campers will sign the Crumb Clean Commitment
- All food lockers will have the Keep it Crumb Clean sign on them
- All trail heads will have the Keep it Crumb Clean at their entrance
- All Kiosks will have the Keep it Crumb Clean sign on them
- The Crumb Clean Campaign will be used at all park facilities
- All campers will watch the marbled murrelet video prior to securing a reservation
- Each picnic table will have the Keep it Crumb Clean sign
- The murrelet will be a feature during every campfire talk
- The murrelet will be mentioned during all junior ranger programs, interpretive walks/talks and interactions
- Murrelet materials like stickers and magnets will be given out to help raise awareness and support for the murrelet.²⁸

Response ORG3-12

Please see Response ORG3-11. Further, SPR BIO-24 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide additional details regarding interpretive programs to educate visitors about the threatened status of marbled murrelet.

Comment ORG3-13

5. BIO-25 does not provide adequate protection for marbled murrelet nesting habitat.

Mitigation Measure BIO-25 states: “Trees determined to have suitable elements for nesting by marbled murrelet and screen trees important for nest protection will be retained.”²⁹ This vague mitigation measure does not provide adequate protection for marbled murrelet habitat and does not sufficiently incorporate the mitigation measures for marbled murrelet habitat avoidance specified in the July 18, 2025, letter from CDFW.³⁰

2. RESPONSE TO COMMENTS

All old-growth habitat in Big Basin SP is rare and should be protected as potential current and future suitable murrelet nesting habitat. Second-growth redwood habitat should also be protected based on its potential to develop into future suitable nesting habitat. Although the CZU Fire significantly altered forests throughout the Park, the old-growth habitat areas retain currently suitable nest trees and screen trees for murrelets, and trees that will become suitable nest and screen trees over time, all of which should be protected. Suitable nest trees in the old-growth habitat include unburned trees and burned mature and old-growth trees that lost their large limbs in the fire but that currently provide suitable nesting platforms through broken tops or large branch stubs.³¹ In addition, all remaining mature and old-growth trees are critical for providing screening for nest trees, particularly through the vigorous post-fire epicormic branching of redwoods occurring in the Park³²; for increasing forest stand integrity; for avoiding edge effects; and because redwood and Doug Fir trees that do not currently have “suitable nesting elements” will develop large branches and broken tops suitable for nesting over time. Researchers do not yet know how long it will take mature and old-growth trees to re-grow branches large enough for nesting, and how marbled murrelets will use the post-fire habitat in the Park. There may be surprises such as the successful fledging of a murrelet chick from a burned tree that “lacked both vertical and horizontal branches that provide screening cover, and was much more visible than is typical” in the Old Growth Area post-fire in 2021.³³

The SDEIR mitigation measure should specify that all mature and old-growth trees throughout Big Basin SP should be protected and retained, not just trees determined to *currently* have suitable elements for nesting or *currently* be screen trees. This is consistent with the recommendations of the CDFW. The CDFW provided a broad definition of “suitable habitat characteristics” for marbled murrelets that include all mature and old-growth coniferous forest stands: “[s]uitable habitat characteristics [for marbled murrelets] shall be defined as mature and old-growth coniferous forest stands, and younger coniferous forest stands having platforms with a relatively flat surface at least 10 centimeters in diameter and 10 meters high in the live crown of a coniferous tree. Platforms can be created by a wide bare branch, moss or lichen covering a branch, mistletoe, witches’ brooms, and other deformities, or structures such as squirrel nests (Pacific Seabird Group 2024).”³⁴ The CDFW then specified a series of mitigation measures for marbled murrelet nesting habitat avoidance (Mitigation Measure 3) that include restrictions on tree removal that are not incorporated into the SDEIR.³⁵ The SDEIR must fully incorporate these CDFW recommended mitigation measures.

Response ORG3-13

SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide additional details regarding the protection of mature and old-growth trees in occupied habitat that are suitable as nesting or screen trees unless they are considered a Hazard Tree. The evaluation for Hazard Tree removal is also provided in SPR BIO-25 to prevent the unintended and unnecessary removal of trees that may serve as murrelet nest trees now or in the future.

Comment ORG3-14

6. The SDEIR must add mitigation measures related to hazard tree management to prevent harm to murrelets.

The PSG Habitat Recommendations include an extensive set of recommendations for hazard tree management that should be included in the SDEIR mitigation measures to prevent the unintended and unnecessary removal of trees that may serve as murrelet nest trees now or in the future. As stated in the PSG Recommendations:

Periodically, mature and old-growth trees, that may serve as murrelet nest trees, are designated by land managers as **Hazard Trees** when they might be in danger of falling on structures.... In such circumstances, they are often removed or their large branches are pruned off. We are concerned about their removal as these hazard trees may contain or contribute to suitable murrelet nest sites. We recommend an approach whereby the risks of potential hazard trees are duly evaluated, including whether the resources at risk can be relocated or removed, whether potential hazard trees can be left untouched, or large branches pruned off rather than felling the tree. Mitigation measures within and near habitat to reduce the risk of negative impacts to murrelets and their habitat due to hazard tree management-related activities.³⁶

The PSG Recommendations provide a set of 11 recommendations for mitigating harms to murrelets from hazard tree management which should be incorporated into the SDEIR. These mitigation measures include but are not limited to:

- ensure that a wildlife biologist participates in the design, implementation, and monitoring of proposed hazard tree activities in murrelet habitat
- require that all trees proposed to be removed or pruned in or adjacent to murrelet habitat be inspected by a qualified forest health protection pathologist or certified arborist to determine whether they are truly hazard trees
- avoid the removal of active or historical murrelet nest trees
- avoid and/or minimize the removal of large trees or large branches that may later support nests or nest sites, or contribute to habitat characteristics.³⁷

Response ORG3-14

Please see Response ORG3-13.

Comment ORG3-15

7. The SDEIR must protect and buffer the unburned and lightly burned stands of old-growth habitat.

2. RESPONSE TO COMMENTS

There are at least four areas of unburned old-growth habitat in Big Basin SP, as identified in the comments submitted by the Pacific Seabird Group.³⁸ These critical areas of unburned and lightly burned nesting habitat should be identified, mapped, and fully protected from any tree removal or development. In addition, following the guidance in the PSG Habitat Recommendations, a buffer zone of no tree removal of at least 100 meters,³⁹ and a buffer zone of no development including Park infrastructure of at least a half-mile (800 meters),⁴⁰ should be implemented around all unburned and lightly burned habitat areas. These buffer zones are important for protecting high-integrity nesting habitat, minimizing the impacts of forest edges on murrelets, decreasing human disturbance, and reducing attraction of predators to murrelet nests.⁴¹

The SDEIR is flawed in failing to address the impacts to marbled murrelets of placing recreational facilities and development within or near the unburned and lightly burned habitat areas; and failing to analyze an alternative that could avoid the inevitable negative impacts to marbled murrelets by fully protecting the unburned and lightly burned stands of old-growth habitat from any tree removal or development and establishing a buffer zone of no tree removal of at least 100 meters, and a buffer zone of no development of at least a half-mile, around all unburned or lightly burned habitat areas.

Response ORG3-15

Please see Topical Response 2, *Old Growth Area and "Unburned Refugia"* and Topical Response 3, *Alternatives Analysis*. Regarding the recommendation to provide a no-tree-removal buffer of 100 meters around the "unburned refugia" areas, the Department would not remove additional trees in the "unburned refugia" areas unless they pose a clear threat as a Hazard Tree, as described in SPR BIO-25. There may also be a future need to control the establishment of sapling trees and understory vegetation as part of required fire fuel management, but this would be minimized or avoided during the breeding season in these "unburned refugia" and surrounding buffers, as described in SPR BIO-27 and SPR BIO-28.

Comment ORG3-16

8. The SDEIR should add a mitigation measure to create a murrelet management team by a near-term set date.

The SDEIR should add a mitigation measure to create and implement a marbled murrelet management team by a near-term set date to inform construction activities, long-term monitoring, and adaptive management. The mitigation measure should specify that the team should include participation from relevant state and federal agencies and experts on murrelet ecology and conservation. The team should develop and implement a marbled murrelet adaptive management plan that includes regular monitoring of murrelet activity levels and uses visual and acoustic surveys to maximize detection of murrelets.

