

BIG BASIN REDWOODS STATE PARK Preliminary General Plan/Final Environmental Impact Report



View of the West Waddell Creek State Wilderness

Response to Comments

State Clearinghouse #2001112104

California Department of Parks and Recreation
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Chapter 1 INTRODUCTION

On June 18, 2012, the California Department of Parks and Recreation (Department) released to the general public and public agencies the Preliminary General Plan/Draft Environmental Impact Report for Big Basin Redwoods State Park (Park). The proposed General Plan will guide future management direction at the Park. It contains a comprehensive and integrated set of parkwide goals and guidelines for the long-term management of the Park that focus on protection of environmental resources, enhancements to visitor use and opportunities, and improvements to administration and operations of the Park. In addition, the General Plan includes proposed park development and designates appropriate land uses.

The Draft Environmental Impact Report (EIR) that is included in the Preliminary General Plan contains the environmental analysis of potentially significant effects of the proposed project. Together, the Draft EIR and this response to comments document constitute the Final Environmental Impact Report for the project.

In accordance with Public Resources Code Section 21091 and CEQA Guidelines Section 15087, an initial 45-day public review period for the Draft EIR was provided. The public was advised of the availability of the Preliminary General Plan/Draft EIR through public notices and notification on the Department's web site and printed in the Santa Cruz Sentinel newspaper. The public notice (Notice of Availability) was posted with the Santa Cruz County Clerk. Copies of the Preliminary General Plan/Draft EIR were also available for review at the following locations: California State Parks: San Mateo Coast Sector Office; Año Nuevo State Park Office; Santa Cruz District Office; Planning Division (Sacramento); Santa Cruz County Libraries: Central Branch, Boulder Creek Branch, Scott's Valley Branch, Felton Branch; Santa Clara County Libraries: Cupertino Library, Los Altos Library, Saratoga Library; San Mateo County Libraries: Half Moon Bay Library, Pacifica Sharp Park Library, Portola Valley Library, Woodside Library; and on the State Parks web site.

The public review period, originally scheduled to end on August 1, 2012, was extended to August 10, 2012 to allow sufficient time for agencies and public reviews. During the public review period, comments on the plan and the environmental issues evaluated in the Draft EIR were received from agencies and individuals. This document provides responses to the written comments received during the total 55-day public review period.

The focus of the response to comments is on the disposition of environmental issues that have been raised in the comments, as specified by CEQA Guidelines Section 15088(b), but also includes responses related to planning considerations of the Preliminary General Plan.

All comments on the Preliminary General Plan/Draft EIR and the responses thereto, are presented in this document, which is organized as follows:

- **Chapter 1** (Introduction) provides a brief overview of the proposed project, describes the requirements under CEQA for responding to the public comments received on the Draft EIR, and describes the organization of the Final EIR.
- **Chapter 2** (List of Commenters) provides a list, in table format, of all written comments received on the Preliminary General Plan/Draft EIR during the public comment period.
- **Chapter 3** (Comments and Responses) provides a complete copy of, and responses to, written comments on the Preliminary General Plan/Draft EIR received during the public review and comment period.
- **Chapter 4** (Recommended Changes to the General Plan) provides a reproduction of portions of the Preliminary General Plan/Draft EIR with proposed revisions to text made in response to comments.

Chapter 2 LIST OF COMMENTERS

This chapter provides a list of all public comments received on the Preliminary General Plan/Draft EIR during the public review period. Table 2-1 indicates the commenter/organization that prepared written comments and the date the comment(s) were postmarked and received.

Table 2-1: List of Written Comments Received

Number	Commenter	Agency/ Organization/ Individual Represented	Date Postmarked
1	John Olejnik	Caltrans, District 5	June 18, 2012
2	Leslie Keedy	Individual	July 13, 2012
3	Bernhardt Schweizer	Individual	July 6, 2012
4	Seth Mason	Individual	July 6, 2012
5	Elliott Sidey	Individual	July 26, 2012
6	Ryan Keyser	Individual	July 26, 2012
7	Scott Peden	Individual	July 29, 2012
8	Kathy Kuyper	Individual	July 29, 2012
9	John Ekstrand	Individual	July 30, 2012
10	Sebastien Praly	Individual	July 30, 2012
11	Kim Norton	Individual	July 30, 2012
12	Diane L. Renshaw	President, Santa Cruz Mtns. Bioregional Council	July 30, 2012
13	Lyndall Erb, PhD	President, Equestrian Trail Riders' Action Committee	July 30, 2012
14	Susan & Martin Garbowitz	Individuals	July 31, 2012
15	Lawrence & Julie Haff	Individuals	July 27, 2012
16	Jose & Sarah Galvin	Individuals	July 31, 2012
17	Terri Vierra	VP, BOD San Lorenzo Valley Water District	August 1, 2012
18	William Newlin	Individual	July 27, 2012
19	Mark Davidson	MBOSC	July 29, 2012
20	Terri Westra & Daryl Lowery		July 31, 2012
21	Shawn A Cronin		August 1, 2012
22	Lee Otter & Susan Craig	CA Coastal Commission	August 1, 2012
23	Anna Weinstein	Audubon California	August 3, 2012
24	Robert Nunes	MBUAPCD	August 1, 2012
25	Heidi Rose	Individual	August 1, 2012
26	Joshua Hart	Individual	August 1, 2012

27	L. Neel	Individual	August 1, 2012
28	L. Neel	Individual	August 1, 2012
29	M. Friis-Hansen	Individual	August 1, 2012
30	Diane K. Noda	US Fish & Wildlife Service	July 30, 2012
31	Reed Holderman	Sempervirens Fund	August 9, 2012
32	Shaye Wolf, Ph.D.	Center for Biological Diversity	August 9, 2012
33	Elisha Hoyt	Individual	August 1, 2012
34	Matt Johnson	County of Santa Cruz	July 19, 2012 August 29, 2012

Chapter 3 COMMENTS AND RESPONSES

This chapter provides a complete copy of the written comments received on the Preliminary General Plan/Draft Environmental Impact Report for Big Basin Redwoods State Park, and presents responses to significant environmental issues raised in the comments, as required by CEQA Guidelines Section 15132, as well as comments pertaining to the Preliminary General Plan.

Each letter is reproduced in its entirety, including attachments. Each letter and comments correspond to Table 2-1. The responses to comments follow each letter. Revisions to text in the General Plan/EIR are shown with a strikethrough or underline. Text that has a ~~strikethrough~~ has been deleted from the General Plan/EIR. Text that has been added is presented as single underlined.

MASTER RESPONSES

A. General Plan and Tiered EIR

As stated in the Executive Summary, Introduction, and in Chapter 5, Environmental Analysis, this General Plan is the primary management document for the park, establishing its purpose and management direction for the future. State Parks is a stewardship agency and the general plan provides the framework for the park's resource stewardship and management of appropriate visitor use. It is a long-term visionary document that provides guidance and direction for future project-level environmental review of site-specific projects. The state park general plan is not considered a master plan for development, and it is different than those prepared for cities and counties. Our tools of adaptive management and carrying capacity allow us to plan for visitation to the parks, and if the resources become threatened or impacted, appropriate management actions are taken to study the cause and effect of problem areas, initiate resource protective measures, and change visitor use patterns or limit the number of visitors where necessary.

The environmental analysis prepared for the general plan is programmatic in scope and serves as a first tier EIR. It evaluates broad environmental issues and does not contain project-specific analysis for the facilities that are considered in the general plan. Strategies for implementation of the general plan are intended to be developed in subsequent planning efforts as they are needed, including the preparation of management plans and specific project plans. As a first tier of planning, this plan provides parkwide goals and guidelines. Future second tier review will provide more detailed information and environmental analysis. At each planning level, specific projects will be subject to further environmental review to determine if they are consistent with the general plan and to identify any potentially significant environmental impacts, mitigation measures and monitoring that would be required by the project. More comprehensive environmental review will be possible at the specific levels of planning, where facility size, location, and capacity can be explicitly delineated, rather than at the general plan level. Additional potentially significant environmental impacts and mitigation measures specific to the project will be identified at that time.

B. Saddle Mountain and Little Basin Development Impacts

Little Basin is an existing recreation development, built and operated by the Hewlett Packard (HP) Company from the 1960s through 2007, as a place to accommodate large company picnics. Camping and other amenities were added in the later years to support the company's activities. This facility is currently owned by California State Parks and operated by a non-profit

organization (United Camps, Conferences and Retreats) under a concessions agreement scheduled to last through 2017. Beginning in 2011, these recreation facilities were made available to the general public for group-oriented recreation activities.

The General Plan emphasizes the preservation of the old growth forest and the park's natural resources in Big Basin Redwoods State Park. It calls for relocating or removing some existing recreation facilities from sensitive resource areas, and providing new facilities and recreation opportunities outside the old growth forest. The Little Basin site is located outside these sensitive resource areas and has potential for expansion of existing facilities and limited new development. The plan emphasizes resource protection and public safety, and acknowledges the need to upgrade and expand roads, utility systems, and infrastructure to support these recreational activities.

The Department's goal for Little Basin is to continue serving the public with an outdoor environmental education facility and group recreation facility. Little Basin accepts groups consisting of four or more individual campers, in which the campers are an intentional group or family unit. This was specifically stated in the current concessions agreement and in the general plan, in part to help regulate visitor access and vehicle traffic on Little Basin Road. The type and level of use remains consistent with the previous use during the past ownership and operations by Hewlett Packard Corp. (HP) and its subsequent use by POST and Sempervirens Fund for group recreation activities. The general plan describes the management intent for Little Basin on page 4-68, which supports group recreation, environmental education, and special event opportunities. It also states that further site studies, resource monitoring and recreation surveys are needed to determine the long-term management, development and use of the Little Basin property. New development, such as a concession-developed and operated overnight lodge with group dining facilities and additional cabins are included in the plan for future consideration. Additional site planning, design, studies, and second-level environmental review would be necessary to determine the scope, potential impacts, and viability of such a development and its relationship with the current use and operations at Little Basin.

As indicated on page 2-19 of the general plan, the current concessionaire is responsible for the management of all aspects of the maintenance and support required to run Little Basin as a first-class camping and recreational facility, which also includes maintaining the on-site water treatment plant and potable water distribution system, campground and recreation facility reservations, and security. State Parks provides ranger patrols and law enforcement as needed. The Department considers resource protection and public safety measures to be essential management actions for day-to-day operations and when changes are being considered. Emergency evacuation procedures are in place for the Little Basin campground. The Tanbark Loop trail/Pine Mountain Road will be maintained as an evacuation route for emergency vehicle access in the event that Little Basin Road is not

accessible in an emergency, and the parking terrace at Little Basin can serve as a heliport for emergency use. Since becoming a part of Big Basin Redwoods State Park, the Little Basin area has been incorporated and fully connected to the state park's water system. In 2012, a new pipeline was installed from the Big Basin Gatehouse to four new water storage tanks located in the Little Basin campground (two domestic and two for fire protection). Trucking water to Little Basin is no longer necessary. The County was asked to make road repairs on Little Basin Road. These and other health and safety measures were taken to accommodate the current level of public use in this area.

The county-owned/maintained Little Basin Road is a public road that presently serves as the primary vehicle access to the state park property at Little Basin, which has been in place for many years. It also serves several private residences along this road. At this broad stage of planning, the general plan guides the Department to coordinate with Santa Cruz County on identifying road improvements and county maintenance actions as indicated by guideline Little Basin 6. State Parks will continue to monitor and evaluate the visitor use at Little Basin and the county road conditions to address problem areas and make recommendations to the County regarding the community's needs. State Parks has as much right to use a public road as other users, and there are mechanisms to coordinate with others to work out shared cost or mitigation. For any new development, State Parks will coordinate with the County of Santa Cruz and Caltrans to initiate traffic and engineering studies for Little Basin Road and its intersection with Highway 236.

A goal of the general plan is to focus new facilities outside the old growth forest and removed from sensitive resources. The general plan identifies the lodge and additional cabins as a concept to be considered at Little Basin (outside the old growth forest) in the long-range planning for the park. There are many factors yet to consider before we can implement this idea. The Department envisions a concession-built and operated facility for current and future group use. Operators would need to evaluate the costs and feasibility of new construction, operations, and resource protection measures, including an assessment of potential environmental impacts and appropriate mitigation, as well as traffic, circulation and provisions for public safety. An environmental assessment of potential impacts would be required for new facilities development based on the project-specific design details including building size, location, required parking, utilities and signage, with projections for the number and frequency of visitors and related traffic. These details are currently unknown.

Saddle Mountain is located at the intersection of Highway 236 and Little Basin Road. The General Plan supports interim use of this site for the outdoor environmental education program, but recognizes the site's potential for other long-term uses, including a welcome center for visitors, ranger offices, and opportunities for recreation, interpretation and education programs. In

planning for this state park, our emphasis was on the preservation of the old growth redwood forest and the need to reduce the environmental impacts and intensity of use in the headquarters area that have occurred over the past 100 years. The planning team considered several alternatives to remove, relocate, or develop new facilities outside the old growth forest. Along with Little Basin, the Saddle Mountain property presents one of the few areas that could serve this purpose. The general plan describes its potential for possible uses, including ranger contact with new visitors and orientation to other park areas for certain recreation activities and visitor experiences. The historic Gatehouse and adjacent park properties would also be considered for accommodating visitor parking and administrative services. One of our main goals is to contact new visitors at the park entrance and reduce the traffic movements in and out of the Headquarters area.

With proper site planning and design, the concept for a new welcome center and shuttle system at Saddle Mountain would provide a relief valve for congested traffic, limited parking, and impacted resources in the Headquarters area during peak visitation periods. To avoid shifting this problem from one area to another, the general plan stipulates that further parking and traffic analysis of the major roadways in these two areas would be necessary. Provisions for visitor and non-visitor traffic through the park would be maintained on State Highway 236. Site-specific planning will include coordination with Caltrans, County of Santa Cruz, and Cal Fire to ensure proper design and public safety considerations for the intersection of Highway 236 and Little Basin Road, with provisions for public transit, shuttle parking, and ADA accommodations. Site-specific projects would also include public input and second-level environmental review.

C. Marbled Murrelet Habitat Management and Species Protection

Big Basin Redwoods SP has the largest remaining stand of old growth redwoods in this region. Old growth coastal redwoods provide habitat for marbled murrelets, although this area is the very southern-most reach and supports a small and fairly isolated population. State Parks received letters from four different agencies expressing concern about the management efforts at Big Basin Redwoods State Park to preserve and protect the marbled murrelet and its old growth habitat; also, expressing opposition to the preferred alternative and general plan proposals that may have an adverse impact on the long-term recovery and survival of the Santa Cruz Mountains marbled murrelet population.

State Parks acknowledges the dedicated work by resource professionals with the Santa Cruz Mountains Bioregional Council, Center for Biological Diversity, US Fish and Wildlife Service, and Audubon Society in protecting the marbled murrelet and its old growth habitat in the Santa Cruz Mountains. The on-going work has been a collaborative effort between State Parks, DFG, USFWS and

other interested partners in educating park visitors at Big Basin Redwoods State Park and developing strategies to help improve the status of the species, including directed studies aimed at reducing the rate of nest predation. State Parks encourages this continued working relationship with important training, mapping, and sharing resource information for effective management at all state parks in this region.

The preferred plan includes important goals and guidelines for effective resource management that will protect critical habitat and special status species. Implementation of site-specific projects will include further impact analysis and environmental review. The plan emphasizes that continued coordination between State Parks, CDFG, and the USFWS is essential toward the management of marbled murrelet habitat and species protection. State Parks also strives to provide sufficient funding, staffing and professional expertise for effective park management.

In order to track information used by State Parks in this document, State Parks has provided an annotated bibliography of murrelet studies in chronological order to show new information has been developed.

2012

Miller S.L., M.G Raphael, G.A. Falxa, C. Strong, J. Baldwin, T. Bloxton, B.M. Galleher, M. Lance, D. Lynch, S.F. Pearson, C.J. Ralph, C.J. and R.D. Young Recent Population Decline of the Marbled Murrelet in the Pacific Northwest. The Condor 114(4):771-781. 2012

"We document here a decline of nearly 30% in the Marbled Murrelet (*Brachyramphus marmoratus*) population of Washington, Oregon, and northern California between 2000 and 2010"

"Annual population estimates for the plan ranged from an estimated 23 700 (95% CI: 18 300 to 29 000) birds in 2002 to a low of 16 700 (95% CI: 13 100 to 20 300) in 2010, representing an average rate of decline of 3.7% annually (95% CI: -4.8 to -2.7%) from 2001 to 2010. This annual rate suggests a total decline of about 29% during this period. We documented downward trends for Washington (conservation zone 1) and for the outer coast of Washington (conservation zone 2). These declines coincide with reductions in the amount of nesting habitat. Further research to evaluate the potential marine and terrestrial factors responsible for the declines is planned."

Perry, M. Z. and R. W. Henry. 2012. Abundance and Productivity of Marbled Murrelets off Central California During the 2010 and 2011 Breeding Season. Final Report Submitted to California State Parks

"In summary, the 2010 and 2011 at sea survey data suggest an improving scenario for the central California marbled murrelet population. The primary hypothesis for the dramatic 2007-2008 dip in population numbers appears to be a temporary exodus from the study area. As with all of the survey data, it is important to recognize the complexities and errors associated with surveying a small elusive bird in the marine environment. The 2010 and 2011 increases in juvenile rations are likely due to a combination of factors including reduced corvid predation, favorable prey abundance at sea, and shifting inland distribution to stands with lower predation."

2011

Gabriel, P.A. and R.T. Golightly. 2011. Experimental Assessment of Taste Aversion Conditioning on Steller's Jays to Provide Potential Short-Term Improvement of Nest Survival of Marbled Murrelets in Northern California. Report to National Park Service (agreement #J8485100027).

"Carbachol treatment had an overall strong effect on corvid predation, reducing corvid attacks on murrelet-mimic eggs by 37 to 72% compared to control eggs."

2010

Perry, M. Z. and R. W. Henry. 2010. Abundance and Productivity of Marbled Murrelets off Central California During the 2009 Breeding Season. Final Report Submitted to California State Parks.

The 2009 abundance estimate was significantly higher than 2007-2008.

"It is unclear whether our results indicate that Marbled Murrelets in central California moved out of the survey area in 2007 and 2008, and then returned in 2009, or if the recent increase was due to the immigration of Murrelets from larger populations to the north."

Perry, M. Z. and R. W. Henry. 2010. Recovering marbled murrelets via corvid management: a population viability analysis approach. Biological Conservation 143: 2414 – 2424.

"...the population could only be stabilized ($\lambda = 1$) with only a 60% reduction in predation if P_{nest} could be increased from 0.33 to 0.77 (assuming $P_{\text{fail-corvid}} = .69$ and $P_{\text{re-nest}} = 0.13$). Without an increase in P_{nest} , a

100% reduction in corvid predation would be required to stabilize the population for this parameter set.”

“...a management program based on lethal control that can at best halve predation rates will be ineffective if the complete elimination of predation is required to stabilize the population.”

It is important to note that the model examines the predation rate and not the number of predators.

Suddjian, D.L. 2010. Summary of 2009 Marbled Murrelet Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.

“Activity levels have remained relatively low since 2002, following a major drop in activity levels of the mid-1990s”

“The average number of detections for all five stations combined was lower in 2009 than in any other year”

Within Big Basin Redwoods State Park, “The Great Horned Owl detections were of note, as this species had not been recorded in the area of murrelet survey stations in any prior year of this study. But in 2009 a male was calling east of ‘Huckleberry’ on June 16, and a female was giving food solicitation calls there on July 7, suggesting a pair was on territory and may have nested in the area.”

“Declining trends for the two areas with the longer-term data sets – Big Basin Park and Peter’s Creek Bridge in Portala – continued to be highly significant, and significant negative trends were evident for the first time at both Butano and Memorial parks.”

2009

Gutowsky, S., M.H. Janssen, P. Arcese, T. K. Kyser, D. Ethier, M.B. Wunder, D.F. Bertram, L. McFarlane, C. Lougheed and R. Norris. 2009. Concurrent declines in nestling diet quality and reproductive success of a threatened seabird over 150 years. *Endangered Species Research* 9: 247-254.

“...reproductive success of marbled Murrelets breeding in the Salish Sea has declined over the past 150 yr and that declines in nestling diet may be partly responsible.”

Malt, J. M. and D. B. Lank. 2009. Marbled murrelet nest predation risk in managed forest landscapes: dynamic fragmentation effects at multiple scales. *Ecological Applications* 19: 1274 – 1287.

Between 2004 and 2006, on Vancouver Island 448 artificial murrelet nests, comparison made between 57 real nests and 55 artificial nests. Video camera recorded 132 nest “discoveries” by potential predators. Steller's jay were the most abundant avian predator and Steller's jays are thought to drive patterns of predation risk at the regional scale. Steller's jay abundance at a landscape scale increases as old-growth forest declines, suggesting that jay densities will increase as forests are harvested.

The cameras also recorded mammalian potential predators such as deer mice and various species of squirrels. Patterns of nest fates did not differ between real and artificial nests. Nest disturbance probability at “hard” (clearcut) edges was 2.5 times that of interior forest, but “soft” edges (regenerating forest) had ½ the disturbance probability of interiors. Natural edges (i.e. riparian areas) had no edge effect at all.

At a landscape scale, overall avian disturbance risk declined by as much as 50% with increasing amounts of regenerating forest. Steller's jay abundance was expected to be less at “soft” edge areas, but the results showed no such effect. They were abundant at both “hard” and “soft” edges and rare at natural edges.

Perry, M.Z., S.H. Newman, C.D. Storlazzi and S.R. Beissinger. 2009. Meeting Reproductive Demands in a Dynamic Upwelling System: Foraging Strategies of a Pursuit-Diving Seabird, the Marbled Murrelet. *The Condor* 111(1): 120-134.

“Murrelets spent more time diving during upwelling than oceanographic relaxation, increased their foraging ranges as the duration of relaxation grew longer, and reduce their foraging ranges after transitions to upwelling.”

“Breeders foraged closer to nesting habitat once they initiated nesting and nest attendance was a maximum.”

“...to meet reproductive demands during nesting, Murrelets adopted a combined strategy of reducing energy expended commuting to forage sites and increasing aerobic dive rates.”

U.S. Fish and Wildlife Service. 2009. 5-Year Review for the Marbled Murrelet.

This document provides a summary of literature available as of 2009. It notes the apparent downward trend in abundance and low reproductive success. The Service's final recommendation was to maintain the marbled murrelets status as “threatened” with a caveat that without

demographic changes (notably reproduction) a change to "endangered" may be warranted in the future.

2007

Hebert, P. N. and R. T. Golightly. 2007. Observations of predation by corvids at a marbled murrelet nest. *Journal of Field Ornithology* 78: 221 – 224.

Between 2002 and 2005 a single nest was observed for four breeding seasons within Redwoods National and State parks. Of the four years, two years the nest was predated by Steller's jay, one year by a common raven, one year the nest successfully fledged a chick. One year a jay attempted to attack a chick but was warded off. Observations concluded that since the eggs are gone after a predation, it is possible to record a nest as empty (no nesting) if monitoring gets started late in the season, so predation rates can be under-estimated. Also, not all predation attempts are successful. Also, it was noted that murrelets are more susceptible to predation early in the season.

2006

Marzluff, J.M. and E. Neatherlin. 2006. Corvid response to human settlements and campgrounds: Causes, consequences, and challenges for conservation. *Biological Conservation* 130(2006): 301-314

"The behavior and demography of crows, ravens, and jays was correlated to varying degrees with proximity to human development."

"Annual survival of crows was positively associated with proximity to human settlements and campgrounds."

"Small corvids (jays) were common nest predators across our study area but their contribution as predators did not vary with proximity to settlements and campgrounds. In contrast, large corvids (crows and ravens) were rare nest predators across our study area but their contribution varied greatly with proximity to settlements and campgrounds."

"...removing large corvids may do little to reduce overall rates of nest predation because of the diverse predator assemblage, but reducing anthropogenic food in the landscape may be effective."

"Some corvids ... increase with settlements... Steller's jay... do not"

"...changes in corvid populations are not always associated with similar changes in nest predation... and even where they are, determining causal connections is difficult."

"Predators like crows may respond dramatically to human activity and influence the risk of predation, but controlling them may do little to reduce predation because other abundant predators like jays and small mammals prey on many more nests."

"Animal-proof garbage cans and camping regulations will not be enough to control predators."

Herbert, P.N. and R.T. Golightly. 2006. Movements, Nesting, and Response to Anthropogenic Disturbance of Marbled Murrelets (*Brachyramphus marmoratus*) in Redwood National and State Parks, California. Final Report.

"When nests were exposed to disturbance in form of sound from an operating chainsaw, neither incubating adults or [sic] chicks flushed from the nest. The proportion of resting behavior was significantly less when the saw was operating than before or after. Reproductive success was not reduced when the nest were exposed to the sound disturbance. No correlation was found between nest success and distance from roads or trails. However, there was a potential for indirect effects of longer-term (greater than 15 minutes) due to potential attraction of corvids."

2005

Vigallon, S. M. and J. M. Marzluff. 2005. Abundance, nest sites, and nesting success of Steller's jays along a gradient of urbanization in western Washington. Northwest Science. 79: 22 – 27.

Jays are more abundant in wild, non-urban sites and in areas of fragmented forest. Jays nested close to edges (within 150 meters of trails). In Seattle, jay abundance was higher in suburban areas than in "exurban" areas, possibly due to anthropogenic food sources.

Vigallon, S. M. and J. M. Marzluff. 2005. Is nest predation by Steller's jays incidental or the result of a specialized search strategy? The Auk. 122: 36 – 49.

Studied the range and nest predation behavior of Steller's jay in managed forests in Washington State. The study followed 26 jays fitted with radio-transmitters. Artificial nests were used to study predation rates in different scenarios.

Average home-range size for Steller's jay was 57 hectares. Jays show an "area of dominance," which diminishes as one gets further from the nest. Ninety-five percent of Steller's jay foraging observations were within 50 meters of the forest edge. Nest predation occurred more within home-range areas- jays find nests incidentally during foraging forays for their food of choice (mainly insects). Jays did not demonstrate a search strategy for nests.

2004

Burger, A. E. et al. 2004. Effects of habitat fragmentation and forest edges on predators of marbled murrelets and other forest birds on southwest Vancouver Island. Proceedings of the species at risk, pathways to recovery conference.

Steller's jay were consistently the most common avian predator. Percent occurrence and relative abundance of Steller's jays and common ravens were higher at stations bordering clearcuts and roads. Highest counts were usually at sites frequently used by people. Predators were more abundant in fragmented forests than undisturbed forests. Eggs in artificial nests disappeared more rapidly when located near clearcuts. Natural edges (i.e., conifer forest/riparian) are less likely to have an increased predator risk from corvids than "hard" edges bordering clearcuts and roads.

2003

McFarlane Tranquilla, L., R., Bradley, N. Parker, D. Lank and F. Cooke. 2003. Replacement laying in Marbled Murrelets. Marine Ornithology 31:75-81.

Reports on the first confirmed replacement egg laid by marbled murrelet and estimates replacement laying to be between 13 to 63% annually. This data was later incorporated into Peery and Henry 2010 viability analysis.

Peery, Z.M., S.R. Beissinger, S.H. Newman, E.B. Burkett and T.D. Williams. 2003. Applying the Declining Population Paradigm: Diagnosing Causes of Poor Reproduction in the Marbled Murrelet. Conservation Biology: 1088-1098.

"The average proportion of breeders... varied significantly between years: 0.11 in 2000 and 0.50 in 2001. Murrelets spent significantly more time foraging in 2000 than in 2001, suggesting that low food availability limited breeding in 2000"

"...reproduction of Marbled Murrelets in central California is limited by food availability in some years and by nest predation in others..."

This article also contains a table with the 19 nests locations and fates used for the viability analysis found in Peery and Henry 2010.

2002

Liebezeit, J.R. and T. L. George. 2002. A Summary of Predation by Corvids on Threatened and Endangered Species in California and Management Recommendations to Reduce Corvid Predation. Species Conservation and Recovery Program Report. 2002-02, Sacramento, CA 103pp.

Documents corvid trends throughout California. American crow and common ravens have increased throughout California. The results for Steller's Jay appear mixed with Breeding Bird Surveys (which represent a more standardized methodology) showing relatively stable trend through the study period and the Christmas Bird Counts (where effort varies from year to year) showing an increase in abundance.

"It is clear that reducing the impacts of corvids on threatened and endangered species is a complex issue with no simple solution."

2001

Brand, L. A. and T. L. George. 2001. Response of passerine birds to forest edges in coast redwood forest fragments. The Auk 118 (3): 678 – 686.

Study examined which of the common passerine species are sensitive to forest edges during the breeding season. One finding was that Steller's jays had higher relative densities near edges.

Luginbuhl, J.M., J.M. Marsluff and J.E. Bradley. 2001. Corvid Survey Techniques and the Relationship Between Corvid Relative Abundance and Nest Predation. J. Field Ornithology 72(4):556-572

"Corvid numbers were poorly correlated with the rate of predation within each forested plot."

"Corvids are habitat generalist with relatively large home range sizes..."

"...we found little evidence for a linear relationship between corvid abundance and predation..."

"Our results indicate that using measurements of corvid abundance to assess nest predation risk is not possible at the typical scale of homogenous plots...Rather, this approach should be considered useful only at the landscape level on the order of 5-50 km²"

McFarlane Tranquilla, L., 2001. Using Multiple Methods to Describe Breeding, Stress Response, and Disturbance of Marbled Murrelets (*Brachyramphus marmoratus*). Simon Fraser University 148 pp

Study examined the potential role of investigator disturbance (eg., capture, handling and processing) in the failure rate of females with fully developed breeding patches. Investigator disturbance explained some but not all of the failures. They also detected a seasonal component to the failure rate.

1995

Nelson, S. K. and T. E. Hamer. 1995. Nest success and the effects of predation on marbled murrelets. UDSA Forest Service Tech. Rep. PSW-152.

72% of the 32 nests were unsuccessful. The major cause was nest predation (56%). Over half of predation took place in egg stage. Predators were mostly common raven and Steller's jay. Nests in sites in the lower Pacific States (WA, OR, CA) had a higher rate of failure due to predation than AK, BC (57% vs. 43%). Potential bias in that many nests were in areas of fragmented forest (higher abundance of Steller's jays). Successful nests were significantly further from habitat edges and better concealed than unsuccessful nests.

"We hypothesize that because this seabird has a low reproductive rate (one egg clutch), small increases in predation will have deleterious effects on population variability."

1991

Singer, S. W., N.L. Naslund, S.A. Singer and C.J. Ralph. 1991. Discovery and observations of two tree nests of the marbled murrelet. The Condor 93:330 – 339.

The study characterized two nest trees (these were the 3rd & 4th nests found of marbled murrelet) within Big Basin Redwoods State Park. Both trees were Douglas firs, large dbh (210 cm & 196 cm), large nest branches, moss-covered, horizontal alignment, well-shaded, high in tree. Both nests were predated; one by a common raven the other by a Steller's Jay.

Suddjian, D.L. 2004. Executive Summary of 2003 Corvid Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.
Suddjian, D.L. 2005. Summary of 2004 Corvid Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.

Suddjian, D.L. 2005. Summary of 2005 Corvid Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.
Suddjian, D.L. 2008. Summary of 2006 Corvid Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.
Suddjian, D.L. 2008. Summary of 2007 Corvid Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.
Suddjian, D.L. 2009. Summary of 2008 Corvid Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.
Suddjian, D.L. 2010. Summary of 2009 Corvid Monitoring Surveys in the Santa Cruz Mountains. Report for the Command Oil Spill Trustee Council.

The Suddjian annual reports describe the existing conditions for each year. As a collection, they document implementation of various management actions and attempt to connect the trends in bird numbers to the actions. Findings from the 2009 report include a significant decline in Steller's jay numbers; no trend in common raven numbers and the second year of recorded American crow presence.

Resource Management Goals and Guidelines

Chapter 4 of the General Plan includes resource protection guidelines and measures for adaptive management that will be incorporated into subsequent planning, design, and environmental review to ensure that new programs and facilities achieve the desired outcomes and stated goals of the plan, and to avoid significant adverse impacts on park resources. Specific guidelines for murrelet management and conservation are identified below:

- Guideline (**Headquarters A1**) on page 4-57 and the Marbled Murrelet Management and Conservation Goal and guideline (**Murrelet 1**) on page 4-17 calls for consultation and coordination with California Department of Fish and Game and the U.S. Fish and Wildlife Service.
- Goals and Guidelines (**Murrelet 1** through **8**) on pages 4-17 and 4-18 provide guidance on food sanitation, trash management, habitat protection, research and education.
- Goals and Guidelines for **Special Status Animals 1** through **3** on pages 4-15 and 4-16 provides guidance on the projects, programs, and methods to protect and rehabilitate special status animal populations and their habitats.

Marbled Murrelet Habitat Preservation

In the Final EIR, a review of the studies done in the last ten years shows that challenges to marbled murrelet survival are varied and inconsistent from year to year and location to location. Predation is one of the variables that have been implicated in the decline of the murrelet population. Given the secretive nature of the marbled murrelets and the lack of nest observations, data on local predation rates is exceedingly difficult to generate. The data

on local predation rates and nest distribution is over ten years old and based on 19 individual nests from 1989 to 2002. Land and at-sea surveys (the most direct measure of population trends) show a decrease some years and an increase in other years. Numbers have declined, perhaps up to 30% throughout the murrelet northern range. However, based on adult/juvenile ratios, the local population may still be in decline, although the same data appears to indicate some improvement for the central California population.

However, in response to the concerns articulated by various letter writers, State Parks finds that research is still on-going as to the causes of the species decline, or even whether there has been a decline in this population. The commitment to predator control and support for other methodologies that would address the rate of decline serves as mitigation for proposed activities. In addition, Parks has reduced cabins in the redwood grove and moved some activities from the old-grove area. However, Parks finds that there is a significant, unavoidable impact with respect to the speculative nature of the research at this time. It is unclear what is causing the decline in numbers, whether disturbance of habitat, predation, or loss of other habitat in other areas. Conversely, it cannot be said with certainty that the activity of Parks visitors in the old-grove redwoods is the reason for the dwindling numbers. This lack of definitive information leads State Parks to make the required overriding findings for a significant unavoidable impact.

In 2005, improved trash management and corvid depredation efforts began in Big Basin Redwoods State Park. State Parks continues its support for predator control and directed studies aimed at reducing the rate of nest predation. Towards this goal, State Parks is working with DFG and USFWS to promote and support methodologies that in addition to controlling the numbers of predators, would directly address the rate of predation. One such measure is the experimental egg aversion treatments proffered by Gabriel and Golightly (2011). While State Parks will continue efforts to reduce numbers of ravens within its boundaries, it's clear that solutions to landscape level increases in ravens will need to include region-wide education and control efforts.

More detailed explanations, with supporting data, are presented in our response to the individual comments received from the Center for Biological Diversity (Responses 32-1 through 32-8).

Park's Purpose and Vision

The park's purpose and vision remains the same today as proclaimed by the founders of the Sempervirens Club in 1900; *preserving the redwoods, saving the fauna and flora for scientific study, and creating a park for all people.*

Following the establishment of the park in 1902, public support and ongoing efforts continued to ensure that the park would indeed be preserved for future generations. This sentiment was a part of the conservation movement

philosophy and policy of the times, and continues on today. The General Plan emphasizes the preservation of the old growth forest and the park's natural resources, utilizing sustainable management practices to improve the ecology and health of the coast redwood forest and associated habitat. To accomplish this goal, the plan calls for relocating or removing some existing facilities (e.g. individual campsites, picnic sites, trails, etc.), where necessary, and implementing effective management strategies to protect sensitive resources and avoid or reduce significant adverse impacts. No new buildings are proposed within the old growth forest.

With the establishment of good access to the park in 1915, the park attracted visitors from San Francisco and around the world. Historic roads (including portions of Highway 236) traverse the park into the old growth forest. Significant historic buildings remain from the park's early period of recreation development and preservation efforts. These remaining buildings are protected and preserved for their historic values and collectively for their national significance. The buildings are utilized for various functions that aid in their long-term preservation, which are accompanied by essential support facilities for public access, education, and recreational enjoyment. Accessibility improvements are being made to buildings and parking lots in the Headquarters area to accommodate all visitors to this area within the old growth forest. Interpretive activities and campfire programs help educate park visitors (campers, picnickers, hikers), and inspire youth outdoor environmental education programs. These park programs help visitors understand the park's history, forest ecology and its associated plant and wildlife habitats, and promote a greater public awareness of the resource sensitivities and the kinds of impacts they can have on them.

The General Plan proposes to retain existing facilities in the Headquarters area, to continue the educational benefits through outdoor recreational experiences, and to preserve the historic buildings, so long as these facilities and visitor use can be managed to avoid significant impacts to natural and cultural resources. A Statement of Overriding Considerations was prepared that finds the proposals contained in the general plan, including the preservation of historic resources, accessibility improvements, and new development for park operations and visitor services, outweighs the potential adverse environmental effects of wildlife disturbance associated with human-related activities within the old growth redwood forest.

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
 SAN LUIS OBISPO, CA 93401-5415
 PHONE (805) 549-3101
 FAX (805) 549-3077
 TDD (805) 549-3259
<http://www.dot.ca.gov/dist05/>



*Flex your power!
 Be energy efficient!*

June 18, 2012

SCRz-1/9-Var.

David Keck
 California Department of Parks & Recreation
 P.O. Box 942896
 Sacramento, CA 94296-0001

Dear Ms. Wagner:

COMMENTS TO BIG BASIN REDWOODS STATE PARK MASTER PLAN

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above referenced project and offers the following comments.

1. Caltrans supports planning efforts that are 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 jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.
2. Following the completion of this programmatic document, each ensuing development that impacts the State right-of-way will require a traffic study to analyze both cumulative and project-specific impacts. It is recommended that the analysis be prepared in accordance with the Department's "Guide for the Preparation of Traffic Impact Studies."
3. Because we are responsible for the safety, operations, and maintenance of the State transportation system, our Level of Service (LOS) standards should be used to determine the significance of the project's impact. We endeavor to maintain a target LOS at the transition between LOS C and LOS D on all State transportation facilities.
4. The traffic study should include information on existing traffic volumes within the study area, including the State transportation system, and should be based on recent traffic volumes less than two years old. Counts older than two years cannot be used as a baseline.
5. The methodologies used to calculate the LOS should be consistent with the methods in the current version of the Highway Capacity Manual. All LOS calculations should also be included in the Draft EIR's as an appendix made available for review.
6. At any time during the environmental review and approval process, Caltrans retains the statutory right to request a formal scoping meeting to resolve any issues of concern. Such formal scoping meeting requests are allowed per the provisions of the California Public Resources Code Section 21083.9 [a] [1].

1-1

"Caltrans improves mobility across California"

Big Basin Redwoods Park Master Plan
June 18, 2012
Page 2

If you have any questions, or need further clarification on items discussed above, please don't hesitate to call me at (805) 542-4751.