2. RESPONSE TO COMMENTS

Response ORG3-16

The District has already established a marbled murrelet management team in accordance with General Plan Guideline Murrelet 9, which is a regional group that includes agency partners and other experts; thus, an additional mitigation measure is not required. Additionally, the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6* serves as the “formal” marbled murrelet adaptive management plan for the BBRSP and other park units in Zone 6. The discussion of General Plan Guideline Murrelet 9 on page 3-62 of the Draft Supplemental EIR in impact discussion (a) has been modified accordingly, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document.

Comment ORG3-17

9. The SDEIR should consider the need for stronger protections for murrelet habitat in Butano and Portola State Parks.

Marbled murrelet habitat in Big Basin SP was heavily impacted by the CZU Fire. Given that the Big Basin Facilities Plan will have adverse harms to marbled murrelets, State Parks should consider the need to strengthen protections in the remaining marbled murrelet habitat in Zone 6, particularly in Butano and Portola State Parks. Effective protections may need to include relocating the campgrounds and picnic areas out of old-growth habitat in these parks.

Response ORG3-17

Please see Topical Response 4, *Other Parks*.

Comment ORG3-18

Conclusion

The Center appreciates the opportunity to comment on the SDEIR. We strongly support the proposal to not re-build the Blooms Creek, Sempervirens, and Jay Camp campgrounds in the Old Growth Area and instead provide camping facilities outside of old-growth redwood habitat. However, because substantial evidence shows that the Big Basin Facilities Management Plan will have significant adverse impacts on marbled murrelets that are not adequately considered, avoided, minimized, or mitigated by the proposed plan or current set of alternatives and mitigation measures in the SDEIR, we urge State Parks to revise and recirculate the SDEIR. We look forward to reviewing a revised document that includes additional feasible alternatives and mitigation measures to avoid, minimize and mitigate the impacts to marbled murrelets in Old Growth Areas and throughout the park.

We are submitting pdfs of the cited references with these comments.

2. RESPONSE TO COMMENTS

Response ORG3-18

This comment serves as a conclusion to preceding comments. Please see Responses ORG3-01 through ORG3-17.

ORG4. Pacific Seabird Group, December 1, 2025

Comment ORG4-01

The Pacific Seabird Group (PSG) is a society of professional seabird researchers and managers dedicated to the study and conservation of seabirds. PSG was incorporated as a 501c3 non-profit in the state of California in 1972 and has an international membership from countries throughout the Pacific Basin and beyond. The principal goals of PSG are to: 1) increase the quality and quantity of seabird research by facilitating the exchange of information, 2) identify and assess the importance of threats to seabird populations, and 3) provide government agencies and others with expert advice on managing threats and populations. Over the last several decades, PSG members have provided Marbled Murrelet population status information, standardized monitoring protocols for at-sea and forest-based monitoring, and assessed management alternatives for state and federal agencies and other constituents. Marbled Murrelets nesting in central California have a small population (Felis et al. 2020), specific nesting habitat requirements (Baker et al. 2006), and may be habitat limited (Raphael 2006, California Department of Parks and Recreation 2017), particularly after habitat loss resulting from the 2020 CZU Lightning Complex Fire (CZU fire, Potter 2023). We urge the California Department of Parks and Recreation to take full advantage of this unique opportunity to protect remaining old-growth forest, Marbled Murrelets and other species relying on this habitat while rebuilding infrastructure and providing valuable visitor experiences. As we stated in our 18 July 2025 letter, we support the many facets of the proposed Plan to relocate most facilities out of the remaining old-growth forest portion of Big Basin Redwoods State Park (Park). This alone may provide much needed conservation benefits to the Marbled Murrelet. However, there are aspects of the proposed Plan that require additional information and analysis to more fully consider and analyze potential impacts to Marbled Murrelets and methods to mitigate those impacts. Given the large-scale damage to Marbled Murrelet breeding habitat and likely long-term impacts to the small central California population from the CZU fire, protection of remaining potential breeding habitat and nesting birds is of the utmost importance. Below, we provide several suggestions to improve the SEIR to best assure that protection of the remaining Marbled Murrelet population and their terrestrial habitat in the Park is maximized to the fullest extent possible.

Response ORG4-01

This comment serves as an introduction to the comment letter, describes the Pacific Seabird Group (PSG), and summarizes their work with marbled murrelets. This comment does not

2. RESPONSE TO COMMENTS

address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment ORG4-02

1. As also stated in our July 18 letter, we found it difficult to assess current conditions in the Park and where proposed infrastructure will be in relation to remaining lightly burned old-growth refugia habitat, as well as to isolated unburned trees possessing appropriate crown structures, which still contain potential Marbled Murrelet breeding habitat. This information is critical to properly locate proposed infrastructure and to analyze potential impacts to Marbled Murrelets. As most of the information on habitat conditions provided in section 3.2 *Existing Conditions* was based on sampling conducted prior to the CZU fire, much of this information may no longer be relevant. For example, we found no mention of the large-scale replacement of the Park's forest understory with *Ceanothus thyrsiflorus*, a species also found in chaparral habitats. In our July 18 letter, we recommended that "remaining late successional and old-growth habitat should be quantified to precisely identify unburned refugia areas that are still suitable for murrelet nesting. Additionally, burned areas with potential to develop into nesting habitat in the coming decades should be identified." Further, we provided a map showing approximate locations of remaining old-growth stands in the Plan area that still contain potential Marbled Murrelet habitat. We did not find this information in the Draft SEIR, so we have provided the map below for your reference. Not shown on this map, but needing investigation, is an additional possible refuge area located west of Middle Ridge, north of Gazos Creek Road, and south of Johansen Road. It appears as a lightly burned area on remote sensing imagery from October 2021 included in Potter (2023). Inclusion of a more thorough assessment of this remaining habitat along with maps and descriptions of the proposed Plan areas would substantially aid the planning and evaluation processes.

Response ORG4-02

Chapter 3, *Biological Resources Environmental Analysis*, of the Draft Supplemental EIR contains a description of existing conditions at BBRSP, including the effects of the CZU fire. Figure 3-1, *Vegetation Types*, of the Draft Supplemental EIR shows the vegetation types in the vicinity of the Focus Area using a more recent fine-scale vegetation mapping of Santa Cruz and Santa Mateo Counties, completed in 2023. Though sampling was mostly conducted before the CZU fire, this mapping effort remains the most accurate reference for natural communities in the region because, despite the unusual intensity of the CZU fire, the species that define these vegetation types have largely persisted and are regenerating. The District has conducted habitat assessments to further define post-CZU fire conditions at BBRSP, including the condition of Potential Nest Trees and mapping for marbled murrelet in the former Headquarters Area. These post-CZU fire conditions were considered as part of the analysis in Chapter 3, *Biological Resources Environmental Analysis*, of the Draft Supplemental EIR and the refinement of the

2. RESPONSE TO COMMENTS

SPRs developed to address potential adverse effects of the proposed project, including restrictions on public access and facility improvements.

Comment ORG4-03

2. We appreciate the review of Marbled Murrelet literature for the 2012-2025 period provided in Appendix D. However, this review omitted the Pacific Seabird Group's *Terrestrial Habitat Management Recommendations for Marbled Murrelets* (Pacific Seabird Group 2024; <https://pacificseabirdgroup.org/psg-publications/technical-publications/>). We also found no reference to this relevant document in the main body of the Draft SEIR despite our reference to it in our July 18 letter. Murrelet habitat recommendations from this document that we strongly suggest for inclusion in the Draft SEIR include:

Response ORG4-03

As discussed on page 3-45 of the Draft Supplemental EIR, the analysis in the Draft Supplemental EIR included a comprehensive review of data on marbled murrelet to expand upon the annotated bibliography contained in the 2013 General Plan and involved a review of available data from 2012 to present (2025). This literature review was contained in Appendix D, *Marbled Murrelet Literature Review (2012-2025)*, (see Appendix D, *Marbled Murrelet Literature Review (2012-2025) (Revised)* of this Final EIR) of the Draft Supplemental EIR and included a chronological listing of each study and a brief summary or excerpt of salient information. As noted in Topical Response 2, *Old Growth Area and "Unburned Refugia"* and Topical Response 3, *Alternatives Analysis*, the recommendations from the PSG's 2024 THMRMM were considered during refinement of the BBFMP and in preparation of the analysis in the Draft Supplemental EIR; however, the document was inadvertently omitted from list of reviewed documents in Appendix D of the Draft Supplemental EIR. Appendix D has been updated as part of this Final Supplemental EIR to reference the PSG's 2024 THMRMM along with several other reports and studies relevant to marbled murrelet (see Appendix D, *Marbled Murrelet Literature Review (2012-2025) (Revised)* of this Final EIR).

Comment ORG4-04

a. no campgrounds, trails, waste management areas, or other public facilities be located within 0.8 km (0.5 mi) of murrelet breeding habitat;

Response ORG4-04

Please see Topical Response 2, *Old Growth Area and "Unburned Refugia,"* for a review of the recommendations from the PSG's 2024 THMRMM.

Comment ORG4-05

b. signs be posted in existing campgrounds or public facilities located in habitat, saying no feeding of wildlife, no excessive noise (particularly around dawn and dusk), and no eating while hiking on trails;

Response ORG4-05

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. SPR BIO-23 and SPR BIO-24 have been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide additional details regarding best management practices to promote marbled murrelet success. Though it is infeasible to control visitor behavior, messaging—including “Keep it Crumb Clean” signs instructing visitors not to feed wildlife—would be posted at campsites and trailheads. In addition, construction noise within a quarter mile of occupied habitat during breeding season would be monitored and controlled.

Comment ORG4-06

c. use of existing campgrounds or recreation facilities be re-evaluated if existing habitat located within 0.8 km becomes occupied by nesting murrelets;

Response ORG4-06

Please see Response ORG3-05 and Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. SPR BIO-26 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide possible controls regarding temporary restrictions to minimize risks to active marbled murrelet nests.

Comment ORG4-07

d. long-term monitoring of predator densities be conducted at campgrounds and facilities near occupied habitat areas and, if necessary, mitigation measures be put in place along with development of an adaptive management plan;

Response ORG4-07

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. SPR BIO-26 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide additional details regarding long-term monitoring and focused studies of corvid species and food subsidies.

2. RESPONSE TO COMMENTS

Comment ORG4-08

e. wildlife-proof trash cans be used in all campgrounds and picnic areas and wildlife-proof food lockers installed at all campsites;

Response ORG4-08

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. Wildlife-proof trash cans would be provided at all campsites and picnic areas as a part of the proposed project, as described in Chapter 2, *Project Description*, of the Draft Supplemental EIR. Additionally, SPR BIO-23 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to specify this requirement for wildlife-proof trash cans.

Comment ORG4-09

f. dishwashing stations be installed in all campgrounds;

Response ORG4-09

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. Dishwashing stations would be provided at all campsites as a part of the proposed project, as described in Chapter 2, *Project Description*, of the Draft Supplemental EIR. Additionally, SPR BIO-23 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to specify this requirement for dishwashing stations.

Comment ORG4-10

g. hazard trees in or near habitat be evaluated and treated in consultation with a wildlife biologist;

Response ORG4-10

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to include how potential Hazard Trees will be evaluated and treated including in consultation with a State Parks–approved biologist.

Comment ORG4-11

h. trees proposed for removal or pruning in or near habitat be reviewed by a qualified forest health protection pathologist or a certified arborist;

Response ORG4-11

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to include how potential Hazard Trees will be evaluated and treated including a requirement that all trees proposed to be removed or pruned in or adjacent to marbled murrelet habitat be inspected by a qualified forest health protection pathologist or certified arborist to determine whether they are truly Hazard Trees.

Comment ORG4-12

i. human infrastructure threatened by hazard trees be considered for removal, relocation, and/or seasonal closure before removing the tree;

Response ORG4-12

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to include how potential Hazard Trees will be evaluated and treated. For Hazard Trees being evaluated for removal, options for addressing the risk will be considered, including whether the resource at risk can be relocated or removed to allow for retention of the tree or large branches pruned off rather than felling the tree. This could include consideration of a temporary closure of campsites or facilities in proximity to a potential Hazard Tree.

Comment ORG4-13

j. removal of active or historic marbled murrelet nest trees be avoided;

k. removal of large branches that may later support nests or nest sites or contribute to habitat characteristics be avoided wherever possible;

Response ORG4-13

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to include how trees

2. RESPONSE TO COMMENTS

determined to have suitable elements for nesting by marbled murrelet and screen trees important for nest protection will be retained.

Comment ORG4-14

l. impacts to surrounding trees when felling hazard trees be avoided or minimized;

Response ORG4-14

Please see Topical Response 2, *Old Growth Area and "Unburned Refugia,"* for a review of the recommendations from the PSG's 2024 THMRMM. SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to include how potential Hazard Trees will be evaluated and treated, including the avoidance or minimization of potential damage to surrounding trees when felling a Hazard Tree.

Comment ORG4-15

m. potential hazard trees be trimmed to create snag habitat, rather than felled entirely;

Response ORG4-15

Please see Topical Response 2, *Old Growth Area and "Unburned Refugia,"* for a review of the recommendations from the PSG's 2024 THMRMM. SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to include how potential Hazard Trees will be evaluated and treated, including avoidance or minimization of removing large trees or large branches that may later support nests or potential nest locations, or that contribute to suitable habitat characteristics. Please also see Response ORG4-14.

Comment ORG4-16

n. all visual disturbance, sudden noises, novel noises, and noises > 90 dB associated with construction and other activities be avoided near nest sites throughout the breeding season and during dawn and dusk activity periods year-round;

Response ORG4-16

Please see Topical Response 2, *Old Growth Area and "Unburned Refugia,"* for a review of the recommendations from the PSG's 2024 THMRMM. SPR BIO-25 has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to require that all visual disturbance, sudden noises, novel noises, and noises louder than 90 dB associated with Hazard Tree activities be avoided near active nest sites throughout the breeding season. In addition, SPR BIO-26 and SPR BIO-28 include provisions to limit construction noise within a quarter-mile of occupied habitat, in coordination with USFWS and CDFW.

2. RESPONSE TO COMMENTS

Comment ORG4-17

o. burning not be conducted near murrelet nesting habitat during the nesting season.

Response ORG4-17

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia,”* for a review of the recommendations from the PSG’s 2024 THMRMM. Due to the importance of the prescribed burning program at BBRSP, the District has determined that this recommendation is infeasible to require as part of the proposed project. However, as described in the modified SPR BIO-26 (as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document), appropriate restrictions will be developed and implemented where monitoring identifies a risk to an active marbled murrelet nest, which could include restrictions against burning in the vicinity of an active nest.

Comment ORG4-18

3. We have concerns about certain proposed visitor use facilities in the old-growth area, including the Sequoia Group Camp, visitor kiosk, backpacker camp sites, picnic areas, parking lots, and amphitheater. Following the measures outlined in the Pacific Seabird Group’s *Terrestrial Habitat Management Recommendations for Marbled Murrelets* for reduction of predation risk (see above), we recommend placing infrastructure as far from remaining potential Marbled Murrelet habitat as possible and avoiding placement of recreational features within 0.8 km (0.5 mi) of murrelet breeding habitat. This recommendation applies to infrastructure such as campgrounds, picnic areas, off-highway vehicle staging areas, trailheads, and trails. This should not be confused with the separate recommendation for harvest activities of “no-cut” buffers of 100 m around murrelet habitat. These measures will help protect Marbled Murrelets from human disturbance, and, more importantly, from predators such as Steller’s Jays (*Cyanocitta stelleri*) and Common Ravens (*Corvus corax*) that can be attracted to human visitors and the food they leave behind.