Sincerely,



JOHN J. OLEJNIK
Associate Transportation Planner
District 5 Development Review Coordinator

cc: Brandy Rider (D5)

Response to Letter 1 – John J. Olejnik, Caltrans, District 5

1-1 Please see Master Response (A) on the General Plan and tiered EIR.

Since this is a programmatic document, a traffic study was not prepared in the development of the Preliminary General Plan and Draft EIR. As indicated in your comment letter, traffic studies should be based on recent traffic volumes less than two years old. The general plan is a long-range management document for the park. The plan's proposals are conceptual and would require additional project planning, site studies, traffic studies, environmental review, allocated funding and operational support before implementation can occur.

State Parks will contact Caltrans during the planning and design of site-specific projects, to identify required traffic studies and analysis of conditions and proposed development that would affect the transportation system in and around Big Basin Redwoods State Park. At that future time, State Parks will consult with Caltrans and review the current versions of the Highway Capacity Manuals and the Guide for Preparation of Traffic Impact Studies for guidance on the standards for level of service, baseline traffic volumes, and the process for environmental review and approvals.

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
 SAN LUIS OBISPO, CA 93401-5415
 PHONE (805) 549-3101
 FAX (805) 549-3077
 TDD (805) 549-3259
<http://www.dot.ca.gov/dist05/>



*Flex your power!
 Be energy efficient!*

August 8, 2012

SCRz-1/9-Var.

David Keck
 California Department of Parks & Recreation
 P.O. Box 942896
 Sacramento, CA 94296-0001

Dear Mr. Keck:

COMMENTS TO BIG BASIN REDWOODS STATE PARK MASTER PLAN – 2nd LETTER

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above referenced project and offers the following comments.

1. Caltrans appreciates that throughout the document coordination is encouraged between our respective agencies, particularly when improvements to the park impact transportation, such as the Waddell Beach area. When that time arrives for specific projects, any work within the State right-of-way will require an encroachment permit issued from Caltrans. Detailed information such as complete drawings, biological and cultural resource findings, hydraulic calculations, environmental reports, traffic study, etc., may need to be submitted as part of the encroachment permit process.
2. Multiple sections of the document discuss “providing review and input to Caltrans on their planning and design for the proposed Highway 1 bridge replacement.” However, due to recent developments, this specific bridge project is no longer active. To keep consistency and accuracy, we might suggest removing reference to it from you document.

If you have any questions, or need further clarification on items discussed above, please don't hesitate to call me at (805) 542-4751.

Sincerely,

JOHN J. OLEJNIK
 Associate Transportation Planner
 District 5 Development Review Coordinator

cc: Brandy Rider (D5)

“Caltrans improves mobility across California”

1A-1

Response to Letter 1A – John J. Olejnik, Caltrans, District 5

1A-1 State Parks will coordinate with Caltrans for specific park projects that encroach on State Route 1 (SR 1) rights-of-way; comply with the encroachment permit process and associated requirements; and provide for mitigation directly associated with specific park projects when necessary. At this time, financing, scheduling and implementation responsibilities cannot be discussed because specific park development projects have not been selected or proposed. When projects have been determined, State Parks will coordinate and discuss all pertinent issues with Caltrans.

It is unfortunate that the Waddell Creek Highway 1 bridge replacement project is no longer considered “active.” State Parks requests that Caltrans maintain this project on a priority list for future funding allocations. On-site discussions with between State Parks, Caltrans, and Coastal Commission staff during our general planning process revealed common goals, critical needs, and potential public benefits for visitor safety, coastal access, and resource management and protection that would result from a future bridge project at the mouth of Waddell Creek. Coastal Commission staff also recommended guideline changes to reflect potential bridge replacement/highway realignment alternatives.

The final general plan will update the current status of the Caltrans bridge replacement project, and modify the text in the guideline Waddell Beach 3 on pages ES-7 and 4-65 to read as follows:

Waddell Beach 3: ~~Provide review and input to Caltrans on their planning and design for the proposed Highway 1 bridge replacement at the mouth of Waddell Creek to promote desirable hydrological, riparian, and estuarine conditions and facilitate safe vehicle ingress and egress from Highway 1. As part of a fully integrated plan for both sides of the highway, incorporate day use parking (approx. 50 - 100 spaces), distributed on either the inland side of Highway 1 depending on resource constraints and future roadway alignment, with safe pedestrian access along Waddell Creek from the inland side of the highway to the Waddell Beach.~~

BIG BASIN REDWOODS STATE PARK: General Plan /Draft EIR

Review comments

Prepared by Leslie Keedy - Property Owner

505 Upper Bloom Grade Boulder Creek Ca 95006

831 338-9009/831 212-6907

Dated July 13, 2012

Introduction:

Upon review of the Master Plan and DEIR it is clearly an inadequate document and elements of the proposed Master plan and DEIR will require further analysis and further mitigation. The existing conditions and proposed impacts specifically related to increased recreational use of Little Basin and the proposed relocation of the Big Basin State Park headquarters to Saddle Mountain have not been reviewed and studied thoroughly, it is absent of environmental review analysis, related documents and required attachments typical of DEIRS and complete Draft Master Plans.

2-1

This document needs to include further environmental reviews; including an air quality, traffic and parking analysis prepared by both County and Cal Trans State engineers, results from an impact study pertaining to increased noise and decibel levels relative to our current more natural ambient levels in these areas, and a study on impacts to existing groundwater and hydrology from draw down, increased recreational waste products, and increases in erosion and sedimentation from increases in public use.

Increased recreational use in Little Basin and Saddle Mountain will significantly change and impact the existing local area. It will increase unauthorized access concerns unauthorized parking, trespass onto private land, damage to private property, increased trash, congestion and wear on the road. Specific language on gating, signage and methods to limit unauthorized access needs to be incorporated into the Master Plan to protect residents from park patron intruders. Road degradation from an already increasing volume of non-local traffic on a virtually unmaintained County Road- Little Basin needs to be further evaluated. A maintenance agreement needs to be created between the County and State Parks to maintain and improve road conditions into perpetuity. The road will require costly widening, large tree removal, resurfacing and ongoing maintenance to accommodate the volume of State Park patrons that will use these two newly developed areas. This traffic impact is not a local County problem but a State concern; there are already width issues and increased traffic congestion problems for residents due to park goers. As presented, the mitigation measures stated in the Master Plan and DEIR for Little Basin and Saddle Mountain are inadequate to support the implementation of these two concepts.

2-2

A more detailed section on how maintenance and enforcement will be adequately addressed is required in the Master Plan. Additionally, there is no discussion of where the Ranger Headquarters will be located. If the park HQ is to be relocated to Saddle Mountain than the Ranger HQ must accompany it to regulate and enforce the increased use and volume of people at this location. This location must be specified in the enforcement discussions of the Master Plan for the proposed new park headquarters. Currently there is no maintenance of State Park land and no enforcement to assist local residents with illegal activity. How expanded recreational uses will be sustained, managed, enforced and funded needs to be thoroughly evaluated and incorporated into the language of the Master Plan and DEIR.

2-3

The preparation of the MP and DEIR documents demonstrates the State's current resource level and a depleted budget. Conclusions asserted in the DEIR are not based upon fact, local analysis or by professionals including the submission of studies. Instead conclusions appear to be conjecture, based upon best case scenario outcomes in lieu of the CEQA required worst. The document is a work product from staff required to operate in a world of depleted resources with inadequate funds or time vested to properly prepare a study of this magnitude. Although individual project DEIRs will accompany these documents into the future, these drafts need to include more detail and analysis to be acceptable.

2-4

Attached to my submitted comments are photographs of existing local site conditions on Little Basin Rd and Upper Bloom Grade. Residents deal with dumping and vandalism issues already, a lot, because the State is slow to respond, if they ever do. I have also included samples of emails to "High Ranking" and fairly well compensated state employees that have never responded to my requests for dialog involving existing State property concerns. It is my unfortunate experience over the last decade that State Park employees do not respond to or help residents, or engage in dialog period and no resolution of existing concerns occurs so it is difficult to imaging a successful response if recreational uses are to be expanded in the Little Basin neighborhood.

Unfortunately it is a valid concern from local residents that the proposed increased recreational uses to accommodate Saddle Mountain and Little Basin, requiring Little Basin Road for access, will create a substantive impact to our quality of life and the native environment and that will not be adequately addressed by the local State Park Department.

The proposed unregulated and unmaintained use increases will most likely significantly degrade and permanently alter the current conditions enjoyed by residents of the Little Basin area. A complete Master Plan and DEIR that is acceptable to neighbors must include more detail to defensibly qualify and quantify potential significant impacts. It is clear that more analysis and mitigation measures are required to satisfy the CEQA requirements for environmental review of this Master Plan.

Comments and suggested additions to Draft Master Plan by page:

ES-6 Saddle Mountain & 236

Add- maintain and enhance existing infrastructure within areas that will experience an increase in volume and use. Require monitoring and future analysis on environmental and social impacts. Add signage to Little Basin Road; widen Little Basin Road at 236 to accommodate increase traffic volumes. Create an Agreement and appropriate State funds to assist the County with maintaining County roads impacted by the State created increases in traffic volume and public use.

2-5

Add- relocate Ranger HQ to Saddle Mountain to ensure that proper public information is provided including outreach, education, interpretation and an adequate law enforcement presence is available to address increases in public use for environmental protection and public safety. Enforcement patrols and Park Ranger Presence required in residential interface areas.

ES-8 Little Basin

Add-maintain and enhance existing infrastructure and access to the Little Basin area, improving the road, signage for no parking and trespass onto private lands, install gating and traffic diversions and chokers in unauthorized areas. Require monitoring and future analysis on environmental and social impacts.

2-6

Add Enforcement and patrols Ranger Presence in residential interface areas.

Delete-Consider... lodge and dining and additional cabins. How is this use consistent with the stated Master Plan outdoor recreational use or the ethos of an outdoor experience and outdoor public education, *if they want to dine & lodge, you don't do it in a State Park or in nature, you go to a urban area.*

I-10 Subsequent Planning

Add –All subsequent Planning Plans and Projects will comply with CEQA and an initial study and environmental review will occur on individual projects to determine impact levels and the required levels of significance of each impact related to each sub- project.

2-7

Specific conditions of approval will include project monitoring, maintenance and enforcement requirements.

2-15 Existing Conditions- Saddle Mountain.

Add- An evaluation is needed to determine level of impacts including air quality, traffic volumes and a traffic study by both County and Caltrans, a climate action baseline study, existing groundwater and hydrology, noise and existing natural ambient noise levels. All current base levels need to be documented to determine how the new proposed uses will impact the location and their level of significance from changing the existing use to adding a headquarters.

2-8

2-17 ES Little Basin

Add- An evaluation is needed to determine level of impacts including air quality, traffic volumes and a traffic study by both County and Caltrans, a climate action baseline study, existing groundwater and hydrology, noise and existing natural ambient noise levels. All current base levels need to be documented to determine how the new proposed uses will impact the location and their level of significance from changing the existing use to adding additional recreational uses and increasing volume of visitation, traffic and draw on natural resources and infrastructure and generated waste.

2-9

2-19 Existing Conditions- Circulation

Add-Air Quality particulate matter, and traffic base line studies and traffic analysis must occur by both State & County engineers to identify level of significance of impacts from increase levels of circulations. The State needs to assist County by Agreement to maintain roads from the increase volume of State Park Traffic into perpetuity. This increase volume is not a County problem it is a State impact. Signage, gates and limitations on access, illegal use and trespass must be added and maintained by state to regulate increased volumes of circulation.

2-10

2-24 Employee Housing

Delete-providing park housing for employees.... this should be an internal State Park Policy independent from the language included in a MP & DEIR document, it is not a good idea to house employees for free for the State Budget, staff should pay to live like the rest of society and park closures, maintenance & staffing budgets should not be cut so employees can still live for free. Drafting this language into a MP may limit future budget cut options without a revision to the Master Plan being required.

2-11

2-103 Summaries of the policies related to the Planning Process:

Add- Maintenance element- State Parks is required to maintain state property to protect the environment and ensure safe public use of park land. Respond to public concern. Etc.

2-12

Add Enforcement element. Park Headquarters at Saddle Mountain will include the Ranger Station for adequate public information, education and outreach, law enforcement, public safety and protection of the environment.

3-1 Issues Analysis Planning Assumption

Add (last bullet on page) Consider and resolve through offering solutions to the issues....during the planning & implementation

2-13

Add- Communicate with residents proactively, to reasonably address concerns presented by land owners, and create solutions with landowners that experience issues of concern resulting from expanded Park uses.

3-2 Issues Analysis

Add (last bullet on page)- Maintain access...on Hwy 1, and 236... and also adjacent roadways that are impacted by Park Users for public safety.

2-14

3-12 Saddle Mountain

Add-(final paragraph)

Important considerations included.....increased impacts from increased use and use change on existing neighborhood and adjacent private property.

2-15

Need for base line studies of traffic, air and water quality, impacts from traffic analysis, access and impacts to Little Basin Road for the increase public use.

3-13 Little Basin

Add- Impacts to the access road into Little Basin Camp Ground, Little Basin Road needs to be maintained and an agreement needs to be reached with the County for a joint-maintenance responsibility ensuring that the road will be repaired from damage caused by the significant increase in use on the road, including, signage, gating, parking , trespass and unauthorized use impacts.

2-16

4-3 Vision

Add- in order to support the increase volume of patronage and recreational use at the Saddle Mountain location it is necessary for the Ranger Headquarters to be a component of the new Park Headquarters area. This will ensure adequate public information, education and outreach, law enforcement, public safety and protection of the environment.

2-17

4-12 Park Plan

Add- MV goal: To maintain vegetation on roads, paths, trails and facilities for public safety.

2-18

Add- V5 Maintain vegetation on roads, paths, trails and facilities for public safety. Comply with street & highway codes and ADA in compliant required areas.

4-26 Aesthetics

Add-A4 buildings

2-19

Add-A5 Provide night lighting in appropriate areas to ensure compliance to park regulations and public safety.

4-27 Aesthetics

Add-A6locate away from public...and private. Ensure maintenance of access points for aesthetic value and safe use, maintain local roads and trails.

2-20

4-29 Recreation

Add- R9 Restrict unauthorized access onto private lands thru use of diverters, signage, physical barriers, listed regulations.

2-21

Add R-10 Ensure adequate law enforcement for public safety and to protect the environment, ensure compliance to park regulations.

4-30 Access

Add- A3 and maintain. Add signs for private property and no access, no dumping, list fines, enforce regulations, sensitive areas, restricted access,

2-22

4-30 cont

Add A6 Gate or allow for gating of private roads off little Basin to prevent unauthorized access, fire danger and vandalism, liability.

4-31 Parking

Add P4 Restrict unauthorized parking along roadways and parking lots thru use of signage, physical barriers, diverters, logs chokers, rocks, gates, patrols and enforcement.

4-31 Trails

Add- T1 post clearly unauthorized access points, sensitive areas, private property, no trespassing, user rules and regulations and fines.

4-34 Concessions

Add- C5 Ensure that concessions are consistent with stated recreational use purpose, outdoor recreational experience as intended by State Park Mission and Master Plan language.

2-23

Add-C-6 Mandate that Concession contracts are a public knowledge and require public notice and are project status subject to review and approval. Are public process, no sole sourcing, no extensions or alterations without public process.

4-48 Park Operations

Add- Ranger HQ at Saddle Mountain, adequate enforcement is s key component.

2-24

Add O2 Work with landowners to promote the safety of park patrons and residents and prevent unauthorized access by patrons and damage to private property, reasonably respond and address landowner inquiry and concern.

Add- O6 maintain clear signage for private property, unauthorized access, sensitive env areas, no parking, and no dumping.

Add- LB7 Work with landowners to limit trespass and unauthorized access that may impact private property. Limit unauthorized uses, and illegal parking thru posting signs, enforcement, and the use of gates, physical barriers, logs, rocks and chokers.

2-24 (cont.)

Add- LB 8 Ensure enforcement of posted regulations and provide adequate patrol and enforcement for public and environmental protection.

4-80 Desired Outcomes and Indicators Spreadsheet

2-25

Add-Reduce user conflicts and traffic congestion...through road improvements, posting signage for no unauthorized access and areas of prohibited parking, and ensuring enforcement.

4-83 Desired Outcomes and Indicators Spreadsheet

Add- Saddle Mountain Ranger HQ. Road improvements to lessen congestion and traffic impact on Little Basin Rd. Signage, gates and physical barriers to limit unauthorized access onto private lands and illegal parking that will narrow the roadway.

4-84 Desired Outcomes and Indicators Spreadsheet

Add-Conduct neighborhood private landowner surveys and respond to a reasonable degree. Enforce rules and regulations, illegal parking, trespass. Maintain road for safe travel for park users and residents.

4.8 Desired Outcomes and Indicators Spreadsheet

Add-under management actions, proper signage to instruct visitors on access limitations parking-trespass

5.7 Environmental Analysis Park HQ and Sky Meadow

2-26

Add- Ranger HQ at Saddle Mountain. Add- Equestrian signage required to restrict horses from accessing private property and unauthorized areas. Restrict horse trailer parking in prohibited areas.

5.8 Environmental Analysis Saddle Mountain and HWY 236

Add- evaluate traffic impacts on Little Basin Rd from increased use, anticipate additional use and road repair requirements. Widen base of road at proposed HQ eliminate large trees that are narrowing the road and creating unsafe passing conditions for large recreational vehicles. Limit unauthorized parking on the side of little Basin & in unauthorized areas. Sign private property and limit access. Contribute to ongoing maintenance of the County road Little Basin. Post no parking and trespass, use physical barriers, gates and obstacles.

2-27

5.9 Environmental Analysis Little Basin

Add- Improve and maintain Little Basin Rd to accommodate increased travel and wear.

5.10 Environmental Analysis

Add- Install gates at access points, signage and physical barriers to limit unauthorized access illegal parking.

2-27 cont.

5.12 Public Services

Delete- Existing public services such as.....are adequate...and other performance objectives for these services. Therefore no further environmental analysis is necessary on the effects of public services.

2-28

DEIR /Environmental Analysis discussion and conclusions:

The proposals for the two new facilities at Saddle Mountain and also expanding Little Basin need further analysis to defensibly determine and defend the "less than significant impact" that is stated as the determination in every item of the CEQA check list of this initial study/environmental review. There is not enough substantive documentation to make this conclusion. There is a lack of information in this environmental review analysis and the true impacts are unknown, unstudied and undetermined. There are no professional analyses, reports, evaluations or documented readings of existing conditions or research on what could occur if uses are expanded and combined with the existing site impacts.

2-29

There are no studies to support defensible conclusions on transportation, parking studies, access impacts for adjacent landowners, or review of the required road improvements that will be needed for public safety and to accommodate the types of vehicles and volumes expected. No traffic impact studies have been performed by State Park consultants, the County or Caltrans, no air quality studies, no review of additional pollution from increased users, no greenhouse gas analysis or readings taken, no groundwater hydrology or soil impact reports from soil engineers or hydrologists reviewing existing draw at the current headquarters and what the impact would be with that rate including the expanded uses proposed at Saddle Mountain and Little Basin, areas with varying hydrology from the current park headquarters. There are no cursory decibel or noise studies or review of current ambient levels and noise levels at the existing headquarters relative to conditions at Saddle Mountain. Impact levels are difficult to define and defend as "less than significant" when no viable analysis has been performed.

The diverse proposed recreational uses and increase volume of public visitation will lead to impacts both immediate and cumulative to the area. The impacts to Little Basin, Saddle Mountain and its immediate vicinity are still unknown and have not been thoroughly analyzed. The mitigation measures listed in the Master Plan and DEIR are limited, undefined and inadequate. The impacts from the proposed expanded uses are clearly understated as they have yet to be even studied.

If alternatives are explored the same type and degree of environmental review and mitigation measures should be applied.

Thank you for your consideration of these items,

Leslie Keedy





Vandalism, signs and gate at state park border, vandalized at owners expense w/no state interest



Illegal dumping, on state property where I have requested to place a gate to stop this activity for almost 10 yrs with no reply period, environment degradation, defined public nuisance and responsibility of residents- state doesn't help , I picked up some, state took 3 months to remove biohazard leaching into aquifer, & to finish clean up. Activities will worsen with increased proposed use at Saddle Mt & Little Basin, a gate is necessary at Bloom Grade & Little Basin to prevent this activity- PLEASE HELP- ANYONE THAT IS CONSCIENTIOUS AT THE STATE?? . DOES ANYONE CARE PERIOD? PLEASE HELP!!

Response to Letter 2 – Leslie Keedy

- 2-1** Please see Master Response (A) on page 9, regarding the General Plan and Tiered EIR, and Master Response (B) on the Saddle Mountain and Little Basin development impacts. The General Plan is a programmatic document, whereas future detailed planning and site-specific projects will require additional environmental analysis and review. This is not a Master Plan, as referred to in the commenter's comments.
- 2-2** Little Basin and Saddle Mountain properties are currently developed for recreational uses that include camping, picnicking, cabins, swimming pool, ball field, trails, campfire center, classrooms, residences, fishing pond, helipad, and support facilities for large groups and outdoor environmental education programs. Past uses included motel units, restaurant, outdoor concerts, and corporate employee picnics and large events. Unauthorized access, indiscriminate parking, and trespass onto State and private properties are problems experienced around the state, especially where residential and commercial developments are located adjacent to the rural properties. Boundary fencing and signage are used, where necessary, to restrict access and inform park visitors and private property owners of state park boundary locations. State Park rules and regulations are also posted at trailheads and visitor parking lots to describe the restrictions and appropriate use of state park property, which includes avoiding trespass onto private properties. State Parks is also concerned with the encroachment on public lands for unauthorized access and private use.

The State's responsibility is to ensure the public's safety and to manage and protect state properties and its resources. Private property owners have similar responsibilities to ensure that their property is also protected. Utilizing the adaptive management approach described on page 4-74, management will take appropriate and necessary actions to ensure that its land uses, developed facilities, and associated activities do not infringe on individual property rights, or cause significant adverse environmental effects, as any other property owner should.

State Parks will continue to monitor and evaluate the visitor use at Little Basin and the county road conditions, and work together with other neighbors to address problem areas and make recommendations to the county regarding the community's needs. For any new development, State Parks will coordinate with the County of Santa Cruz and Caltrans to initiate traffic and engineering studies for Little Basin Road and its intersection with Highway 236. Future site-specific projects will also require additional studies and environmental analysis and review.

- 2-3** The Park Operations section in Chapter 4 of the general plan identifies goals and guidelines for public safety, staffing and facility needs, utilities, and regional planning and community involvement. The General Plan does not make funding or staffing commitments; however, it does emphasize the importance of securing adequate staffing, operations and maintenance facilities needed to handle increased visitor use and future changing conditions. It is not the purpose of the general plan to determine daily operations or maintenance actions. Unit operations are the responsibility of the unit, sector, and district management personnel, guided by Department policies stipulated in the Department Operations Manual (DOM).

The Saddle Mountain development would include a park office to establish a ranger presence in the location of Little Basin Road for supplementing park administration and operations, including law enforcement, visitor safety, and resource protection. Some visitor services and operations functions would remain in the Headquarters area.

- 2-4** CEQA does not require a worst case analysis. It requires "reasonable" considerations. Please see the Master Response (A) on the General Plan and Tiered EIR in reference to your comments on the requirements for a Master Plan and Draft EIR. We emphasize that this general plan is not a "Master Plan" for park development. Its requirements are governed by the Public Resource Code (PRC), Sections 5002.1 – 5002.5 and the California Environmental Quality Act (CEQA) for a first-tiered programmatic EIR.

As stated on page 4-54, and noted throughout the general plan document, working in partnership with the region's open space agencies and recreation providers along with adjacent property owners can strengthen natural, cultural, and scenic resources protection, enhance park operations, improve recreational and educational opportunities, and protect private property interests. This would include improved communications and collaboration between the State and private property owners to address issues related to park operations, public safety, and protection of public and private properties. Please see Response 2-2.

- 2-5** Commenter's comments and suggested additions refer to the plan's guidelines referenced in the Executive Summary, but do not reflect all of the management guidelines that would apply to Saddle Mountain. Additional guidelines for Saddle Mountain and Highway 236 are identified on pages 4-61 to 4-63, which includes provisions for visitor contact, information, interpretation, transportation and traffic, signage, and additional resource surveys and protective measures. Parkwide goals and guidelines for utility systems and infrastructure are provided in Chapter 4 on page 4-54. CEQA does not require analysis of direct social impacts. Please see Response 2-3 regarding relocation of Ranger HQs.

- 2-6** Commenter's comments and suggested additions refer to the plan's guidelines referenced in the Executive Summary, but do not reflect all of the management guidelines that would apply to Little Basin. Additional guidelines for Little Basin are provided on pages 4-68 to 4-69. Also, refer to Master Response (B) on Saddle Mountain and Little Basin development impacts, and the explanation provided in response 2-2 regarding enforcement of unauthorized uses and private property trespass. The Department's Operations Manual and related policies address the issues of environmental protection and public safety.

Your comment about the appropriateness of a lodge, cabins, and dining facility in a state park is contrary to the findings of the state and national recreation surveys that identify camping as one of the top priority recreation activities that the public supports and demands as shown in the general plan on pages 2-107 through 2-114. Our analysis of population growth, demographics, and age and technology factors predicts that the growing senior population will demand more services than previous generations. They will anticipate more amenity-rich and meaningful recreational experiences, programs, and facilities including alternative overnight accommodations such as cabins and lodges with food services. Baby boomers, with mobility issues and strong interests in conservation and heritage programs and volunteer activities will continue to seek access, services, and accommodations in state parks to continue their enjoyment of outdoor recreation areas. Therefore, we believe that consideration of alternative camping facilities and services (lodge and cabins) identified in the general plan for Little Basin is appropriate and consistent with the State Park's mission and the stated purpose for Big Basin Redwoods State Park.

- 2-7** The GP section titled "Subsequent Planning" on page 1-10 is an overview of subsequent planning actions, documents and environmental review that would occur following the adoption of the general plan. An explanation of future planning actions and environmental review is described on the following general plan pages: ES-10, 5-3, 5-4, and several places in Section 5.6 Environmental Impacts and Mitigation. Specifically stated on page 5-13 is the following statement: "All park plans and projects shall be in compliance with state and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project specific mitigation. Appropriate mitigation specific to detailed project design will be implemented, as necessary, in later planning and development stages."
- 2-8** The General Plan/EIR is a programmatic document and as such, does not provide the level of detail information and analysis necessary to determine the project's full impact on the environment and level of significance. Implementation of the General Plan will require specific

project proposals and subsequent environmental review that will provide more detailed information. The potential environmental effects and mitigating guidelines are discussed at the program level in Chapter 5, on pages 5-16 to 5-19 (air quality), pages 5-22 to 5-24 (climate change), pages 5-37 to 5-39 (traffic), pages 5-30 to 5-35 (hydrology), and page 5-34 (noise).

- 2-9** Please see Response 2-8 related to the level of detail required for a programmatic document.
- 2-10** Please see Response 2-8 and refer to the Master Response (B) on Saddle Mountain and Little Basin development impacts for an explanation regarding the responsibility of the County and users of Little Basin Road. Also see Response 2-2 regarding enforcement of unauthorized uses and private property trespass.
- 2-11** The GP section titled "Employee Housing" in Chapter 2 is a description of existing accommodations for housing park employees. In units of the State Parks System, housing is not free to employees. Employees are offered available housing at fare market rental value through a monthly rental agreement. The Department Operations Manual (DOM), Chapter 2200 sets forth the department's policies for all aspects of department housing. Establishment of statewide department housing policies is intended to ensure consistent and equitable application with allowance to meet local operational needs and ordinances. It is the policy of the Department of Parks and Recreation to provide housing for employees, within limits of practicality, to ensure availability of qualified employees to meet operational need and requirements, and to enhance recruitment and retention.
- 2-12** The comment is not related to CEQA issues. The policies listed on page 2-103 are summarized from the Santa Cruz County General Plan and the Local Coastal Program. Maintenance and law enforcement actions taken by State Parks must be consistent with the Public Resources Code and other planning and policy guidelines, including the Department's Operations Manual and the Department's Administrative Manual as identified on page 2-101 and described in Appendix G.
- 2-13** The comment is not related to CEQA issues. While State Parks does try to work with neighbors to address issues of concern related to park use, we have a mission that includes all residents of California , not just adjacent property owners.
- 2-14** Guidelines for park operations and public safety issues are included on pages 4-48 and 4-49. Additional guidelines for Saddle Mountain and Highway 236 are identified on pages 4-61 to 4-63.

- 2-15** Please see response number 2-8 related to the level of detail required for a programmatic document.
- 2-16** Please see responses 2-2 and 2-8, and refer to the Master Response (B) on Saddle Mountain and Little Basin development impacts. The general plan describes the management intent and guidelines for Little Basin on page 4-68 and 4-69. It states that further site studies, resource monitoring and recreation surveys are needed to determine the long-term management, development and use of the Little Basin property. For new development, additional site planning, studies, and second-level environmental review would be necessary to determine the scope, potential impacts, and viability of proposed developments and their relationship with the current use and operations at Little Basin.
- 2-17** The comments and suggested additions relate to the park's vision statement on page 4-6. This vision statement provides an overview of desired future conditions within the park. It identifies the new welcome center for visitors, with park administration and visitor services located at Saddle Mountain. The proposed development for Saddle Mountain would establish a ranger presence in the location of Little Basin Road for supplementing park administration and operations, including law enforcement, visitor safety, and resource protection.
- 2-18** The purpose of the vegetation guidelines on page 4-12 is for the management and protection of native vegetation and associated habitats. Maintaining vegetation for public safety is better addressed in the Public Safety guidelines on pages 4-49 and 4-50. Safety Guideline 4 includes reference to several principles of design for public safety.
- 2-19** Not all buildings should be screened from public view. Buildings that serve the public should be visible and accessible to park visitors. They should be designed for compatibility with its natural setting and adjacent land uses. Guideline Aesthetics 4 identifies operation facilities as one element that may need screening to preserve the aesthetic qualities of the park's public use areas. This would include buildings and other structures that may present a negative visual impact from the surrounding area.

Please refer to the Public Safety guidelines at the top of page 4-50 that addresses adequate lighting in areas of the park that are used at night. Guideline Aesthetics 5 on page 4-26 provides additional guidance for lighting considerations consistent with public safety standards. State Parks also has a responsibility to minimize impacts of ambient lighting to animals and protect the dark skies as a valuable resource.

2-20 GP guidelines are intended to guide the management of park resources and uses. As stated on page 4-25, preserving the highest aesthetic standards for Big Basin Redwoods SP is a shared responsibility between State Park planners, managers, and staff, as well as representatives from other responsible agencies and neighboring landowners. Considerations for compatible land uses, aesthetic values, public safety, and resource protection were important aspects in developing this general plan for Big Basin Redwoods State Park. They are addressed throughout this plan and in Chapter 4 with the parkwide and area-specific guidelines, and in more detailed planning, design and environmental review of future park development projects. Issues related to park roads and trails will be addressed in greater detail during the preparation of a future Roads and Trails Management Plan. State Parks will coordinate with the County and Caltrans to address issues on local roads and highways in addition to the application of adaptive management actions, as discussed in the general plan beginning on page 4-74.

2-21 Generally, it is not the responsibility of State Parks to restrict access onto private lands. Park staff utilizes signage, fencing and other methods on a case-by-case basis to address these problems and to inform park visitors about park rules and regulations and importance of respecting park resources and individual rights of adjacent private properties. Law enforcement responsibilities and actions are carried out by park rangers on a daily basis. You are encouraged to continue working with park staff to identify problem areas and determine appropriate actions to address these important issues.

As stated above, Public Safety guidelines are provided on pages 4-49 and 4-50 of the general plan.

2-22 Please refer to Master Response (B) on Saddle Mountain and Little Basin development impacts, and the explanation provided in response 2-2 and 2-21 regarding enforcement of unauthorized uses and private property trespass.

2-23 Comment noted. This is not a CEQA issue. The Public Resources Code, Section 5080.03 governs concession contracts. This section includes guidelines for public notice and bidding process, contract negotiations, and the legislative review process. The California Park and Recreation Commission sets policy for concession contracts. Concessions shall be consistent with the Public Resources Code, Department policies, the parks' purpose and classification, and the general plan as stated in the guideline Concessions 1 on page 4-34.

2-24 The section titled "Park Operations" beginning on page 4-48 provides several guidelines that address park operations, staffing and facilities for the entire park, including adequate office space for the rangers,

maintenance staff and volunteers to provide self-contained, onsite management. Also, please refer to the Master Response (B) on Saddle Mountain and Little Basin development impacts.

- 2-25** The Table 4-1 titled "Desired Outcomes and Indicators" provides a list of indicators and potential management actions that may be developed in order to achieve the desired outcome. This is not a complete list of indicators or management actions, and may be modified as field observations, investigations, and surveys provide new information and understanding. **Two potential management actions will be added to Table 4-1, as follows:**

Page 4-80, Headquarters Area:

- Prior to construction of new facilities at Saddle Mountain, conduct traffic study for Highway 236, and implement road improvements as identified in the traffic study including appropriate signage to reduce traffic congestion and facilitate safe vehicle travel through the park.

Page 4-83, Saddle Mountain:

- Conduct surveys to identify law enforcement problems and unresolved issues, and solicit public input in developing appropriate and effective management actions.

- 2-26** Saddle Mountain Welcome Center would establish a ranger presence in the location of Little Basin Road and Highway 236 for supplementing park administration and operations, including law enforcement, visitor safety, and resource protection. Rangers enforce park rules and regulations for unauthorized parking and use of trails. Trail signs and markers are located on existing trails and at trailheads with restrictions for trailer parking and use of trails by equestrians. Please see Response 2-21, and refer to the Master Response (B) on Saddle Mountain and Little Basin development impacts.
- 2-27** The bulleted items on page 5-8 are brief descriptions of the guidelines proposed on Chapter 4. The general plan can only propose future actions on roads and lands within state park ownership or jurisdiction. The State has no authority or agreement with the County of Santa Cruz for the maintenance and repairs of Little Basin Road. The guideline, Little Basin 6, on page 4-69 and the second bullet on page 5-10 directs the Department to coordinate with the county to identify road improvements and county maintenance actions necessary to maintain public vehicle access on Little Basin Road.
- 2-28** The commenter offers no explanation or substantial evidence to justify the deletion of the current findings that existing public services are adequate to maintain acceptable service ratios, response times, and other performance objectives for these services.

2-29 Please see Master Response (A) on General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts. The General Plan is a programmatic document, whereas future detailed planning and site-specific projects will require additional environmental analysis and review. The State CEQA Guidelines Section 15126.6(d) permits the evaluation of alternatives to be conducted in less detail than is done for the proposed project.

Many of the comments pertain to the interests of private property owners, who bought their property after the property in questions was purchased as park land. It is the duty of the property owner to post their property as private. The roads are public roads and not limited to private property users.

I'll be short and to the point.

Remove the wilderness area designation. Aren't we supposed to stay on the trails anyway?

No backcountry tours in a motorized vehicle.

Bicyclists(a growing segment) are getting the short end of the stick. Fire roads are ok, but not what cyclists really like. There are trails that are disappearing because nobody uses them. They're too remote and/or don't go to a "destination" for hikers and most equestrians(5-6 miles is a long ride for many riders according to my friend who is an avid equestrian). Open all trails open to horses to bikes, and those trails won't disappear. Need a couple of routes from Headquarters to Waddell Beach for bikes in the park.

Prohibit any form of motorized bicycle explicitly, except on open(to all vehicular traffic) public roads.

Do not place horse campgrounds near a walk/bike in campgrounds.

Thank you,
Bernhardt Schweizer
2800 El Rancho Dr
Santa Cruz, 95060

3-1

Response to letter 3 – Bernhardt Schweizer

3-1 Thank you for your comments regarding trails and trail use in Big Basin Redwoods State Park. The goal and guidelines for trails planning and development are listed on pages 4-31 and 4-32. The guideline, Trails 2, specifically calls for a parkwide Roads and Trails Management Plan to guide the placement and use of future trails in the park. Multi-use trails and trail loops of shorter length are also mentioned in guideline Trails 3.

The designated state wilderness protects the relatively undeveloped portion of the park, providing opportunities for solitude or a primitive and unconfined type of recreation. Opportunities exist outside the wilderness to accommodate bicycles and develop multi-use trail connections from headquarters to Waddell Beach. No motorized bikes are allowed in State Parks except on roads. There are no horse campgrounds near walk/bike-in camps. The proposed bike camp at Ranch del Oso will be separate from the existing horse camp to avoid potential conflicts.

Big Basin Redwoods SP Planning Team,

I was reading the Big Basin Plan this afternoon and I would like to request that a section of trail be converted to include mountain bikes. The section of the trail is called the McCrary Ridge. This would be a connector section between two existing bike permitted trails, Hihn Hammond Rd and Skyline to the Sea. This would make for an excellent ride on the periphery of the park from the redwoods by the Park HQ to the ocean down at Hwy 1. I have hiked this section many times in the past as either a day trip to the falls or a backpacking trip to the Sunset campsites and do not often come in contact with other hikers along the McCrary ridge. I think that it would be a safe fireroad to include in the bikes allowed list. Also for those that start at Hwy 1, being able to have a "turnaround" point be the ranger station in the ParkHQ or Boulder Creek for lunch would be a welcome destination.

4-1

Thank you,
Seth Mason
San Jose, CA

Response to letter 4 – Seth Mason

- 4-1** Thank you for your suggestion regarding a trail connection between Park HQ and Highway 1. Guideline Trails 2 on page 4-32 includes a potential multi-use trail connection outside the state wilderness between the Hihn Hammond Road/trail and the Skyline to the Sea Trail at West Waddell Creek. Alternatives would be considered, including a realignment of the McCrary Ridge Trail and/or a new trail developed south of the ridge top. Please watch for future specific project trail plans.

From: Elliott Sidey <esidey@gmail.com>
Sent: Thursday, July 26, 2012 11:34 AM
To: General, Plan
Subject: big basin general plan

I would like to propose more biking trails as well as more hiking trails.
thanks!

| 5-1

Response to letter 5 – Elliott Sidey

5-1 Thank you for your comments regarding trails and future trail use in Big Basin Redwoods State Park. The general plan calls for a parkwide Roads and Trails Management Plan to guide the placement and use of future trails in the park. Multi-use trails and trail loops of shorter length are also mentioned in guideline Trails 3.

From: orlandoxxl@gmail.com on behalf of Ryan Keyser <keyser.ryan@gmail.com>
Sent: Thursday, July 26, 2012 4:02 PM
To: General, Plan
Subject: Big Basin Redwoods General plan suggestion - more cross-country biking trails.