Response ORG4-18

Please see Topical Response 2, *Old Growth Area and “Unburned Refugia;”* Topical Response 3, *Alternatives Analysis;* Response ORG3-02; Response ORG3-04; and Response ORG3-15.

Comment ORG4-19

4. Nest predation is a significant factor limiting Marbled Murrelet nest success across the breeding range (USFWS 2024) with corvids (crows, ravens, and jays) being the primary nest predators (Nelson 2020). Corvid populations have been shown to benefit from human food sources such as garbage and food scraps, resulting in increased densities (West and Peery 2017)

2. RESPONSE TO COMMENTS

and likelihood of predation (Peery and Henry 2010). Given the documented success of the “Crumb Clean” campaign in reducing predator densities in Big Basin State Park (Brunk et al. 2021), we strongly support the Park’s plan to continue the “Crumb Clean” campaign in combination with other measures to minimizing predator impacts (see Comment #2, above). We suggest strengthening the Crumb Clean campaign by integrating outreach materials into parking or shuttle reservation websites and documentation and verbally communicating the importance of the campaign to visitors when arriving at parking areas, visitor facilities, and campgrounds. Park docents could help with public outreach and education regarding this important conservation topic. Finally, we recommend continuing existing corvid management efforts within the Park.

Response ORG4-19

Chapter 3, *Biological Resources Environmental Analysis*, of the Draft Supplemental EIR provides a comprehensive summary of the status of marbled murrelet and SPRs that would serve to address potential impacts on marbled murrelet. SPR BIO-23 and SPR BIO-24 have been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document, to provide additional details regarding best management practices consistent with the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6*. These practices include continuation of the Crumb Clean Campaign and existing corvid management efforts at BBRSP. The modifications to SPR BIO-24 specifically include additional integration of outreach materials into parking and shuttle reservation websites and verbally communicating to visitors when arriving at parking areas, visitor facilities, and campgrounds.

Comment ORG4-20

5. As stated in section 3.4 *Project Impact Analysis* of the Draft SEIR, the Park’s *General Plan Guideline Murrelet 9* calls for formalizing “...existing State Parks marbled murrelet management team for Big Basin Redwoods State Park and develop formal marbled murrelet adaptive management plan for the park.” We strongly support this initiative, which has not yet been implemented. Before park planning goes further, we recommend formalizing the marbled murrelet management team and developing a marbled murrelet adaptive management plan that includes regular monitoring of murrelet activity levels and uses a combination of both visual and acoustic surveys to maximize detection of murrelets. PSG could offer a member of the Marbled Murrelet Technical Committee to participate with the Park on this management team.

Response ORG4-20

Please see Response ORG3-16.

2. RESPONSE TO COMMENTS

Comment ORG4-21

6. To further reduce impacts to the Park's Marbled Murrelet population, we offer the following additional recommendations:

- a. We suggest studies be conducted to examine movements and use of anthropogenic food subsidies by the Park's Common Ravens, including in areas outside the Park. Common Ravens are opportunistic foragers and scavengers and can have extensive home ranges; thus, ravens found in the Park likely also forage extensively on both natural and anthropogenic resources outside the Park's boundaries. Large sources of food waste, such as waste distribution centers and landfills, typically attract large numbers of scavengers such as ravens and gulls and can help inflate populations of these species. For example, in a study of Western Gulls (*Larus occidentalis*) breeding at Año Nuevo Island on the San Mateo County coast near Big Basin Redwoods State Park, Shaffer et al. (2017) found the City of Santa Cruz Resource Recovery Facility to be a major food source for those gulls. This facility is about 24 km from the old-growth area of the Park, or nearly the same distance as Año Nuevo Island to the facility. Research on movements of ravens occurring within the Park could help identify key measures and external partnerships to help curb the Park's raven population.

Response ORG4-21

The District will continue to support and participate in marbled murrelet research that contributes to the conservation of this species. Areas of public access in BBRSP would be monitored as part of on-going surveys for marbled murrelet occupation, as outlined in modified SPR BIO-26 (as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document). Focused studies would be conducted to examine movements and use of anthropogenic food subsidies by common raven, American crow, and jays to evaluate the potential conflict these uses may have to the long-term viability of nesting habitat for marbled murrelet in the surrounding area and to inform the need for adaptive management over time. Best Management Practices from the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6* would be implemented at other State Park units in Zone 6, as is current practice of the District. Please also see Topical Response 4, *Other Parks*.

Comment ORG4-22

- b. We recommend also reducing impacts to Marbled Murrelets at other Santa Cruz Mountains state parks. Impacts to murrelets, including from habitat loss, avian predation, and human disturbance, are similar at other parks. Measures to reduce impacts to murrelets, including moving campgrounds and picnic areas away from murrelet habitat, could help mitigate this Plan's impacts on the Santa Cruz

2. RESPONSE TO COMMENTS

Mountains murrelet population. One suggested action would relocate the campground at Butano State Park away from the old-growth forest.

Response ORG4-22

Please see Response ORG4-21 and Topical Response 4, *Other Parks*.

Comment ORG4-23

Thank you for your consideration of our comments. If you have any questions about these comments or seek additional information about Marbled Murrelets, please contact the co-chairs of the PSG Marbled Murrelet Technical Committee

Response ORG4-23

This comment serves as a conclusion to preceding comments. Please see Responses ORG4-01 through ORG4-22.

2.4.3 Comments from Individuals

IND1. Leslie Keedy, October 17, 2025

Comment IND1-01

This EIR study and its content information has not adequately addressed potentially significant impacts to adjacent private property, including environmental impacts, increased trespass and foot traffic, vehicle traffic – despite shuttles, noise pollution, light pollution, groundwater, and increased physical trash from patron use, and other adverse impactful ecological activities resulting from increased public use.

The current low state staffing levels and resources levels will limit response to neighbor concerns and limit park oversight. The plan implementation will further significantly impact immediate neighbors. Emails and messages are currently not returned.

Response IND1-01

Section 2.3, *Project Components*, of Chapter 2, *Project Description*, of the Draft Supplemental EIR has been modified, as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document to clarify that the proposed project is not expected to increase visitation levels compared to pre-fire visitation. Impacts related to traffic, noise, light pollution, and groundwater are evaluated and described in Appendix A, *Notice of Preparation and Initial Study*, of the Draft Supplemental EIR in Section XVI, *Transportation*, Section XII, *Noise*, Section I,

2. RESPONSE TO COMMENTS

Aesthetics, and Section XVII, *Utilities and Service Systems*, respectively. Because there would be no change in visitation due to the proposed project, when compared to the 2013 General Plan EIR, the proposed project would not result in new impacts or a substantial increase in the severity of those impacts for these topics areas, and further analysis of these topics was therefore not required in the Draft Supplemental EIR.

The commenter's opinions regarding low state staffing and resources levels are noted.

Comment IND1-02

Roads such as upper Bloom Grade have not been adequately protected with park signage and gating to limit trespass and stop lost people and vehicles from trespass into private property.

Response IND1-02

This comment is noted. The comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment IND1-03

My specific property at 505 upper Bloom Grade is now completely surrounded on three sides by State Park property limiting its serenity and privacy. Initially Sempervirens fund stated said they would purchase my property and then they never followed up or responded to my messages and then when I finally was in contact with them they told me they were no longer interested ..however this property will be directly adversely impacted by unpermitted uses and trespass and people cutting across the private land to get to trails and roads, etc. It is no longer desirable as a private residence. This property should be purchased and acquired at fair market value and made part of the saddle mountain trail system as it features scenic views, and an existing loop trail already in place from previous logging.

Response IND1-03

This comment is noted. The comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment IND1-04

Due to acquisition of all surrounding lands by the state my adjoining property is virtually surrounded by public use, the property no longer retains its character, privacy and serenity that it had prior to the 2020 CZU wildfires and the greater state acquisitions.

2. RESPONSE TO COMMENTS

Response IND1-04

This comment is noted. The comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment IND1-05

The road that accesses my land upper bloom grade which I am solely responsible for financially has been adversely impacted by unauthorized vehicles and the state has offered no funding or support to maintain or repair this road from increased unsolicited vehicle use. Although the uphill side land is now owned by Sempervirens fund to center line of the road, there has been no maintenance of the road or management of the encroachment of invasive plant material, nor addressing drainage and erosion impacting the road.