First off, I thoroughly enjoy most aspects of the redwoods park. I live only 3 miles from the park headquarters, and visit it often. I have recently moved here from Utah, and am an outdoors enthusiast. One thing that I found curiously and obviously lacking is the mountain biking trails. With access being limited to fire roads, I find it extremely dull. I understand that there are many considerations (safety, liability, access, costs, damages, etc) in choosing the purpose of a trail, but even horses are allowed on many of the hiking trails, but no bikes. I am requesting bike paths, or a biking circuit be designated somewhere in the park, perhaps near the china grade region that splits the park, or elsewhere. I understand that most of the existing trails will not accommodate bikes and other travelers at the same time, and I am not asking for that. I would like to have more designated biking trails to enjoy. I'm not a downhill rider. Cross-country singletrack are my favorite.
 Ryan Keyser

6-1

Response to letter 6 – Ryan Keyser

6-1 Thank you for your comments regarding trails and trail use in Big Basin Redwoods State Park. The guideline, Trails 2, calls for a parkwide Roads and Trails Management Plan to guide the placement and use of future trails in the park. You are encouraged to participate during this future planning process, which should address trail routes and connections to other public lands in the Santa Cruz Mountains. Trail planning is currently underway for Castle Rock State Park. Please bear in mind that any trail use is to be used for the purposes of accessing and enjoying the park. State Parks does not provide “biking circuits” that are an attraction in and of themselves.

From: scotpeden@cruzio.com
Sent: Sunday, July 29, 2012 9:32 PM
To: General, Plan
Subject: GENERAL PLAN/DRAFT EIR

I do not like the portion of the EIR that wants to move park headquarters out of the central part of the park, and to make shuttling the only way to get to trail heads.

I can't see me missing a shuttle, and having to walk another 2-4 miles uphill to get back to my car. I can't see coming back at any time of the year at dark, and finding that shuttles don't run anymore. Imagine on a moonless night, having to walk 2-4 miles of hwy 9 or 6 miles of trails to get back to your car. Many trails, leaving from the present HQ, are simply a whole day as it is.

A shuttle WHEN IT ACTUALLY RUNS, would be a nice thing to take people to the outside edges of the park, and do the 5-8 mile walks back to the cars. Not all of us can do 10-18 mile loops. East Ridge Trail, and from Lane trail Camp and Sky Sea trail at China Grade would all open up some 5-9 1 mile walks back to HQ area.

Shuttle funding is just way to easy to cut the funding of. We no longer have bus service to Big Basin so those who walked Skyline to the Sea trail one way could take a bus in, and a bus out. Shuttles would eventually slit our throat as service and maintenance has been continually cut to our parks for at least the last 20 years. Due to constant budget cutting over the last 25-30 years, to rely on shuttles seems like a destructive idea to follow. That isn't a temporary trend due to today's economy, our state parks 1 Billion maintenance backlog runs back 2-3 decades, it is the management we have NOW, and have had for the least decades. Lets not obligate ourselves to more monthly/yearly expenditures.

Taking fees at the gate house (there is one at the south entrance, the one at the north entrance was removed some years ago) would alleviate people waiting in line to get into park, or then having to return from the direction they came from to go to the camp grounds. That is only a fee taking place so that in slow season we could keep everything as it is now, which is quite workable.

I've waited in lines at Yosemite and Lassen to get in, they were always worse then getting into Big Basin. I am in Big Basin a minimum of 3 times a month, and Rancho Del Oso a minimum of 1 time a month.

Most of the campgrounds we had form 1930 through 1950 are not taken care of even as day use. A fair number of Picnic tables and fire places are destroyed or in need of repair, while we still have water that works in that area. Returning 50-80 of those sites to use would require 2 bathrooms

being upgraded to have showers. A drop in the bucket financially compared to what the proposals seem like.

7-1 (cont.)

Sempervirens Campground and Blooms Campground earth are so beaten that the trees are suffering. The ground is so hard in the camped areas that water can't percolate in the winter and Huckleberry is fast approaching that, where it was a wonderful semi wilderness campground 18 years ago. They should be able to benefit from fog drip, but it is like concrete under those millennium old trees.

7-2

It is my understanding we stopped having cabins in BBHQ around the old lodge due to the ground compaction, and closed the old 1930's campgrounds too. The habitat around the old lodge is just now starting to be able to support itself though we still have huge pools where water can't percolate, though the campgrounds up North Escape Rd have none of those issues that I can see.

Without offering more year round camping, or at least only on peak holidays, Sempervirens and Blooms could work as an overflow, allowing juggling of campground use and maintaining a better integrity of the land/trees.

Little Basin has an area off of lower Tan Bark Trail that could accommodate something like 20-30 trail or bicycle camp spots. Little Basin has more parking than necessary for the campground use they have presently, but that doesn't mean we have to use it up or wipe out one of the remaining woodland meadows left after managing the environment for Forests only, instead of a balance of what existed before the mono culture management system was started, of only redwood trees and their accompanying species. I've photos of many many acres of grasslands that are now chaparral or forests, that alone is destructive to the eco system, which relies on many different eco systems instead of just redwoods and tan oaks, where they didn't exist 125 years ago.

A bicycle camping area on Gazos Ck rd near Barranca Knoweles near the 200 ft elevation mark would be good, it would show bikers they DO have a way to get from the interior to the coast, legally, on a road, that is possible to maintain instead of on trails that are already suffering from only summer maintenance AND no ranger patrols, ever. Many of the illegal bikers are already a hazard on those trails.

7-3

Repairing the road so the old Camp Herbert could be in use again would also expand use, as well as income. Trail Camps from the Skyline to the Sea are clogged, and don't take a lot of resources to maintain compared to a car camping area with showers and flush toilets.

Sky Meadow is a sensitive habitat area, why are we looking at putting more traffic in around the meadow, which no one is suppose to walk in or have activities in, then we have with group campgrounds already?

More campground space is necessary, simply to let the already existing areas have a year off here and there so the compaction can remedy itself.

2

A shuttle would be nice, taking fees at the old gate house would be nice, improving facilities that we the tax payers are going to pay for, then give to some Corporation to make a profit off instead of the Parks benefiting from that income, is not desirable.

7-3 cont.

We already have the Tent Campgrounds, Little Basin and 2 other Nature schools in the park, of which the owners make a living off of, why can't that be managed for the same price, and the money used to maintain what we have instead of building something new.

Scott

Response to letter 7 – Scott Peden

- 7-1** We understand your concern regarding the economic and long term viability of shuttles. The general plan identifies a shuttle system for visitor transport in and around Big Basin Redwoods SP as one consideration for future management actions to address vehicle traffic and circulation needs during peak use periods. The access and circulation goal and guidelines on pages 4-29 and 4-30 guide park management to improve visitor access and optimize operations efficiencies. These guidelines allow continued vehicle traffic into the headquarters area and through the park on Highway 236. The guideline, Access 4, calls for the Department to "...coordinate with regional transit providers or concessionaires to provide transportation alternatives, such as a shuttle system, between park areas and nearby parks and open space preserves, to achieve more efficient use of existing facilities and to reduce park traffic and the size of parking facilities needed to serve visitor activities." A shuttle could become part of a non-profit or concession-operated program to provide visitors with other transportation options during peak visitation periods and to reduce the impacts from increased traffic movements on park roads and through sensitive environments. The guideline, Saddle Mountain 3 on page 4-61, also guides the department to investigate shuttle operations in other state, national, and local parks to help determine the required components and feasibility of implementing a shuttle system for Big Basin Redwoods SP. The general plan is a "visionary document" that describes long-range goals and desired future outcomes that extend beyond the current fiscal budget and economic constraints. Additional analysis of alternatives is needed at the time funding does become available for implementation of general plan proposals.
- 7-2** Regarding soil compaction in the existing campgrounds and public use areas, the general plan guidelines Headquarters A1 – A5 guide future management actions to protect sensitive resources and restore the understory vegetation in the developed public use areas. In addition, the

Adaptive Management Process described on pages 4-74 to 4-86 provides management with a tool to assess resource conditions, monitor use, and take appropriate actions to remedy problem areas. Potential actions could include seasonal closures of campgrounds and picnic areas and/or closures on a rotational basis to allow for vegetation recovery or restoration efforts.

- 7-3** The general plan guideline, Backcountry 5, on page 4-72 supports additional trail camps for cyclists in the backcountry outside sensitive resource areas. New trails, trail camps, and trailheads would be the focus of the proposed Roads and Trails Management Plan described in the Trails 2 guideline on page 4-32.

The Sky Meadow area includes existing group camps and a performance stage, which are used for group activities and special events. Sensitive resource areas, such as the meadow, are managed and signed for their protection. No new development is proposed near the meadow or sensitive resource areas. The park has received increasing demands for seasonal accommodations to better serve diverse groups with alternative overnight accommodations (cabins) and improved parking. The resource sensitivity of the Sky Meadow area is acknowledged on page 3-11 of the general plan, which states that these resources are important considerations in planning for public access and recreational uses.

In response to the comments that we received, Department staff has conducted additional site reviews and prepared a more detailed resource description of the Sky Meadow area. After further investigation of the resources and site conditions that exist in the Sky Meadow area, the proposal for cabins near Sky Meadow has been deleted from the general plan. Additional goals and guidelines will be added to the final general plan to protect resources and upgrade parking and infrastructure to support continued use of the Sky Meadow Group Camp. **A description of Sky Meadow, with additional goals and guideline revisions, will be added to page 4-59 of the General Plan as follows:**

Sky Meadow:

The Sky Meadow area is comprised of the Lower Sky Meadow residential area and the Sky Meadow group camp, located on either side of a four-acre wet meadow. The structures providing staff housing within the 1940s residential area are clustered in a flat grassy area surrounded to the north by remnant native perennial bunchgrasses and chaparral transitioning to a Douglas-fir and oak-dominated canopy. The south side of this developed area is bordered by mature coast live oak and well-spaced old growth redwoods and Douglas-fir. A spur road off Sky Meadow Road provides access to the group camp along a gentle ridge dominated by old growth redwood clumps, huge Douglas-fir and mature coast live oak and madrone. The first parking

area for the group camp sits below a wet swale where the forest floor is dominated by sedges, rushes and an uncommon occurrence of California fescue. Saturated soils are evidenced by several large uprooted trees. Sky Meadow itself is a wet meadow with rhizomatous sedges, rushes and large patches of California oat grass and Santa Barbara sedge. The perimeter is surrounded by clusters of redwoods, large coast live oaks and Santa Cruz Mountain oaks.

Lower Sky Meadow Headquarters Goal G: *Protect and preserve historic residences and associated features and structures that contribute to the nominated National Register Historic District located in the Lower Sky Meadow residential area.*

Lower Sky Meadow Headquarters Guidelines:

Headquarters C1: ~~Introduce up to 10 overnight cabins outside the Sky Meadow Residential historic district, along the road near the existing group camps and outside sensitive resource areas. These cabins will require an expansion of parking and utilities infrastructure in the vicinity to provide seasonal accommodations for individual or group use.~~

Lower Sky Meadow Headquarters C2: Conduct site-specific surveys and investigations for sensitive plant and animal species protection, and coordinate with the Sempervirens Fund early in the site planning to locate new facilities and avoid dedicated trees and memorial groves.

Lower Sky Meadow Headquarters C3: Allow for development of additional staff housing, trailer pads, and amenities outside of the designated National Register boundaries of the Lower Sky Meadow residence area when addressing future housing needs, to maintain the historic integrity of this significant 1940s residence area.

Sky Meadow Group Camp area:

Sky Meadow Group Camp Goal: *Provide for group recreation and preserve the wet meadow and surrounding old growth redwood and Douglas-fir forest habitats.*

Sky Meadow Group Camp Guidelines:

Sky Meadow Group Camp 1: Limit visitor use of the meadow to the existing historic Girl Scout camping platform and adjoining trail.

Sky Meadow Group Camp 2: Upgrade parking and utilities infrastructure to support continued use of existing facilities.

Sky Meadow Group Camp 3: Minimize disturbances to marbled murrelet breeding habitat by locating future visitor amenities outside the old growth forest.

The General Plan supports interim use of Saddle Mountain for the outdoor environmental education program, but recognizes the site's potential for other long-term uses, including a welcome center for visitors, ranger offices, and opportunities for recreation, interpretation and education programs. In planning for this state park, our emphasis was on the preservation of the old growth redwood forest and the need to reduce the environmental impacts and intensity of use in the headquarters area that have occurred over the past 100 years. The planning team considered several alternatives to remove, relocate, or develop new facilities outside the old growth forest. Along with Little Basin, the Saddle Mountain property presents one of the few areas that could serve this purpose. The general plan describes its potential for possible uses, including ranger contact with new visitors and orientation to other park areas for certain recreation activities and visitor experiences. New development will require further study and analysis prior to implementation at Little Basin or Saddle Mountain.

From: kathy kuyper <chswift@hotmail.com>
Sent: Sunday, July 29, 2012 10:00 PM
To: General, Plan
Subject: mountain bikes in Big Basin State Park

Please keep mountain bikes out of the park.

Right now they are supposed to stay on the fire roads, but they don't and I have been almost run over on trails in Big Basin.

Mountain bikes have completely taken over Wilder Ranch SP, Nisene Marks and Henry Cowell. In those parks, they go on all the single track trails, and make new trails where they please. It is not safe to walk the trails, because often you do not hear them coming and they are going so fast, a person can't get out of the way fast enough. Even walking on the fire roads is dangerous, because most bikers give no warning of their approach and if you happen to wander from one side to the other to look at something, you can get clipped by a bike that happens to be passing you at that moment.

Thanks for your consideration, Kathy Kuyper, Aptos, CA

8-1

Response to letter 8 – Kathy Kuyper

8-1 Thank you for your comments and concerns for mountain bike use in Big Basin Redwoods SP. Mountain biking is permitted on the 53 miles of paved (23 miles) and unpaved (30 miles) park roads. Enforcing park rules to keep bicycles on the roads and off hiking and equestrian trails has proven difficult in parks with limited staff to patrol the backcountry. However, we have several parks where bicycles, equestrians, and hikers learn to share multi-use trails and reduce conflicts through volunteer trail patrols and improved trail design. The general plan calls for the preparation of a Roads and Trails Management Plan that will further evaluate existing routes, user needs, and provide more detailed trails planning for Big Basin Redwoods SP. This process will include additional opportunities for public input and review of detailed plans for future trail locations and appropriate use.

John Ekstrand
3507 Laguna Avenue.
Palo Alto, CA 94306
Day time Phone (408) 980-5526
email john.ekstrand@newport.com

California State Parks
Planning Division
Big Basin Redwoods SP Planning Team
P.O. Box 942896
Sacramento, CA 96296-0001

BIG BASIN REDWOODS SP PRELIMINARY GENERAL PLAN/DRAFT EIR RESPONSE-
John Ekstrand, July 2012

Thank you for working to prepare this plan. The data that you have collected is very useful in order for us to understand the complexity of the planning process. I own a small parcel of recreational land in the Saddle Mountain neighborhood. I chose this location because it is very quiet, yet not remote, so I can go to it for a day on the weekend to enjoy the redwood and oak forest and get away from the noise, traffic and pollution in Silicon Valley.

SADDLE MOUNTAIN AREA

- 1. The current use of the property as an environmental education camp for children is an ideal use of Park resources. It provides an environmental educational opportunity in a beautiful redwood park setting. I believe that it should be retained.
- 2. If the Park entrance, headquarters, parking, visitor center, restaurant and store are to be moved outside of the old growth forest to Saddle Mountain I believe that for traffic safety, the entrance location should not be at the crest of the hill, but located further down the hill near the Gatehouse.
- 3. It is very important to shield private residences in the greater Saddle Mountain neighborhood from the new activities at Saddle Mountain. I trust that State Parks will come up with innovative solutions during the detailed planning of Saddle Mountain development. I look forward to working with you during that phase.

9-1

LITTLE BASIN

- 4. Currently, Little Basin is served by only one tenuous narrow road upon which slides regularly occur. Widening this road would be an expensive and destructive process. With the increased use of Little Basin, the danger of having 100s of people trapped out there in the event of a fire is very real. I suggest that the old roads from the Gatehouse area to Little Basin be rehabilitated and used as the main access. At least one other emergency exit road to Empire Grade, Pine Mountain or Bloom's Creek Campground should be made usable in case of a fire emergency
- 5. Existing water and sewer systems at Little Basin are currently not adequate. The increased uses envisioned in the plan will only make the problem worse. How is this to be addressed?

9-2

SKY MEADOW

- 6. The Increased use of Lodge road by park staff to access expanded employee housing and maintenance facilities along Lodge Road (2-20) needs to be carefully evaluated. Also the possible extra traffic that the 10 concessionaire developed rental cabins with parking and utilities (ES-6) and other uses for the Sky Meadow area may add to Lodge Road traffic. Lodge Road was built in 1903. Outside the Park it traverses a very steep unstable 200' cliff. Repairs to make it suitable for heavier traffic will be destructive and expensive. Perhaps it is possible to open up one of the other roads from Sky Meadow area to the Gate House to handle this increased traffic.

9-3

John P. Ekstrand 7/29/12

Response to letter 9 – John Ekstrand

- 9-1** Please see the Master Response (B) for Saddle Mountain and Little Basin development impacts. State Parks is currently negotiating an extended agreement with the non-profit operator for continuation of the environmental education camp. Environmental education program alternatives are also being explored for other locations in the Santa Cruz Mountains vicinity.

The general plan provides goals and guidelines for the long-term development and use of the Saddle Mountain property that will benefit all park visitors and help reduce impacts in the heart of the old growth redwood forests. Guidelines, Saddle Mountain 4 and 5, include provisions to preserve the scenic qualities, establish adequate screening from adjacent land uses, and interpret the sites history and its important resources. Future site planning and analysis will include an opportunity for additional public input and review during the future planning process.

- 9-2** Thank you for your suggestions regarding the use of other park roads for vehicle access and exits during a fire emergency. Park rangers and maintenance personnel will continue to maintain park roads and trails and identify areas for needed improvements to ensure public safety and access for emergency vehicles. Emergency evacuation procedures are in place for the Little Basin campground. The Tanbark Loop trail/Pine Mountain Road will be maintained as an evacuation route for emergency vehicle access in the event that Little Basin Road will not be accessible in an emergency and the parking terrace at Little Basin can serve as a heliport for emergency use. Future park trails and road connections will be addressed in the preparation of the Roads and Trails Plan for Big Basin Redwoods SP. This planning process will include public participation and review from user groups and other interested in the park's future management, protection and visitor use.

The Little Basin concessionaire is responsible to manage all aspects of the maintenance and support required to run Little Basin as a first-class camping and recreational facility, which also includes maintaining the on-site water treatment plant and potable water distribution system. Since becoming a part of Big Basin Redwoods State Park, the Little Basin area has been incorporated and fully connected to the state park's water system. In 2012, a new pipeline was installed from the Big Basin Gatehouse to four new water storage tanks located in the Little Basin campground (two domestic and two for fire protection). Trucking water to Little Basin is no longer necessary.

- 9-3** Public access to the proposed cabins is from Sky Meadow Road off Highway 236. Lodge Road primarily serves the few employee residences in this area that are familiar with the road conditions and steep terrain. The

potential for additional employee housing in the lower residence area is very limited in order to protect cultural and natural resources, therefore any increased traffic on Lodge Road would be minimal.

The development of new housing and/or cabins will require further evaluation of site-specific conditions and potential environmental impacts, including parking and traffic alternatives. Appropriate measures will be taken to ensure the public's safety and minimize traffic impacts during the planning and implementation of site-specific projects.

10

From: sebastien praly <seb@praly.com>
Sent: Monday, July 30, 2012 8:27 AM
To: General, Plan
Subject: General Plan comment

Hi,

I am a mountain biker would like to see more access into Big Basin as well as little Basin. I am also interested in volunteering in any future trail building and maintenance on multi-use trails. Please increase access to mountain bikers other than fire roads. I would be more than willing to purchase a season state park pass if State Parks would increase its access.

10-1

Also, would really love to get access to skyline-to-sea and be able to ride from the ocean up to the summit and back.

Thank you,

Sebastien Praly

140 Figone Ln, Ben Lomond.

Response to letter 10 – Sebastien Praly

10-1 Thank you for your comments and interests in multi-use trails at Big Basin Redwoods State Park. The guideline, Trails 2 on page 4-32, calls for a parkwide Roads and Trails Management Plan to guide future park trails planning and use. You are encouraged to participate during this future planning process that will consider multi-use trail opportunities within the park and possible connections between the summit and the ocean. Trail planning is currently underway for Castle Rock State Park.

From: Kim Norton <bear.village@yahoo.com>
Sent: Monday, July 30, 2012 7:48 PM
To: General, Plan
Cc: kairos@ihwy.com
Subject: Comments on Big Basin General Plan and DEIR

I am writing about the Preliminary General Plan and Draft Environmental Impact Report for Big Basin Redwoods State Park. I am a neighbor to this park, residing on Lodge Road. Besides an interested neighbor, I am enjoyer of camping and the beautiful redwoods and forest.

However I am confused to see this general plan which includes expansion plans of the Big Basin SP, when just a year to two ago the park was threatened to be closed due to budget cut backs. This General Plan and DEIR did not include any budget or timescales. Is it realistic to expand the park when other basic, major issues face the state and local governments such as Santa Cruz County including maintaining roads, staffing adequate police and fire protection, and being able to educate our children?

The General Plan and DEIR is inadequate on the EIR side:

- What about traffic issues? Will my neighbors and I be forced to wait in long lines just to get to our houses? Will emergency vehicles be able to get to our residences if needed during peak hours?
- What about road maintenance? Has anyone involved in this General Plan and DEIR examined the roads in and around the park?

The road that I live on, Lodge Road, is an alternate entrance to the Big Basin State park, especially used to get to the area where the park rangers reside. It is a county road, yet has not been paved since the 1970's. Currently there are very large and deep pot holes that I have to jockey around just to get down this road. After next winter I fear there is especially a good likelihood that one particular section of potholes will merge into one and make this road impassible.

With expansion plans, how will the State park system deal with the normal wear and tear of the roads in and around the park? Except for Highway 236, accessing roads around the park such as Lodge Road and Little Basin Road are only one lane roads (one lane for both directions). If the park is expanded, how will these narrow roads accommodate increased traffic?

If the roads are to be maintained by the county, how will the state guarantee that the county will do their part? Recently in the local paper, there was an article that the county didn't have the budget to maintain the roads of the county, let alone the roads in and around this State Park.

- How will the State Park maintain fire protection? The forest is very overgrown and lacks clearings for fire management. The fuel is extremely high since the forest has been in a growth mode for at least over a century. How will the county make this park a safe place with adequate fire breaks and escape routes should there be a forest fire for Big Basin visitors as well as us neighbors?
- How will the State Park be able to support bus routes with in the park? The county transportation has been cut, and the bus to the park only goes once or twice a day during the week.
- How will the State Park have enough rangers, especially with plans of expansion?
- How will the State protect the park from being used for illegal pot farms and their risk to the environment such as starting forest fires?

How will the State insure that the park and its expansion expenditures are protected from future threats of being closed? If the park is closed in the future, not only will it be a waste of funds to now expand the park (funds that could be used for the necessities of roads and education) but then the park could really be endangered by even more illegal pot farmers and other illegal occupiers that would meet little resistance..

Without expansion, there would be no additional environmental impact to consider.

How will the state be able to maintain and protect the existing Big Basin, especially with the addition of Little Basin and its maintenance and protection? Until the economy turns around and basic needs of the people are in hand and then a decent budget is identified, the General Plan should concentrate on how the park can be maintained and protected.

1

Sincerely,

Kim Norton
P.O. Box 1834
Boulder Creek, CA 95006
(mailing address)

11-1

11-2

Response to letter 11 – Kim Norton

11-1 Thank you for your interests and comments regarding the future of Big Basin and the current budget issues affecting state and local government's ability to maintain and improve state parks and county facilities. There are no immediate plans or available funding to expand park facilities. The General Plan is a visionary document to guide long-term protection of resources and identify opportunities for appropriate visitor use. It provides California State Parks and other state, federal, and local agencies with a plan for desired improvements and management actions if and when future funding becomes available.

Implementation of General Plan proposals will require further studies and environmental impact assessment to address traffic and related issues. Road maintenance, local traffic, and emergency vehicle access are regularly addressed through daily park operations and maintenance budgets and procedures. No changes are proposed or anticipated for traffic on Lodge Road as a result of general plan implementation. State Parks will continue to coordinate with the county of Santa Cruz and Caltrans for road maintenance repairs and necessary improvements to maintain safe vehicle access and use of roads in and around Big Basin Redwoods State Park.

11-2 Your comment asks about fire safety, mass transportation safety and illegal uses. The general plan includes wildfire management guidelines (Wildfire 1 and Wildfire 2 on page 4-51) that provide guidance through the Wildfire Management Plan and interagency agreements with CAL FIRE in order to protect human lives, property and sensitive natural resources. In addition, the Vegetation Management Guidelines on page 4-12 identify methods to re-establish and promote natural ecological processes and to maintain sustainable forest management techniques to ensure healthy forests. The GP also includes Operations and Public Safety guidelines on pages 4-48 and 4-49, to ensure that current and future facility developments are planned and appropriately designed for safe public access and use, including the routes into and out of the park.

Public protection and law enforcement against crime and illegal activities is the responsibility of park rangers. Rangers are alert to situations that could cause damage to persons or property. They collect and report information relevant to a reported crime and, when appropriate, notify the law enforcement agency with concurrent jurisdiction. Park rangers also rely on informing and educating the public of existing laws and regulations and their importance to the protection of the facilities and features of the State Park System. Please see letter response 12-2 for new guideline regarding staffing for park patrols and backcountry surveillance.

Santa Cruz Mountains Bioregional Council
607 Paco Drive
Los Altos, CA 94024
www.scmbe.net

July 30, 2012

California State Parks
Planning Division
Big Basin Redwoods SP Planning Team
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Big Basin Planning Team,

The Santa Cruz Mountains Bioregional Council (www.scmbe.net) is a nonprofit organization of environmental scientists and natural resource professionals whose purpose is to conserve natural biodiversity within the Bioregion. The Santa Cruz Mountains Bioregion extends from San Francisco in the north to the Pajaro River in the south and from the Pacific Ocean on the west to the San Francisco Bay on the east, and includes all of Big Basin Redwoods State Park.

12-1

The park contains very valuable biotic resources, including nesting sites for the endangered Marbled Murrelet (*Brachyramphus marmoratus*). In 2011 murrelets were detected in Redwood Meadow, Huckleberry Campground, Blooms Creek Campground, and at other areas. Occupied behaviors, indicative of nesting nearby, were noted at Blooms Creek Campground and the meadow. The park also has largest remaining stand of old-growth redwood forest in the Santa Cruz Mountains: an estimated 4300 acres, comprising more than 40% of the total remaining old-growth forest in the Santa Cruz Mountains Bioregion.

Both the Bioregional Council and individual members of the Council have been active in efforts to protect park resources and educate park visitors. Most recently the Council helped the parks department obtain a grant that paid for the acquisition of 240 food storage lockers, 150 of which were installed at campsites in Big Basin. Individual members have contributed their time to share information about the distribution and management needs of steelhead (*Oncorhynchus mykiss*), coho salmon (*O. kisutch*), California red-legged frog (*Rana aurora draytoni*), tidewater goby (*Eucyclogobius newberryi*), and the Marbled Murrelet. They have also mapped the extent of old-growth redwood within the park boundaries, and provided training sessions in redwood ecology for state park staff and park docents. As active, informed professionals we are very concerned about the future direction of park management.

We have reviewed the Preliminary General Plan and Draft EIR and would like to offer our comments. Our comments are directed toward the preferred alternative, since not enough detail was presented on the other alternatives in either the draft plan or the draft EIR to allow a proper evaluation of them.

We cannot support the preferred alternative as it is defined now because it would increase visitor use in the park. We believe that the park is already too congested in the summer, especially so on weekends and holidays. The large number of visitors and the reduced ranger staff have led to a general lack of compliance with many park regulations designed to protect the environment. At present, on heavy use days, we have observed unregulated, inappropriate visitor activity,

12-2

Santa Cruz Mountains Bioregional Council, 7/30/12

Page 1 of 3

producing such adverse impacts as air quality degradation, noise pollution, trampling of vegetation and soil, and the disruption of normal behavior patterns of native birds and wildlife through careless food management and abundant human presence.

12-2 (cont.)

We specifically oppose the following components of the preferred general plan:

- (1) New overnight cabins in the Sky Meadow Group Camp area
- (2) Additional or expanded equestrian facilities in both the greater Park Headquarters area and the Rancho del Oso area
- (3) New bicycle camp in the Rancho del Oso area
- (4) Road widening to two lanes of the Little Basin Road

We support strongly the following components of the preferred general plan:

- (1) Development of parking lots, shuttle service, and park administrative offices in the Saddle Mountain area
- (2) Maintaining the existing backcountry road system for service and emergency vehicles, to allow efficient fire control and law enforcement in the back country area.
- (3) Backcountry auto tours for handicapped persons
- (4) Remodeling/repair of the Lodge building to provide a meeting room and facilities for docents and natural history interpreters.

We recommend adding the following provisions to the preferred alternative:

- (1) Expand ranger presence in the park to allow more perimeter patrols, and more backcountry patrols.
- (2) Develop a road and trails management plan, which among other things would evaluate the need to remove or relocate some trails or trailheads.
- (3) Target acquisition of the agricultural and timberlands bordering Rancho del Oso within the Waddell Creek Watershed.
- (4) Improve coordination with the California Department and the U.S. Fish and Game for management of Marbled Murrelet habitat and the habitat of other rare or endangered species.
- (5) Close and rehabilitate the Blooms Creek Campground, as it is in the heart of the murrelet use area. Encourage campers to use Little Basin Campground instead.
- (6) Provide better food sanitation and trash management activities. Increase the number of trash pickups and time them so as to avoid overfilling of trash receptacles.
- (7) Provide cleanup and table sanitation efforts in the picnic areas during the summer. On Friday, Saturday, and Sundays during the late afternoon have staff make a sanitation sweep through the picnic areas, cleaning off food wrappers and scraps from fire grills, picnic tables, and the ground nearby.
- (8) Modify restrooms to provide outside dishwashing sinks with cleanable grease traps to provide an alternative to campers who now wash their dishes under the water spigots, which then tend to collect food residue, and attract corvids.
- (9) Provide interpretive signing on each picnic table that explains why visitors should not feed the animals, should leave the site clean after their use, and should not throw food scraps into the fire.
- (10) Implement a program to restore native vegetation to the sites of early-day buildings, parking lots, campgrounds, and other structures that have been removed but have not yet recovered due to the lack of restoration of healthy physical, chemical, and biological soil conditions. These sites are relatively small, but many such sites exist.

Finally, the plan indicates that tidewater goby are present in the lagoon at Waddell Creek. The goby were eliminated in 1973, reintroduced in 1991, and eliminated again in the mid-1990's by storms. The park should urge their reintroduction by the Fish and Wildlife Service, which has proposed Waddell Creek as critical habitat for the tidewater goby.

12-3

Thank you for the opportunity to comment on the Big Basin Preliminary General Plan and Draft EIR. If you require clarification of our concerns or need additional information, please contact us.

Sincerely yours,



Diane L. Renshaw
President
Santa Cruz Mountains Bioregional Council

Response to letter 12 – Diane Renshaw – Santa Cruz Mountains Bioregional Council

- 12-1** State Parks acknowledges and supports the work done by the Santa Cruz Mountains Bioregional Council and its resource professionals in protecting resources in the Santa Cruz Mountains Bioregion and to help educate park visitors at Big Basin Redwoods State Park. We encourage your members to continue working with park staff with important training, mapping, and sharing resource information for effective management at all state parks in the region. Our mission is clear and our convictions remain strong towards the preservation of significant resources within the Santa Cruz Mountains, while continuing to provide access and opportunities for the visiting public to California State Parks.
- 12-2** The General Plan describes the resource conditions and patterns of use at Big Basin Redwoods State Park. Once widespread in the northern hemisphere, native coast redwood forests are now limited to a narrow coastal belt from central California to extreme southwestern Oregon. Currently, approximately 4% of the old growth redwood forest present when Euro-Americans arrived in the redwood region has not been logged. The largest remaining old growth redwood acreage in the Santa Cruz Mountains is protected in Big Basin Redwoods SP (page 2-44). The developed facilities located in the Headquarters Area occupy about 40 acres, which is less than 10% of the park's old growth forest.

The General Plan acknowledges the congested traffic and intensity of use during peak visitation periods and the human impact on natural resources. We also recognize that the temporary reduction of park staff (rangers, maintenance, and seasonal employees) at state park units in the Santa Cruz Mountains region has placed an added burden on park management and our ability to reduce resource impacts in heavy use areas and remote park locations. Nevertheless, the General Plan in its entirety provides a long-range vision and guidance for resource management and protection, and includes recommendations and guidelines for improved facilities that, if implemented, would alter current visitor use patterns and help improve environmental conditions. Several components of the preferred alternative are intended to redirect park visitors to points of interest outside the Headquarters area and facilitate greater efficiency in park operations, educational programs and public safety. Chapter 4 of the General Plan includes resource protection guidelines and measures for adaptive management that will be incorporated into subsequent planning, design, and environmental review to ensure that new programs and facilities achieve the desired outcomes and stated goals of the plan, and to avoid adverse impacts on significant resources. State Parks strives to provide sufficient funding, staffing and professional expertise for effective park management and to ensure public safety.

Of the ten provisions that the Council recommended, the General Plan includes all but two of these: (5) close Blooms Creek Campground and (8) modify restrooms with outside sinks. The following General Plan guidelines address the Council's recommended provisions:

- Guideline (Trails 2) on page 4-32 calls for preparation of a Road and Trails Management Plan.
- Guideline (RDO 13) on page 4-67 calls for the investigation of future land acquisitions from willing sellers in the Ranch del Oso area.
- Guideline (Headquarters A1) on page 4-57 and the Marbled Murrelet Management and Conservation Goal and guideline (Murrelet 1) on page 4-17 calls for consultation and coordination with California Department of Fish and Game and the U.S. Fish and Wildlife Service.
- Guidelines (Murrelet 2 through 8) on page 4-18 provide guidance on food sanitation, trash management, habitat protection, research and education.
- Guideline (Headquarters A4) on page 4-57 directs the department to restore forest understory vegetation and reduce soil compaction, where possible, within developed public use areas.

The other provisions are either included in the Chapter 4 guidelines, or by reference in future plans and program actions for resource management, interpretation, and coordination with other agencies. The guideline (Headquarters A3) on page 4-57 directs the relocation of developed recreation facilities to protect sensitive natural and cultural resources, which would include campsites along Blooms Creek where necessary. Provisions for dishwashing sinks can be considered during future facilities planning and design. With regards to ranger patrols, **the following guideline will be added to the General Plan under Staffing Needs and Facilities:**

New Guideline:

Staffing and Facilities 6: Provide sufficient staffing to conduct perimeter patrols and surveillance in the backcountry areas for resource protection and visitor safety purposes.

While there may a decrease in marbled murrelet habitats, the fact is that this park does provide habitat. California State Parks is not, and should not be, penalized for the decrease in habitat all over the world. We are committed to action as our participation in the marbled murrelet studies show.

- 12-3** Our management emphasizes healthy and functioning goby habitat. We manage the system as a whole and in so doing maintain habitat for goby, a species whose population size in a given lagoon tends to fluctuate over time. Our understanding is that this species recolonizes suitable habitat following extreme weather events. That said, we are not opposed to

allowing the reintroduction of the species by the Fish and Wildlife Service if it is determined that some circumstance outside of our control prevents goby from recolonizing from nearby sources on their own.



EQUESTRIAN TRAIL RIDERS' ACTION COMMITTEE

Lyndall Erb, PhD; President
BOX 370210, Montara, CA 94037

July 30, 2012

California State Parks
Planning Division
Big Basin Redwoods SP Planning Team
P.O. Box 942896
Sacramento, CA 94296-0001
Email: generalplan@parks.ca.gov
Fax: (916) 653-4458

BY EMAIL

To the Planning Team

In reading over the plan for Big Basin Park, I find myself in agreement with most of the plan. It has been well prepared. I would like to make a couple of comments.

I am concerned with the change in the mission of the park, it does not seem necessary to change the statement and the changes are not consistent with a mission statement. I think the park should be geared to the best experience for the user while maintaining the environment. I realize this is your goal, but the statement seems to be less focused on the user. Over emphasis on the environment may be detrimental to the user experience. As an ecologist (PhD, UC Davis 1981) I am concerned with the current thought of returning environments to a former status. I have yet to see a good definition of which former status we are trying to return to, the ecological system is changing and although we may not like the change as we perceive it I don't see a way to go backwards without doing more damage to the system. I applaud the efforts to keep the system functional with the existing flora and fauna, but I do not see a reasonable way to keep the system from continuing to change.

13-1

As an equestrian my biggest concern is the language regarding RDO. The equestrian campground at RDO is a very important piece of the park that has not been readily available to horsemen for several years. I have used the campground in the past and have tried to continue using it, but have had a difficult time getting access to it. I am hoping that the language: "upgrade or reconfigure," does not mean to make smaller. It may seem to park management that the area is not well used but I can assure you that we would use it if it was

13-2

A COALITION OF EQUESTRIAN ORGANIZATIONS:

COASTSIDE HORSE COUNCIL - DISABLED EQUESTRIANS - JACK BROOK HORSE CAMP AD HOC COMMITTEE - LOS ALTOS HOUND - LOS ALTOS HILLS HORSEMENS ASSOCIATION - LOS VIAJEROS RIDING CLUB - MOUNTED PATROL OF SAN MATEO COUNTY - PORTOLA VALLEY TRAILS ASSOCIATION - SAN FRANCISCO HORSEMEN'S ASSOCIATION - SAN MATEO COUNTY HORSEMEN'S ASSOCIATION - THE SHACK RIDERS - WOODSIDE HORSE OWNERS ASSOCIATION - WOODSIDE TRAILS CLUB



more accessible. Currently access is difficult with a large trailer and parking for day rides is not readily available. The campground itself is hard to get a trailer in and out of and if cars are parked in the adjacent lot it can be impossible to get in and out. For these reasons horsemen from out of the area are reluctant to use RDO. After driving for an hour to get to RDO, I have been told by the rangers that I could not park there which is not something I would repeat. I have ridden in different areas of the park and would happily camp and ride there again if I knew I could have better access.

13-2 (cont.)

Some of the local horse clubs have offered help to get the camp repaired and maintained but I have been told we could not help. I would hope that with the current status of park funding that this offer will not be refused. In San Mateo County the example of Jack Brook Horse Camp should let management know that we are serious about helping. The RDO campground is an important spot to get a series of camps up the coast from Santa Cruz to Half Moon Bay. We are hoping that the addition of a camp at Butano will become a reality.

13-3

I do like the idea of a camp for bicycles in the RDO area, however it should not be too close to the horse camp. I fully believe in multi use trails and support the bike use of trails throughout the area. My concern is that horses that are used to bikes on the trail may not be used to them in camp. Also large trailers and small tents do not make good camping partners. I think that for the better enjoyment of both groups the camps should be separated.

13-4

The concerns about the impact of horses on the area I find of greatest concern. There is a lot of talk about the impact of horse manure on the watershed and public health. The research that has been done regarding horse manure has found little or no indication of disease from horse manure, although it is often interpreted otherwise. I think there is a much greater impact from human waste in the back country areas than from any of the animals, wild or domestic. Never the less, there is reason to be concerned with manure and possible contamination, but current manure management practices can reduce or remove the chance of water contamination and provide a source of compost for use in other areas of the park. These systems are easily constructed. Horsemen who camp frequently are used to cleaning up the campground and willing to help new campers learn what is needed to preserve the area.

In conclusion, please don't forget how many of these areas were first accessed and how the trails were constructed. The horse and rider have been a major part of opening the backcountry to other users.

Best regards,

Lyndal Erb, PhD

Response to letter 13 – Lyndall Erb, PhD- President, Equestrian Trails Riders' Action committee

- 13-1** The proposed mission (Declaration of Purpose) of the park is stated on page 4-4, which updates the original purpose statement approved in 1964. This revised purpose statement does not include returning environments to a former status. It states its purpose to protect, restore and perpetuate the outstanding coast redwood forests and watersheds, where the emphasis is on restoration of impacted areas and improved health of the forest and associated habitats. The original 1964 purpose statement referenced making the park available ... in an essentially natural condition, which was difficult to define and therefore was removed for the very reasons that you indicated. State Parks believes that the proposed Declaration of Purpose achieves the proper balance between preservation of resources and providing opportunities for high quality recreation and visitor enjoyment.
- 13-2** The guideline (RDO 3) on page 4-65 reflects the importance of the equestrian campground and supports continued equestrian use in this area acknowledging the need for improved campsites, trailer parking and circulation. Future site-specific plans and management programs at Rancho del Oso (RDO) will address these issues in addition to the other deficiencies identified in resource protection, operations, interpretation, camping, and day use facilities at RDO.
- 13-3** State Parks relies heavily on volunteers for trail maintenance and patrols, but cannot always accommodate donations of labor and materials for park projects due to public liability issues. However, due to the budget constraints for park operations, creative partnerships have developed with non-profits and other organizations to provide essential services and fund raising for park improvement projects. We appreciate your interest in helping this cause and encourage your continued efforts to work with park staff in identifying the needs for improvement and opportunities for participation in future park projects at Ranch del Oso.
- 13-4** We concur with your comments that the bike camp should be separate from the horse camp. The general plan identifies two possible locations for the bike camp; one location is near the horse camp and ranger office. During the site-specific planning and design of these facilities, State Parks will solicit input from both user groups to better understand user needs and to identify important design considerations. The general plan identifies sensitive resource and other site considerations that must also be taken into account during project design and implementation.

From: Susan Garbowitz <mgarbow@hotmail.com>
Sent: Tuesday, July 31, 2012 1:42 PM
To: General, Plan
Subject: Big Basin Park General Plan Comments

July 31, 2012

State Parks Department

Re: Big Basin General Plan

We live by Hwy. 236 about a mile from Saddle Mountain. Leaving all of Hwy 236 open in your plan is a great improvement.

Please consider the traffic issues of multiple roads intersecting at Saddle Mt., especially backups due to left turns.

The road to the camp ground at Saddle Mt. is one lane with few turnouts. Could that be widened or turned into a loop road which would also give another emergency exit?

It would be wonderful to have a helicopter landing spot at Saddle Mt. since so many local emergencies originate at Big Basin. Retaining the swimming pool would provide recreation and water for fire safety.

Thank you for your time and consideration.

Park Supporters,

Susan and Martin Garbowitz

125 Heartwood Hill, Boulder Creek, CA 95006

Mailing address: PO Box 1917, Boulder Creek, CA 95006

Email: mgarbow@hotmail.com

14-1

Response to letter 14 – Susan and Martin Garbowitz

14-1 Thank you for your comments and suggestions regarding roads, traffic, and public safety at Saddle Mountain. A number of design alternatives are possible for vehicle access and circulation into the Saddle Mountain property. State Parks will coordinate with Caltrans to identify design standards and required traffic studies and analysis of conditions and proposed development that would affect the transportation system on Highway 236 at the intersection of Little Basin Road. Please also see Caltrans letter and our Response 1-1.

The General Plan on pages 2-15 to 2-17 describe the existing conditions and facilities located at Saddle Mountain. Existing facilities were built as early as 1949 through the 1960s. The swimming pool is estimated to be about 40 years old. Future plans will determine which facilities (including the pool) will be removed or adapted for future use. As described in the plan on pages 4-60 and 4-61, Saddle Mountain has potential to include several provisions for visitor services and operational needs. Guideline Saddle Mountain 5 on page 4-61 calls for preserving the meadow and

open space qualities in the planning and design of future park facilities. Open areas, sufficient in size, can be used as a heliport for emergency use. In addition, the parking terrace at Little Basin also serves as a heliport and the reservoir used for recreation and available water for fire safety.

Lawrence and Julie Haff
20319 Little Basin Road
Boulder Creek, CA 95006

California State Parks
Planning Division
Big Basin Redwoods SP Planning Team
P.O. 942896
Sacramento, CA 94296-0001 July 24, 2012

Dear Representatives of the State Park and Recreation Commission,

As residents of Little Basin Road in Boulder Creek, we are concerned about the lack of thorough planning and the further development of Big Basin Redwoods State Park. We have reviewed the Preliminary General Plan / Draft EIR and have attended three informational meetings that were advertised in the local paper. In our opinion, the plan lacks specificity and does not take into consideration the homeowners in this remote area. The following summarize our major concerns. I have referenced direct quotes and pages from the General Plan in italics.

1. Lack of Community Involvement in the Process and Planning

The informational meetings were just that-- informational. No one took notes and there was no general discussion. We were encouraged to go from station to station but questions were frequently referred to other staff -- or to the County-- and no one addressed our concerns. At the February 2010 meeting in Felton, community members wrote ideas / concerns on cards. The cards were placed in a box but they do not appear to be addressed in the General Plan.

While the state website states there were planning sessions in Boulder Creek and Los Gatos as far back as 2001 and 2003, we were not made aware that the planning process had started. We came on board when the "Open House" format was being used. From our perspective, the State was trying to feign involvement while limiting community members' feedback and input.

I did invite the District Manager to attend a Little Basin neighborhood meeting the following week. He agreed to meet us but later called me to say he would only meet a maximum of two neighbors and only if we would agree to meet in his office.

2. Fire Safety

We are concerned about access by fire personnel in the event of a major fire. Our road is narrow and we do not know how hundreds of campers would leave the area on a single lane, poorly maintained road while fire trucks and personnel are simultaneously trying to get into the area.

15-1

15-2

When we raised this issue in February 2010, the District Ranger told us that this was a County issue. When I contacted our County Supervisor, he said this was a state issue. Incidentally, the County recently tried to drop Little Basin Road from the County road list and make it a privately maintained road.

15-3

The following statement indicates that the state is *not* going to take responsibility for the maintenance of the road so it will fall to Santa Cruz County who has just identified \$150,000,000 in road maintenance needs. Where will Little Basin fall on the County's priority list?

- *Coordinate with Santa Cruz County to identify any road improvements and County maintenance actions that may be necessary to maintain public vehicle access on Little Basin Road from Highway 236 to the Little Basin Property p. 241*

3. Safety and Law Enforcement

Law enforcement is an issue, given the state budget constraints, the personnel reductions in the parks system and the actual closing of numerous state parks. We are concerned that there will not be adequate law enforcement by either the sheriff's department (on the county road and on private property) and by rangers on the state land.

- *The State Parks will provide ranger patrols and law enforcement as needed p. 55*

15-4

I have not seen a ranger on Little Basin Road in several years.

4. Water and Sewage

There continues to be a shortage of water on the Little Basin property. Today, three trucks brought water into the area. We have heard that a new water line is being laid from Big Basin to Little Basin. This water line is coming in on an old fire road that connects the two areas. We do not know if this is really happening, as it is not addressed in the report.

- *The current operator is exploring alternatives to upgrade the water supply and distribution system p. 54*
- *Available funding will focus on making improvements to increase the sewage capacity and provide enough water to serve existing campground use without trucking in water p. 55*

15-5

So we are once again trucking in water...

5. Road Conditions

Little Basin, the two and a half mile Santa Cruz County access road, has been poorly maintained and is subject to constant deterioration due to the passage of heavy commercial vehicles such as: water tankers, logging trucks, landscaping vehicles, garbage trucks, buses, etc. The road has not

15-6

been resurfaced in the thirty years that we have lived on the road. Up until this year, potholes have been filled by well-meaning neighbors. Earlier this spring the county filled several of the larger potholes at the entrance to Little Basin Road. This may be the new "cooperation and coordination" the state is referring to on p. 241.

- *A narrow 1.7 mile county road p. 240*

Why the inaccuracy?

Additionally, this is a one lane road, and meeting traffic going the other way often entail one of the parties backing up to a point where the other can pass. This will be an extremely aggravating situation causing delays getting to and from our homes due to the increased traffic volumes.

6. Expanding Facilities

This draft actually suggests expanding the facilities but does not address the community's concerns about fire, water, safety, and road conditions. This projects future growth but does not address CEQA issues.

- *Consider a concession-developed and operated overnight lodge with group dining facilities and additional cabins p. 241 (Little Basin Guideline 5)*
- *Environmental effects were eliminated...no further analysis of the effects on land use and planning is necessary p. 269 (General Plan)*
- *Contact adjacent land owners to identify any parcels that may be available by willing sellers and suitable for park additions p. 223*

We are going to grow but don't have any environmental impacts??

7. California Environmental Quality Act (CEQA)

In the *June 2012 Big Basin Redwoods State Park Newsletter* refers to an Environmental Analysis that was performed. No such analysis was attached to the Preliminary General Plan. We are concerned that the reference to "project" level environmental review means that it is the State's intention is to file a CEQA exemption.

- *Because the General Plan contains goals and guidelines that are designed to avoid or minimize potential adverse environmental effects, no significant program-level impacts were determined p. 3 June 2012 Big Basin Redwoods State Park Newsletter*
- *Environmental effects were eliminated...no further analysis of the effects on land use and planning is necessary p. 269 (General Plan)*
- *No further analysis is necessary p.269-270. This phrase is repeated four times on these two pages.*

Conclusion

15-6 (cont.)

15-7

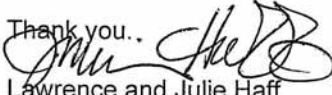
15-8

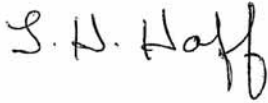
We don't trust this process. We are concerned that the General Plan for Big Basin Redwoods State Park will adversely affect the value of our home and our once enviable retreat in the redwoods will fall victim to the constant drone of traffic and become our own little "fish hook".

15-9

We believe the General Plan is flawed and the planning process of Saddle Mountain and Little Basin should be suspended until these issues can be investigated in a more thorough manner—preferable by an outside agency.

Thank you..


Lawrence and Julie Haff



Response to letter 15 – Lawrence and Julie Haff

15-1 Our planning team did their best to provide information on the planning process and identify opportunities for public input. As you indicated, the initial planning steps begin in 2001. We held several meetings to identify planning issues and concerns for Big Basin, Ano Nuevo, and Butano State Parks. Due to staffing limits and changing workload priorities, the Big Basin project stopped and started a few times during the past ten years, but the early information was not lost. We restarted the process again in 2010 with additional meetings that you attended. Following these meetings, a summary of public comments was posted and remains available on our website at the following link: http://www.parks.ca.gov/?page_id=21486. In preparing the preferred alternative, the planning team considered all of the needs and concerns expressed by local residents, user groups, and others who expressed interests and recommended changes in park operations, facilities development, and management of resources at Big Basin Redwoods SP. Many of the local concerns were focused on changes in park operations, some of which are listed in your comment letter. Our planning process was open and transparent as we could make it, but please remember that the general plan is considered a visionary plan and programmatic EIR that is not intended to address these issues at the level of detail you desire.

- 15-2** Emergency evacuation procedures are in place for the Little Basin campground. The Tanbark Loop trail/Pine Mountain Road will be maintained as an evacuation route for emergency vehicle access in the event that Little Basin Road will not be accessible in an emergency and the parking terrace at Little Basin can serve as a heliport for emergency use.
- 15-3** State Parks will continue to monitor and evaluate the visitor use at Little Basin and the county public road conditions, and work together with other neighbors and users to address problem areas and make recommendations to the county regarding the community's needs. For any new development, State Parks will coordinate with the County of Santa Cruz and Caltrans to initiate traffic and engineering studies for Little Basin Road and its intersection with Highway 236.
- 15-4** The Park Operations section in Chapter 4 of the general plan identifies goals and guidelines for public safety, staffing and facility needs, utilities, and regional planning and community involvement. The General Plan cannot make funding or staffing commitments; however, it does emphasize the importance of securing adequate staffing, operations and maintenance facilities needed to handle increased visitor use and future changing conditions. The proposed development for Saddle Mountain would establish a ranger presence in the location of Little Basin Road for supplementing park administration and operations, including law enforcement, visitor safety, and resource protection. Some visitor services and operations functions would remain in the Headquarters area. It is not the purpose of the general plan to determine daily operations or maintenance actions. Unit operations are the responsibility of the unit, sector, and district management personnel, guided by Department policies stipulated in the Department Operations Manual (DOM).
- 15-5** The Little Basin concessionaire is responsible to manage all aspects of the maintenance and support required to run Little Basin as a first-class camping and recreational facility, which also includes maintaining the on-site water treatment plant and potable water distribution system. One of the early actions taken by the concessionaire was to install a new waterline to serve Little Basin, so that trucking water will no longer be necessary.
- 15-6** Please response 15-3 above.
- 15-7** Please see Master Response (A) on the General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts.
- 15-8** Given that the general plan is a visionary document and programmatic EIR, it does not make funding commitments for future management and

facilities development. It provides a purpose, vision, goals and guidelines for future planning and park management actions. It includes development concepts, but detailed proposals require further study and environmental impact assessment in determining the actual location, size, design of facilities and mitigation required for implementation. We welcome your future participation in subsequent State Park projects and encourage you to contact the park and/or district office with your concerns and suggestions for improvements at Big Basin Redwoods State Park.

- 15-9** Comment noted. These are not comments that pertain to the CEQA document.

Subject: State Parks General Plan (Little Basin Development Concerns)

To whom this may concern, this letter is to express our concerns as a resident of Little Basin Road. We the Galvan Family have lived here five years, and are located at the third house from the left after the left hand turn onto Little Basin Rd. No way, in this letter will there be negativity towards the general plan for development or suggestion of cancellation. Our intent is to have our voice and concerns acknowledged. The following will state our safety concerns, how the development impacts us as a resident, alternative suggestions for facility and operations.

16-1

Traffic & Congestion

- I. Road 236 Congestion onto Little Basin Rd, Traffic control for two way access on a one lane road. Have heard suggestions for shuttle bus from the general plan.
- II. Little Basin Rd is not wide enough for heavy two way traffic. The closer you get from Rd 236 to Little Basin Park front gate, the road worsens. For example: Landslides Drop offs, Blind Curves.
- III. Little Basin Rd does not contain adequate road shoulders or Pull outs.
- IV. Park Visitors unaware of traffic conditions, when to yield for other cars coming and going, and maintaining a slow speed.
- V. Visitors walking, cycling, horseback riding or hiking with heavy traffic can cause pedestrian accidents. Also can cause potential risk of trespassing on private property.
- VI. Proper Speed and Traffic signs to park facility.
- VII. Ensuring NO Parking or Trespassing on Private Property

Emergency Conditions

- I. Heavy Traffic Congestion can impact response time in an emergency situation and the one lane road of little basin will not make situation easier for emergency response teams and vehicles
- II. Traffic with no turn outs on little basin will not benefit access to facility for Emergency Vehicles
- III. Campers or Facility Visitors with RV's that we as residents have seen try to squeeze through the tight turns and narrow rocky road. Potential problems with suggested shuttles to facility and visitors with RV's.
- IV. Fire Prevention and Safety
- V. Alcohol on facility would make Little Basin Rd at a higher risk to accidents

16-2

Maintenance of Little Basin Rd

- I. Maintaining of Little Basin Rd, pot hole and asphalt repair
- II. Dead Trees and brush along little basin rd potential for fires and accidents

Environmental

- I. Littering on Road 236 and Little Basin Rd. Suggestion would be to have proper waste management containers from beginning of turn onto Little Basin to Little Basin Park.

Best Regards and Thank You for Your Time,

Jose I Galvan & Sarah N Galvan
Little Basin Rd, Boulder Creek , CA

Response to letter 16 – Jose and Sarah Galvin

16-1 Your comments and concerns are included for consideration during subsequent planning, future management programs, site-specific projects and environmental review. Please see Master Response (A) on the General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts.

16-2 State Parks will continue to monitor and evaluate the visitor use at Little Basin and the county road conditions, and work together with other neighbors to address problem areas and make recommendations to the county regarding the community's needs. For any new development, State Parks will coordinate with the County of Santa Cruz and Caltrans to initiate traffic and engineering studies for Little Basin Road and its intersection with Highway 236.

Emergency evacuation procedures are in place for the Little Basin campground. The Tanbark Loop trail/Pine Mountain Road will be maintained as an evacuation route for emergency vehicle access in the event that Little Basin Road will not be accessible in an emergency and the parking terrace at Little Basin can serve as a heliport for emergency use.



SAN LORENZO VALLEY WATER DISTRICT

13060 Highway 9 • Boulder Creek, CA 95006-9119
Office (831) 338-2153 • Fax (831) 338-7986
Website: www.slvwd.com

August 1, 2012

California State Parks Planning Division
Big Basin Redwoods SP Planning Team
P.O. Box 942896
Sacramento, CA. 94296-0001

Dear Big Basin Redwoods State Parks Planning Team:

The San Lorenzo Valley Water District (District), headquartered in Boulder Creek, is a public water agency serving approximately 22,500 residents of the San Lorenzo Valley and parts of Scotts Valley. The District appreciates the opportunity to comment on these documents.

The District has an interest in the future development of Big Basin State Park. First, the District's surface water supply emanates entirely from the San Lorenzo River Watershed. A small portion of Big Basin State Park lies within the San Lorenzo River watershed. Second, Highway 236, the southern gateway to Basin State Park intersects Highway 9 in Boulder Creek. The expected increase in visitors traveling via this southern entrance to Big Basin will have a traffic impact on Boulder Creek and could potentially create an additional demand for water served by the District; visitors will likely be using water at local restaurants, hotels, and gas stations within the District's service area.

The District has reviewed the Preliminary General Plan and Draft EIR and offers comments about the preferred plan and the alternatives. Comments relate to several main issues:

- The documents do not clearly indicate the portion of Big Basin Redwoods State Park that lies within the San Lorenzo River Watershed, nor do the documents discuss the potential impacts of existing and proposed park development on the watershed.
- The documents do not supply sufficient information to assess the anticipated additional on-site water supply required by the proposed development and increased visitor use at Little Basin. Furthermore, potential alternative supplies for the Little Basin site are not identified or discussed.
- There is no analysis of potential traffic and water demand impacts from the expected increase in visitors using the southern entrance of Highway 236, as a result of the proposed development of Big Basin.
- The alternatives presented in the documents are too vague to allow proper evaluation and comparison with the preferred alternative.

Discussions of these issues are enumerated below:

1. Clearly indicate the portion of Big Basin State Park lying within the San Lorenzo River Watershed and discuss potential impacts to the watershed

Comment: The Draft EIR/GP provides no discussion or visual representation of the portion of Big Basin State Park that drains into Boulder Creek described below. Please explain and provide maps that clearly indicate parts of the Park that lie within the San Lorenzo River/Boulder Creek watershed, and discuss potential impacts from activities in the proposed plan to this watershed:

17-1

“Big Basin Redwoods SP encompasses most of the 26 square mile (16,700 acres) watershed of Waddell Creek, along with portions of other watersheds including significant Waddell Creek tributaries. The features and resources of the Waddell Creek watershed influence the hydrologic and related resources of Big Basin Redwoods SP. The Waddell Creek tributaries include: Sempervirens Creek and its tributaries Union and Blooms Creeks; Opal Creek and its tributaries Rogers, Maddocks, Redwood, and Huckleberry Creeks; and Timms, Kelly, and Last Chance Creeks.

Other Watersheds: There are several creeks within Big Basin Redwoods SP that drain directly to the Pacific Ocean and are not tributaries to Waddell Creek. These include Finney Creek with a 225-acre watershed of steep topography with predominately pine forest, some redwood and brush. The middle and lower reaches have perennial flow. Elliot Creek, adjacent to and south of Finney Creek, has a 640-acre watershed similar to Finney Creek, and exhibits perennial flow through the Big Basin Redwoods SP area. Other significant creeks and rivers with portions of their headwaters within the boundaries of Big Basin Redwoods SP are Scott Creek, ~~the San Lorenzo River (a tributary of Boulder Creek)~~, Boulder Creek (a tributary of the San Lorenzo River) and Año Nuevo Creek.” (p. 2-40)

Suggested correction: Boulder Creek is tributary to the San Lorenzo River.

Comment: The portion of the park lying within the San Lorenzo River Watershed may apparently include the China Grade Road area, or Lodge Rd. a 1.8 mile long paved public road, which is extremely steep and which is used by park employees. Discuss potential impacts on the watershed from the proposed development on the use of Lodge Road:

“China Grade Road connects the northern and southern routes of Highway 236 and is an additional access route into the eastern portion of the park. Primarily used by local residents and visitors attending area summer camps, China Grade Road is not considered a major access route for park visitors due to the steep terrain and narrow road conditions. Lodge Road, which connects to the southern route of Highway 236, provides additional access to the eastern portion of the park and is primarily used by park staff to access park residences and maintenance facilities.” (p. 2-20)

2. Assess the anticipated additional on-site water supply needs at Little Basin, as well as potential alternative supplies

Comment: There is no discussion of the volume of water produced by the existing wells at Little Basin, and no estimation of how much additional supply would be needed for the new developments proposed in the GP/Draft EIR for Little Basin. Please indicate potential alternative sources of water supply, indicate the volume of water that is currently trucked in, and from where that water comes. Please describe any and all existing alternatives for additional water supplies:

“Two wells at Little Basin have provided water for domestic use, fire, and landscape maintenance and a water treatment plant is located on the property. During drought years, potable water was trucked in to service the campground during peak summer months. The current operator is exploring alternatives to upgrade the water supply and distribution system.” (p. 2-18)

Comment: The concessionaire may be responsible for maintaining the system, but State Parks has the ultimate responsibility for quantifying current water supply in this EIR, as well as additional water supply needs of proposed development at Little Basin:

“In transferring Little Basin to State Parks, POST and Sempervirens set aside funding for a land stewardship fund to ensure that this property is well maintained and cared for into the future. Little Basin’s facilities will be managed and operated by the nonprofit group, United Camps, Conferences and Retreats (UCCR), under a concessions agreement scheduled to last through 2017. Available funding will focus on making improvements to increase the sewage capacity and provide enough water to serve existing campground use without trucking in water.

The concessionaire is responsible to manage all aspects of the maintenance and support required to run Little Basin as a first-class camping and recreational facility, which also includes maintaining the onsite water treatment plant and potable water distribution system, campground and recreation facility reservations, and security. State Parks will provide ranger patrols and law enforcement as needed.” (p. 2-19)

Comment: The water source at the Little Basin site is not included in the water supply description for the park. Please include the water source at Little Basin in the description:

“Three sources of water have been developed and are currently used within the park. Water from Sempervirens Reservoir, which holds approximately 78 acre-feet, serves the Headquarters area including employee residences and campgrounds. The yearly withdrawal is approximately 34 acre-feet. RDO obtains water from a spring to supply park facilities and the ranger residence. The Nature and History Center uses water from an 11 foot-deep shallow well. All three sources have historically been adequate to meet typical demand, even during drought conditions, although the Nature and History Center well requires some water conservation measures during summer.” (p. 2-41)

3. Need to evaluate potential traffic and water demand impacts from increase in use of the southern entrance

Comment: Highway 236 intersects Highway 9 in Boulder Creek. The expected increase in visitors traveling via this southern entrance to Big Basin, as a result of the development proposed at Little Basin and Saddle Mountain, will have a traffic impact on Boulder Creek and could potentially create an additional demand for water served by the District; an increased number of visitors will likely be using water at local restaurants, hotels, and gas stations within the District’s service area:

“Management Intent

Through highway signing and development of new entrance facilities, Saddle Mountain property will be transformed into the primary visitor contact facility and gateway into Big Basin Redwoods SP headquarters area. The Highway 236 entrance from the north will continue to serve visitor and non-visitor traffic, viewed as a secondary access for most visitors.

Saddle Mountain Goal: Establish a ‘front door’ park entrance for primary visitor contact and park orientation on Highway 236 at the southern park boundary.” (p. 2-60)

17-2 (cont.)

17-3

"Highway 236 - 1: Coordinate with Caltrans to manage visitor and non-visitor traffic along Highway 236 through the park, and improve signage on Highway 9 locations at Waterman Gap and along Highway 236 at China Grade Road to redirect visitors to the south entrance at Saddle Mountain.

Highway 236 - 2: Explore State Scenic Highway and Federal Scenic Byway status for Highway 236, to help provide grant funding for the costs of planning, designing and developing byway-related projects. For example, Federal scenic byway designation helps provide grant funding for scenic byway improvement projects, such as:

- Safety improvements: This can include safety improvements due to changing traffic patterns on a scenic byway,
- Planned development of a corridor management plan: If an area has had increased tourism, lodging and other amenities may be needed on a scenic byway,
- Improvements to a State or Native American Tribal Scenic Byway: This includes the planning, designing and development of the byway,
- Construction of new facilities, . . ." (p. 4-61 & p. 4-62)

Comment: The District believes that until the issues discussed in **paragraphs 1 -3** above are addressed in the preliminary General Plan, the following statement in the draft EIR cannot be supported:

"Any facility development and resource management efforts that may occur with the implementation of the general plan would not result in significant project-level environmental impacts. The goals and guidelines in the general plan would direct management actions that would preserve, protect, restore, or otherwise minimize adverse effects related to biological resources, cultural resources, aesthetics, seismic hazards, water quality, traffic, and water supply. These management actions would also maintain Big Basin Redwoods SP's contribution to cumulative impacts to a less-than-significant level." (p. 5-44)

4. Discuss more completely the potential benefits and impacts of the alternatives to allow proper evaluation and comparison with the preferred alternative.

Comment: The alternatives presented in the documents are too vague to allow proper evaluation and comparison with the preferred alternative. The draft EIR states:

"The State CEQA Guidelines Section 15126.6(d) permits the evaluation of alternatives to be conducted in less detail than is done for the proposed project." (p. 5-44).

While this is true, the District believes that there is far too little information provided in the documents with regards to the alternatives. For example, there is no information provided about water supply in any of the alternative discussions, and there is no comparison amongst all of the project alternatives that considers water supply.

Thank you for the opportunity to comment on these documents.

Sincerely,



Terry Vierra, Vice President
Board of Directors

Response to letter 17 – Terri Vierra, Vice President, Board of Directors, San Lorenzo Valley Water District

- 17-1** The general plan map Figure 7, Watersheds and Streams, delineates the watershed boundaries in the vicinity of Big Basin and other state park units in the Santa Cruz Mountains. A small portion of the park at the northeastern park boundary along Highway 236 lies within the Boulder Creek watershed. The Sky Meadow area and portion of Lodge Road within the state park fall outside the Boulder Creek watershed. The key parcels in this watershed are Saddle Mountain at the park's south entrance and at China Grade. The preferred alternative includes new development at Saddle Mountain as described on page 4-60, but affects a previously developed site with multiple land uses during the past 60 years. Site-specific plans and environmental assessment will follow planning guidelines for new development to ensure that impacts on the watershed would be less than significant. Please see Master Response (A) on the General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts.

The final general plan will reflect the following text correction that you identified on page 2-40, second paragraph:

“Other significant creeks and rivers with portions of their headwaters within the boundaries of Big Basin Redwoods SP are Scott Creek, Boulder Creek (a tributary of the San Lorenzo River) ~~San Lorenzo River (a tributary of Boulder Creek)~~, and Año Nuevo Creek.”

- 17-2** Since becoming a part of Big Basin Redwoods State Park, the Little Basin area has been incorporated and fully connected to the state park's water system. The park has virtually unlimited supplies of water unit due to the presence and use of the very large Sempervirens Reservoir and water treatment facility.

In 2012, a new pipeline was installed from the Big Basin Gatehouse to four existing water storage tanks located in the Little Basin campground. Two tanks are being used for potable water and two existing tanks are being used for irrigation water. Little Basin no longer relies on the water supplied by existing wells, or potable trucked in to service the campground during peak summer months. The old potable water well at Little Basin is no longer producing water and was disconnected and capped using California Department of Health Services procedures. This well cannot be legally used again for potable water. The old agriculture/irrigation well at Little Basin produces about 20 GPM and operates completely independent of the potable system. It cannot be used for potable purposes, because it's too shallow and the water from it contains extremely high concentrations of Iron.

Sempervirens Reservoir is the source of water for Big and Little Basin areas. The new water supply, storage, and distribution system is now in place at Little Basin to serve the water needs of existing uses and future demands. In 2011, Mills Young Engineering consultants prepared a Little Basin Water and Waste Water Assessment that evaluated four different options to supply and treat water for Little Basin. Option #1 was selected to install a booster pump and water line over Pine Mountain to Little Basin from Big Basin, which was considered to be the most cost effective and with the least environmental impact. This system design was based on the engineer's estimates of the water needs and delivery system capacities for Little Basin (see enclosed engineering data). It was determined that the capacity of the reservoir far exceeds the needs of Big and Little Basin. The estimated delivery quantities were 15 gallons per minute. The actual gallons per minute delivered to Little Basin are closer to 25 gallons per minute. Further analysis of the future water needs will be based on more detailed planning and design of new facilities being proposed in the General Plan. The very large available supply impounded within the Sempervirens Reservoir is expected to exceed the future water demands of the park.

The final general plan will reflect the following updated text identified on page 2-18, last paragraph:

Little Basin's existing sewage system (septic tanks) and potable water storage system ~~serviced services~~ the campground. Two wells at Little Basin have provided for domestic use, fire, and landscape maintenance and a water treatment plant ~~is~~ was located on the property. During drought years, potable water was trucked in to service the campground during peak summer months. In the summer of 2012, a new pipeline was installed from Big Basin to four existing water storage tanks located in the Little Basin campground (two domestic and two for fire protection). ~~The current operator is exploring alternatives to upgrade the water supply and distribution system.~~ With the new waterline to serve Little Basin, trucking water will no longer be necessary. Also, the existing water plant at Little Basin could be removed and the building used for other purposes.

Text additions were also made on page 2-24, end of first paragraph:

Since becoming a part of Big Basin Redwoods State Park, the Little Basin area has been incorporated and fully connected to the state park's water system. In 2012, a new pipeline was installed from the Big Basin Gatehouse to four new water storage tanks located in the Little Basin campground (two domestic and two for fire protection).

- 17-3** Please see Master Response (A) on the General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts.

17- 4 Please see response 17-2 above.



Job: 11005 Little Basin Water
 Date: 5/24/2012
 Page: _____

LITTLE BASIN WATER SYSTEM DEMANDS

Resources: <http://www.p2pays.org/ref/42/41980.pdf>

- 1) Data compiled from:
 NC Division of Water Quality's regulations on Wastewater Not Discharged to Surface Waters, pages 37-39.
 (http://h2o.enr.state.nc.us/admin/rules/2H.0200.pdf)
 Residential Water Use Research Project of the Johns Hopkins University and the Office of Technical Studies of the Architectural Standards Division of the Federal Housing Administration, 1963. Found on page 79 of Water Supply and Pollution Control, 6th Edition, W. Viessman, 1998.
 The Community Water Systems Source Book, 5th Edition. Table 1.

Camp – construction camp	60 gallons per person per day
Camp – summer camp	55 gallons per person per day
Campground (no hookups)	100 gallons per campsite per day
Campground (with hookups)	120 gallons per campsite per day
School – boarding school	60 gallons per student per day

- 2) Santa Cruz County Requirement: 3 gallons per minute per single family residence

- 3) <http://www.cbia.org/go/cbia/?LinkServID=E242764F-88F9-4438-9992948EF86E49EA>
 Water Use in a 3-bedroom California Residential Home
 92118 gallons per year in 1975, 74,306 in 1990, 59,115 in 2009
 / 365 = 252 gallons per day

- 4) Per Ekezan Water Report for Little Basin:

Campground w/ common bathroom	35 gallons per person per day
-------------------------------	-------------------------------

Maximum Water Required

Conference Group Rental:		Campground plus 2 Rental Groups:	
Number of People	450 per day	Number of People Camping	250 per day
Gallons per Person	40 per day	Gallons per Person Camping	40 per day
Gallons Required for Conference	18000 per day	Number of People in Group w/Food Service	100 per day
Staff Residence gallons required	300 per day	Gallons per Person w/Food Service	60 per day
Maximum Gallons Required	18300 per day	Number of People in Group Campground	100 per day
		Gallons per Person in Group Campground	40 per day
		Staff Residence gallons required	300 per day
		Maximum Gallons Required	20300 per day
		- Governs Design -	

Pipeline Flow

Maximum Water Required = 20300 gallons per day
 Assume water used will be replaced within 24 hours (Assumes no net daily draw down, even at design level)
 Peak hourly and daily demands supplied by storage tanks listed below
 Required Flow = **14.10 gpm** **Design Pump and Pipeline for 15 GPM**

C:\Mills Young Engineering\Job Files\2011\11005 Little Basin\11005 Calculations\Pipeline Calculations.xls



Tank Storage Volume

Domestic - Tank 1	D = 9.9167 ft	(Field Measured)	
	h = 32.5 ft	Length	
	V = 2510.2 ft ³	=	18777 gallons
Domestic - Tank 2	V = 2510.2 ft ³	=	18777 gallons
Domestic Storage Total		=	<u>37555 gallons</u>
			$V = \frac{\pi D^2 h}{4}$
Fire - Tank 3	V = 2687 ft ³	=	20100 gallons (Per tank label)
Fire - Tank 4	V = 2687 ft ³	=	20100 gallons
Fire Storage Total		=	<u>40200 gallons</u>
Combined Total Storage			77755 gallons

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Big Basin Redwoods SP
 Preliminary General Plan / Draft EIR -
 Response -
 William Newlin, July 2012

Thank you for the opportunity to again provide input on this Preliminary General Plan.

I am responding from several perspectives:

- *I lived in Big Basin in the Meadow and the Gate House.
- * My father started his State Park career in 1936 at Big Basin while living on Newlin Summit (AKA Saddle Mountain). He retired some 39 years later as a District Superintendent.
- *My ancestors settled on Bloom Summit (later called Newlin Summit and currently being referred to as Saddle Mountain) in 1896.
- * I own ten acres across Little Basin Road from the Sempervirens Camp at Saddle Mountain (AKA Newlin Summit).
- * 28 years of my career were in insurance claims and large loss litigation.
- * A native Californian and taxpayer.

I have a very special place in my heart for Big Basin, Little Basin and especially Newlin Summit. (Please see exhibit A and B which give brief backgrounds of my ties to Big Basin and Newlin summit).

I have reviewed the 387 page document and find many good plans and several plans which give me grave concerns.

Areas of Concern are:

01. **Preservation** of the history of Big Basin State Park.
02. **Preservation** of the history of Newlin Summit (AKA Saddle Mountain).
03. **Preservation** of the high value program, Sempervirens Camp, currently functioning at Saddle Mountain.
04. **Saddle Mountain**
 - A. **Risk Management** - Saddle Mountain's use plan potentially creates a traffic situation that could lead to a finding of negligence in planning.

development and construction and very large judgments for damages against the State of California.

B. **Fiscal evaluation - ROI** - Lack of expense/ return on investment evaluation of the Saddle Mountain project- high creation costs for limited use period each year - high litigation risk/costs.

C. **Consider less expensive and less risky alternatives.**

05. **Little Basin**

A. **Risk Management** Safety concerns regarding Little Basin Road. Potentially very high risk costs.

B. **Fiscal Evaluation - ROI** - Lack of expense / return on investment evaluation of Little Basin Road. Expense to make it safe and keep it safe.

06. Need for fiscal evaluation of all proposals in light of forecasts of tight budget constraints for State Parks for a very long time.

07. Cost and risk exposure of attempting to redirect traffic from Waterman's gap through Boulder Creek to Saddle Mountain and the Park and from China Grade to Saddle Mountain and the park.

08. Sewer / treated waste water.

I will comment on these concerns in the order of issues with greatest negative impact to the stakeholders:

04. **Saddle Mountain** (Plan pages 4-60 + & 5-51+)

A. Risk Management

Quote from General Plan: " **Public Safety Goal:** Ensure that current and future facility developments are planned and appropriately designed for safe public access and use, including the routes into and out of the park." This statement along with verbiage about safe roads and no blind turns appears to fall short when one views the Saddle Mountain plan.

The Saddle Mountain proposal does not adequately address the safety issues and it represents the greatest potential negative impact and expense for all concerned.

It's primary use would be as a reception, registration, park and ride/shuttle facility for the park. From a traffic standpoint it is a disaster waiting to happen, as it will create a complicated traffic pattern at the crest of a steep/ blind hill (6% grade). It will be at the confluence of three roads and two private entrances (Highway 236, Little Basin Road, Old Big Basin Road, the entry/exit of the registration facility and the entry/exit for the residence directly across from the planned registration facility). The registration facility requires left turns to enter for all Park visitors and, for campers, an additional left turn to exit to go to their campgrounds. This could reach in excess of 2000 left turns on the busiest days. Further, having to stop and wait and then slowly move up the steep 6%,

18-1

grade before the summit is especially dangerous for RVs and travel trailers. This increases the risk of accidents and litigation.

The driving public will have limited visibility (total visibility for vehicles from the east and west is 740 feet) as they approach the registration facility. Approaching each other at 40 miles per hour, it would take 6 seconds for them to close the distance. This very dangerous traffic pattern may expose the State of California to a civil lawsuit if someone is injured. When an accident occurs, allegations of negligent design and construction, and disregard of a known dangerous traffic pattern will be made and may create grounds for special damages against the State of California. An extremely costly outcome. Judgments in the 1 to 9 million area are not uncommon. They can be reviewed on line via Google.

See alternatives 2&3 below.

18-1 (cont.)

B. Fiscal evaluation - ROI.

From a fiscal evaluation there will be very high design and construction costs for limited annual use.

In April of 2011 I provided the following feedback on the plan following the Felton meeting which applies both to liability exposure and fiscal evaluation:

1. What planning issues should be addressed by the general plan and environmental impact report?

Traffic impact and safety issues is an area needing in depth analysis as trying to redirect traffic from the north entrance of Hwy 236 presents several potential challenges and impacts.