Response IND1-05

This comment is noted. The comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no further response is required.

Comment IND1-06

This project was inadequately vetted by the immediate neighbors. There was little inclusion, complete dismissal of mitigating impacts of neighbors concerns, no inclusion of suggestions, neighbors comments were dismissed. The rural neighborhood is no longer what it was because of the saddle Mountain headquarters proposal. This plan and change in public use was thrust upon us immediate neighbors with little input and leaving neighbors no recourse.

Response IND1-06

The opinion of the commenter is noted. Section 1.2, *Environmental Review Process*, of Chapter 1, *Introduction*, of the Draft Supplemental EIR, describes the environmental review process for the proposed project that included opportunity for public input on the Notice of Preparation released on June 16, 2025, or at the public scoping meeting was held on Thursday, July 10, 2025, at 6:00 p.m. These CEQA-focused public comment opportunities were in addition to the opportunities for participation during the BBFMP planning process which occurred over three stages from 2023 to 2025 and included online surveys, in-person open houses, focus groups that included three on-site meetings with the Saddle Mountain neighbors, on-site experiences, virtual workshops, pop-up events, and public webinars.

IND2. Matt Baldzikowski, December 1, 2025

Comment IND2-01

The SEIR for the Facilities Management Plan and General Plan Amendments is well thought out and presented. I support the proposed project in general.

I offer the following comments for consideration:

Response IND2-01

This comment serves as an introduction to the comment letter. Please see Responses IND2-02 through IND2-09.

Comment IND2-02

The Sequoia Group Camp within the Old Growth Area is still troubling. It is a difficult call since much of the infrastructure remains post-fire. However, I lean towards abandonment and restoration for the following reasons. There appears to be Old Growth (OG) connectivity with the core Old Growth area. This connectivity is especially evident along the beginning portion of the access road and in redwood clumps within and surrounding the camp area. Fair post-fire canopy exists, which will improve with time, and there appear to be trees with potential marbled murrelet nesting platforms.

The Sequoia Camp would be the only camping facility proposed that is topographically connected to the Core OG area. A ridge East of Sequoia separates the OG area from the Overnight and Upper Sky Meadow Areas. Camping and access vehicle sounds will likely carry to the Core OG area, as will smoke from campfires and BBQ's. Campground use may also attract corvids to the OG area. On my recent visit I saw and heard no corvids there (Sequoia).

Response IND2-02

The proposed Sequoia group campground, picnic areas, and trail staging areas in the Old Growth Area would be carefully monitored as part of on-going surveys for marbled murrelet occupation, as outlined in modified SPR BIO-26 (as shown in Chapter 3, *Revisions to the Draft Supplemental EIR*, of this document). Focused studies would be conducted to examine movements and use of anthropogenic food subsidies by common raven, American crow, and jays at these locations to evaluate the potential conflict these uses may have to the long-term viability of nesting habitat for marbled murrelet in the surrounding area. Additionally, the 2017 *Marbled Murrelet Landscape Management Plan for Zone 6* recommendations would be followed to minimize impacts to marbled murrelet. Please also see Response ORG2-18.

2. RESPONSE TO COMMENTS

Comment IND2-03

The access road to Sequoia is steep and narrow and will need repairs and ongoing maintenance. This is possible, but OG habitat connectivity may be more important.

Response IND2-03

This comment is noted. This comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment IND2-04

Restoring Sequoia appears to potentially further reduce impacts to marbled murrelets (MAMU). Perhaps the Overnight and Upper Sky Meadows could accommodate the Group camps instead.

Response IND2-04

Please see Response ORG4-18; Response ORG3-04; and Topical Response 3, *Alternatives Analysis*.

Comment IND2-05

The Gazos East and West group picnic areas are also of concern. This area has been identified as unburned MAMU refugia (singer pers. Comm. 2025) as referenced by Pacific Seabird Group comments (July 18, 2025). The North Escape Road would be partially reopened to recreational parking and traffic to access the picnic areas. The picnic area could also attract corvids to this core OG area. Removing recreational vehicular access, parking, and picnic sites would likely further reduce potential impacts to MAMU at this location.

Response IND2-05

Please see Response ORG3-08 and Response ORG4-18.

Comment IND2-06

On my recent visit there were numerous families, from toddlers to great-grandparents walking the North Escape Road. It was peaceful and families had room to speak out. As it is (closed to vehicular rec access) the North Escape Road may be the most pedestrian/ADA friendly pathway within the OG area. It is a small, easily accessed "Avenue of the Giants." Car access, parking, and group picnic areas would diminish the existing OG experience in my view.

2. RESPONSE TO COMMENTS

If a picnic area were still desired here (Gazos), I would recommend no vehicular access/parking. Perhaps wagons could be available for guests as part of the reservation. It is a short, flat, paved walk in.

Response IND2-06

North Escape Road is an important access road for operations and emergency access. Please see Response ORG2-08 for a description of the activities and facilities planned along North Escape Road. The comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no further response is required.

Comment IND2-07

I also noted that there was no smoke, smell of campfires and BBQ's in the OG area as there was in the past. I could smell the forest! This enhanced my visitor experience. I recommend that any cooking within the OG area be limited to cooking stoves, no BBQ's. BBQ's could be provided elsewhere.

Response IND2-07

The recommendation of the commenter is noted. The comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no further response is required.

Comment IND2-08

Special Animals Section 4 of the SEIR discusses that culverts would be sized for fish passage. This is good, but there is only an emphasis on culverts. Full span bridges may be preferable for fish passage and should be included in this section.

Response IND2-08

General Plan Guideline Special Animals 4 is included in the 2013 General Plan and was included in the Draft Supplemental EIR as a reference. The proposed project includes revisions to specific sections of the 2013 General Plan as needed to create clear consistency with the BBFMP. Revisions to this General Plan guideline are not proposed. The opinion of the commenter is noted. The comment does not address the adequacy of the analysis in the Draft Supplemental EIR; therefore, no response is required.

Comment IND2-09

In conclusion, I appreciate the huge level of work and thought involved by DPR staff and consultants in this effort. My comments are respectfully submitted. In my mind they are maybe

2. RESPONSE TO COMMENTS

fine tuning, the bulk of the big issues have been well considered already. For this reason I support approval of the SEIR.

Response IND2-09

This comment serves as a conclusion to preceding comments. Please see Responses IND2-01 through IND2-08.

IND3. Susan Kirks, December 1, 2025

Comment IND3-01

There should be no camping ground or camping activity in the area of habitat for Marbled Murrelet. As you know, active nesting birds and their nests are protected by the federal Migratory Bird Treaty Act and the CA Fish and Game Code. For any human activity in the area of the trees that comprise the Murrelet's nesting habitat, buffer zones should be established and demarcated to prevent any human encroachment into the area where the Murrelets are nesting. Marbled Murrelets are asynchronous nesters, but generally the regulations apply to nesting birds February 15 to early September. That would mean all of Spring and Summer.

So, no camping activity should be allowed in the area of the trees where the Murrelets nest. If other active nesting birds are identified, those habitat areas should also be protected, with no human encroachment.

Response IND3-01

Please see Response ORG4-18 and Response IND2-02.

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

3.1 INTRODUCTION

This section contains revisions to the Draft Supplemental Environmental Impact Report (EIR) in response to comments from agencies, organizations, and the public, as well as staff-directed changes. These text revisions include typographical corrections, insignificant modifications, and amplifications and clarifications of the Draft EIR. For each revision, the Draft EIR page and location on the page are identified, followed by the textual, tabular, or graphical revision.

Double underlined text represents language that has been added to the EIR; text with ~~striketrough~~ represents language that has been deleted from the Draft EIR. None of the revisions to the Draft EIR constitute significant new information, as defined in California Environmental Quality Act (CEQA) Guidelines Section 15088.5; therefore, the Draft EIR does not need to be recirculated.