- Currently map software and GPS software directs anyone, living north of Sunnyvale up the 280/101 corridors, all the way to Santa Rosa, to use the north Hwy 236 route into the park. Consideration of working with all of these software vendors would be appropriate to avoid confusion. The Boulder Creek route adds several miles and 20 plus minutes to the route over the hill on Hwy 9. GPS defaults to the shorter north 236 highway route.
- With increased traffic on the southern route of Hwy 236 , increased use of Little Basin Road, a main entrance/registration/park and ride at Saddle Mountain that requires multiple left turns by visitors registering and entering the park, it appears a redesign of this intersection may be appropriate. A signal, left turns lanes, and merge lanes for left turn traffic may be a solution. Improper planning or failure to properly provide for traffic flows and safety may result in State liability.
- Increased traffic through the populated areas of Boulder Creek may require a signal at Hwy 9 and 236 in down town Boulder Creek.. Impact of increased traffic from Skyline into Boulder Creek may also require some road modifications.

18-2

I reiterate these concerns as the plan is very expensive because of the costs of designing and building an entry/exit intersection which diminishes the chance of catastrophic auto accidents. With the short visibility I am inclined to say it would be a very questionable proposal. The costs of redirecting traffic from Waterman's Gap which will likely require modification of the existing road and the addition of signals and road widening will be substantial. The overall cost of creating an aesthetically pleasing set of structures that respect neighbors rights and minimizes destruction of flora and fauna will be high. **It will only make sense to staff it during the peak usage times which would likely be less than 120 days each year.** The main registration facility in the center of the park will require staffing at the same time as Saddle Mountain because the park is a multi-entrance park and requiring person to drive through the park and out the other side, three miles one way, to register and then return three miles to the park is unreasonable.

This results in an excessive expense for a limited period of use each year. The alternatives enumerated below have much better ROI - return on investment, and can still be done with minimum impact on flora and fauna.

The Saddle Mountain plan does not address the current large loss of fees as visitor payment is at their initiative. They are not presently required to go through a toll entrance.

C. Alternatives with less Risk exposure and better Fiscal/ ROI results

A second model:

For a multi-entrance park like Big Basin a better model is Yosemite or Yellowstone where parking is centrally located so users do not have to be detoured to register. The parking and shuttle facility could be in the central park area and overflow parking could be where the cabins were by the lodge as well as the old pool area.

In Yosemite you go through registration booths/gates at each entry road.

Toll Entrances staffed during busy times would recover a portion of the very large loss of income currently experienced because paying is at the visitors initiative. The General Plan table for attendance (table 2-1, page 43, 2-7) shows 190,000 unpaid day use visitors from June through September (190,000 X \$10. = \$ 1,900,000). By having toll booth entrances on both roads and staffing them only Friday through Monday each week, during this four month period, with a 25% rate of success, you could collect \$ 475,000. While this is a large number of dollars, it is a very conservative projection.

A third model:

Use the area near the gate house on the right side of the road as you enter the park for parking and the park and ride shuttle. As you enter the park from Boulder Creek it is a very large meadow approximately 800 feet before the Gate House. There is a new Big Basin sign on one edge of the meadow at the road. This site would remove exposure to

18-3
(cont.)

lawsuits from a potentially dangerous intersection at Saddle Mountain as visibility at this location for east and west bound traffic is a total of 1000 feet, there is no crest of a hill and you do not have side roads entering. Further, left turns are significantly reduced. It is 1.5 miles from the heart of the park. Further, there is no private property beyond this point other than Camp Hammer. It is a very large meadow capable of holding several hundred cars, (table 2-2 shows current parking capacity in the central park area of 380). I was in the park most of Tuesday, July 24 and the central parking area was only briefly full at noon. There was still space in the current overflow areas.

An entry toll station at this location would recover a portion the very large loss of income currently experienced because paying is at the visitors initiative.

The Saddle Mountain location can still provide opportunities for park administration offices and ranger housing along with the high value youth education camp as these do not create significant traffic risk factors. In visiting the Park I noticed that several of the homes in Sky Meadow and Upper Sky Meadow appeared to be vacant. Why do we need additional ranger housing? It may also serve as a trailhead location.

05. Little Basin (PLAN 4-66+ & 5-53+)

A. Risk Management

The proposal for the types of activities and uses for Little Basin make a great deal of sense to me. What I question is the current entrance via Little Basin Road. As the traffic numbers grow the need for widening of the road will become evident. The road has a history of sliding out and it is very narrow with extremely steep drop offs on one side. This creates a financial risk from litigation for poor design or maintenance. Further, the increased traffic brings back the issue of traffic entering and exiting the road at the crest of the Saddle Mountain. I use Little Basin road to enter and exit my property, as I am a couple of hundred feet off the highway on Little Basin Road. It is dangerous now and with the increased traffic of redirecting people to enter the Park from Waterman Gap through Boulder Creek will only exacerbate the problem.

Further, there is no escape route from Little Basin. If the road were to slide out, a tree fell on the road or there was a forest fire the campers would be trapped. This again creates potential law suits and high judgments.

It makes it extremely difficult for fire fighters and first aide responders to get to the several hundred campers that are there on weekends.

Would it make more sense to make an entrance road to Little Basin from near the Gate House?

Your previous notes of replies by the public state: *"Use the two old roads out of Little Basin that head into Camp Hammer and East end of Big Basin near the Gate House. The roads could be used as one of a pair of one-way roads in and out of Little Basin".*

B. Fiscal Evaluation/ ROI

The high expense of widening and maintaining the current Little Basin Road may dictate that the best entrance would be near the Gatehouse and Camp Hammer.

18-4

06. Need for fiscal evaluation- Overall ROI

While the plan speaks of all proposals being subject to fiscal/expense evaluation, I feel that some proposals are clearly excessive from a cost perspective and are fiscally indefensible. To have them be part of the plan is not appropriate or should be highlighted as high cost proposals. In a time of austerity that will be with all of us, and especially the State Park system, for many years, we must be very expense conscious over the long term. With the numerous parks that have been closed, I feel we must nip in the bud any proposals that are extravagant or represent excessive expense.

18-5

The Big Basin S.P. Preliminary General Plan puts forward some very expensive proposals and could easily approach tens of millions of costs in their present form, especially when one considers the risk of loss through litigation and the costs of modifying roads and traffic flows. I propose we eliminate portions of the plan that are very expensive and only serve the public for a short time each year. We can find fiscally justifiable alternatives. The very expensive proposals are ill-advised and are the types of projects that have bankrupt towns like Stockton and Vallejo. They are ill-advised infrastructure projects. Granted, the State will not likely go bankrupt, but the questionable spending is the same. Proposals that have high probability of risk/litigation exposure also must be scrutinized for their negative fiscal potential. The States taxpayers deserve this consideration.

03. Preservation of the high value program:

Saddle Mountain is currently being used for an extremely high value youth educational camp (Sempervirens Camp). It teaches our youth the value of a wonderful park such as Big Basin. The buildings and layout are ideal for this use. If allowed to remain, it is not only a high value program for our youth, but a form of income because they pay rent. Further, it has a modest traffic impact.

18-6

If the Park wishes to put administrative offices and ranger housing here it can be done without using any of the buildings currently being used by the high return on investment youth educational camp.

01. Preserve Big Basin History

I note comments in several areas of the General Plan addressing historical features and events such as the CCC, Sky Meadow, and others. From attending the 100th anniversary event and visiting with others who lived in the Park, I find a great potential for gathering photos and data on the early builders of the park and the pre-park events. The current information is significant and the potential for a more in depth historical display is great. I have ancestors who were involved in the early development and construction of roads and buildings in Big Basin. I am aware of an audio tape and interviews that cover history of the park and Newlin Summit. From the guest list for the 100th anniversary, other information may be available. How much communication occurs between the park and

18-7

the museum in Boulder Creek? Boulder Creek use to have old timers days and they did interviews. Perhaps the museum or others have copies of interviews that further explain the Park's history.

18-7 (cont.)

02. Preserve Saddle Mountain History

Saddle Mountain's (AKA - Bloom summit - Newlin Summit) history goes back hundreds of years because of native American presence and the history of its settlement goes back to the mid 1800s. I note comments about the history of Saddle Mountain from the mid 1900s in the General Plan. I have previously shared photos of my ancestors and Newlin Summit. I have detailed information about the area starting in 1896.

18-8

07. Redirecting traffic from Waterman's gap through Boulder Creek. (Risk Management and Fiscal evaluation - ROI)

A study of the traffic impact of going through Boulder Creek may **not** support the Saddle Mountain Plan due to existing traffic, commuter traffic and traveling through a relatively higher populated area. Highway 9 below Waterman's Gap is a crooked narrow road and redirecting traffic could result in the need to enhance the road and add signals at some intersections. This will create **substantial design and construction expense**. Without road enhancement it may represent **increased litigation risk to the State of California** for poor designing/planning.

18-9

To guide persons coming off of Skyline to take 9 to Boulder Creek and then to Saddle Mountain adds 7.5 miles to their trip versus going directly into park via the North Entrance. This adds a minimum 15 to 20 minutes and possibly up to 30 minutes to their trip depending on traffic as you are taking them through the most populated areas of the Boulder Creek and creating additional traffic which could be severe during commute hours for local residents. It adds to the traffic that comes from the Felton route to the Park. Friday afternoon and night will be highly impacted. Further, traffic will stack up on Hwy 236 at the approach to Saddle Mountain on the steep hill before the summit because of the need to turn left into a registration facility. Having to stop and wait and then slowly move up the steep grade is especially dangerous for RVs and travel trailers. This increases the risk of accidents and litigation. It also inconveniences all residents of the Lodge Road, Old Big Basin Road, Little Basin Road and Hwy 236 as they will have difficulty getting to and from their residences. These are major negative factors that make alternative 3, above, a very viable alternative. Further, a toll gate can be put at the north entrance to the Park and traffic does not need to be diverted through Boulder Creek.

The plan is in conflict with all GPS units as they direct drivers off the Skyline/ Hwy 9 summit to go straight to the park versus via boulder Creek. They direct all travelers from Santa Clara north to use Highway 9 and to go straight into the Park.

The plan talks of redirecting visitors down China Grade to get to the Saddle Mountain facility. China grade is extremely narrow, steep and crooked. It will be very expensive to get the road to a state where there are no blind corners and it is wide enough for two vehicles. This is also an area where vehicles with horse trailers will be present.

08. Sewer / treated waste water.

Is it accurate that sewer/ waste water from Little Basin will be piped to the processing plant in Big Basin and in turn, after treatment, is going into Wadell Creek? This increases the flow of treated sewage. Doing this is a further violation of State law, is it not?

18-10

There are many good proposals in this general plan and I admire the thoroughness of the plan except for considerations of Risk Management and ROI. There are just a few proposals that have extra ordinary cost potential and thus deserve close scrutiny.

The comments on history are driven by my history, love of State Parks, my father's career with State Parks and my ancestor's contributions to the area and the park.

Again, thank you for the opportunity to provide input.

William Newlin
1633 Willowside Road
Santa Rosa, Ca 95401
707-579-2312

Exhibit A

Bloom/ Newlin Summit timeline:

1880's Bloom's summit

1895/96 -Isaac Luttrell arrives from Ontario, Canada (My Great Grandfather)

He was a logger, wood craftsman, redwood furniture maker and general laborer.

He acquires property over a period of years on both sides of Little Basin Road and the current Highway 236. His daughters arrive shortly thereafter.

1902 his daughter Martha marries my Grandfather John Newlin .

1909 John and Martha buy land from Isaac Luttrell and bring their family to the summit - A son Clyde and a son Walter.

1911 they have a daughter Marjorie. They live in the meadow where the current youth camp is located.

Circa 1905/1908 John Newlin and Isaac Luttrell helped build roads into Big Basin Park. John was a cowboy by trade and was very proficient in handling teams of horses and horse drawn equipment.

During this period Isaac Luttrell hand hued beams used in some of the early structures in Big Basin.

Circa 1911 Joseph Newlin moved to Newlin summit to live in the meadow. He was a Civil War veteran and he lived on the summit until his death.

1910-11 John and Martha moved to a house they built across the present Highway 236.

It became a residence and Cafe with gasoline and cabins used by tourists and park personnel. It was called "Summit Service" - Thus Newlin Summit. They farmed the summit with cattle, horses, hay, grapes, orchard and a large garden. Martha was also known for her flower gardens and very large cactus garden. My father rented model T Fords to tourists.

My father moved to boulder Creek in 1938 when he married my mother. He continued to help with the farm.

He started working temporarily for the park in 36 and became permanent in 39. I was born in 1942. We lived in Big Basin both in the Meadow and the Gatehouse. My sister attended the second grade in Boulder Creek while we lived in the Gatehouse. We moved to Mountain View in the summer of 1947.

Exhibit B

Clyde Newlin

Work History State Parks:

Summer 1927 - Worked for private contractor on Gazos Creek road project in Big Basin.

9-19-36 to 11-16 36 TAU in Big Basin -Park Custodian

4-26-37 to 10-25-37 TAU in Big Basin - Park Custodian

5-1-38 to 10-15-38 TAU in Big Basin - Park custodian

5-1-39 to 9-1-39 TAU in Big Basin - Park Custodian

9-1-39 Permanent assignment to Big Basin as State Park Custodian

10-1, 1940 transferred to Morro Bay State Park as Park Supervisor

10-1 43 transferred to Big Basin State Park as State Park Ranger II, Assistant Supervisor later to be promoted to State Park Ranger III assuming the duties of Park Supervisor for Big Basin in the absence of the Supervisor as well as Supervisor of the newly acquired Portola State Park.

9-1-45 transferred to Portola State Park as State Park Ranger III Supervisor.

4-1-47 Promoted to Assistant Distant Superintendant District 4.

7-1-52 Promoted to District Superintendant District 3.

Retired 1975.

Response to letter 18 – William Newlin

- 18-1** As stated throughout the general plan, future developments will be planned and designed based on the outcome of further site-specific studies and analysis. At that time, we will have opportunities to refine project objectives, to satisfy long-range goals for resource protection, public safety, and park management and operations. We acknowledge that we may not be able to achieve all proposals envisioned by the general plan, at the time when we can more effectively determine future development cost, facility design, and potential environmental effects.
- 18-2** Please see Master Response (A) on the General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts.
- 18-3** The General Plan emphasizes the preservation of the old growth forest and the park's natural resources in Big Basin Redwoods State Park. It calls for relocating or removing some existing recreation facilities from sensitive resource areas, and provide new facilities and recreation opportunities outside the old growth forest. During peak visitation days, Saddle Mountain offers the best opportunity to contact visitors upon their arrival and direct them to other park areas to reduce the traffic movements and intensity of use in the Headquarters area. In past years, the idea to locate a toll booth on Highway 236 at each park entrance was discussed and rejected by Caltrans due to the flow of visitor and non-visitor traffic. Additional alternatives for traffic control, fee collection, and visitor parking will be explored as future funding becomes available for project level planning, design, and implementation. The purpose and function for the historic Gatehouse would also be evaluated in these alternatives.
- 18-4** Emergency evacuation procedures are in place for the Little Basin campground. The Tanbark Loop trail/Pine Mountain Road will be maintained as an evacuation route for emergency vehicle access in the event that Little Basin Road will not be accessible in an emergency and the parking terrace at Little Basin can serve as a heliport for emergency use. Please see Master Response (B) on Saddle Mountain and Little Basin development impacts.
- 18-5** Comment noted. CEQA does not require analysis of fiscal impacts. Strategies for implementation of the general plan will be developed in subsequent planning efforts as they are needed, including development and operations costs, preparation of management plans, specific project plans, and second-level environmental review. Please see Master Response (A) on the General Plan and tiered EIR.
- 18-6** State Parks also recognizes the high value of the outdoor environmental education program operated by the non-profit organization. A short term

extension of their lease agreement is currently being evaluated to continue the program and bring it into compliance with park rules and regulations. The buildings and structures are also in need of repair and upgrades to meet ADA compliance. The current lease agreement provides that most of the rental income is off-set through expenditures to maintain and provide for critically needed facility repairs and improvements. These repairs and improvements are undertaken by the non-profit and subject to CEQA review and State Park's approval and oversight. This current use of the buildings and property at Saddle Mountain by the non-profit was always considered an interim use until such time that plans can be finalized on the long-term use of this property for the greater benefit of all park visitors. Alternative sites exist for continuation of outdoor education programs.

- 18-7** We are in agreement with you about the great potential for obtaining photos and information about the park activities and events that occurred before and after the establishment of the park; and making this information available for education and interpretive purposes.
- 18-8** We appreciate the photos and information that you shared with the park on Saddle Mountain (Newlin Summit) and your family history. We encourage you to maintain contact with the park regarding the use of this and other historical information and its application in future interpretive exhibits and programs.
- 18-9** Guideline Highway 236-1 on page 4-61 directs the department to coordinate with Caltrans to manage visitor and non-visitor traffic along Highway 236 through the park, and improve signage on Highway 9 locations at Waterman Gap and along Highway 236 at China Grade Road to redirect visitors to the south entrance at Saddle Mountain. It was not our intent to redirect traffic onto China Grade Road. However, improved trailhead parking is desirable at this location. The general plan guideline on page 4-61 will be revised as follows:

Guideline Highway 236-1: Coordinate with Caltrans to manage visitor and non-visitor traffic along Highway 236 through the park, and improve signage on Highway 9 locations at Waterman Gap and along Highway 236 at China Grade Road to redirect visitors to the south entrance at Saddle Mountain.

- 18-10** There currently are no plans to bring wastewater to Big Basin from Little Basin. It would be illegal under our current NPDES permit to discharge wastewater into E. Waddell Creek from Little Basin.

MOUNTAIN BIKERS OF SANTA CRUZ
 P.O. BOX 331
 SANTA CRUZ, CA, 95061-0331

info@mbosc.org
 www.mbosc.org



July 29, 2012

California State Parks
 Planning Division
 Big Basin Redwoods SP Planning Team
 P.O. Box 942896
 Sacramento, CA 94296-0001

To Whom It May Concern:

My name is Mark Davidson and I represent Mountain Bikers of Santa Cruz (MBoSC) - a volunteer non-profit educational association whose mission is to create, enhance and preserve trail opportunities for mountain biking in Santa Cruz County. We have over 400+ people on our mailing list, over 2000 supporters on our facebook group(s) and have about 175 current paid members.

In recent years MBoSC has raised funds and provided trail design expertise and volunteers towards trail remediation projects in and around Santa Cruz County and the Lake Tahoe area. Most recently, we have raised almost \$25,000 of funding and have completed 1,500 volunteer hours towards the construction of the Pogonip multi-use trail in the Pogonip in the city of Santa Cruz. We have also contributed about \$6000 in funds to our State Parks District for a couple projects at Castle Rock and Wilder Ranch.

First of all, I would like to thank the Planning Division for incorporating our previous feedback and for soliciting comments to the Big Basin General Plan. We appreciate that you have recognized our user group as a growing constituency of Parks visitors and supporters.

Our access goals for Big Basin include:

- A "Skyline to Sea Trail" for bikes.
- Ensure that the expansion of Wilderness does not take away any recreational trail corridors.
- A provision for bikes to ride to park head quarters from the ocean.
- More access trails in the headquarters area to avoid riding on roads. Particularly for young kids.

We are pleased that this current draft doesn't conflict with our modest goals of increasing more access for mountain bikes in Big Basin.

We strongly support this item in the Wilderness/Backcountry section:

"Make provisions for low impact recreational use of the backcountry, with additional trailhead parking and trail camps, and multi-use trails. Develop a park-wide Roads and Trails Management Plan, with goals for regional trail connections and linkages from the ridgetops to

MOUNTAIN BIKERS OF SANTA CRUZ
P.O. BOX 331
SANTA CRUZ, CA, 95061-0331

info@mbosc.org
www.mbosc.org



the coast highway. Consider a potential multi-use trail connection outside the state wilderness between Hihn Hammond Road/Trail and the Skyline-to-the-Sea Trail at West Waddell Creek."

19-1

To achieve this goal we would like you to consider a realignment of the McCreary Ridge trail section out of the Wilderness area to allow bikes. Alternatively, you may want to consider a realignment of the Wilderness boundaries to exclude the McCreary Ridge. Either way the McCreary Ridge trail may be a great solution for multi-use trail access. We recognize there may be re-alignment issues but we are willing to support this effort with expertise, labor and resources.

We also support this goal in the Saddle Mountain section:

"Develop multi-use trail connections between Saddle Mountain, Little Basin, and the HQ area. Consider provisions for equestrian trailhead parking and staging area."

19-2

This will provide more opportunities for campers with families to move around this area on bikes rather than driving between the park HQ, Little Basin and Saddle Mountain areas.

We recognize that the details of these goals will be in the Roads and Trails Management Plan and we would love to be involved in that process. Mountain bikers can offer recreational trail design strategies that can mitigate erosion, reduce trail maintenance and user conflict.

Big Basin State Park has a role to play in the long-term goals of our user group. We would love a legal way to ride off road from Santa Clara Valley to the coast. The recent multi-use conversion of the Skyline trail in Castle Rock that connects to Skyline Sandborne Park to Saratoga Gap is part of that network. We wish to see additional access through Castle Rock and Big Basin to complete that connection.

Sincerely,

Mark S Davidson
President, Mountain Bikers of Santa Cruz

Response to letter 19 – Mark Davidson – Mountain Bikers of Santa Cruz

- 19-1** Guideline Trails 2 on page 4-32 includes a potential multi-use trail connection outside the state wilderness between the Hihn Hammond Road/trail and the Skyline to the Sea Trail at West Waddell Creek. Alternatives would be considered, including a realignment of the McCrary Ridge Trail and/or a new trail developed south of the ridge top.
- 19-2** Future park trails and connections with adjacent public lands will be addressed in the preparation of the Roads and Trails Plan for Big Basin Redwoods SP. This planning process will include public participation and review from user groups and other interested in the park's future management, protection and visitor use. Continued involvement of MBoSC members is welcomed in this future trails planning process.

From: Teri Westra <tewestra@gmail.com>
Sent: Wednesday, August 01, 2012 12:24 PM
To: General, Plan
Cc: tribasincommunityorganization@yahoo.com
Subject: July 31, 2012

July 31, 2012

California State Parks
 Planning Division
 Big Basin Redwoods SP Planning Team
 P.O. Box 94296-001
 Sacramento, CA94296-001

Comments, Concerns, and Questions re:
 The Preliminary General Plan/Draft EIR

Our names Teri Ellen Westra and Daryl Lowery.
 We reside at 20801 Little Basin Rd., Boulder Creek, CA.
 We have lived here, respectively, 14 and 17 years.
 This letter into sections:
 Plea from one human to another, concern bullet points, followed by
 detailed historical background and narrative.

We live in the area of consideration. Our family and friends lives here.
 we have raised children here, and revel in e fact that out grandchildren
 benefit from During our time in residence, many people have come to the
 portion of this forest for which we have assumed stewardship, for rest,
 retreat, and healing.

It is our belief that this stewardship includes the duties of appropriate
 maintenance, care, and defense against any forces or elements that might
 bring harm, and are completely committed to carrying out this sacred duty
 to the very best of our ability.

As someone who considers themselves an inextricable part of this land,
 which your organization for which your organization is also entrusted to
 care, we humbly request that you proceed in a manner that is not only life
 sustaining and enhancing for all concerned, but one that utilizes a
 "Systems" or "Seventh Generation" approach; a comprehensive and systematic
 approach that not only considers short term and immediate needs and
 impacts, but that also considers long term outcomes.

I, Teri, have specialized training and education in these areas, and
 willingly offer my services to support you in this process.

Current plan does not reflect or address:

Issues of traffic and safety on Highways 236 and Little Basin Rd.
 Issues of increased fire danger, provision of fire services, including an
 adequate emergency plan with detailed protocols that outline evacuation
 procedures. A case in point; two weeks ago Little Basin was host to

20-1

between 200 and 300 people. had a fire broken out, there would have been loss of life, injury, and inevitable legal action on a magnitude too horrifying to contemplate.

This is because Little Basin Road is currently the only way in and out of the Little Basin Facility, despite the long time existence of another road, which has been allowed to fall into disrepair, with no apparent plan for restoration, that would direct traffic through The Park, and ameliorate many of the concerns outlined in this letter.

We would like respectfully suggest that the development of this road be considered as a proper use of some of the monies recently discovered to be at the disposal of your department.

Issues of increased exposure to criminal activity and potential personal threat and property damage with dramatically increased exposure to general population, including detail of budgets and allocation of resources to provide adequate policing by Park Rangers in cooperation with other local law enforcement agencies.

Issues of degradation of road surfaces on Highways 236 and Little Basin Road with dramatically increased traffic, including engineering studies that address potential damage to properties and forest, especially those that exist below the road line, as a result of increased vibratory erosion and unsettling created by increased number of vehicles utilizing these roads, including large and heavy water, sanitation, and supply delivery trucks.

All publications from State Parks have stated a plan to work collaboratively with Santa Cruz County, as they are responsible for these roads. Missing from the General Plan are current agreements to this effect, as well as budgets and plans for what this means or how it is to be implemented.

This item is especially curiosity generating, as neither entity, as reported at all public gatherings, has any monies available for such projects.

Detailed environmental reports outlining impact to flora, fauna, air quality, water quality--including watershed destruction, and the "Indigenous" human population, some of whom are able to document familial ownership and residence of over 135 years.

Original Indigenous People's rights and considerations.

There are many documented instances of artifact discovery up and down Little Basin, along Highway 236, and up Old Big Basin Road.

Cursory examination by experts has generated a consensus that the area within these boundaries was, in all likelihood, the site of an Ohlone encampment.

Specific concerns:

Proposed movement of camp headquarters to Saddle Mountain, and increased commercial development of Little Basin, seem to constitute unapproved changes to current zoning assignment, as well as impinging upon existing

20-1 (cont.)

20-2

20-3

guarantees offered to residents at the time of purchase; for which there is ample prohibitive case law.

20-3 (cont.)

Imposition upon the existing community without offer of any form of remuneration or compensation vs the massive benefit to State Parks which could be viewed as tantamount to annexation, strictly prohibited under current Geneva Conventions, as applied in the United States under the Hornbook Rule.

A recent study commissioned by a national publication found that "Baby Boomers" are not utilizing overnight accommodations as in the past, begging the question for the need for all the additional overnight accommodation. Assuming, in the distant future, this trend were to reverse itself, it seems that monies could be reasonably found at that time, in response to actual need, rather than utilizing scarce funds to invest in facilities that would not be used, while still requiring maintenance and upkeep.

20-4

Thank you for your time and consideration.
Please do not hesitate to contact us with any questions or concerns.
May All Beings Know Peace.

Sincerely,

Teri Ellen Westra and Daryl Lowery
831-295-3265 831-295-3240

Sent from my iPad

Response to letter 20 – Terri Westra and Daryl Lowery

- 20-1** Please see Master Response (A) on the General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts. State Parks will continue to monitor and evaluate the visitor use at Little Basin and the county road conditions, and work together with other neighbors to address problem areas and make recommendations to the county regarding the community's needs. For any new development, State Parks will coordinate with the County of Santa Cruz and Caltrans to initiate traffic and engineering studies for Little Basin Road and its intersection with Highway 236.
- 20-2** Evidence of prehistoric inhabitants has been documented in several places throughout the park. Ethnography is provided in the general plan on page 2-55 that describes the cultural of the Ohlone indigenous people. The plan also includes goals and guidelines for cultural resource management (page 4-19), interpretation (page 4-42), and protection of archeological resources (page 4-23). This general plan was prepared in consultation with Ohlone representatives consistent with the Department's Native American Consultation Policy, and encourages their participation in future park projects.
- 20-3** The Santa Cruz County land use designation for Big Basin Redwoods State Park is "Existing Parks and Recreation." Saddle Mountain and Little Basin properties, with their existing facilities, were acquired and added to the state park. These properties are managed for resource preservation, recreation and educational activities. New facilities proposed for these areas are not for-profit commercial developments. The new facilities proposed by the general plan are typical for parks and recreation and not considered a change in land use. They will provide needed facilities for park operations and visitor services, accommodations, and educational programs through concession agreements and/or contracts with non-profit organizations, and will have project-level CEQA assessment.
- 20-4** Our analysis of population growth, demographics, and age and technology factors predicts that the growing senior population will demand services more readily than previous generations. They will anticipate more amenity-rich and meaningful recreational experiences, programs, and facilities including alternative overnight accommodations such as cabins and lodges with food services. Baby boomers, with mobility issues and strong interests in conservation and heritage programs and volunteer activities will continue to seek access, services, and accommodations in state parks to continue their enjoyment of outdoor recreation areas. Therefore, we believe that consideration of alternative camping facilities and services (lodge and cabins) identified in the

general plan for Little Basin is appropriate and consistent with the State Park's mission and the stated purpose for Big Basin Redwoods State Park.

Aug 1 2012

To:

The Big Basin Redwoods State Park Planning Team.
Concerning the planned development of Saddle Mountain and Little Basin

I am writing this to express my opinions on the above mentioned plan. I am vehemently opposed to the Saddle Mountain "Welcome Center" plan for several reasons. My concerns are as follows.

I am perhaps the second closest neighbor of Saddle Mountain, and have found even the present "school" to be an intrusive and oblivious newcomer. Illegal building, no permits obtained for improvements to tent cabins, an office trailer put in with no permits, and intrusive and excessive noise are only a part of what I have experienced from this current endeavor.

The plan to put a new visitor center there will no doubt include building more structures, paving what is currently a meadow and turning it into a parking lot, the possibility of a shuttle bus terminal, congested and confused traffic flow on Highway 236 and Little Basin Road, along with many parked cars on Highway 236 seeking to avoid paying a use fee while taking advantage of any free shuttle service into the park. For proof of this last statement, just look at the several sections of Highway 9 near Henry Cowell Park where park goers clog the side of the road with their cars solely to avoid paying a use fee.

Big Basin Park just very recently completed construction and renovation of parking areas and toilets and Handicapped ramps in the current headquarters area, which is a natural location for the Park Headquarters, and is already equipped with all the facilities needed to welcome and orient visitors.

Why go to the expense of building a new Welcome Center when you already have one? Does the State Park system have that kind of money to waste?

Building a new Welcome Center will obviously cost money that the State Park System claims it does not have, and furthermore, should not spend, on frivolous and over-idealistic pursuits. The Saddle Mountain property should be used, at most, for housing of Park employees since the structures there are already suited for that purpose.

Also, I am deeply concerned about the absurd possibility of paving the meadow there, as that would dramatically and deleteriously affect the absorption of rainwater into the aquifer that we depend on for our well water.

Also, the development of Little Basin needs to be carefully examined in light of the extremely narrow road access, water and septic issues, and the concept of development of concessions, including a lodge, dining facilities, and additional cabins. There is one section of the Little Basin Road that is already in jeopardy of giving way and sliding down the steep slope underneath it, and increased traffic of construction and maintenance vehicles, along with vastly increased visitor traffic could precipitate a landslide.

I also am concerned about the Plan's statement about "co-ordinating with Caltrans to manage visitor and non-visitor traffic along State Highway 236 through the park". Highway 236 is a State Highway, and is my most economical, shortest, and quickest route into the Bay Area. I am not a visitor to the park when I use this State Highway as a route into the Bay Area. When I do visit the park, I pay my use fee just as anyone else should. State Highway 236 must be kept opened and maintained as a State Highway and open to all citizens.

In closing, I can only say, Why build a new headquarters when you already have one in the perfect place in which to welcome and orient visitors to the Park? A place which already has all the necessary facilities in place now. Don't waste our money.

Shawn A Cronin
20400 Big Basin Way
Boulder Creek, CA. 95006
USA

Shawn A. Cronin

21-1

Response to letter 21 – Shawn A Cronin

21-1 Please see Master Response (A) on the General Plan and tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts. With proper site planning and design, the concept for a new welcome center and shuttle system at Saddle Mountain would provide a relief valve for congested traffic, limited parking, and impacted resources in the Headquarters area during peak visitation periods. The general plan stipulates that further parking and traffic analysis of the major roadways in these two areas would be necessary. On page 4-61, Guideline Saddle Mountain 5, the plan calls for the preservation of the meadow and open space qualities in the planning and design of future park facilities, and to establish adequate vegetative screening and buffers between administrative and visitor activity areas and between park development and adjacent properties.

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
 725 FRONT STREET, SUITE 300
 SANTA CRUZ, CA 95060
 PHONE: (831) 427-4863
 FAX: (831) 427-4877
 WEB: WWW.COASTAL.CA.GOV



August 10, 2012

California State Parks
 Planning Division
 Big Basin Redwoods Planning Team
 1416 9th Street, Room 1442-7
 P.O. Box 942896
 Sacramento, CA 94296-0001

Memorandum

**Re: Big Basin Redwoods State Park Preliminary General Plan and Draft EIR:
 Comments from Coastal Commission staff (Lee Otter, Rick Hyman and Susan Craig)**

General comments:

The Preliminary General Plan (GP) is a welcome and timely addition to the planning resources available for the northern extremity of Santa Cruz County. Overall, we find that its provisions are generally consistent with, and will help to implement, the policies of the California Coastal Act (Coastal Act) and the Santa Cruz County Local Coastal Program (LCP). This memorandum suggests a few revisions regarding public access and parking to more fully support those objectives, and concludes by addressing regulatory context.

Coastal Act goals as applied by, and reflected in the GP include, but are not limited to:

- avoidance of wetland fill;
- restoration of the natural hydrologic regime at Waddell Creek;
- maintaining optimal estuarine conditions for anadromous fish species (Coho salmon, steelhead);
- protection of a wide variety of environmentally sensitive habitat areas (ESHAs), including old growth redwood stands utilized as nesting habitat by a rare seabird (Marbled murrelet—State endangered, Federal threatened);
- minimizing impairment of inland and coastal views;
- avoidance of new structures that will require armoring of the shoreline and streambanks in the future;
- remediation of existing rock armor as feasible;
- replenishment of beach sands in a way that reflects the natural sediment flux from Waddell Bluffs;
- facilitation of transit service;
- provision of adequate recreational support facilities, including restrooms, parking and safe beach access; and,

- planning for public access to and along the coast, particularly including facilities for non-motorized modes (e.g., hiking trails, equestrian and bicycle camping in the Waddell-Rancho del Oso area).

We previously met with State Parks planning staff, County and Caltrans representatives, on-site at the State Highway Route 1 Waddell Creek bridge. We are pleased that the constraints and opportunities identified in that meeting are well represented in the Preliminary GP document. Correction of coastal bike route, coastal trail and Coastal Act terminology, as noted below; expanding the potential options for relocating Waddell Beach parking, to correlate with the realignment options for Highway 1; and clarification of the need for continuity of non-motorized routes through the State Park unit, discussed below, will help to complete the alignment between the GP and the identified Coastal Act and LCP goals.

Specific recommendations:

Public Access terminology: Future improvements to the Pacific Coast Bike Route (PCBR), and completion of the California Coastal Trail (CCT) will entail linkages through Big Basin Redwoods State Park. For the sake of clarity and consistency with other current coastal trail system planning efforts, we recommend use of the PCBR and CCT terminology for the coast-wise bicycle and hiking trail routes, respectively. This would be particularly helpful on p.ES-8, item 3; on p.4-66, RDO Guideline 6; and in Table 4-1.

22-1

Beach Access Parking (Waddell Beach Guideline 3 & Executive Summary): In order to avoid prejudicing the viable planning options for replacing the Waddell Creek highway bridge and its approaches, we recommend the following modification regarding the siting and amount of parking provided at or near Waddell Beach. Specifically, the third item in the section of the Executive Summary that covers Rancho del Oso and Waddell Beach (p. ES-7) now states, in part: "Provide review and input to Caltrans on their planning and design for the proposed Highway 1 bridge replacement... Incorporate day use parking (approx. 50 spaces) on the inland side of Highway 1, with safe pedestrian access along Waddell Creek from the inland side of the highway to the beach." This corresponds to Waddell Beach Guideline 3 on p.4-65 in the main text.

22-2

We recommend that these two entries along with similar text in Table 4-1 Desired Outcomes and Indicators; and, on Figure 20, Waddell Beach and Rancho del Oso Goals be revised to read:

As part of a fully integrated plan for both sides of the highway, incorporate day use parking, 50-100 spaces, distributed on either side of the highway depending on resource constraints and future roadway alignment, with safe pedestrian access from the inland side of the highway to Waddell Beach.

We concur with the overall concept of making sure that planning for bridge replacement/highway realignment is fully integrated with protection of public access and coastal resources at this critical

location. The bridge replacement/highway realignment alternatives already identified by Caltrans include versions that replace the bridge on its present alignment, versions that retain or eliminate the existing Waddell Beach parking area, and alternatives that realign the highway substantially inland. However, the sentence as written reads as if there will only be parking on the inland side of Highway 1 in the future.

22-2 (cont.)

Our recommended wording will broaden the range of potential design options for maintaining the continuity of the highway over the long run, protecting sensitive coastal resources, avoiding new shoreline armoring, establishing a CCT link on the seaward side, improving trailhead facilities and providing safe pedestrian access to the beach. For example, one option for consideration would be a combination of general public access parking on the inland side of the highway, with short-term and/or equipment drop-off parking on the seaward side (the map note on Figure 20 already suggests short-term parking with a vehicle turn-around on the *inland* side). An excellent summary of the various bridge replacement/realignment alternatives can be found in the newly-released Caltrans background report listed under “Resources” at the end of this memorandum.

Also, the sentence as written could be read to suggest that there will be only 50 total parking spaces. This would not adequately reflect actual usage and demand. A parking needs study by Coastal Commission staff in 2010 photographically identified actual use levels at about 100 vehicles at a time, when full. This included 86 vehicles in the unpaved parking area seaward of the highway, and an additional 14 vehicles overflowing onto the shoulders of the highway. The referenced parking study is listed under “Resources” at the end of this memorandum.

We recognize that, in the future, resource protection needs, a retreating shoreline, and highway realignment will likely impact the actual number of parking spaces that can be accommodated. Nonetheless, until the question of future highway alignment is settled, we believe that the GP should specify a *range* of vehicle spaces. This range should encompass the likely maximum number that can be sustained, given the site’s resource constraints and limited available space. Therefore, until more detailed information emerges from the anticipated future integrated planning process for the replacement of the existing Waddell Creek bridge, we recommend that the high end of this range reflect current levels of use at full occupancy (i.e., 100 vehicle spaces).

Public access along the coast. Maintaining the quality and continuity of Route 1, as well as the PCBR and the CCT, should be added as appropriate goals for the BBSP GP. As well, the GP would benefit from a guideline that provides clear direction for having these key recreational routes continue, unbroken, through the State Park.