3.2 DRAFT SUPPLEMENTAL EIR REVISIONS

Chapter 2, Project Description

On page 2-14, the first paragraph in Section 2.3, *Project Components*, is revised as follows:

The proposed project has been prepared to guide the rebuilding of park facilities after the CZU fire. No change in total park visitation levels as a result of the proposed project is expected to occur, when compared to pre-fire visitation levels. The BBFMP is a planning document designed to guide the stewardship, management, and use of existing and future facilities. It will also include the development of conceptual design alternatives to evaluate distinctive strategies for site configuration and use. The plan makes management recommendations and proposes facility use considerations for a specific park unit, portion of a park unit, or project. To ensure consistency with the BBRSP General Plan, the proposed project also includes General Plan amendments.

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

The last paragraph on page 2-18, continuing onto page 2-19, in Section 2.3.2, *Proposed Park Facilities, “Old Growth Area,”* is revised as follows:

North Escape Road is a paved State Park road that parallels Highway 236 and would serve as an access road, facilitating operations, management, and emergency access to the park’s northern recreation facilities. A small trail camp, with ten walk-in campsites and one potable water supply and dishwash station ~~water, vault restroom, and dishwash station~~ would be located approximately 0.75 miles beyond the road’s southern access gate. Drive-in reservation-only picnic sites ~~Two group picnic areas~~ would be reconstructed with ~~vault~~ toilets, potable water, dishwash stations, and wildlife-proof trash and recycling containers along North Escape Road and at Gazos Creek Road near the intersection with North Escape Road, with visitor parking included at each location. Two parking lots, one east and one west of North Escape Road, would include 10 and 24 parking spaces, respectively. Several landscape restoration efforts will take place alongside North Escape Road, including the removal of spur roads and firepits. Walk-in campsites and day-use picnic areas with parking would be designed for minimal impacts.

The last paragraph of Section 2.3.2, *Proposed Park Facilities, “Old Growth Area,”* on page 2-19 is revised as follows:

Sequoia Campground would be reconstructed similar to its pre-fire design. This includes two group campsites, each with the capacity to hold 50 people. The proposed project includes maintaining existing gravel parking lots with 40 spaces, reconstructing restrooms, potable water supply, dishwash stations, food lockers, and wildlife-proof trash and recycling containers. Minor changes ~~would~~ may include replacing combo toilets with vault toilets.

The following item is added to the list on page 2-31 in Section 2.8, *Required Permits and Approvals*:

- Possible additional resource management permits, to be determined through consultation with United States Fish and Wildlife Service and/or California Department of Fish and Wildlife

Chapter 3, *Biological Resources Environmental Analysis*

SPR BIO-23 through SPR BIO-26 on page 3-24 are revised as follows:

- BIO-23:** To improve habitat conditions for marbled murrelet, appropriate management activities such as the Crumb Clean Campaign and improved waste patrol and cleanup in visitor-use areas will continue to be implemented by DPR to control corvid food sources and the risks these species pose to marbled murrelet breeding success. Consistent with the recommendations for best management practices from the 2017

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

Marbled Murrelet Landscape Management Plan for Zone 6, this should include the following:

- Reduce/Eliminate Food and Trash Subsidies
 - All trash receptacles should be animal proof.
 - Trash receptacles should not be allowed to overflow (emptied regularly).
 - Garbage trucks will be housed where animals cannot gain access.
 - Animal-proof food storage lockers will be installed in all campsites.
 - Dishwashing stations will be installed in all campgrounds.
 - Water spigots will have grates installed which allow food to fall out of reach of predators.
 - Water spigots will have a “no dishwashing” sign on them.
 - The “camp dishes 101” sign will be placed throughout the campground.
- Enforcement
 - Campgrounds will be patrolled by park rangers first thing in the morning for enforcement.
 - Campgrounds will be patrolled by interpretive rangers in the evening cooking hour for interpretive education.
- Active Corvid Removal
 - Ravens, crows, and in some circumstances possibly Steller’s jays, may be removed to reduce predation pressure.
- Forest Management
 - Prescribed fires will be planned and conducted as possible.
 - Second-growth forest management will be part of managing forests for murrelets.
- Noise Management
 - Adhere to latest USFWS standards for noise reduction for projects within a quarter mile of occupied habitat during the breeding season while studies to refine the standard are conducted.
- Outside of Parks
 - Work with the surrounding community to implement actions to reduce availability of food subsidies

BIO-24: Interpretive programs to educate visitors about the threatened status of marbled murrelet and why they should not feed wildlife will continue. Consistent with

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

recommendations for best management practices from the 2017 Marbled Murrelet Landscape Management Plan for Zone 6, this should include the following:

- Interpretive Messaging
 - Campers will sign the Crumb Clean Commitment during campsite check-in.
 - All food lockers will have the “Keep it Crumb Clean” sign on them.
 - All trail heads will have the “Keep it Crumb Clean” sign at their entrance.
 - All kiosks will have the “Keep it Crumb Clean” sign on them.
 - The Crumb Clean Campaign will be used at all park facilities.
 - All campers will watch the marbled murrelet video prior to securing a reservation.
 - Strengthen the Crumb Clean Campaign by integrating outreach materials into parking and shuttle reservation websites and documentation and verbally communicating the importance of the Campaign to visitors when arriving at parking areas, visitor facilities, and campgrounds.
 - Train all Park docents to help with public outreach and education regarding the Crumb Clean Campaign as an important conservation message.
 - Each picnic table will have the “Keep it Crumb Clean” sign.
 - The marbled murrelet will be mentioned during every campfire talk.
 - The marbled murrelet will be mentioned during all junior ranger programs, interpretive walks/talks and interactions.
 - Marbled murrelet materials such as stickers and magnets will be given out to help raise awareness and support for the marbled murrelet.

BIO-25: Trees determined to have suitable elements for nesting by marbled murrelet and screen trees important for nest protection will be retained. These will include all mature and old-growth trees in occupied habitat that are suitable as nesting or screen trees unless they are considered a Hazard Tree that poses an immediate threat to visitors or facilities, in which case they will be assessed for suitability as nesting or screen trees for marbled murrelet. Based on the 2024 Pacific Seabird Group protocols, suitable habitat characteristics for nesting by marbled murrelet are trees in mature and old-growth coniferous forest stands, and younger coniferous forest stands having platforms with a relatively flat surface at least 10 centimeters in diameter and 10 meters high in the live crown of a coniferous tree. Platforms can be created by a wide bare branch, moss or lichen covering a branch, mistletoe, witches’ brooms, and other deformities, or structures such as squirrel nests. For Hazard Trees being evaluated for removal, options for addressing the risk will be considered such as whether the resource at risk can be relocated or removed to allow for retention of

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

the tree or large branches pruned off rather than felling the tree. This could include consideration of a temporary closure of campsites or facilities in proximity to a potential Hazard Tree. The evaluation of possible Hazard Tree removal for potential nest or screen trees will include the following:

- Ensure that a DPR-approved biologist participates in the design, implementation, and monitoring of proposed Hazard Tree activities in marbled murrelet habitat.
- Require that all trees proposed to be removed or pruned in or adjacent to marbled murrelet habitat be inspected by a qualified forest health protection pathologist, certified arborist, certified DPR Tree Hazard Inspector, or Registered Professional Forester to determine whether they are truly Hazard Trees.
- Avoid the removal of active or historical marbled murrelet nest trees.
- Avoid and/or minimize the removal of large trees or large branches that may later support nests or potential nest locations, or contribute to suitable habitat characteristics.
- Impacts to surrounding trees when felling a Hazard Tree(s) will be avoided or minimized.
- All visual disturbance, sudden noises, novel noises, and noises louder than 90 dB associated with Hazard Tree activities will be avoided near active nest sites throughout the breeding season.