22-3

At present, State Highway Route 1 provides the primary public access route to—and through—the seaward part of the Park. In fact, for the majority of visitors, the primary recreational feature is the highly scenic drive along Highway 1. For those touring the coast by bicycle, the PCBR follows the shoulders of Highway 1 through the Park. And, the *de facto* CCT route for hikers includes the Nature Trail at Rancho

del Oso (RDO), the Marsh Trail, the RDO entrance road, and the seaward shoulder of the highway northwards towards Año Nuevo State Reserve.

We recommend that the GP specifically recognize that the continuity of public access to and along the coast is a primary goal identified by the State. We suggest, for example, citing the applicable sections of Coastal Act Chapter 1 [i.e., California Public Resources Code Section 30001.5, Legislative findings and declarations/goals]:

The Legislature further finds and declares that the basic goals of the state for the coastal zone are to: ... (c) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners.

More particularly, the suggested public access guideline would recognize the function of Highway 1 as a primary public access corridor, scenic vantage point and recreational resource within the boundaries of the Park—and specify that the scenic qualities of the park unit as seen from this vantage point be protected. Similarly, such a guideline should call for maintaining the continuity of the PCBR through the park, with safe shoulder widths, support facilities such as bike racks at destination points, and protection of scenic qualities as viewed from the bike route.

For hikers, the recommended public access guideline should provide for protection and signing of existing coastal trail segments as part of the CCT, where suitable public trails already exist. And it should call for a process to identify the remaining links necessary to provide a continuous, safe CCT route through the State Park. Generalized recommendations can be found in *Completing the California Coastal Trail*, cited below. In particular, the CCT should be planned on an alignment that minimizes exposure to automobile traffic. And, if possible, the GP should include a graphic that identifies the preferred future alignments for the PCBR & CCT.

The GP should also reference and commit to follow the results of the trail planning process now underway for the Monterey Bay Sanctuary Scenic Trail (in which State Parks has participated). This process, under the leadership of the Santa Cruz County Regional Transportation Commission, will presumably address both the PCBR and CCT strands of coastal access. If this planning process is completed prior to finalizing the GP, then the agreed upon PCBR/CCT alignment and standards should be incorporated into the GP.

The Preliminary GP commendably calls for developing a new bicycle camp and walk-in campground in the RDO area. Such facilities would clearly support improved public access opportunities along both the PCBR and the CCT. However, the text of the Preliminary GP does not specifically indicate the relationship of the camping facilities to the PCBR or CCT. We suggest these facilities be described as supporting the PCBR and the CCT.

22-3 (cont.)

Public access to the coast. The Preliminary GP recognizes the need to maintain and improve public access connections between the inland areas of the State Park and Waddell Beach. At present, speeding highway traffic is a safety issue. In the future, it is possible that the highway will be elevated—at least modestly—in conjunction with the anticipated bridge replacement project. This will create an opportunity to improve visitor safety, by separating pedestrians from highway traffic.

22-4

We commend the proposed GP Guidelines that call for: 1. maintaining maximum public access opportunities, consistent with protection of sensitive coastal (and park) resources—including automobile parking at or near Waddell Beach; 2. collaboration with Caltrans to provide a pedestrian underpass to the beach, as part of the future bridge replacement project; and, 3. interim measures for improving the safety of public access, particularly with respect to the Route 1 crossing. In addition to cautionary signage (as already indicated by Waddell Beach Guideline 2), we recommend specific mention of a pedestrian crosswalk as an additional measure for improving visitor safety; e.g., by adding a sentence to Guideline 2 to the effect of “Submit request to Caltrans to stripe a pedestrian crosswalk at this location.”

Coastal Act terminology. The regulatory reference in the first entry in Appendix H Regulatory Influences needs to be corrected. The enacted State law is the “California Coastal Act of 1976,” not the Coastal Zone Management Act (CZMA). Please correct all references to the CZMA to read instead: “California Coastal Act.” The balance of this part of the Appendix H text is otherwise accurate.

22-5

Coastal Zone Regulatory Context: The seaward portion of Big Basin State Park (BBSP) falls within, and is a scenic highlight of, the California Coastal Zone (CZ) as governed by the Coastal Act. The CZ boundary encompasses those areas of BBSP that fall within 5 miles of the shoreline. Waddell Beach, Rancho del Oso and much of the Waddell Creek watershed are within the CZ portion of BBSP.

22-6

Since some future activities at BBSP emanating from this GP (including modification of existing State Park facilities) will be subject to coastal zone regulation, this memorandum concludes by outlining the process to be followed in the CZ portion of the park. For the benefit of the reader and future planners, we suggest that consideration be given to amplifying the Preliminary GP’s description of this authority. This process is summarized in the following paragraphs, which could be incorporated in Appendix H of the GP.

All future development, as defined by Coastal Act Section 30106, is subject to the provisions of the California Coastal Act including its provisions for delegation of coastal permit authority upon certification of a Local Coastal Program (LCP). Developments of all kinds within the CZ portion of the park are subject to first obtaining a Coastal Development Permit (CDP). Except for a small area of “original” jurisdiction in the vicinity of the Waddell Creek estuary, CDP applications are submitted to Santa Cruz County for review and hearings.

The County’s standard of review is the Coastal Commission-certified LCP, including the LCP’s Land Use Plan and implementing ordinances. Certain actions contemplated in the Preliminary GP, such as reduction or relocation of the Waddell Beach parking area, may first require

amendment of the County's LCP. Realignment of Highway 1 may similarly trigger the need for LCP amendment.

For qualifying public works projects, the Coastal Act also provides an alternative development review process that does not entail a locally-issued CDP. This process requires prior Coastal Commission approval of a Public Works Plan (PWP). At nearby Wilder Ranch State Park, for example, projects identified in the approved PWP do not need separate approval as CDPs. Although only rarely utilized, the PWP process is an available option for future State Parks (or Caltrans) projects subject to the California Coastal Act.

The CZMA, enacted in 1972, is the corresponding federal legislation. In accordance with the CZMA, the California Coastal Act and the various Local Coastal Programs comprise the federally-designated California Coastal Management Program (CCMP). In addition to its primary development review responsibilities under the California Coastal Act, an ongoing role for the Coastal Commission is to review Federal agency actions for consistency with the CCMP.

Appeals of County actions, original jurisdiction CDPs, requests for approval of PWPs, federal consistency matters, and any submitted LCP amendment requests are heard by the Coastal Commission at its regularly-scheduled meetings.

22-6 (cont.)

Route 1/replacement of Waddell Creek Bridge: Within the time frame of the Big Basin State Park General Plan (GP), we anticipate that the existing State Highway Route 1 bridge will need to be replaced. This will require approval by the Coastal Commission, in the form of an original-jurisdiction CDP or PWP—and could potentially also necessitate amendment of the Santa Cruz County LCP prior to action on such CDP/PWP. Although Caltrans will be the applicant, some State Park property will likely be involved, and State Park facilities will likely need to be modified or relocated. State Parks may be a co-applicant or give permission for Caltrans to be its agent in the permit process.

22-7

When the time comes for identifying specific environmental and engineering alternatives, the recommendations of the GP will help Caltrans and State Parks to plan collaboratively for a project design that will best meet Coastal Act and LCP policy requirements—particularly with respect to the protection of the Park's coastal habitat, scenic, public access and recreational resources. The recommended refinements to the Preliminary GP, listed above, will help to achieve this outcome.

Resources:

The following resource documents should be cited in the GP as references that will be consulted as future activities and projects are developed:

1. "Waddell Beach Parking Report" (Coastal Commission staff file memorandum), dated Aug.2, 2010.
2. *Completing the California Coastal Trail*, produced in 2002 by the California Coastal Conservancy pursuant to SB 908 (especially see the "Principles for Designing the Coastal Trail" section, regarding Coastal Trail continuity and separation from motor traffic).
3. *Scott Creek and Waddell Creek Bridge Replacements: Potential Physical and Biological Implications*, Caltrans background report, May 2012. A synopsis of relevant sections follows:

Caltrans has conducted a background study, and has summarized its findings in this report. The study includes important information for planning future uses in this portion of Big Basin State Park. In particular, it provides an analysis of projected shoreline erosion in the Waddell Beach area. The consultant concludes: "The shoreline is expected to migrate landward through time by an estimated 175–200 feet inland of the existing road alignment by 2100"[p.224].

Appendix J of the report includes a remarkable time series of habitat areas mapped on air photos, 1928-2002. These show, for example, that coastal dune habitat-- generally treated as an environmentally sensitive habitat area (ESHA) by the Coastal Commission--has been greatly reduced on the north side of Waddell Creek since 1928. It also shows the alignment of the pre-1941 bypass road/trail that extended northwards from Waddell Creek, through the Monterey pine forest along the top of Waddell Bluffs.

Appendix K lists special-status species and habitats present at the mouth of Waddell Creek, including native Monterey pine forest, coastal brackish marsh, and confirmation of nesting California black rails. Appendix L provides a functional habit analysis for several categories of ESHA. Species found near the mouth of Waddell Creek that are included in this analysis are: juvenile & adult Coho salmon and steelhead; Tidewater goby; Western snowy plover; California red-legged frog; San Francisco garter snake; and Western pond turtle.

Although these findings are preliminary and have not been fully verified by our agency, this report represents a substantial compilation of available resource data and should be referenced accordingly. Follow-on State Park facility improvement plans, as well as highway/bridge replacement planning, will need to consider each of these ESHA types, as well as strategies for adaptation to a retreating shoreline. While the Preliminary GP already includes these considerations, the Caltrans background report will provide valuable detail for *all* agencies having land use responsibilities in the Waddell watershed.

The cover letter accompanying the report indicates that funds are not *currently* available for a bridge replacement project that addresses environmental impacts resulting from highway construction work in the 1930-1940's. Nonetheless, shoreline erosion, streambank erosion, and flood events are certain to be ongoing concerns at the mouth of Waddell Creek.

Response to letter 22 – Lee Otter and Susan Craig – California Coastal Commission

22-1 State Parks appreciates the participation of the Coastal Commission staff during the general planning effort in identifying opportunities for public access and facility improvements at Waddell Beach. In reference to the public access terminology, the following general plan text and guidelines will be revised as follows:

Page ES-8, bullet 3:

- Develop a bicycle camp and walk-in campground facilities at a location either adjacent to the horse camp or in an open area along the existing road north of the day use parking lot. Consider alternative forms of camp facilities, such as yurts or tent cabins, with provisions to serve backpackers and touring bicyclists utilizing the California Coastal Trail (CCT) and Highway 1 Pacific Coast Bike Route (PCBR). Trail.

Page 4-66, Guideline RDO 6

RDO 6: Develop a bicycle camp and walk-in campground facilities (approximately 15 sites) at a location either adjacent to the horse camp or in an open area along the road north of the day use parking lot. Consider alternative forms of camp facilities, such as yurts, with provisions to serve backpackers and touring bicyclists utilizing the California Coastal Trail (CCT) and Highway 1 Pacific Coast Bike Route (PCBR). Trail.

Page 4-83, Table 4-1 Goals and Guidelines

Develop a bicycle camp and walk-in campground facilities, and consider alternative forms of camp facilities, such as yurts, with provisions to serve backpackers and touring bicyclists utilizing the California Coastal Trail (CCT) and Highway 1 Pacific Coast Bike Route (PCBR). Trail.

22-2 We concur with your assessment of the potential highway realignment alternatives and recommendations to broaden the range of potential design options. The guideline Waddell Beach 3 on pages ES-7 and 4-65 will be revised in the final general plan to read as follows:

~~**Waddell Beach 3:** Provide review and input to Caltrans on their planning and design for the proposed Highway 1 bridge replacement at the mouth of Waddell Creek to promote desirable hydrological, riparian, and estuarine conditions and facilitate safe vehicle ingress and egress from Highway 1. As part of a fully integrated plan for both sides of the highway, incorporate day use parking (approx. 50 - 100 spaces), distributed on either the inland-side of Highway 1 depending on resource constraints and future roadway alignment, with safe pedestrian access along Waddell Creek from the inland side of the highway to the Waddell Beach.~~

22-3 The final general plan will include the following goals and guidelines for public access and trails along the Highway 1 corridor through Big Basin Redwoods State Park:

Coastal Access Goal: Maintain the quality and continuity of public access and Highway 1 as the primary public access corridor, scenic vantage point and recreational resource within the boundaries of the Park.

New Guideline:

Access 6: Protect the scenic qualities and maintain continuity of the California Coastal Trail (CCT) and Pacific Coast Bike Route (PCBR) along Highway 1 through the park, with safe shoulder widths, support facilities such as bike racks at destination points, and the proposed bike camp at RDO.

New Guideline:

Trails 8: Provide for protection and signing of existing coastal trail segments as part of the CCT, where suitable public trails already exist. Also, identify the remaining links necessary to provide a continuous, safe CCT route through the State Park that minimizes exposure to automobile traffic. In new development projects and during preparation of the unitwide Roads and Trails Management Plan, consider the findings and recommendations of the 2002 Coastal Conservancy report titled: Completing the California Coastal Trail and the Monterey Bay Sanctuary Scenic Trail planning process currently underway.

The following guideline will be revised as follows:

RDO 6: Develop a bicycle camp and walk-in campground facilities (approximately 15 sites) at a location either adjacent to the horse camp or in an open area along the road north of the day use parking lot. Consider alternative forms of camp facilities, such as yurts, with provisions to serve backpackers and touring bicyclists utilizing the California Coastal Trail (CCT) and Highway 1 Pacific Coast Bike Route (PCBR). ~~Trail.~~

22-4 The goals and guidelines on pages 4-64 and 4-65 provide direction for project-level planning and design of facilities to facilitate safe pedestrian and vehicle circulation at Waddell Beach. We will coordinate with Caltrans in the redesign of vehicle access, parking locations, and providing means for a safe pedestrian crossing on Highway 1.

- 22-5** As recommended, the following paragraph in Appendix H will be revised as follows:

California Coastal Commission, Central Coast District

The California Coastal Commission was established by voter initiative in 1972 and made permanent by the Legislature in 1976 through adoption of the California Coastal Act in 1976. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the Coastal Act to include (among others) construction of buildings, division of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. Coastal Zone Management Act (CZMA). The primary mission of the Commission, as the lead agency responsible for carrying out California's federally approved coastal management program, is to plan for and regulate land and water uses in the coastal zone consistent with the policies of the CZMA.

- 22-6** As recommended, the following paragraphs will be added to **Appendix H, page H-1**, which summarizes the process to be followed for future park development within the Coastal Zone portion of the state park.

All future development, as defined by Coastal Act Section 30106, is subject to the provisions of the California Coastal Act including its provisions for delegation of coastal permit authority upon certification of a Local Coastal Program (LCP). Developments of all kinds within the CZ portion of the park are subject to first obtaining a Coastal Development Permit (CDP). Except for a small area of "original" jurisdiction in the vicinity of the Waddell Creek estuary, CDP applications are submitted to Santa Cruz County for review and hearings.

The County's standard of review is the Coastal Commission-certified LCP, including the LCP's Land Use Plan and implementing ordinances. Certain actions contemplated in the Preliminary GP, such as reduction or relocation of the Waddell Beach parking area, may first require amendment of the County's LCP. Realignment of Highway 1 may similarly trigger the need for LCP amendment.

For qualifying public works projects, the Coastal Act also provides an alternative development review process that does not entail a locally-issued CDP. This process requires prior Coastal Commission approval of a Public Works Plan (PWP). At nearby Wilder Ranch State Park, for example, projects identified in the approved PWP

do not need separate approval as CDPs. Although only rarely utilized, the PWP process is an available option for future State Parks (or Caltrans) projects subject to the California Coastal Act.

The CZMA, enacted in 1972, is the corresponding federal legislation. In accordance with the CZMA, the California Coastal Act and the various Local Coastal Programs comprise the federally-designated California Coastal Management Program (CCMP). In addition to its primary development review responsibilities under the California Coastal Act, an ongoing role for the Coastal Commission is to review Federal agency actions for consistency with the CCMP.

Appeals of County actions, original jurisdiction CDPs, requests for approval of PWPs, federal consistency matters, and any submitted LCP amendment requests are heard by the Coastal Commission at its regularly-scheduled meetings.

22-7 Our Department would support a bridge replacement project at the mouth of Waddell Creek to promote desirable hydrological, riparian, and estuarine conditions and facilitate safe parking and vehicle ingress and egress from Highway 1. As stated, such a project would likely involve State Park property and facilities at Waddell Beach and RDO. State Parks will coordinate with the Coastal Commission and Caltrans staff in future project design, coastal permits, and environmental protection alternatives.

22-8 As recommended, the following resource documents will be added to **Chapter 6, References, beginning on page 6-3:**

1. "Waddell Beach Parking Report" (Coastal Commission staff file memorandum), dated Aug.2, 2010.
2. Completing the California Coastal Trail, produced in 2002 by the California Coastal Conservancy pursuant to SB 908 (especially see the "Principles for Designing the Coastal Trail" section, regarding Coastal Trail continuity and separation from motor traffic).
3. Scott Creek and Waddell Creek Bridge Replacements: Potential Physical and Biological Implications, Caltrans background report, May 2012.



Sent via e-mail

August 3, 2012

RE: Big Basin Redwoods State Park General Plan/Draft EIR

Dear Mr. Hong,

These comments are submitted on behalf of Audubon California's 150,000 members and active supporters. We are writing to express concern that the Preferred Alternative of the General Plan falls unacceptably short of protecting the central coast population of the federally threatened and state endangered marbled murrelet. Additionally, the draft EIR does not meet CEQA requirements to describe the significant effects of the General Plan on the marbled murrelet.

The marbled murrelet population in central California is declining toward extinction and needs immediate and significant changes in management to reverse this decline. The central coast population has been reduced to ~600 individuals, suffers from extremely low breeding success, and is physically isolated from the population in northern California. The majority of this population's remaining old-growth nesting habitat occurs in California State Park lands in the Santa Cruz mountains, and the greatest ongoing threat is unsustainably high egg and chick predation by corvids (e.g. ravens and Steller's jays).

California State Parks, in collaboration with the Department of Fish and Game and USFWS, are the agencies responsible for preventing take of Santa Cruz mountain murrelets under the federal and state Endangered Species Acts (ESA), and for planning and carrying out recovery actions under the Acts. Yet the population has declined as a result of inadequate management and a lack of leadership and planning. There is no existing management plan for this state-endangered species, nor are we aware of an intent on the part of DFG or USFWS to create or fund a management plan. Actions taken to date taken to address the increasing and devastating impacts of corvid predation have failed to work. We refer to the October 29, 2010 comment letter by the Center for Biological Diversity for the best available information on the status, trends and impacts of corvids on central coast marbled murrelets.

We have the following specific comments on the General Plan, EIR and Alternatives Analysis:

We do not concur that "development and improvements within Big Basin Redwoods SP would not result in significant disturbance or losses of sensitive plant communities, special status plants, special status wildlife, or wildlife habitats; thus maintaining any impacts of project

23-1

implementation at a less-than significant level.” The draft EIR has failed to describe how the central coast population of marbled murrelets will not be significantly adversely affected by:

23-1 (cont.)

- Increased campgrounds – the Preferred Alternative includes up to ten new overnight cabins in the Sky meadows area, and does not consider closing or relocating campgrounds at Blooms Creek, Sempervirens, or Jay Camp, located in the most important murrelet nesting areas. These new and existing campgrounds will continue to provision corvids, especially with expected increased park visitation, which will result in unsustainable murrelet nest depredation.
- Increased Park visitation, trails, and trailside camps within the State Wilderness Area.
- Lack of specific activities and timelines associated with “coordination among DFG, USFWS and State Parks” toward “long-term recovery and survival of the Santa Cruz Mountains marbled murrelet population” (pg 4-57).
- Lack of a detailed plan or statement of intent for trash management, corvid management, or public outreach, which are all necessary to recover the murrelet population in Big Basin State Park, in addition to relocation of campgrounds from important murrelet old-growth nesting areas.

The Preferred Alternative does not reflect the General Plan’s marbled murrelet protection guidelines (pgs 4-17 – 4-18) especially #6: “Where possible, consider relocating camping and/or picnic facilities or rotating use in areas with marbled murrelet habitat.” Rather than follow up on this idea, the Preferred Alternative will increase the number of camp sites in or in close proximity to old-growth nesting habitat.

23-2

We urge State Parks to:

23-3

- Integrate the provisions of Alternative 1 to remove some or all of camping and picnic facilities within the old growth to protect marbled murrelets and ancient redwoods, specifically at Blooms Creek, Sempervirens, and Jay Camp.
- Remove or relocate the food store from Headquarters area to reduce food sources for corvids in order to protect marbled murrelets and their nesting habitat.
- Limit campsite development to Little Basin campground.
- Work with DFG, USFWS, scientists and conservation organizations to create a detailed, funded recovery plan for the marbled murrelet population in the Santa Cruz Mountains (Zone 6) with statement of intent, and long-term funding strategy, to ensure the survival and recovery of this population, with a focus on habitat protection, trash management, corvid management and public outreach. This may include innovative strategies such as Conditioned Taste Aversion (Gabriel & Golightly 2011)
<http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=40742&inline=true>

We appreciate the opportunity to comment and look forward to a final EIR and General Plan, and subsequent actions, that reflect these concerns and suggestions that we know we share with other resource management agencies and NGO's.

Sincerely,



Anna Weinstein
Audubon California
(510) 601-1866 x233
aweinstein@audubon.org

Response to letter 23 – Anna Weinstein

23-1 In the Final EIR, a review of the studies done in the last ten years shows that challenges to marbled murrelet survival are varied and inconsistent from year to year and location to location. Predation is one of the variables that have been implicated in the decline of the murrelet population. Given the secretive nature of the marbled murrelets and the lack of nest observations, data on local predation rates is exceedingly difficult to generate. The data on local predation rates and nest distribution is over ten years old and based on 19 individual nests from 1989 to 2002. From 2002 to the present, there has been no discernible trend.

Based on at-sea surveys (the most direct measure of population trends), the species has declined, perhaps up to 30% throughout the murrelet northern range. However, based on adult/juvenile ratios, the local population may still be in decline, although the same data appears to indicate some improvement for the central California population.

In 2005, improved trash management and corvid depredation efforts began in Big Basin Redwoods State Park. State Parks continues its support for predator control and has directed studies aimed at reducing the rate of nest predation. Towards this goal, State Parks is working with California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) to promote and support methodologies that, in addition to

controlling the numbers of predators, would directly address the rate of predation.

However, in response to the concerns articulated by various letter writers, State Parks finds that research is still on-going as to the causes of the species decline, or even whether there has been a decline in this population. The commitment to predator control and support for other methodologies that would address the rate of decline serves as mitigation for proposed activities. In addition, Parks has reduced cabins in the redwood grove and moved some activities from the old-grove area. However, Parks finds that there is a significant, unavoidable impact with respect to the speculative nature of the research at this time. It is unclear what is causing the decline in numbers, whether disturbance of habitat, predation, or loss of other habitat in other areas. Conversely, it cannot be said with certainty that the activity of Parks visitors in the old-grove redwoods is the reason for the dwindling numbers. This lack of definitive information leads State Parks to make the required overriding findings for a significant unavoidable impact.

- 23-2** Please refer to response 7-3. Department staff has conducted additional site reviews and prepared a more detailed resource description of the Sky Meadow area. After further investigation of the resources and site conditions that exist in the Sky Meadow area, the proposal for cabins near Sky Meadow has been deleted from the general plan. Additional goals and guidelines will be added to the final general plan to protect resources and upgrade parking and infrastructure outside the old growth forest to support continued use of the Sky Meadow Group Camp.
- 23-3** These are comments related to General Plan policies, not the EIR. Thank you for the suggestions.


MBUAPCD

 Monterey Bay Unified Air Pollution Control District
 Serving Monterey, San Benito, and Santa Cruz Counties

 24580 Silver Cloud Court
 Monterey, CA 93940
 PHONE: (831) 647-9411 • FAX: (831) 647-8501

August 1, 2012

 California State Parks
 Planning Division
 Big Basin Redwoods SP Planning Team
 P.O. Box 942896
 Sacramento, CA 94296-0001

 Sent Electronically to:
 Email: generalplan@parks.ca.gov

SUBJECT: Big Basin Redwoods State Park Preliminary General Plan and Draft Environmental Impact Report, State Clearinghouse #2001112104

Dear State Parks Planning Team:

Thank you for providing the Monterey Bay Unified Air Pollution Control District (Air District) the opportunity to comment on the above-referenced document.

The Air District has reviewed the document and has the following comments:

- 1) General – For reference, please use the Air District’s CEQA Air Quality Guidelines when analyzing potential impacts of the specific elements of the General Plan. The guidelines can be accessed at the District’s website at http://www.mbuapcd.org/mbuapcd/pdf/mbuapcd/pdf/CEQA_full.pdf
- 2) Existing Air Quality, Cement Plant, Page 2-31 – The second paragraph states that one of the main emissions sources in the NCCAB is a large cement plant in Davenport. Please note that this plant (CEMEX) is no longer in operation as it closed in 2010. Reference to the Davenport cement plant as one of the NCCAB’s largest emission sources should be deleted.
- 3) Existing Air Quality, Davenport Air Monitoring Station, Page 2-31 – This section also refers to the nearest air monitoring station being in Davenport, about 11 miles from Big Basin. It should be noted that the station, like the plant, is no longer in operation. However, recent monitoring data from Davenport should still be useful for describing conditions in the project area. The Davenport station often recorded the highest PM₁₀ readings in the entire NCCAB and also had the greatest number of exceedances of the State PM₁₀ standard. These exceedances were often due large in part to naturally occurring sea salt, which fortunately has no known health effects. A similar environment likely exists in the Rancho del Oso and Waddell Beach Specific Areas of the General Plan.
- 4) Existing Air Quality, Page 2-31 – The text in the second paragraph indicates that the NCCAB is a non-attainment zone for ozone and PM₁₀. Please note, this applies to California air quality standards only. The area actually attains the National Ambient Air Quality Standards for ozone, PM₁₀ and PM_{2.5}. The NCCAB also meets the California standard for PM_{2.5}. Also, the word “area” rather than “zone” should be used when referring to attainment and non-attainment areas.

24-1

 Richard A. Stedman, Air Pollution Control Officer

5) Sustainability Guidelines on Page 4-53 – The Air District commends State Plans for their sustainability goals. These include **Sustainability 4**, which considers use LEED standards in building design and **Sustainability 5**, which includes use low-emissions and zero-emissions vehicles, shuttles and light utility equipment. These measures should not only reduce greenhouse gas emission but also emissions of criteria pollutants and toxic air contaminants, such as diesel particulate matter.

6) 4.4 Parkwide Goals and Guidelines, Utilities Goal, Page 4-54 – This goal involves repair or replacement of older pipes and structures, some of which date back to the 1920’s or earlier. Please note, these facilities may contact hazardous materials such as asbestos. Removal and handling of these materials must be done in compliance with District Rule 424, National Emissions Standards for Hazardous Air Pollutants. If you have questions about Rule 424, please contact Mike Sheehan, District Compliance Inspector III, at (831)647-9411 x 217.

24-2

7) Impact Analysis, Short-Term Construction Emissions, Page 5-18 - During the construction phase of the specific elements of the General Plan, the Air District suggests that the following Best Management Practices (BMPs) for mitigating fugitive dust be considered when applicable:

24-3

- Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
- Prohibit all grading activities during periods of high wind (over 15 mph).
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area.
- Haul trucks shall maintain at least 2'0" of freeboard.
- Cover all trucks hauling dirt, sand, or loose materials.
- Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.
- Plant vegetative ground cover in disturbed areas as soon as possible.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all exiting trucks.
- Pave all roads on construction sites.
- Sweep streets if visible soil material is carried out from the construction site.
- Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the Monterey Bay Unified Air Pollution Control District should be visible to ensure compliance with Rule 402 (Nuisance).
- Limit the area under construction at any one time.

8) Impact Analysis, Long-Term Operational Emissions, Page 5-18 – The general discussion in this section that operational air quality impacts should be minor due to minor expected increases in vehicle activity seems reasonable. However, there is no evidence to support this conclusion, such as a screening level air quality analysis. Potential air quality impacts should be analyzed in greater detail when each specific element of the General Plan is considered. For instance, emissions

24-4

associated with increases in motor vehicle activity should be evaluated using an emissions model such as CalEEMod. Estimated emissions should then be compared to recommended thresholds, as described in Chapter 5 of the Air District's CEQA Air Quality Guidelines.

- 9) Air Quality Impact Analysis, Prescribed Fire, Page 5-18 – The top paragraph makes reference to guideline **Vegetation 4**, which continues use of prescribed fire as part of the vegetation management strategy. The strategy is to further identify conditions under which the fires would be conducted in order to minimize impacts on air quality.

Following a smoky burn in heavy forest understory fuels in Fall 2011, the following strategies were jointly developed by the California Department of Parks and Recreation and the Air District to mitigate smoke and to better inform nearby residents about the burn in progress:

- Website - During the planning stage for burns likely to extend a week or more, set up an informational web-site that can be used to notify and inform residents about the burn. This could include information on the reason for the burn and the operational burn plan. Following ignition, the site could show daily maps of the fire progress as well as smoke projections.
- Burn Size - When feasible, create smaller burn plots.
- Alternatives - When feasible, consider using chipping, hauling or pile burning as well as lop & scatter as alternatives.

The Air District requests that these strategies be considered when conducting prescribed fires under the General Plan.

Best regards,



Robert Nunes
Air Quality Planner
(831) 647-9418 ext. 226 or bnunes@mbuapcd.org

cc: Amy Clymo, Supervising Air Quality Planner
Mike Sheehan, Compliance Inspector III

24-5

Response to letter 24 – Robert Nunes – Monterey Bay Unified Air Pollution Control District (MBUAPCD)

- 24-1** **The following document will be added to the Chapter 6, References**
Monterey Bay Unified Air Pollution Control District
CEQA AIR QUALITY GUIDELINES
Adopted October 1995, Revised: February 1997, August 1998,
December 1999, September 2000, September 2002, June 2004 and
February 2008

The second paragraph under Existing Air Quality on page 2-31 will be revised as follows:

The majority of Big Basin Redwoods SP is located within the northernmost portion of the NCCAB which includes Santa Cruz, San Benito and Monterey counties. A small portion of the park that is located in San Mateo County is included in the southern portion of the San Francisco Bay Area Air Basin (SFBAAB). The main emission sources in the NCCAB are the Moss Landing Power Plant, ~~a large cement plant at Davenport located approximately 11 miles southwest of Big Basin,~~ agricultural activities, and vehicle emissions from Highway 101 traffic. Though separated by the Coast Range (Santa Cruz Mountains) to the south, wind can move air pollution from the SFBAAB to the NCCAB. The NCCAB is a non-attainment ~~zone~~ area for ozone and PM10. This applies to California air quality standards only. The area actually attains the National Ambient Air Quality Standards for ozone, PM10 and PM2.5. The NCCAB also meets the California standard for PM2.5. The nearest air monitoring site ~~is was~~ is approximately 11 miles south of the park in Davenport, ~~but is no longer in operation. However, recent monitoring data from Davenport is useful for describing conditions in the project area.~~ Two air quality components of concern are ozone and particulate matter.

The second paragraph on page 2-32 under Particulate Matter (PM) will be revised as follows:

Sources of ambient PM include: combustion sources such as trucks and passenger vehicles, off-road equipment, industrial processes, residential wood burning, and forest/agricultural burning; fugitive dust from paved and unpaved roads, construction, mining, and agricultural activities; and ammonia sources such as livestock operations, fertilizer application, and motor vehicles. In general, combustion processes emit and form fine particles (PM2.5), whereas particles from dust sources tend to fall into the coarse (PM10) range. The Davenport station often recorded the highest PM10 readings in the entire NCCAB

and also had the greatest number of exceedances of the State PM10 standard. These exceedances were often due large in part to naturally occurring sea salt, which fortunately has no known health effects. A similar environment likely exists in the Rancho del Oso and Waddell Beach Specific Areas.

24-2 The third paragraph on page 5-40 under Impact Analysis will be revised as follows:

Implementation of guidelines **Utilities 1** through **Utilities 4** would evaluate the current park infrastructure, repair and upgrade the current water supply and distribution system, as necessary, identify utility needs, and develop recommendations for utility upgrades and replacement. The repair or replacement of older pipes and structures may contact hazardous materials such as asbestos. Removal and handling of these materials will be done in compliance with the Monterey Bay Unified Air Pollution Control District Rule 424 National Emission Standards for Hazardous Air Pollutants (NESHAPS).

24-3 The first paragraph on page 5-40 under Short-Term Construction-generated Criteria Air Pollutant Emissions will be revised as follows:

The air quality impacts from construction can be substantially reduced by the use of dust control measures and other construction best management practices (see guideline **Geology/Hydrology 5**). Dust control measures would be developed during site-specific planning. ~~Air quality may also be temporarily impacted by prescribed burning programs or wildfires in the park. Under guideline **Vegetation 4**, the Department would use prescribed fire as part of a vegetation management strategy. This strategy would identify conditions under which prescribed burning would be allowed in order to minimize impacts to air quality.~~ During the construction phase of specific projects, the following Best Management Practices will be considered for mitigating fugitive dust when applicable:

- Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
- Prohibit all grading activities during periods of high winds.
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area.
- Haul trucks shall maintain at least 2'0" of freeboard..
- Cover all trucks hauling dirt, sand, or loose materials.
- Plant tree windbreaks on the windward perimeter of

- construction projects if adjacent to open land.
- Plant vegetative ground cover in disturbed areas as soon as possible.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all exiting trucks.
- Pave all roads on construction sites.
- Sweep streets if visible soil material is carried out from the construction site.
- Post a publicly visible sign which specifies the telephone number and person to contact regarding
- dust complaints. This person shall respond to complaints and take corrective action within 48
- hours. The phone number of the Monterey Bay Unified Air Pollution Control District should be
- visible to ensure compliance with Rule 402 (Nuisance).
- Limit the area under construction at any one time.

Air quality may also be temporarily impacted by prescribed burning programs or wildfires in the park. Under guideline **Vegetation 4**, the Department would use prescribed fire as part of a vegetation management strategy. This strategy would identify conditions under which prescribed burning would be allowed in order to minimize impacts to air quality. The following strategies were jointly developed by the California Department of Parks and Recreation and the Air District to mitigate smoke and to better inform nearby residents when conducting prescribed fires:

- Website - During the planning stage for burns likely to extend a week or more, set up an informational web-site that can be used to notify and inform residents about the burn. This could include information on the reason for the burn and the operational burn plan. Following ignition, the site could show daily maps of the fire progress as well as smoke projections.
- Burn Size - When feasible, create smaller burn plots.
- Alternatives - When feasible, consider using chipping, hauling or pile burning as well as lop & scatter as alternatives.

24-4 The third paragraph, last sentence under Long-Term Operational Criteria Air Pollutant Emissions **on page 5-18** will be revised as follows:

Consequently, implementation of the general plan would not conflict with or obstruct implementation of MBUAPCD air planning efforts. Potential air quality impacts will be analyzed in greater detail when each specific element of the General Plan is considered. For instance, emissions associated with increases in motor vehicle activity would be evaluated using an emissions model such as

CalEEMod. Estimated emissions would be compared to recommended thresholds, as described in Chapter 5 of the Air District's CEQA Air Quality Guidelines.

- 24-5** The comment refers to the strategies jointly developed by California State Parks and the Air District to mitigate smoke and to inform nearby residents about the burn in progress. We will consider these strategies when conducting prescribed fires under the general plan.

From: heidirose@baymoon.com
Sent: Wednesday, August 01, 2012 11:14 PM
To: General, Plan
Subject: Big Basin General Plan/DEIR Comments

California State Parks Planning Division Big Basin Redwoods State Park
 Planning Team P.O. Box 942896 Sacramento, CA
 94296-0001

Those concerned,

Thank you so much for this opportunity to provide my input. I have lived in Santa Cruz County for 3 decades, most of my life. Big Basin was a very important part of my childhood and continues to play a large role in my life today. I am extremely blessed that I am able to enjoy the park frequently. I am grateful for the park's influence on my life and am grateful to all of the people behind the scenes who make it possible to experience such a national treasure. Thank you.

Some thoughts for your plan:

Our state parks are only as viable as our global climate, and we must reduce our CO2 emissions if we intend to preserve our state parks. Toward this goal, we desperately need to reinstate public transit service to Big Basin. I lived car-free for many years in an effort to reduce my impact on wildlife and the planet. I depended on the bus for access to Big Basin for many years, enjoying my ability to walk through the park to the ocean and get back home to the San Lorenzo Valley safely and easily via the bus. When the routes were cut to weekends I was disappointed but at least I was still able to come to the park. When I heard the routes would be cut entirely I went to the Santa Cruz Metro's community outreach meeting and provided them with multiple reasons to keep the service, as well as some ideas as to how. After service was cut, I sadly stopped coming to the park. It just wasn't possible without cycling a very long way on some scary and dangerous roads. I missed the park terribly and felt overwhelmed and saddened by the decision, as it cut off the park to me (and countless others in our community and beyond) simply because I did not want to own a car. I have since gotten a car and can now access the park more easily, but having bus service would allow myself and many others to access the park without a vehicle, thus reducing greenhouse emissions. I would gladly pay more for bus service to Big Basin (as on the Highway 17 bus). Perhaps line it up with the highway 17 bus so that people from other parts of the state can access the park without using a car, as the Highway 17 bus leaves from a major transit station (San Jose Diridon) with both local and interstate trains/buses. An advertising campaign between the state park and Metro would help increase ridership, especially now that more people are becoming conscious of their environmental impact and wanting to drive less or not at all. Please do whatever you can to restore this much-needed service. It benefits so many people: low income, car-free, elderly and

25-1

1

disabled, as well as the local (and global) ecosystem and community because of the reduced emissions and car trips.

25-1 (cont.)

In addition to restoring bus service to Big Basin, there are other ways to encourage people to use alternative transit to the park. Increasing fees for car entrance/camping and decreasing camping/backcountry fees for those entering on foot, bicycle, or bus would help minimize the impact of cars on Big Basin and the surrounding ecosystems and communities. An increase would also bring some much-needed funds to the park. I realize there is "hiker/biker" camping at headquarters, but what about also reducing backcountry fees for people entering on foot or bicycle? I feel that if I walk or bike or take the bus I should not have to pay the same amount as someone bringing and parking a car, adding wear and tear and pollution to the park. And if I should drive and park my car I feel responsible and am willing to pay my fair share. Parking should never be subsidized, except for the disabled.

Flush toilets and a waste treatment plant are simply out of place in Big Basin State Park and not at all consistent with the values of conservation and stewardship. I am very concerned about the impact of the wastewater treatment plant on the Waddell Creek and surrounding wetlands and ocean. Many wilderness areas use pit toilets and these are widely accepted by the public in campgrounds and wild areas. We need to curb our water consumption and also protect this important creek habitat for salmon, trout, newts, etc. A friend told me he called the treatment plant to ask about bacteria levels and swimming in the East Waddell and the person answering the phone said "No you don't!" I find this VERY disturbing and alarming. If the creek is not fit for humans what about the wildlife that depends on its waters? What kind of impact does this have on the creek, the wetlands, and Pacific Ocean? I encourage the park to close the unsightly, wasteful, polluting treatment plant and install low impact pit toilets or other composting type toilets.