BIO-26: DPR will continue to support and participate in marbled murrelet research that contributes to the conservation of this species, making every effort to obtain funding for and continue ongoing monitoring, management, and studies. The CZU fire significantly changed the vast majority of marbled murrelet habitat in Big Basin Redwoods State Park. Much of this habitat burned at high intensity and is currently no longer suitable or occupied as it lacks the large limbs required for nesting. DPR will continue to assess the effects of the CZU fire on marbled murrelet habitat to document post-fire habitat conditions and monitoring marbled murrelet presence or absence, effectiveness of predator control programs, and suitability as marbled murrelet nesting habitat as old-growth forest cover regenerates and suitable nesting substrate returns through limb growth, protective canopy development, and creation of broken top platforms. A particular focus will be placed on areas of unburned and lightly burned habitat in old growth forest in Big Basin Redwoods State Park, which will be mapped and monitored closely. Appropriate restrictions will be developed and implemented where monitoring identifies a risk to an active marbled murrelet nest. This could include temporary restrictions on public access to campgrounds, picnic areas, staging areas, trails, and other facilities. Long-term monitoring of habitat conditions will be used to inform the need for adaptive management over

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

time and additional controls on visitor use and access in occupied habitat, if appropriate.

To determine occupancy of potential habitat stands (trees) within a quarter mile of areas mapped as old-growth redwood forest, DPR will follow the latest Pacific Seabird Group (PSG 2024) protocols and direction obtained through coordination with CDFW and USFWS. If the stand is not occupied, noisy construction activities may occur during the marbled murrelet breeding season. If the stand is occupied, activities will occur as spelled out in BIO-28. In addition to in person Audio-Visual (AV) surveys, DPR will use Audio Recording Units to passively monitor marbled murrelet presence in stands that have marginal habitat to confirm lack of occupancy.

Focused studies will be conducted by DPR to examine movements and use of anthropogenic food subsidies by common raven, American crow, and jays at these locations to evaluate the potential conflict these uses may have to long-term viability of nesting habitat for marbled murrelet in the surrounding area. The results of these surveys on nest occupation and food subsidy studies will be used to inform the need for adaptive management over time.

SPR BIO-28 on page 3-25 is revised as follows:

BIO-28: ~~DPR will coordinate with CDFW and USFWS prior to initiating construction activities that may affect marbled murrelet and/or their nesting habitat.~~ Prior to initiating any project activity occurring during the marbled murrelet breeding season that will affect this species and/or their nesting habitat, consultation with CDFW and USFWS will be required to review and approve proposed survey methodologies, habitat assessments, and avoidance measures. Based on site-specific conditions, if construction work must occur within a quarter mile of occupied habitat during the marbled murrelet breeding season (March 24–September 15), the latest USFWS’s “Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California” (dated October 1, 2020) may be used by a DPR-approved biologist to allow limited construction activities that do not create noise disturbance that could result in inadvertent take of this species. Alternatively, DPR will adhere to guidance and requirements developed in consultation with and approved by CDFW and USFWS for any work during the breeding season within a quarter mile of assumed occupied habitat.

If limited activities are allowed during the marbled murrelet breeding season in occupied habitat, work activities will not begin until two hours after sunrise and will cease two hours before sunset each day. Appropriate worker training, vehicle access

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

restrictions, maintenance of a clean site through daily trash removal, and other BMPs will be used to minimize disturbance and avoid attracting corvids and other predatory species.

On page 3-62, the summary under General Plan Guideline Murrelet 9 in impact discussion (a) is revised as follows:

Summary: In 2017, the District created the Zone 6 Marbled Murrelet Landscape Management Plan. The plan includes BMPs to protect marbled murrelet and their habitat that are to be followed by all projects occurring in the plan area. This plan serves as the formal marbled murrelet adaptive management plan for the park. Additionally, the District has worked consistently with other agencies and partners to document and better understand the status of marbled murrelet in Zone 6. This regional group serves as the State Parks marbled murrelet management team. Thus, this General Plan Guideline has been fulfilled and the recommendations in the management plan are still being implemented and will be required for all projects in Zone 6, including the proposed project. A formal marbled murrelet adaptive management plan has not been prepared, but District staff use an adaptive management strategy in evaluating needs and adjusting strategies. Funding for the marbled murrelet program at the District provides funding for both visitor services and maintenance operations given the critical role they provide in accomplishing the overall program.

Chapter 4, Alternatives to the Proposed Project

On page 4-4, an additional alternative is added to Section 4.3, *Alternatives Considered but Rejected*, as follows:

4.3.5 Reduced Facilities Alternative

This alternative would not incorporate Sequoia Group Camp; the trail camp at North Escape Road; or any of the picnic areas in the Old Growth Area, including in the Main Day-use Area, North Escape Road, and Blooms Creek. All other components of the proposed project would be incorporated into this alternative. The purpose of this alternative is to remove facilities from areas that have a greater potential to contain desirable marbled murrelet habitat.

While this alternative reduces facilities in the Old Growth Area, as compared to the proposed project, it does not fully remove facilities from old growth redwood habitat. To provide a larger range of project alternatives and variation from the proposed project, Alternative B and Alternative C, as described in Section 4.6, *Natural Preserve Alternative*, and Section 4.7, *Old Growth Redwoods Avoidance Alternative*, respectively, have been selected for analysis instead.

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

The Reduced Facilities Alternative, like Alternative B and Alternative C, would likely result in reduced biological resource impacts when compared to the proposed project, although to a lesser extent, and this alternative would not completely avoid the project's significant and unavoidable impacts. Therefore, this alternative was not selected for analysis.

On page 4-14, the description of Alternative B, *Natural Preserve Alternative*, is revised as follows:

Under Alternative B, all existing facilities would be removed from the Focus Area. Thus, there would be no day-use, overnight facilities, trails, or parking infrastructure provided at BBRSP in the Focus Area. Therefore, this alternative would result in reduced visitation when compared to the proposed project. All facilities trails would be provided in BBRSP the Natural Preserve only would be outside of the Focus Area. to connect BBRSP existing trail system so improvements to only existing trails would be included. All publicly accessible trailheads for these trails would also be outside of the Focus Area, since trails would not be provided within the Focus Area trailhead parking would not be included in this alternative. Therefore, this alternative would result in reduced visitation when compared to the proposed project.

The ecological restoration efforts, as described in the proposed project, would be included in Alternative B. The purpose of this alternative would be to protect the habitat within BBRSP that is important for biological resources, including the marbled murrelet population.

Under this alternative, the 2013 General Plan would need to be amended to include a subclassification for the Focus Area as a Natural Preserve. The General Plan guidelines would also need to be amended to remove ~~extensive~~ all visitor uses and facilities from the Focus Area.

Construction activities in BBRSP under the Natural Preserve Alternative would be limited to demolition, clearance, and ~~trail~~ habitat improvement activities. This analysis assumes that all applicable SPRs, mitigation measures, and other requirements recommended for the proposed project would apply to Alternative B. The potential environmental impacts associated with Alternative B when compared to the proposed project are described in the sections that follow.

On page 4-15, Section 4.6.3, *Air Quality*, is revised as follows:

Under the Natural Preserve Alternative, all existing facilities would be removed from the Focus Area and no development would occur. Thus, the only construction-level air quality impacts under the Natural Preserve Alternative would be from the removal of existing structures in the Focus Area. Only No new construction associated with habitat restoration would occur in BBRSP under this alternative apart from improvements to existing trails.

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

On page 4-15, Section 4.6.4, *Biological Resources*, is revised as follows:

Under the Natural Preserve Alternative, all existing facilities would be removed from the Focus Area and no development would occur. Therefore, sensitive habitat, including marbled murrelet habitat, in the Focus Area would not be impacted by new development. Additionally, there would be no day-use, overnight facilities, trail, or parking infrastructure provided in the Focus Area at BBRSP and ~~trails would be provided only to connect the Focus Area to the existing trail system~~. With fewer visitors, there would be less opportunity for nest predators to be attracted to the Focus Area for crumbs and food scraps, when compared to the proposed project.

On page 4-15, Section 4.6.7, *Greenhouse Gas Emission*, is revised as follows:

Under the Natural Preserve Alternative, all existing facilities would be removed from the Focus Area and no development would occur. Thus, the only construction activities that would occur in BBRSP under the Natural Preserve Alternative would be the demolition and removal of existing structures in the Focus Area, and to support habitat restoration, improvements to existing trails, which would lead to less GHG emissions than under the proposed project.