25-2

Please oppose NextG's current plan to install a cell tower near the wetlands, and oppose and prohibit ALL forms of wireless microwave radiation at the park, as mounting evidence shows a direct correlation between microwave radiation and a myriad of negative impacts on wildlife (and humans). One study I read notes a 90% mortality rate in tadpoles beneath a cell tower. We cannot allow any cell towers or associated infrastructure in or near our state parks. It is harmful to wildlife and their ecosystems. Furthermore, people need a place to go where they are not polluted by wireless radiation. There are so few such places left, we must protect them.

25-3

I would like to encourage increased and larger (more visible/obvious/simple) signage (or even different regulations) regarding use of trails during the winter newt activity. I frequent the park in the winter and notice a lot of dead, run-over newts, especially on Skyline to the Sea. I love riding my bike in Big Basin, and really appreciate the opportunity to do so. However, I personally do not ride my bike on trails during the winter for fear of running over a newt. Whether hiking or biking I notice that riders in the park are extremely courteous and

25-4

respectful of others, I have no problem with bicycle riders. I am an advocate of bicycle riding in general, but maybe it should be restricted during certain times of the year in order to protect the newts. In the very least some larger and more visible signs on the trail like: "SLOW: Newts Crossing/Mating." Or perhaps even some signs or cones in front of the larger puddles where newts are mating (where cyclists often just ride through without looking), saying "Newt Habitat: WALK BIKES." Perhaps you'd consider volunteer docents at the trailheads to talk to cyclists entering the park about the newt activity and slowing down? I would certainly volunteer for that. I think that most people aren't aware of the newts and if they were made aware would willingly make adjustments to their riding style so that they could stop quickly or walk their bikes in particularly sensitive areas. Please consider in the very least increased education and signage, and perhaps restricting bikes altogether during certain times of the rainy season. This may be more necessary during winters with decreased rainfall, to give the newts every opportunity to reproduce.

25-4 (cont.)

I would also like to say that I used to enjoy backcountry camping in the late fall, winter, and early spring and hope that you could bring it back. I was very disappointed that this was cut a couple years ago. The "off-season" is a wonderful time for locals to enjoy the park, and for many people in our community, especially young people/students working summer jobs it's the only time. The more people who can enjoy the park the more people there are who care about it and want to take responsibility for preserving and protecting it. Locals are a great resource in terms of volunteering and advocacy. I know times are tough for the state parks, and I realize there are sometimes a few people who leave a mess and make things difficult for the hard-working staff, but even extending the season a little bit into the fall and starting it a little earlier in the spring would allow for more people to access the park. Maybe just open one camp for winter use? It is unfortunate that there are no longer any local places where one can safely and legally camp during winter or "off-season" months.

25-5

Lastly, I would like to address an issue about human waste. I have several times seen human excrement on some of the arterial trails off of Skyline, especially since backcountry camping in off-season was cut and the toilets are closed. One time it was right next to the Waddell Creek on the Skyline trail! Each time I have seen this the waste was completely uncovered (no apparent attempt to bury it) and was surrounded by toilet paper blowing about. I also frequently see toilet paper about, perhaps from urination? I always pick up trash when I hike, and lately I've actually been bringing disposable gloves and a bag with me in case I run into a pile of toilet paper. I just can't stand to see it there and I feel it encourages more littering. May I suggest a sign at the entrance bathrooms, ex.: "last facilities: there are no bathroom facilities inside the park." Or perhaps open one toilet alongside Skyline and clearly designate it at entrances? I also think that all state parks and wilderness areas should have an educational sign about how to appropriately bury human waste should an emergency arise, and/or the importance of packing out or not using toilet paper because it takes so long to break down. I want to believe that people just don't know any better and are not really trashing our parks in

such a way. I know it's a "sensitive" subject but it's one that needs to be addressed. I wish it were more common to see information about human waste when entering wilderness areas, it would remove some of the stigma and empower people to do the right thing and keep our wild places pristine.

Thank you again for this opportunity to address the Planning Division. I really appreciate your time and consideration in hearing input from the public. I love Big Basin State Park and will continue to do whatever I can to protect and preserve it, as well as support it financially whenever possible. Thank you so much to all of the people that keep Big Basin open. I am very grateful.

Warm Regards,

Heidi Rose
7685 West Zayante Road
Felton, CA 95018

Response to letter 25 – Heidi Rose

- 25-1** State Parks appreciates your comments and suggestions for providing public transit service to Big Basin. We will continue to work with the counties and others to encourage bus service to the Headquarters area and Waddell Beach, and consider alternatives to reduce the impacts from vehicle emissions.
- 25-2** The wastewater collection system and treatment plant at Big Basin was rehabilitated in 2010 to meet safety standards for water quality and environmental protection. Restrooms are upgraded and water storage and distribution systems are replaced as necessary to avoid the kinds of impacts on Waddell Creek you described. The park uses vault toilets and composting type toilets where appropriate in the backcountry areas.
- 25-3** The Telecommunication Act of 1996 specifically prohibits alleged health issues to be considered when siting cell towers. Although we know that some people would like the parks to be completely cut off from outside communication, many people consider such access important as a safety issue. Currently, we have no plans to install cell towers in the park. The cell tower recently sited near Waddell Creek is located outside state park property. Its coverage will help facilitate ranger communications.

- 25-4** Thank you for your suggestions regarding bicycle use on trails during winter months, and the need to educate bicyclists and provide better trail signage to protect Newts during the rainy season.
- 25-5** For reasons of public safety and environmental protection, park staff evaluates roads and trail conditions during the winter season to determine when and where it becomes necessary to close trail camps or restricted access into the backcountry and wilderness areas. Winter storms bring down large trees and increase trail erosion and sediment into the creeks and streams. Public safety is a primary concern and emergency vehicle access and response time is more difficult under these conditions. Also, some campgrounds are closed temporarily during the “off season” to improve resource conditions and allow time for recovery of plant and wildlife habitats.

From: Joshua Hart <joshuahart@baymoon.com>
Sent: Wednesday, August 01, 2012 5:00 PM
To: General, Plan
Subject: Re: Comment on Big Basin SP General Plan/ DEIR

California State Parks

Planning Division

Big Basin Redwoods SP Planning Team

P.O. Box 942896

Sacramento, CA 94296-0001

August 1st, 2012

Dear Big Basin Planning Team,
Thank you for taking my comments into consideration in revising the Big Basin General Plan and Draft EIR. My comments are divided into categories below:

I. Transportation

Travel to Big Basin is currently very car dependent. Santa Cruz Metro service to both HQ and Waddell Beach has been terminated as of last year. We encourage State Parks, the local community, and Metro to partner and bring back at least basic bus service to both ends of the Park. It's only a marginal increase in funding to extend existing bus service from Boulder Creek and Davenport to Big Basin State Park, providing access to low income, car-free, the disabled, tourists from other countries. Cutting longstanding service to Big Basin was a poor policy decision that will worsen environmental effects of car traffic on the park and surrounding area, diminish visitor access to the State Park, and should be reversed as soon as possible. Perhaps at the very least a weekend shuttle from Scotts Valley Transit Center to connect the Highway 17 express with Big Basin HQ so that visitors from the Bay Area would have some transit option in the meantime until Metro service is restored. The previous Metro schedule allowed one to hike from HQ to the sea at Waddell Creek, and then take the bus back to Santa Cruz. There has been a noticeable increase in hitchhiking from Waddell Creek since bus service was cut, showing that there is a demand for community transportation.

The potential of cycling- both as a means of recreation and transportation within- and to the park- is significant. Access deep within the park by bicycle is possible via Waddell Creek and the Skyline to the Sea trail. Restrictions on bicycles along the Skyline to the Sea trail in winter may be advised however. Many newts and other amphibians are killed or injured by cyclists, and to a lesser extent walkers and runners. Perhaps a low speed limit or prohibition on bicycling during the winter is needed. As a cyclist who enjoys riding on that trail it's hard to say cycling should be banned, but during the winter newt migration, nature should take precedence. Bikes would still be able to use the trail 3 out of 4 seasons. Secure bicycle parking should be provided- perhaps at Rancho del Oso area and HQ, and people should still be able to walk their bikes. Additionally, speed limits should be reduced on access roads and some parts of Highway 1 to allow safer road sharing. Opportunities to identify and develop non-motorized thoroughfares within the park, and connecting to Butano and other nearby parks should be identified.

26-1

II. Wilderness areas

Wilderness areas should be expanded, and opportunities to protect key wildlife corridors enhanced. For example, a recent biological study indicated that the mountain lion population within Big Basin State Park was becoming inbred because of insufficient migratory corridor connecting with other populations. State Parks may want to work with Caltrans to provide under crossings of major highways like 17 in areas where mountain lions are known to have been hit and killed by cars.

26-2

III. Camping

More wilderness camping should be provided and existing sites maintained and available year round. It's important for Bay Area and Central Coast residents to have a legal place to access the wilderness nearby overnight, on a year round basis. The cost of these back-country facilities must be less than providing tarmac, bathrooms and car camping. I would be in favor of reducing land dedicated to campgrounds near HQ and returning that land to the redwoods. There doesn't seem to be a place to enjoy the grandeur of the big trees without noise, car traffic, and other disturbances.

26-3

The cost of backcountry camping should be reduced and the cost of car and RV camping increased, with a low-income reduction in fees. If the public arrives at the park by bicycle or foot, they should get a further discount on camping. Incentives should encourage simple use, non-motorized travel, and low impact visits to the park.

IV. Telecommunications

More reliable payphones are needed as these provide basic and emergency access for visitors to the park. Wireless voice and data communications should be discouraged within the park in favor of essential wired communications. Mounting evidence of ecological and human health issues related to wireless technology should lead State Parks to begin to phase out wireless technology throughout our system. State Parks should take an active role in keeping cell sites, wi-fi, and other wireless communications infrastructure away from vulnerable ecosystems. The NextG cell site proposed adjacent to Rancho del Oso is a key example of a project that is inappropriate adjacent to a State Park. Not only does wireless radiation affect wildlife, an increasing number of people who have developed electro-sensitivity, state parks remain one of the few places they can go to find refuge in an increasingly wireless world. Cell phone service is not needed- and in fact is wildly inappropriate in wilderness areas. Signs asking people to refrain from cell phone usage within the park should be considered.

26-4

In addition, biologists conducting field studies of endangered species using wireless tracking devices in the park and elsewhere would do well to consider the biological impact of devices attached to animals, in terms of biological impact, carcinogenic impacts, and behavioural impacts on the animals they are studying.

V. Utilities

Big Basin SP should consider going off the electrical grid as a demonstration project, using solar and hydro power to generate the power needed for the campground and services. As technology advances, this may become more economically feasible than paying PG&E for service.

26-5

In a recent walk through the headquarters area, we noticed PG&E SmartMeters mounted directly within several campsites, adjacent to old growth redwood trees. I hope Big Basin staff and management is aware that PG&E's own Federal Communications Commission compliance document (available upon request) specifies that all persons remain at least 20cm from these meters at all times. Because these are mounted directly adjacent to picnic tables, it is very likely that people- especially children- may expose themselves to very high levels of radiation from the meters, putting visitors to the park at risk and making State Parks along with PG&E-liable for any health damages. This may also place State Parks and PG&E in a position where they are violating the Americans with Disabilities act if the SmartMeters in the campground are barring access to disabled visitors to the Park.

SmartMeters should be removed as soon as possible from campgrounds, and replaced with analog meters, or even better have the electrical equipment relocated away from where people are camping. PG&E should waive the 'opt out' fee considering State Parks tenuous financial state.

VI. Waste

Waste is a problem for Big Basin. The wastewater treatment plant is an industrial sized facility, inappropriate for the setting, and likely polluting the West Waddell. Other alternatives should be considered such as composting toilets, and other non-anaerobic processes to deal with waste. The priority should be on protection of the natural ecosystems as well as hygiene.

26-6

VII. Long term Planning

Big Basin should work to coexist with adjacent communities and work together to protect vulnerable ecosystems and species, to maximize pedestrian, bicycle, and transit options for access, and to keep out wireless and other inappropriate development in order to keep the park healthy, accessible and pristine. Opportunities for responsible, low impact backcountry camping should be encouraged, while car camping should be limited and some campgrounds near HQ returned to their natural state depending on demand.

26-7

VIII. Community Watch

Due to State Parks tenuous and imposed financial situation, it behoves the park to look at partnering with nearby communities to keep an eye on things to prevent damage to the fragile ecosystems within Big Basin, and to act as stewards for the land to point out areas where maintenance and remediation are required.

26-8

IX. Control of invasives

Use of pesticides and herbicides should not be permitted within state parks. Where removal of broom and other invasives is needed, this should be done by hand not chemical.

26-9

X. Gathering of wild plants

A limited hand gathering of natural edible plants should be permitted to the public within areas where use is not heavy and within reasonable guidelines. Those gathering guidelines adopted by Point Reyes National Seashore may work in larger state parks such as Big Basin.

Thank you for the opportunity to comment as part of Big Basin's planning process. Please let me know if you have any questions.

26-10

Joshua Hart MSc
PO Box 30, Davenport, CA 95017
joshuahart@baymoon.com

Response to letter 26 – Joshua Hart MSc

26-1 The general plan guidelines Access 2 and Access 4 on pages 4-29 and 4-30 call for an integrated and efficient multi-modal transportation system for visitor access to the park. State Parks will continue to work with the counties and others to encourage bus service to the Headquarters and Waddell Beach areas.

The goal and guidelines for trails planning and development are listed on pages 4-31 and 4-32 of the general plan. The guideline, Trails 2, specifically calls for a parkwide Roads and Trails Management Plan to guide the placement and use of future trails in the park. Multi-use trails and trail loops of shorter length are also mentioned in guideline Trails 3. Protecting Newts during the rainy season is an issue of concern that necessitates educating trail users, providing informational signs, and restricting access to some areas of the park.

26-2 The wilderness (5,810 acres) and backcountry (10,540 acres) constitutes 85% of the park. The general plan goals and guidelines on pages 4-13, 4-14, and 4-15 emphasize the importance to protect, restore, and maintain the wildlife populations at Big Basin Redwoods State Park. On page 4-19, Regional Habitat Management Guideline calls for the protection of known wildlife habitat linkages and to increase species abundance and diversity.

26-3 Thank you for your suggestions regarding camping fees at Big Basin Redwoods SP. Camping fees can vary at the different state parks depending on the provisions that are made available to the visiting public. Big Basin has a variety of overnight accommodations that include trail camps, tent cabins, bicycle camp, and typical campgrounds for car camping. The user fees range between \$15 per night for a trail camp (6 people) and \$35 per night for car camping. Tent cabins are more expensive and will vary depending on day of the week and seasons. No fees are charged for people walking or bicycling into the park, only the use of campsites and day use parking. The general plan would allow for more trail camps in the backcountry outside sensitive resource areas.

26-4 Please see comment letter response 25-3.

26-5 The installation of the electrical service SmartMeters at Big Basin Redwoods State Park was initiated by Pacific Gas and Electric Company as part of their on-going regional wide effort to modernize the state's electrical system to be stronger, smarter, and more efficient. The installation of SmartMeters is considered the first step of creating a larger Smart Grid effort that is driving a new green technology industry in California. The installation of SmartMeters throughout Northern California

has been subject of numerous public hearings and has received the review and approval from the California Public Utility Commission. The installation of SmartMeters in and around Northern California (and nation-wide) has also received benefit of independent safety review by industry and public health experts.

There are 53 electrical meters located within the +/- 18, 580 acre in Big Basin Redwood State Park, including the coast-side Rancho del Oso area. Of these 53 meters, 43 are confirmed to be SmartMeters, which are primarily located on buildings/structures. According to PG&E, all of the SmartMeters within Big Basin Redwoods State Park have been installed in compliance to established state-wide codes and industry standards that has received review and approval of the California Public Utility Commission.

26-6 Please see response for comment letter 25-2.

26-7 We believe that the goals and guidelines throughout this general plan will guide the park and future planning to achieve the objectives you stated in your letter.

26-8 In these past few years, State Parks has increased its efforts to create new partnerships and work with local communities, user groups, and thousands of volunteers to protect resources and improve the park system for our millions of visitors.

26-9 State Parks follows all applicable state and federal laws, as well as internal policies regarding the use of pesticides and herbicides. As stated in our Department Operations Manual Pest Control Policy 0702:

It is the policy of the Department to initiate pest control only when necessary to protect public health and safety, facilities, and cultural and natural resources. The Department shall avoid the use of chemical pesticides until all non-chemical methods have been explored and found by the Department to be inadequate. Control efforts shall be in accordance with other Department policies on plant and animal resources, cultural resources, and facility management.

26-10 Under the California Code of Regulations and State Parks policy, the collection of wild plants in units of the State Park system is not allowed. Two exceptions exist for plant collection. Native American tribal members may be granted permission for resource gathering through a Native American Gathering Permit. Additionally, collection may occur in specific units and only when authorized by the Department to "take berries, or gather mushrooms, or gather pine cones, or collect driftwood". If allowed in a specific park unit, authorization to collect these resources is posted at the headquarters of the unit to which the authorization applies and is

limited to personal use only and not for commercial purposes. Conditional authorization for up to five pounds of mushrooms, berries, or pine cones that would be used for non-commercial purposes may be obtained from the District Superintendent of the specific unit where the collection would occur. Big Basin Redwoods State Park only allows plant collection through a Native American Gathering Permit.

From the California Code of Regulations: Title 14. Natural Resources
Division 3. Department of Parks and Recreation Chapter 1. General §
4306. Plants and Driftwood.

(a) No person shall willfully or negligently pick, dig up, cut, mutilate, destroy, injure, disturb, move, molest, burn, or carry away any tree or plant or portion thereof, including but not limited to leaf mold, flowers, foliage, berries, fruit, grass, turf, humus, shrubs, cones, and dead wood, except in specific units when authorization by the Department to take berries, or gather mushrooms, or gather pine cones, or collect driftwood is posted at the headquarters of the unit to which the authorization applies. Any collecting allowed by authority of this section may be done for personal use only and not for commercial purposes.

In addition, State Park policy based on Section 4306 is found in DOM 0317.1.3.4 (Mushrooms) and 0317.1.3.5 (Berries and Pine Cones)

From: mfrishansen@skyhighway.com
Sent: Wednesday, August 01, 2012 6:51 PM
To: General, Plan
Cc: theeelworld@cruzio.com
Subject: responce to draft, General Plan Big Basin Redwood State Park
Attachments: BackCountry.msg

To the Big Basin GP Planners

I would rather see the State spent money to keep all State Parks open than change Big Basin. What is there now works. But if you must...

Camp Hammer would be the best place to put Park Headquarters. It is a much safer way to enter and exit Highway 236. Across the street is the utility road/East Ridge Trail, forty acres (currently owned by Terry Ornales, who is right now in the process of selling to the Sempervirens), a huge meadow and the old horse ranch (currently owned by the Park). There is an access road through the property (Camp Hammer) to Little Basin Campground. This old road has a wash out spot that needs an extra large culvert or bridge. It is much cheaper to fix this than widen Little Basin Road. It goes up into Little Basin to the old fire break along the ridge between Little Basin and Big Basin referred to as Tanbark Trail. It needs some work, but it is doable. This road provides a much needed fire escape road from Little Basin Campground, without it there will be deaths in case of a fire that closes Little Basin Road.

There is another fork to this road that would be a great horse trail, bicycle road, foot trail, though not recommended for motor vehicle traffic, except emergency use because it passes by old growth redwoods. This road is a flat level road that needs no work and goes right in to Blooms Creek Campground and in to the old State Park Headquarters, thus in to the infrastructure of existing trails.

Saddle Mountain, well, please keep the pool open. People need a place to cool off and giving them the pool will help keep them out of the creeks and polluting them. It also gives a backup source of water to dip from for fighting fires, though the favorite spot is the Country Club Reservoir-Lake. Please make the pool available with a day pass. Please plan a space for emergency helicopter landing. Now severely injured people hurt in Big Basin, Little Basin or Camp Cutter, are airlifted to hospitals from Saddle Mountain.

Cut the grass. There is no meadow in Saddle Mountain nor Little Basin. These areas are an invasive non-native species domestic long grass. It is almost deadly to people with hay fever and asthma, not to mention a fire danger.

Get a new outdoor school. Educating children should be a great thing, but not with Exploring New Horizons here. Do not renew the contract with

1

27-1

27-2

these really, really ugly people. I would recommend asking Chuck who manages the Little Basin Campground if their group wants another site, they are wonderful neighbors.

There is a lovely campfire site beside Little Basin Road and Bloom Grade Road. This area can be noisy and not affect the peace of others because of how the cliffs are. Get rid of the other amphitheater, it is in a watershed the winter and not a good spot environmentally.

The trails on the south (the far end of the property from the highway) were put in illegally and go through private property and should be removed. If you need trails they should be away from the road more on the interior of the property which gives a more pleasant nature experience and especially remove and spur of the trail that connect to Little Basin near any private driveways.

Consider removing the large gardens. These use too much water. The water table in this area will not support expansive gardens. If we use the water, it is not there for the forest. And after all, isn't that why we live up here. We all love this forest.

Planting native vegetation sounds nice but it needs to be kept way back from the road, so that it does not create blind spots. Little Basin Road is a 2.5 mile long road zoned to be 40 feet wide, according to Santa Cruz County Public Works. There is a 20 foot set back for buildings and 6 foot fencing, for a reason, safety! You can't see around the inside comes with the brush in the way.

The wood fencing added by Exploring New Horizons, behind the house, along Little Basin Road is not to code, is not safe, is ugly and needs to be removed. Thank you! It was not "replacing an existing fence" the old fence that was there years before was barbed wire and therefore see through and it did not make a blind corner dangerous.

It would be wonderful if all activities on this property had to follow State Park rules.

If it so noisy you can hear it on the next property over, it is too loud. No amplified noises, whether microphones, music or megaphones. This is especially important by the highway, the lodge or the pool. Dogs should be on a leash at all times. Consider not renting to people with dogs and cats or limiting the number of dogs and cats by the tenants, this is legal to do by a landlord.

Memorial Gardens? Not in the Saddle Mountain area or the Little Basin Road area. There is no parking. Old people are those that have the money for this stuff and they want to park close. The on Lodge Road is placed over historic roads which the Park is trying to remove and the trails. Then you can walk anywhere. Trails and roads are dedicated to be gutted, so the surrounding areas stay pristine. Walking anywhere is not okay. It is bad for the forest. Almost all things in a Redwood forest are surface rooting plants walking anywhere destroys the landscape.

Trespassing. All private homes/properties, on Little Basin Road, their driveways are within 0.6 mile from the highway except the property for sale and one owned by the Sempervirens. The part of the road of the road from 0.6 to 1.0 or so is a severely steep canyon delicate and prone to slides. Tourist should be kept off these areas and they should be marked private property or not open to the public. All the turnouts are on private property in this zone except Bloom Grade (which has the best cell phone service for miles around).

27-4

There are no trails from Saddle Mountain to Little Basin Campground and no State Park land to put them on unless it is on steep canyon walls. There are only private driveways going back to peoples homes.

No property owner in their right mind would want a pedestrian freeway up their driveway. We go through many a hardship to live up here, the terrible commute to work, to school for the kids, 3 1/2 to 6 1/2 days almost every winter without power. People buy a home up here, not to make money, but to spend the rest of their lives and die here. Almost 75 to 80 percent of the people who live here are 55 years or older, have no children, or there kids were raised elsewhere and settled elsewhere, or their kids think their parents are crazy for living this far out. Most of these homes will be available when the current owners pass. Now that the homeowners are close to or at retirement when they truly can enjoy all their time in this forest paradise to take that away from them would be criminal. (Note this is true for the tri-basin area, Little Basin Road, Old Big Basin Road , Lodge Road and Highway 236 by those areas.

Your general plan mentions using fire or herbicides to remove non-native invasive species. No, no, no. Fire in a Redwood Forest is dangerous and the rains the year after have caused slides where the big trees fell (this happened in the Opal Creek area). It is not needed in the tri-basin area, because, many of us pull French Broom some up to 100 hours a year and have been doing this for 20 years or more.

27-5

I like the idea of no alcohol in the Little Basin Campground, the road is too dangerous to put drunks on it.

I don't like the special events in Little Basin Campground that include concerts. This will bring in drugs and our roads are dangerous enough without drug users on them.

You need to provide a smoking area, otherwise people sneak off into the woods and this creates a fire danger. Cigarette butts are the number one source of litter on our beaches (if you do beach clean ups I am sure you already know this). Half of all liter on our beaches are cigarette butts. We don't need them along our public roads, not to mention how poisonous it is to people jogging, bicycling having to breathe the smoke on our quiet side streets. When it rains the butts along the roadways get into our watersheds, polluting them with over 100 types of poisons. Doesn't it make sense to put a smokes bench and butt can, where it can be contained, supervised and cleaned up easy.

27-6

One major issue with the General Plan is that it is trying to reroute traffic that should be on State maintained Highway 236 to small county road designed for one direction traffic in the horse and buggy days, that run through treacherous mountain passes.

Our county has no money to fix this situation. Lodge, Little Basin, China Grade, Old Big Basin Road/Way, are all quiet one lane roads which are almost as peaceful as "back county trails" in Big Basin before your plan goes in. We ride bikes, horses, jog and walk with our dogs on leashes, our kids or more likely our grandkids without fear but now we have what should be highway traffic on them, because of someone from Sacramento who wants their plan to look nice on paper who will never come to visit or maybe once but will ruin this area permanently for those of us who live here work here and play here. This is devastating. If the State is going to do this the State needs to pay for two lane roads plus bike lanes. Or you could just forget the General Plan and leave things how they work now or wait till the money is there to make things work right.

Thank you for taking the time to read this.

L. Neel
PO Box 1457
Boulder Creek, California 95006

Response to letter 27 – L. Neel

- 27-1** Thank you for your suggestions regarding the location for the park headquarters and access road. The general plan cannot make proposals or recommendations for properties not currently owned by California State Parks. Prior to the implementation of the general plan, further consideration will be given to the actual size and locations of roads, trails, and new facilities, including the discussion of alternatives during the more detailed site-specific planning and design phase.
- 27-2** Your comments and suggestions will be considered during the subsequent planning and implementation of the general plan for the Saddle Mountain and Little Basin properties.
- 27-3** There are no memorial gardens proposed by the general plan in the Saddle Mountain or Little Basin areas.
- 27-4** Please refer to the Master Response (B) on Saddle Mountain and Little Basin development impacts, and the explanation provided in response 2-2 regarding enforcement of unauthorized uses and private property trespass.

Generally, it is not the State Parks responsibility to restrict access onto private lands. Park staff utilizes signage, fencing and other methods on a case-by-case basis to address these problems and to inform park visitors about park rules and regulations and importance of respecting park resources and individual rights of adjacent private properties. Law enforcement responsibilities and actions are carried out by park rangers on a daily basis. You are encouraged to continue working with park staff to identify problem areas and determine appropriate actions to address these important issues.

- 27-5** Please refer to the response 26-10 regarding the department's policy for the use of herbicides.
- 27-6** The use of cigarettes in the park is strictly regulated and signs are posted warning people about the potential of fire danger and environmental hazards.
- 27-7** Please refer to the response 18-9 regarding future traffic on Lodge Road.

From: mfrishansen@skyhighway.com
Sent: Wednesday, August 01, 2012 6:54 PM
To: General, Plan
Cc: theeelworld@cruzio.com
Subject: response Back Country General Plan Big Basin Redwood State Park
Attachments: BackCountry.msg

To Big Basin GP Planners,

I would like to be able to enjoy the experience of traveling through Big Basins lovely forest, mountains, streams and finally get to the beach.

But I have arthritis and am disabled. I cannot hike the 22 plus miles round trip to the beach. I know I can ride my bike to the horse trails and walk using my bicycle like a little old ladies walker to lean on to get down/up the horse trails to where I can ride again, spend an hour or so at the beach and come home in the same length of time it takes to hike with a "car" method.

If I go with a friend, meet at park headquarters with two cars, drive to the coast, leave one at the coast, then come back in the other car, hike to the coast and drive back to park headquarters it involves 3 hours and 125 miles of driving. That much traveling in cars makes my back sore.

Note too that the Santa Cruz County buses no longer go to Big Basin or go to Rancho Del Oso as of this year and they haven't gone "full circle" for many years.

McCrary Ridge Trail was bulldozed in by McCrary to be a roads width to provide a fire break to protect those in the next canyon from fire. It is basically a road and if horses are allowed, I don't see any reason why bicyclers can't use it too.

Henry Creek Trail was partially a fire break (E. D. Rogers 1915 map of Big Basin) and it provided a wagon road to Henry's cabin, there are some side trails that connect to Anderson Landing Road.

Howard King Trail is fine to walk the the bike but is narrow to ride.

The Skyline to the Sea Trail, while I will take any road I can get, but this one has entirely too many people on it (I call it the pedestrian freeway to the sea trail) I don't recommend this one.

I do like loops because if you pass someone or something dangerous it is nice for the option to take a different way back.

Some of your General Plan says bicycles must be on the "rim" of Big Basin.

1

28-1

Rim means high elevation. The top of China Grade is 2,300 feet, while Sandy Point Lookout is 1,400 feet. This makes a difference when the beach elevation is zero and I travel round trip.

I would also appreciate potties and they don't have to be wheel chair accessible for me. Herbert Campground was six miles from camp headquarters and 4 1/2 from the coast. It would be a perfect location for a pottie as is Sandy Point Lookout. Without toilets you see yellow and brown toilet paper in the back country. It does ruin the pristine view.

My idea of a vacation is: to leave the car behind; enjoy the fresh air; beautiful distant views; the wild flowers of spring/summer; "the winter wildflowers of Santa Cruz County", the rainbow of colorful fungus; the animals; the sunshine and especially the raging winter storms, the weather that makes you feel so alive to be out there in it.

As a part of the aging population our doctors say don't jog or run, ride a bicycle. Parks should be for everyone, not just the unbelievably fit. Disabled people should be allowed to get out to see and be a part of the park, not just sit in a park shuttle van.

Thank You for taking time to read this.

L. Neel
PO Box 1457
Boulder Creek, California 95006

Response to letter 28 – L. Neel (letter #2)

- 28-1** Thank you for your suggestions and insights on trails and provisions to increase accessibility of the park's facilities and improving access into the park's natural areas. The park recently completed several park projects to modify buildings, restrooms, pathways to comply with the Americans with Disabilities Act (ADA). Future construction, trail reroutes, and retrofitting projects of existing facilities will all require compliance with ADA. Future park trails, trail camps, and roads will be addressed in the preparation of the Roads and Trails Plan for Big Basin Redwoods SP (see Trail guidelines on pages 4-31 and 4-32 of the General Plan).

From: mfrishansen@skyhighway.com
Sent: Wednesday, August 01, 2012 4:01 PM
To: General, Plan
Subject: response to Preliminary General Plan - Big Basin Redwood State Park

I object to your plans for Saddle Mountain and Little Basin Campground.

You allow non-profits to run concessions on park land because you do not have the funds to steward the properties you acquire. Saddle Mountain has been year round noise for the past 12 years after the non-profit Sempervirens built without permits, avoided county restrictions and handed off the property to the park (at a much larger sum of money than they paid for it), in my opinion, to get out of trouble with County Planning. Is it the same with Little Basin Campground?

You want to acquire as much land as you can so you can charge admission. I thought parks were for the people.

What is the projected timeline for implementation of the General Plan?

Will you have 24/7 surveillance of the parking lot at Saddle Mountain? Will you allow pets, campfires, helicopter landing pad, amplified speakers, generators, camping, swimming, alcohol, farm animals, smoking, etc. ?

Will you allow parking in the pull-outs and/or in any available space along Highway 236 for people who do not want to pay to visit the park? Will you be putting in a controlled stop light with turning lanes at the intersection of Highway 236, Little Basin Way and Old Big Basin Way for the volumes of vehicles you project (including the support transport of goods to give these visitors the comforts of eating, entertainment, lodging, staff workers). What is the escape route for Little Basin Campground? It is barely more than a one lane, ill-kept road. A fallen tree, mud-slide or broken down vehicle can block the entire flow in or out.

What ever happened to the Horse Concession across from Camp Hammer? The Sempervirens are approaching the 40 acre parcel for sale next to it. Will that become one of your overflow parking lots?

What will the runoff water from the parking lots into the immediate watershed effect be? Are you planning to pave these lots? Will the parking area change the water tables for existing wells of the contiguous properties?

Where does one go to look at your current budget?

Have people always paid entrance fees to visit parks?

29-1

29-2

I have lived next door to Saddle about 30 years. We share a property line of about 475 feet. Their noise funnels down Highway 236 and across the saddle of the land. Camp Hammers Messiah amplified programs funnel up the mountain. Noise is pollution. Silence is golden or so it used to be. There is now a rooster adding his vocals to the peacocks and the groups that rent the "unresolved redtagged (2003) but now Park owned" Saddle Mountain facilities.

Based on these past experiences, I have my doubts and apprehensions about your future plans for these properties.

Sincerely,

M. Friis-Hansen
20400 Big Basin Way
Boulder Creek, Ca 95006

Response to letter 29 – M. Friis-Hansen

- 29-1** Please see Master Response (A) on the General Plan and Tiered EIR and Master Response (B) on Saddle Mountain and Little Basin development impacts. The General Plan is a programmatic document, whereas future detailed planning and site-specific projects will require additional environmental analysis and review.

Emergency evacuation procedures are in place for the Little Basin campground. The Tanbark Loop trail/Pine Mountain Road will be maintained as an evacuation route for emergency vehicle access in the event that Little Basin Road will not be accessible in an emergency and the parking terrace at Little Basin can serve as a heliport for emergency use.

- 29-2** It is our understanding that the concessionaire who operated the horse concession along Highway 236 could not continue for financial reasons. We are unable to comment on any plans that the Sempervirens Fund may, or may not, have for acquiring properties in the vicinity of Big Basin Redwoods State Park.

Parking guidelines are provided on page 4-31, which includes assessment of the physical and environmental constraints, design alternatives and actions to mitigate resource impacts. Site-specific projects would also include public input and second-level environmental review.

State Park's budget is prepared each fiscal year by the Department of Finance and approved by the Governor. State budget information can be obtained at the following website: <http://www.dof.ca.gov/>. The

General Plan establishes a purpose, vision, and long-range management direction for the park, and does not commit specific funds for implementing plan proposals and recommendations. Site-specific projects, when proposed for implementation, are prioritized and would compete for available funding with other park projects throughout the state.

Park visitors do not pay entrance fees at Big Basin Redwoods SP. Park fees are collected for the use of parking and overnight facilities.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Ventura Fish and Wildlife Office
 2493 Portola Road, Suite B
 Ventura, California 93003



IN REPLY REFER TO:
 08EVEN00-2012-CPA-0124

July 30, 2012

California State Parks, Planning Division
 Big Basin Redwoods Planning Team
 1416 9th Street, Room 1442-7
 P.O. Box 942896
 Sacramento, California 94296

Subject: Comments on the Big Basin Redwoods State Park Preliminary General Plan and Draft Environmental Impact Report

Dear Big Basin Redwoods Planning Team:

This letter provides the U.S. Fish and Wildlife Service's (Service) comments on the Big Basin Redwoods State Park Preliminary General Plan (General Plan) and Draft Environmental Impact Report (DEIR) (State Parks 2012). The Service provides comments as a responsible agency pursuant to Article 20, §15381, of the California Environmental Quality Act (CEQA). It is our understanding that comments on this draft document are to be submitted to the California State Parks Planning Division by August 1, 2012.

The Service's responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act prohibits the taking of any federally listed endangered or threatened species. Section 3(18) of the Act defines "take" to mean "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Harm is further defined by the Service to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Harass is defined by the Service as intentional or negligent actions that create the likelihood of injury to a listed species by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species. Exemptions to the prohibitions against take may be obtained through coordination with the Service in two ways: (1) if a project is to be funded, authorized, or carried out by a Federal agency, and may affect a listed species, the Federal agency must consult with the Service pursuant to section 7(a)(2) of the Act; and (2) if a proposed project does not involve a Federal agency but may result in the take of a listed animal species, the project proponent should apply to the Service for an incidental take permit pursuant to section 10(a)(1)(B) of the Act.

As it is not our primary responsibility to comment on documents prepared pursuant to CEQA, our comments on this General Plan and DEIR do not constitute a full review of project impacts. Rather, they focus on those sections that address the federally listed species under our role as a responsible agency particularly as they relate to compliance with the Act and its implementing regulations. In addition, the Service is a Designated Trustee for natural resources pursuant to subpart G of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR § 300.600 et seq.). As a designated Trustee, the Service is authorized to act on behalf of the public under Federal law to assess and recover natural resource damages and to plan and implement actions to restore, rehabilitate, replace, or acquire the equivalent of the affected natural resource injured as a result of a discharge of oil. Several oil spills in central California have affected the marbled murrelet. The Service acts in its capacity as a Trustee on the Command, Luckenbach, and Cosco Busan Oil Spill Trustee Councils, all of which have provided, or plan to provide, significant settlement funds to State Parks, including Big Basin Redwoods State Park, to benefit marbled murrelets in the Santa Cruz Mountains. Our comments on the DEIR and Goals and Guidelines of the General Plan are below.

Preliminary General Plan

The General Plan was developed to address a need for formal planning highlighted by recent acquisitions, new potential for regional natural lands and open space connections, growing demand from the expanding California population for new recreation options and coastal access and the opportunity to coordinate planning with several other parks in the region.

This General Plan was developed by State Parks as part of a regional planning effort along with general plans approved for Año Nuevo State Park and Butano State Park. These parks are in proximity to each other and share natural, cultural, and visitor demographic characteristics, and face similar issues. Key issues of the General Plan have been outlined as the following: (1) vegetation, wildlife, and habitat protection; (2) recreation demand and visitor opportunities; (3) public access and circulation; and (4) rehabilitation and preservation of significant historic resources. Key plan proposals of the Preferred Plan include five separate park planning zones: (1) Wilderness and Backcountry, (2) Headquarters Area, (3) Saddle Mountain and Highway 236, (4) Rancho del Oso and Waddell Beach, and (5) Little Basin. Chapter 4 of the General Plan provides natural resource management goals and guidelines related to vegetation and wildlife management, special status plants and animals, and regional habitat management (State Parks 2012).

The General Plan and DEIR discuss potential impacts to the federally endangered Santa Cruz cypress (*Cupressus abramsiana*) and the federally threatened marbled murrelet (*Brachyramphus marmoratus*), western snowy plover (*Charadrius nivosus*), and California red-legged frog (*Rana draytonii*). In this letter, we address these species largely collectively; though, highlighting potential impacts to western snowy plover critical habitat and marbled murrelets. Our comments focus mainly on our concerns with new development and expansion of facilities and recreation in the old growth redwood forest which provides nesting habitat for marbled murrelets, a declining species in the Santa Cruz Mountains.