On page 4-22, the description of Alternative C, *Old Growth Redwoods Avoidance Alternative*, is revised as follows:

Thus, the Redwood Ecology Interpretation Center, the campfire center, approximately 170 campsites and 38 cabins, ~~and~~ approximately 250 parking stalls, and approximately 120,000 square feet of picnic areas, would not be included in Alternative C. Facilities requiring less intense development in these opportunity zones would still be included in Alternative C, like trails and ecological restoration efforts.

Appendix C, *Biological Resources Standard Project Requirements*

Appendix C, *Biological Standard Project Requirements*, has been modified as shown in Appendix C, *Biological Resources Standard Project Requirements (Revised)*, of this Final Supplemental EIR.

Appendix D, *Marbled Murrelet Literature Review (2012-2025)*

On page 1, the first paragraph is revised as follows:

This literature review on the marbled murrelet (*Brachyramphus marmoratus*) was conducted as part of the background review during preparation of the Supplemental Environmental Impact Report (SEIR) on the Big Basin Facility Management Plan. The purpose of this literature review is

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

to expand on the annotated bibliography contained in the 2013 General Plan and Final EIR for Big Basin Redwoods State Park (California State Parks 2013), under the master response on marbled murrelet from the Final EIR, which reviewed available data on the species from 1991 to 2012. This expanded review provides a compendium of scientific literature and other reports from 2012 to ~~August~~ October 2025 and focuses on research and monitoring performed in central coastal California, identified as Conservation Zone 6 in the 1997 federal Recovery Plan for the species (U.S. Fish and Wildlife Service 1997).

On page 8, a reference is added for the year 2017 as follows:

Henry, R. W. and W. B. Tyler. 2017. Abundance and productivity of Marbled Murrelets off central California during the 2013–2016 breeding seasons. Unpublished report prepared for The Luckenbach and Command Oil Spill Trustees and California State Parks, Santa Cruz District, Felton, CA.

The central California breeding population contained an estimated 152–1,063 murrelets during the 2013–2016 breeding seasons.

“While still remaining below historic population estimates from the 1999-2003, results presented in this report may signify a positive population response to CADPR [California Department of Parks and Recreation] actions.”

On page 10, continuing onto page 11, a reference is added for the year 2020 as follows:

Felis, J. J, E. C. Kelsey, J. Adams, C. Horton, and L. White. 2020a. Abundance and productivity of Marbled Murrelets (*Brachyramphus marmoratus*) off central California during the 2019 breeding season. U. S. Geological Survey Data Series 1123. Unpublished report prepared by U. S Geological Survey, Western Ecological Research Center.

The central California breeding population contained an estimated 272–601 murrelets during the 2019 breeding season.

Felis, J., J. Adams, and E. C. Kelsey. 2020b. Summary of Marbled Murrelet at-sea survey results in USFWS Conservation Zone 6, central California, during the 2020 breeding season. Unpublished report prepared by U.S. Geological Survey, Western Ecological Research Center.

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

On page 12, a reference is added for the year 2021 as follows:

Mahdizadeh, M. and W. Russell. 2021. Initial floristic response to high severity wildfire in an old-growth coast redwood (*Sequoia sempervirens* (D. Don) Endl.) forest. *Forests* 12:1135.

Coast redwoods had the highest survival rate and canopy retention of trees in old-growth forest at Big Basin Redwoods State Park immediately (0.5 years) after the CZU fire, while Douglas-firs had the lowest survival rate and low canopy retention.

On page 17, a reference is added for the year 2023 as follows:

Potter, C. 2023. Impacts of the CZU Lightning Complex Fire of August 2020 on the forests of Big Basin Redwoods State Park. *California Fish and Wildlife Journal* 109:e1.

“The unprecedented intensity of the CZU Fires together with two successive years (2021 and 2022) of extreme drought and summer heat has inflicted severe damage on the majority of old-growth trees in BBRSP [Big Basin Redwoods State Park].”

On page 18, a reference is added for the year 2024 as follows:

Pacific Seabird Group. 2024. Terrestrial habitat management recommendations for Marbled Murrelets. Pacific Seabird Group Technical Publication Number 7. Available at: <https://pacificseabirdgroup.org/psg-publications/technical-publications/>.

This publication provides recommendations for delineating, protecting, managing, and enhancing existing suitable habitat and developing new suitable habitat; reducing threats and impacts from megafires and human activities; and guidelines for hazard tree removal and infrastructure and energy projects (e.g., wind power, roads, and power lines) that can impact murrelets in their terrestrial habitat.

Overall recommendations for forest management include the following:

- delineate occupied areas;
- protect all habitat;
- maintain and enhance forested areas adjacent to habitat;
- maintain and enhance large blocks of contiguous forest cover;
- minimize predation and predator numbers in and near habitat;
- minimize the effects of disturbance near habitat;
- avoid or minimize adverse impacts to murrelet habitat due to forest fires.

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

Additional recommendations for protecting and conserving murrelets in forests are provided for the following:

- methods for delineating an occupied area;
- creating and maintaining buffers around occupied areas;
- reducing the threat of megafires;
- reducing impacts from human impacts;
- hazard tree removal and utility work;
- minimizing noise and other types of disturbance.

On page 18, the following references are added and revised for the year 2025 as follows:

Leal, M. 2025. Post-CZU fire conditions and changes to habitat suitability for Marbled Murrelets at Huckleberry Campground in Big Basin Redwoods State Park. Unpublished report prepared by Santa Cruz District, California State Parks, Felton, CA.

Several PNTs were identified at Huckleberry Campground in Big Basin Redwoods State Park in 2025, but most that were known there prior to the CZU fire were lost. Six protocol-level murrelet surveys were conducted there in July and August 2025; one survey recorded at least one detection of distant, heard-only murrelets. An ARU deployed at the campground from mid-May to early September 2025 recorded a total of 21 call bouts across six days.

Mahdizadeh, M. and W. Russell. 2025. Post-fire succession in an old-growth coast redwood (*Sequoia sempervirens*) forest. Fire 8:322.

Vegetation characteristics and forest structure were compared between one and four years following the CZU fire in old-growth forest at Big Basin Redwoods State Park.

“While *Ceanothus* can enrich soils with nitrogen, its proliferation may delay or suppress Douglas fir seedling establishment by competing for space and light that can potentially outcompete Douglas fir seedlings and alter the forest composition in the short to medium term.”

“Although overall canopy cover increased slightly from 2021 to 2024, the change was not statistically significant, likely due to the inherently slow growth of upper canopy trees and stressors such as drought.”

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

Singer, S. W. and A. Rinkert. 2025. Impact of the 2020 CZU Fire on Marbled Murrelet nesting habitat at in Big Basin Redwoods State Park. Unpublished report in prep prepared by Steven Singer Environmental & Ecological Services, Santa Cruz, CA.

The status of 107 platform trees was monitored at Big Basin Redwoods State Park before the CZU fire and at ~~two~~ various intervals afterward to determine their suitability for murrelets. A substantial number of platform trees were lost, ~~with losses becoming significant within two years after the fire~~ and the fire caused major changes to the structure and composition of the old-growth forest. Only 11% of Douglas-firs and 40% of coast redwoods were still ~~suitable~~ alive within two years after the fire. However many of these trees were so severely burned that they are no longer suitable for marbled murrelet nesting in the near term. ~~and~~ Both tree species fared significantly better in areas burned at moderate and low severity compared to areas burned at extreme and high severity.

White, L. M., E. C. Kelsey, G. Haight, A. Rinkert, and J. Adams. 2025. Abundance of Marbled Murrelets (*Brachyramphus marmoratus*) off central California during the 2025 breeding season. Unpublished report prepared by U.S. Geological Survey - Western Ecological Research Center, Santa Cruz CA for California State Parks, Santa Cruz District, Felton, CA.

The central California breeding population contained an estimated 149–322 murrelets during the 2025 breeding season, which is one of the lowest annual estimate of the population since surveys began in 1999.

3. REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

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