Predation on marbled murrelet nests by corvids, particularly Steller's jays (*Cyanocitta stelleri*) and common ravens (*Corvus corax*), has been frequently observed (Peery et al. 2004) and has been recognized to be a significant threat to marbled murrelets (Service 2009). Surveys of both corvid species in the Santa Cruz Mountains have shown elevated densities at known murrelet nest sites, likely due to the location of campgrounds within murrelet habitat (Peery and Henry 2010). In the Santa Cruz Mountains, Suddjian (2005) found Steller's jays 8.8 times more numerous in standard campgrounds or immediate vicinity than control areas more than 300 meters from campgrounds, picnic areas, or residential areas. Jay density was significantly positively correlated with the number of occupied campsites. Suddjian (2005) also found that raven numbers in campgrounds exceeded those in control areas by 28 times based on pooled data (ravens were generally uncommon). A recent corvid monitoring and management report issued by Redwood National and State Parks (RNSP) (RNSP 2012) indicates similar to results from previous years, 2011 results showed campground areas contained a significantly higher number of Steller's jays as compared to two control category types. Campgrounds averaged 6 to 10 times the number of jays in the control areas and were similar to results recorded from 2007 to 2010 (George and Peery 2012, as cited in RNSP 2012). There is no trend to indicate that Steller's jay density in the campgrounds and picnic sites is decreasing in response to RNSP corvid management actions (RNSP 2012).

Peery and Henry (2010) state approximately half of the known murrelet nests in central California are located within 1 kilometer of heavily used campgrounds in a single State Park; they indicate that significant gains in population viability could be achieved by targeting efforts in small areas providing food subsidies to corvids. Peery and Henry also report that reducing predation by 40 percent from current levels coupled with a modest increase in after-hatch-year survival could potentially result in stable population growth. Known threats to marbled murrelets compounded with predation, are likely to be largely responsible for current observations of poor reproductive success. Data on nest success from radio telemetry and adult to juvenile ratios as an index of breeding success continue to confirm that reproduction in Washington, Oregon, and California is too low to sustain populations (Service 2009).

General Plan Goals and Guidelines

Headquarters Area

The General Plan summarizes the following goals and guidelines for future management and development of the Headquarters Area of Big Basin Redwoods State Park:

The park Headquarters is located in the heart of the old growth forest. It includes the oldest sections of the park and contains old growth redwoods (*Sequoia sempervirens*), unique cultural resources, developed facilities, and a variety of recreational opportunities. This area in the northeastern part of the park includes a portion of the original 3,800 acres acquired in 1902, and is accessible by public roads and trails. The oldest and tallest redwood trees occur in the old growth forest in the park headquarters area. Hiking trails,

day use picnicking, and camping facilities in the old growth forest are among the most popular visitor attractions at this park (State Parks 2012).

Campgrounds, picnic areas, and visitor facilities are located in some of the most important remaining old growth nesting areas for marbled murrelets. In the past, uncontrolled human food subsidies have resulted in significant increases in corvid populations in prime old growth nesting habitat, which often leads to high nest predation of murrelets, resulting in low nesting success. Park managers, as stewards of the resources, are challenged to provide recreation and camping facilities within the old growth redwoods while protecting the nesting habitat of marbled murrelets. This will be achieved in coordination with the California Department of Fish and Game (CDFG) and the Service (State Parks 2012).

Headquarters Goal A: Preserve the old growth redwood forest and protect native plants and wildlife habitats.

Headquarters A1: Coordinate with CDFG and the Service toward the long-term recovery and survival of the Santa Cruz Mountains marbled murrelet population.

Headquarters A2: Limit new facilities construction in the old growth redwoods and manage visitor activities to protect sensitive resources and achieve long-term management objectives.

Headquarters A3: Relocate developed recreation facilities, where necessary, to protect sensitive natural resources and significant cultural resources.

Headquarters Goal B: Improve the park's setting and overall visitor experience in the historic Headquarters area, rehabilitate historic buildings for adaptive reuse and accessibility, and reduce vehicle traffic and high intensity uses.

Headquarters Goal C: Protect and preserve historic residences and associated features and structures that contribute to the nominated National Register Historic District located in the Lower Sky Meadow residential area.

Headquarters C1: Introduce up to 10 overnight cabins outside the Sky Meadow Residential historic district, along the road near the existing group camps and outside sensitive resource areas. These cabins will require an expansion of parking and utilities infrastructure in the vicinity to provide seasonal accommodations for individual or group use.

Headquarters C2: Conduct site-specific surveys and investigations for sensitive plant and animal species protection, and coordinate with the Sempervirens Fund early in the site planning to locate new facilities and avoid dedicated trees and memorial groves.

Headquarters C3: Allow for development of additional staff housing, trailer pads, and amenities outside of the designated National Register boundaries of the Lower Sky Meadow residence area when addressing future housing needs, to maintain the historic integrity of this significant 1940s residence area.

Service comments on the goals and guidelines for Big Basin Redwoods State Park's Headquarters Area: The Service supports relocation of visitor facilities, limitation on the construction of new facilities in old growth redwoods, reduction of vehicle traffic and high intensity uses, and coordination between agencies toward the long-term recovery and survival of the Santa Cruz Mountains marbled murrelet population. As documented in the General Plan and in literature, food subsidies provided by humans in marbled murrelet habitat have resulted in significant increases in corvid populations, leading to high nest predation of murrelets, ultimately resulting in low nesting success. Introducing up to 10 overnight cabins, parking, and utilities infrastructure in the Sky Meadows area within the old growth redwoods, is contrary to the goal of recovery and survival of the marbled murrelet population in the Santa Cruz Mountains. Even with implementation of a trash management program as outlined in the Wildlife Management Guidelines below, the introduction of new facilities and additional visitor use in the Headquarters and Sky Meadows areas would exacerbate the already detrimental impacts of disturbance and increasing corvid populations in marbled murrelet nesting habitat. The proposed activities are likely to cause direct and indirect impacts to marbled murrelets that could rise to the level of take as defined in the Act. If take of marbled murrelets cannot be avoided, we recommend that State Parks apply for an incidental take permit pursuant to section 10(a)(1)(B) of the Act.

30-1

Waddell Beach Area

The General Plan summarizes the following goals and guidelines for future management and development of the Waddell Beach Area of Big Basin Redwoods State Park:

Waddell Beach Goal: Preserve the long-term health of the Waddell Creek watershed and coastal beach environment, and provide safe public beach access and visitor parking to support ocean-oriented recreational activities associated with Waddell Beach.

Waddell Beach 1: Coordinate with Caltrans to maintain and expand Waddell Beach parking facilities, as feasible, to support beach activities and ocean view parking. Maintain and improve, as necessary, the bus transit stop, parking, and restroom facilities to maintain functional efficiency, safe pedestrian and vehicle circulation, and attractiveness. Consider asphalt paving and striping to improve parking and circulation efficiency and public safety.

Waddell Beach 4: Protect habitat at the mouth of Waddell Creek, and implement best management practices that may include seasonal beach closures during snowy plover nesting periods.

Service comments on the goals and guidelines for Big Basin Redwoods State Park's Waddell Beach Area: The Service supports the Waddell Beach Goal to preserve the long-term health of the watershed and coastal beach environment, providing safe access for recreation, while also implementing protective measures for western snowy plovers and their habitat. On June 19, 2012, a revised critical habitat designation for the western snowy plover was published in the Federal Register. Unit CA-17, Waddell Creek Beach is designated critical habitat for the species. This critical habitat unit was occupied at the time of listing and has historically been an important breeding and wintering site (Service 2012). The critical habitat designation states:

This unit provides habitat to support breeding plovers, will facilitate interchange between otherwise widely separated units, and helps provide habitat within Recovery Unit 4 (identified in the Recovery Plan (Service 2007) along the central California Coast. This unit includes the following physical or biological features essential to the conservation of the species: wind-blown sand dunes, areas of sandy beach above and below the high-tide line with occasional surf-cast wrack supporting small invertebrates, and generally barren to sparsely vegetated terrain. The physical or biological features essential to the conservation of the species may require special management considerations or protection to address the main threats from nonnative vegetation and human disturbance. Control of nonnative vegetation and enforcement of existing human-use regulations are needed to ensure the suitability of the unit (Service 2012).

Waddell Beach has a recovery management goal to support 10 breeding birds (Service 2007); this goal is not currently being met, likely due to human disturbance and human facilitated predation. Activities that allow additional unmanaged human use and facilitate predators are likely to prevent western snowy plovers from returning to breed. We encourage State Parks to manage this critical habitat area diligently, implementing seasonal beach closures, trash management, interpretive signage, and any additional protective measures outlined in the recovery plan and critical habitat rule.

Wildlife Management

The General Plan summarizes the following goals and guidelines for wildlife management within Big Basin Redwoods State Park:

Wildlife Management Goal: Protect, restore, and maintain the wildlife populations at Big Basin Redwoods State Park.

Wildlife 3: Prepare and conduct surveys and inventories of natural resources in areas subject to development. Avoid or reduce negative impacts to sensitive resource areas and follow all applicable regulations and guidelines for minimizing adverse impacts from new facilities development.

Wildlife 6: Reduce and, where possible, eliminate wildlife access to human food and garbage by using wildlife-proof trash containers and dumpsters throughout

the park, increasing the frequency of trash collection, and educating the public about the detrimental effects that human food can have on the ecological balance of the park and surrounding regions. Post signs throughout the park informing people not to feed wildlife and to cover and store food and trash appropriately. Also see listed actions for marbled murrelet Management and Conservation.

Wildlife 7: Protect common and special status wildlife and their habitats for the purpose of establishing and maintaining self-sustaining populations in a natural ecological setting and/or as required by laws and regulations. Avoid human-induced disturbance and degradation of natural areas. Protect special habitat elements, such as snags, where possible.

Service comments on wildlife management at Big Basin Redwoods State Park: The Service supports State Parks conducting surveys and inventories of natural resources, avoidance of negative impacts to resources, and adherence to regulations and guidelines. The implementation of trash management and outreach to the public in Big Basin Redwoods State Park is vital for curbing ongoing issues from human food subsidies to corvids and other wildlife; however, this program has not been sufficient to offset the impacts of visitation and recreation and controlling the increased corvid populations, as a self-sustaining population of marbled murrelets has not been attained. Implementation of this program alone will not be sufficient for offsetting the impacts of increased visitation and recreation. The Service supports the protection of both common and special status wildlife and their habitats for the purpose of establishing and maintaining self-sustaining populations. Considering the imperiled status of the marbled murrelet in the Santa Cruz Mountains, we encourage State Parks to go to the lengths necessary to reach this goal.

30-3

Special Status Animals

The General Plan summarizes the following goals and guidelines for special status animals within Big Basin Redwoods State Park:

Special Status Animals Goal: Protect special status wildlife within the park and manage for their perpetuation.

Special Animals 1: Protect all special status native wildlife species and their habitats. Include all taxa that are locally important (including endemic species) as well as those protected by Federal and/or State law. A comprehensive list of species requiring special management attention should be prepared and regularly updated. Implement specific programs using sound ecological principles and professionally accepted methods to protect and rehabilitate special status animal populations and their habitats.

Special Animals 2: Monitor marbled murrelet, snowy plover, and other special status animal species to identify population trends and to develop management strategies for their protection and perpetuation.

Special Animals 3: Minimize trail building, roadwork, and park facility maintenance activities in or near breeding areas during the breeding seasons for special status species.

Special Animals 4: Minimize disturbance to special status aquatic species, including California red-legged frog and anadromous fish, when scheduling and implementing activities that may result in streambed alteration or disturbance to wetlands or riparian habitat. This includes the sizing and placement of culverts beneath roads and trails throughout the park to facilitate fish passage. Culvert drainage patterns should follow the natural grade of the stream as much as possible to maximize fish passage.

Service comments on special status animals at Big Basin Redwoods State Park: The Service supports the protection, monitoring, and management of all special status species in Big Basin Redwoods State Park. Trail building, roadwork, and park facility maintenance in or near breeding areas during breeding seasons for special status species should be avoided. These activities may cause take in the form of harm or harassment if normal behavioral patterns, including breeding, are impaired or disrupted. For all special status species, timing of activities should be considered to avoid their respective breeding seasons or migrations. As mentioned above, if take of listed species cannot be avoided, we recommend that State Parks apply for an incidental take permit pursuant to section 10(a)(1)(B) of the Act.

30-4

Marbled Murrelet Management and Conservation

The General Plan summarizes the following goals and guidelines for marbled murrelet management and conservation within Big Basin Redwoods State Park:

Marbled Murrelet Management and Conservation Goal: Coordinate with the Service and CDFG toward the long-term recovery and survival of the Santa Cruz Mountains marbled murrelet population. Implement actions to minimize marbled murrelet population decline, protect and restore marbled murrelet breeding habitat, reduce the impacts of human presence on the breeding success of this bird, and contribute to the recovery of the species.

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

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.

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).

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

Service comments on marbled murrelet management and conservation at Big Basin

Redwoods State Park: The Service supports the relocation of camping and picnic facilities to outside of marbled murrelet habitat, coordination between State Parks and the agencies toward the long-term recovery and survival of the Santa Cruz marbled murrelet population, and of the Marbled Murrelet Management and Conservation Goal outlined in the General Plan. Disturbances, trail building, and maintenance activities in old growth redwood habitat during the marbled murrelet breeding season should be avoided. As mentioned previously, disruption or impairment of normal behavior patterns is take and would require an incidental take permit pursuant to section 10(a)(1)(B) of the Act. Due to the current status of marbled murrelets in the Santa Cruz Mountains, we encourage State Parks to work with the agencies and species experts to take all necessary measures to ensure the goal of long-term recovery and survival of the species is achieved. Because the population of marbled murrelets in the Santa Cruz Mountains is in decline and currently not considered self-sustaining, measures taken by State Parks may need to vary considerably from the Preferred Plan as outlined in the DEIR to achieve long-term recovery.

30-5

Recreation and Trail Use

The General Plan summarizes the following goals and guidelines for recreation and trail use at Big Basin Redwoods State Park:

Recreation Goal: Provide a range of high-quality recreational opportunities that allow California's diverse population to visit, enjoy, experience, and appreciate the important natural, cultural, recreational, and aesthetic resources of Big Basin Redwoods State Park.

Recreation 1: Provide facilities and programs that enhance the public's enjoyment and appreciation of the park's natural, cultural, recreational, and aesthetic resources. Include facilities that support appropriate activities such as hiking, camping, backpacking, nature, and history study, bicycling, surfing, wind surfing, horseback riding, picnicking, and the enjoyment of solitude, including provisions for concession-developed or operated recreation opportunities.

Recreation 2: Relocate, remove, and/or reorganize facilities to preserve and protect park resources, to better serve visitor recreation needs, and to provide efficient park administrative, public safety, and maintenance functions.

Recreation 6: Provide additional day use and overnight accommodations outside the old growth forest, to serve the visitor needs reflected by California's changing demographic trends. Develop group recreation facilities, where appropriate, and make provisions to accommodate a wide range of user groups and for special events during year-round seasonal conditions.

Trails Goal: Provide a multi-use trail system within the park and trail access to regional and statewide trail systems.

Trails 1: Develop new pedestrian, bicycle, and equestrian multiuse trails and trailheads. Focus on providing trails that access natural, cultural, and scenic resources, the backcountry and wilderness areas, and that connect to regional trail systems. Promote and encourage the use of existing unpaved and paved roads within the park as multi-use trails. Improve existing trailheads and create new trailhead facilities and trail connections in less-visited areas of the park to reduce use levels in the heavily visited historic core area. Use the Department's *Trails Handbook* to guide trail design, construction, management, and maintenance.

Trails 4: Locate trails and trailheads to minimize impacts to natural, cultural, and scenic resources and areas of geological instability.

Service comments on recreation and trail use at Big Basin Redwoods State Park: The Service supports providing facilities to visitors and providing recreational opportunities and relocation of facilities outside of the old growth forest. Recreational activities within old growth forest have been a primary cause of reduced marbled murrelet nest success and as a result have contributed to a decline in the Santa Cruz Mountains marbled murrelet population. Establishment of new trails in the backcountry and wilderness areas may cause additional disturbance to marbled murrelets and other listed species and their habitats. Although we support the State Parks' purpose and vision to provide educational and recreation opportunities to visitors in Big Basin Redwoods State Park, we encourage State Parks to accomplish this in a responsible and conscientious manner in regard to listed species and their habitats.

Interpretive Themes – Marbled Murrelets

The General Plan summarizes the following goals and guidelines for interpretive themes pertaining to marbled murrelets at Big Basin Redwoods State Park:

Interpretive Themes - Marbled Murrelets:

Marbled murrelets nest in the old growth redwood groves of Big Basin.

30-6

This theme covers the natural history of the marbled murrelet, especially its nesting behavior, and the cultural/natural history account of how the mystery of where they nest was solved at Big Basin. It also addresses threats to the marbled murrelet, especially corvids, reasons behind park policies in nesting areas and campgrounds, and actions visitors can take to help protect the species.

Service comments on interpretive themes pertaining to marbled murrelets: The Service supports providing education on the natural and cultural resources within Big Basin Redwoods State Parks through interpretive planning, including the natural history of marbled murrelets and threats to the species within Big Basin Redwoods State Park. In addition to identifying corvids as a threat to marbled murrelets, we recommend that State Parks emphasize that increased corvid populations in the park are due to uncontrolled human food subsidies to jays and ravens. We further recommend that State Parks include the current status of the Santa Cruz Mountains population of marbled murrelets and use this interpretative opportunity to reiterate the importance of appropriate trash management by visitors in Big Basin Redwoods State Park.

30-7

Draft Environmental Impact Report

The DEIR focuses on the environmental effects of the Preferred Plan which includes the five key plan proposals listed above. The DEIR provides environmental impacts and mitigation and three alternatives to the Preferred Plan: (1) Facilities Removal and Increased Resource Protection, (2) Wilderness Expansion, and (3) No Project.

Preferred Plan

Key plan proposals of the Preferred Plan are described in detail in the DEIR. We are providing comments on the following elements of the Preferred Plan, as they may impact listed species and their environments. For Rancho del Oso and Waddell Beach, please see comments for Waddell Beach Goals and Guidelines above, as they also apply to the Preferred Plan of the DEIR.

Proposed activities in the Headquarters area as described in the Preferred Plan include the following:

1. Restrict new facility construction in the old growth redwoods and manage visitor activities to protect significant resources and achieve long-term management objectives.
2. Establish the primary visitor contact and campground registration outside the Headquarters area, and relocate some park administrative functions to a new facility at Saddle Mountain.
3. Coordinate with CDFG and the Service toward the long-term recovery and survival of the Santa Cruz Mountain's marbled murrelet population.

4. Protect sensitive aquatic species, including California red-legged frog and anadromous fish, and take appropriate measures to minimize disturbances in critical habitats during breeding and spawning seasons.
5. Rehabilitate the Lodge building, according to the Secretary of Interior Standards, to provide suitable adaptive uses for this historic building.
6. Introduce up to 10 overnight cabins with parking and utilities in the Sky Meadow area along the road to the existing group camps and outside sensitive resource areas.
7. Allow for development of additional staff housing, trailer pads, and amenities outside the designated National Register boundaries of the Lower Sky Meadow residence area to serve future housing needs, while maintaining the historic integrity of this significant 1940s residence area.

Proposed activities in the Little Basin area as described in the Preferred Plan include:

1. Upgrade and expand utility systems and infrastructure to support recreational activities, such as camping (including cabins), hiking, biking, horseback riding, fishing, interpretive programs, and group activities, including special events. Consider program needs for a possible environmental education center.
2. Complete resource inventories and evaluations, and implement resource protection measures where needed. Remove or relocate existing facilities, as necessary, to preserve and protect sensitive and significant natural and cultural resources.
3. Upgrade and/or modify existing facilities to satisfy operational needs and to meet ADA accessibility requirements.
4. Interpret resource values and site history of Little Basin property.
5. Consider a concession-developed and operated overnight lodge with dining facilities and additional cabins.
6. Coordinate with Santa Cruz County to identify road improvements and county maintenance that may be necessary to maintain public vehicle access on Little Basin Road from Highway 236 to the Little Basin property.

Service comments on the Preferred Plan: The Service supports the restriction of new facility construction in the old growth redwoods, coordination between the agencies to protect resources and achieve long-term management objectives, and relocation of facilities outside of the Headquarters area to Saddle Mountain; however, rehabilitation of the Lodge building, introducing up to 10 overnight cabins with parking and utilities in the Sky Meadow area, and development of additional staff housing, trailer pads, and amenities, would occur within or adjacent to the old growth forest. As mentioned in our Headquarters comments above, these activities will likely exacerbate the already detrimental impacts of disturbance and increasing corvid populations in marbled murrelet nesting habitat. We strongly recommend that State Parks eliminate any new facility construction and recreation within or directly adjacent to the old growth forest from the Preferred Plan. Consequently, we are in support of relocating visitor and recreation facilities outside of the old growth forests, as proposed for the Little Basin and Saddle Mountain areas.

30-8

Alternatives to the Proposed Plan

The DEIR presents the following alternatives to the Proposed Plan:

Alternative 1: Facilities Removal and Increased Resource Protection

Alternative 1 would focus on the protection, sustainability, and biodiversity of the plants and animals within the old growth redwood forest. Measures to ensure this protection would include: removing some or all of the existing campgrounds and picnic areas within the old growth redwood forest; relocating the food service concessionaire, administrative, and maintenance offices to Saddle Mountain and to Little Basin; adapting the Headquarters historic buildings for interpretive and educational purposes; removing long-term parking from the Headquarters area; and establishing a visitor shuttle system to park destinations. Traffic flow would be redesigned in order to accommodate vehicles while reducing congestion and minimizing resource impacts. Parking, trails, and trailheads would be established outside of the Headquarters area away from the most sensitive habitats. Modification or removal of existing facilities would occur in the Headquarters area to protect and restore native habitats and natural processes. This action would reduce the overall amount and variety of visitor facilities in the park. The campgrounds would be removed or reduced in size, or closed on a seasonal and rotational basis to aid the recovery of forest habitat.

Removing, or reducing in size, recreational facilities within the old growth redwood forest would minimize the negative impacts to the forest understory, and minimize soil compaction around the redwood trees. This would also help restore the health of associated plant and wildlife habitats, with special attention to the federally protected marbled murrelet. This action would reduce the overall amount and variety of visitor facilities in the park. Removing food sources to jays, ravens, and raccoons would also help protect murrelets and other nesting birds. Vehicular traffic and associated noise and air quality effects would be reduced in the day use and overnight use areas. Visitor and non-visitor traffic would still traverse through the park on Highway 236. Visitor surveys

indicate a strong interest to maintain the opportunities to enjoy the traditional camping, hiking, and picnicking experiences at Big Basin, which is part of its legacy for family traditions in past, present, and future generations. With the few areas suitable for development outside the old growth forest and within current state park ownership, this alternative was not selected because it would result in the loss of recreational facilities currently serving visitors to the Santa Cruz Mountains region, and would not address the increasing recreational demands for visitor camping, group picnic areas, and tent-cabin facilities (State Parks 2012).

Alternative 2: Wilderness Expansion

Alternative 2 would convert the backcountry to an expanded wilderness (potential addition of 4,000 acres) within Big Basin Redwoods SP. This would encourage greater use of the park for more primitive visitor experiences and low-impact type of recreational use. Because a state wilderness area, by definition, should have “no permanent road within any wilderness” (Wilderness Act of 1964), this alternative would require the closure and/or removal of all roads, or roads converted to trails. This action would also prohibit bicycle use and use of mechanized equipment within the designated wilderness areas. This alternative would also include the removal of developed trail camps, with opportunities remaining for informal primitive camping. In addition, this alternative would establish a threshold for visitor carrying capacity and reduce the overall use intensity within the Headquarters area during the peak use periods, through a reduction of long-term parking and overnight camping. Administrative and maintenance functions and concession services would be relocated, as feasible, to transform the Headquarters area into a pedestrian oriented low intensity use area with greater emphasis on natural resource protection goals and management objectives. Visitor access would rely on short-term parking and a shuttle system to reduce traffic and congestion. The remaining backcountry would accommodate multi-use trails and trail camps for individuals and group use.

Alternative 3: No Project

The California Environmental Quality Act requires an evaluation of the “No Project” Alternative and its impact (CEQA Guidelines §15126.6[e][1]). The No Project Alternative represents perpetuation of existing management actions, and its analysis is based on the physical conditions that are likely to occur in the future if the project (the proposed general plan) is not approved and implemented. The purpose of describing and analyzing the no project alternative is to allow decision-makers to compare the impacts of approving the proposed general plan with the expected impacts of not approving the general plan. Without a general plan for Big Basin Redwoods SP, it is assumed that the existing patterns of operation and management would continue and no new major recreational or operational facilities would occur. Visitation and park use would be expected to increase as the state-wide and regional populations grow. Many of the management actions that would protect, preserve, and restore natural and cultural resources beyond the requirements of laws and regulations may not occur under the No Project Alternative.

Service comments on the proposed alternatives: Throughout the General Plan and DEIR, coordination between State Parks, CDFG, and the Service toward the long-term recovery and survival of the Santa Cruz Mountain's marbled murrelet population is named as a management goal. Based on the declining status of the species in the Santa Cruz Mountains, and the presence of breeding habitat within Big Basin Redwoods State Park, we conclude that the best alternative for the goal of achieving the long-term recovery and survival of the marbled murrelet and for the benefit of all listed species addressed in the General Plan and DEIR, is Alternative 1: Facilities Removal and Increased Resource Protection.

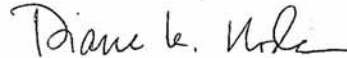
The Trustees for the Command, Luckenbach, and Cosco Busan oil spills have provided State Parks with over \$1.6 million to reduce human food subsidies and impacts of jays and ravens to marbled murrelets in the Santa Cruz Mountains in the past 8 years. While surveys indicate that corvid numbers have decreased, corvid densities near campgrounds still appear to be many times greater than reference areas. There is no evidence to date based on juvenile at-sea surveys, that marbled murrelet nest success has improved in the Santa Cruz Mountains. Considering that additional and on-going corvid management actions are needed when campgrounds are in old growth habitat, State Parks lack a permanent funding mechanism for corvid management actions, and the effectiveness of current corvid management actions on marbled murrelet reproduction have yet to be demonstrated, it is prudent to support Alternative 1: Facilities Removal and Increased Resource Protection.

We recognize; however, that in addition to protecting natural and cultural resources, it is the mission of State Parks to create opportunities for high-quality outdoor recreation. If Alternative 1 is not implemented as the preferred alternative, we encourage State Parks to consider removing or closing facilities and recreation in and adjacent to the old growth forest, managing western snowy plover critical habitat, and managing habitats for the benefit of protecting special status species, yet continuing to provide high-quality outdoor recreation and visitor use areas outside of old growth forests and other sensitive breeding habitats.

We recommend that State Parks further evaluate the effects that establishing additional facilities and visitor services in Big Basin Redwoods State Park, particularly in the Headquarters and Sky Meadows areas, trails and facilities in the backcountry and wilderness areas, and Waddell Creek, will have on listed species and their habitats. We also recommend that State Parks review the recovery plans and recent 5-year status reviews for the federally listed species addressed in the General Plan and DEIR to gauge what steps would be necessary to facilitate their recovery and long-term survival.

We appreciate the opportunity to provide comments on the Big Basin Redwoods State Park Preliminary General Plan and Draft Environmental Impact Report. If you have any questions regarding the contents of this letter, please contact Lena Chang of my staff at (805) 644-1766, extension 302.

Sincerely,



Diane K. Noda
Field Supervisor

Response to letter 30 – Diane K. Noda – US Fish and Wildlife Service

30-1 The general plan lays out the framework and overall direction for the park. None of the projects envisioned within the General Plan have an anticipated timeline for implementation and are likely several years away. Given the uncertain timeline and the potential for future listings, it would be premature to begin formal consultations on undeveloped project plans. Specific projects, while conceptualized within the General Plan, will require their own environmental impact analysis including potential impacts to listed species. While developing specific project proposals, State Parks will work with State and Federal regulatory agencies to develop relevant avoidance measures and where necessary appropriate minimization and mitigation measures. Incidental take permits under Section 10(a)(1)(a) of the Federal Endangered Species Act will be considered for individual projects, as appropriate. Please refer to the Master Response (C) on marbled murrelet habitat management and species protection.

30-2 The final general plan in Chapter 4, page 4-15, will be revised to reflect Waddell Beach as critical habitat for the western snowy plover, and will include a new guideline as indicated below:

Special Status Animals

Forty-one special status animal species are confirmed or strongly suspected to occur within the boundaries of Big Basin Redwoods SP and suitable habitat exists within the park for an additional nine species. Ten of the species with confirmed sightings in the park have state and/or federal listing status. These are the American peregrine falcon, brown pelican, California black rail, California red-legged frog, coho salmon, marbled murrelet, San Francisco garter snake, steelhead (central California coast

ESU), tidewater goby, and western snowy plover. Tidewater gobies have historically been found in Waddell Creek and the creek has been designated critical habitat. Tidewater gobies were reintroduced in 1991 and were extirpated by high outflows in 1998. Appropriate management should be provided for all special status animal species.

New guideline:

Special Animals 7: Manage the Waddell Creek Beach critical habitat to support breeding western snowy plovers, implementing seasonal beach closures, trash management, interpretive signage, and any additional protective measures to ensure habitat suitability for breeding birds. Also, State Parks will continue to support efforts by the USFWS to reintroduce tidewater goby into Waddell Creek, should such efforts be proposed by the USFWS.

- 30-3** Please refer to the Master Response (C) on marbled murrelet habitat management and species protection (page 12).
- 30-4** Please see response #30-1 above.
- 30-5** Please refer to the Master Response (C) on marbled murrelet habitat management and species protection. Also, see responses #30-1 and 30-2 above.
- 30-6** As noted in your comment letter, the general plan includes several goals and guidelines that call for conducting resource surveys and taking necessary management actions to avoid or reduce negative impacts in special wildlife habitats. The plan also calls for the preparation of a unitwide Roads and Trails Management Plan that will take in multiple factors (including sensitive habitats) in consideration of existing and new trail routes.
- 30-7** Please refer to the Master Response (C) on marbled murrelet habitat management and species protection.
- 30-8** Rehabilitation of the lodge will preserve this significant historic building, and continue to serve for essential administrative functions, interpretation, and visitor services. The proposed cabins and parking would improve the road and parking conditions of the existing sky meadow campground, and provide alternative overnight accommodations for visitors using the group camp and during special events. The plan's provisions for employee housing are limited to the existing historic residences and mobile home. Adjacent open space would allow for an additional trailer pad and storage building. Site-specific resource surveys will be done to determine the presence of special status plant and wildlife species, and effective mitigation measures will be incorporated into the project

planning and design to avoid adverse impacts to sensitive resources. No new buildings are proposed within the old growth forest.

- 30-9** Alternative 1 was not selected as the preferred alternative because it would result in the loss of significant recreation facilities and essential visitor services. The preferred plan includes important goals and sufficient guidelines for effective resource management that will protect critical habitat and special status species. Implementation of site-specific projects will include further impact analysis and environmental review.

The general plan recommends preparing and updating comprehensive natural resource management plans, including marbled murrelet, fire management, trails and watershed management plans that will provide additional guidance for identification, protection, habitat restoration, and adaptive management of the park's resources, especially special status species and sensitive habitats.

The general plan recommends actions, in coordination the USFWS and CDFG, for the long-term recovery and survival of the marbled murrelet, state-listed as endangered and federally-listed as threatened (see guideline Murrelet 1). Included are guidelines for minimizing recreational facility development in areas of marbled murrelet nesting habitat and in other special status species habitat. In addition, noise-producing activities such as construction or maintenance activities would be minimized during the breeding season and would comply with applicable federal and state regulations (see guidelines Special Animals 3 and Murrelet 1). Human food and garbage will be controlled with wildlife-proof trash containers and public education that addresses the detrimental effects of these materials on wildlife (see guideline Wildlife 6). Actions may include limiting access to some areas of the park, or temporarily closing or relocating facilities to promote restoration (see guideline Vegetation 2). The plan's adaptive management process, outlined in Section 4.6, Managing Visitor Capacity, describes a process for evaluating, monitoring, and mitigating visitor impacts so that adverse impacts to wildlife are minimized.



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419 South San Antonio Rd., Ste. 211
Los Altos, CA 94022-3640
T (650) 949-1453
F (650) 949-1483
redwoods@sempervirens.org
www.sempervirens.org

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Department of Parks and Recreation
Planning Division, General Plan section
P.O. Box 942896
Sacramento, CA 94296-0001
ATTN: Dave Keck, Project Manager


Subject: Big Basin State Park
Preliminary General Plan/Draft Environmental Impact Report

Dear Mr. Keck,

This is in response to the recent communication for final Public Review Statements regarding the Big Basin State Park Preliminary General Plan/Draft EIR. The Sempervirens Board of Directors was given a briefing by State Parks staff representatives in 2010. The Board considered the State parks summary of the Plan, and responded to several issues that it believed required amendment.

Sempervirens Fund's position has not changed and we wish to reiterate some of our main concerns as stated in our 2010 letter.

We appreciate you giving us another opportunity to share our comments on the draft plan. As you know, Sempervirens was instrumental in creating the park and in adding much land to it over the past 112 years. We have raised millions of dollars for this purpose and are deeply and continuously involved in trying to increase visitation and make it an inspirational experience. Our major concerns are for preserving and protecting the magnificent old growth and for enhancing visitor access without negatively affecting the forests. We have some specific comments:

1. Over the years we have dedicated honorary and memorial redwood trees over a substantial area of Big Basin, including the Sky Meadow area. We understand that the draft plan propose up to 10 new cabins and supporting parking and infrastructure in Sky Meadow. Our dedicated trees and groves tribute program has been approved and accepted by the State of California, and has been an important part of our fundraising for the park. We ask you to do nothing in the General Plan which would disturb those trees or limit access to the donors, including in Sky Meadow.
2. We are pleased that you will be limiting new facilities and relocating some existing facilities in Park Headquarters among the old-growth redwoods. We continue to 

31-1

31-2

strongly oppose adding new tent-cabins or other structures among the old-growth anywhere in the park, as we previously stated in our 2010 letter.

3. We believe that the rustic character of the existing structures should be preserved, even though their functions may be modernized.
4. We believe that the congestion at Park headquarters only occurs on weekends during the summer months. It would be a shame if free access to existing trailheads was limited or if new or expanded parking areas or shuttle stops could not be built for access to all of the trails which exist or are planned. This is especially true for trails which are presently accessible from Highway 236 and from China Grade. We encourage any proposed shuttle service to provide regular and timely stops to these trails. We also suggest accommodating local users through a flexible parking permit system during the less busy weekdays.
5. We want to ensure that environmental education for youth continue to be available and accessible in the Saddle Mountain/Little Basin area. Four years ago, Sempervirens Outdoor School was taken over by the park, with a long term lease to Exploring New Horizons. Each year over 2,000 disadvantaged children spend five days at the school, which for most is their first exposure to nature. We assume the proposed development at Saddle Mountain will extinguish this operation and would like to know more about how the loss of this educational opportunity will be mitigated and/or compensated for in the Plan.
6. We are pleased with your inclusion of a specific set of actions to address the alarming decline of the marbled murrelet population. We would like to see as many resources and actions as possible be directed to preventing murrelet predation by corvids which have the highest numbers in the campground areas of the Park. Without such aggressive and immediate action, it is almost guaranteed that we will see the extirpation of murrelets in the Santa Cruz Mountains within as little as 40 years.
7. Finally, we are very pleased that Little Basin has been thoroughly integrated into the draft General Plan and are very satisfied with the recommendations for its future as an vital part of Big Basin as a whole.

31-3

31-4

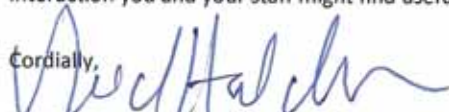
31-5

Sempervirens Fund, together with our partners at Peninsula Open Space Trust, Save the Redwoods League, The Land Trust of Santa Cruz County, and The Nature Conservancy (with support through the Living Landscape Initiative) are committed to working on how to preserve the entire Santa Cruz Mountains Redwoods Heartland, by linking existing protected areas and acquiring title or easements over all of the unprotected open space in between. Big Basin will have a key part in this Great Park we envision – an area that will be a collaboratively managed area of up to 300,000 acres.

31-6

We thank you for this opportunity to express our comments, and would welcome any interaction you and your staff might find useful.

Cordially,



Reed Holderman, Executive Director
Sempervirens Fund

Response to letter 31 – Reed Holderman- Sempervirens Fund

31-1 Specific language was included in the general plan guideline, Headquarters C2 that reads as follows: *Conduct site-specific surveys and investigations for sensitive plant and animal species protection, and coordinate with the Sempervirens Fund early in the site planning to locate new facilities and avoid dedicated trees and memorial groves.* Proposed cabins would be located near the road so as not to disturb the memorial redwood trees or limit access by the donors.

Also see general plan guideline (Agreement 5) on page 4-51 that directs the department to coordinate with the Sempervirens Fund and Save the Redwoods League in locating and signing dedicated memorial groves and trees, and to ensure that access requirements and resource protection measures are sufficiently addressed.

31-2 As stated on page 4-57 of the general plan, no new building construction is proposed within the old growth forest. Some removal or relocation of existing recreation facilities may be necessary to protect significant resources and preserve the plant and wildlife habitats in the old growth forest. State Parks removed from consideration the cabins and other development within the old growth forests (Headquarters area) in developing the preferred alternative. This action is consistent with State Parks's previous efforts to remove cabins and campgrounds in the 1960s that facilitated activities and visitor use patterns that were considered detrimental to the environment. The 10 cabins proposed in the general plan are located outside the old growth forest.

31-3 Thank you for your suggestions regarding vehicle access to trailheads, and shuttle operations. Plan proposals for a shuttle operation and access to Saddle Mountain, Headquarters area and Little Basin would not preclude continued private vehicle access to these areas. This proposal is intended to supplement and expand transportation options for visitors during peak use periods.

31-4 State Parks also recognizes the high value of the outdoor environmental education program operated by the non-profit organization. A short term extension of their lease agreement is currently being evaluated to continue the program and bring it into compliance with park rules and regulations. The buildings and structures are also in need of repair and upgrades to meet ADA compliance. This current use of the buildings and property at Saddle Mountain by the non-profit was always considered an interim use until such time that plans can be finalized on the long-term use of this property for the greater benefit of all park visitors. Alternative sites exist for continuation of outdoor education programs.

- 31-5** Please refer to Master Response (C) regarding Marbled Murrelet Habitat Management and Species Protection on page 12. State Parks will continue its collaborative effort with DFG, USFWS and other interested partners in educating park visitors at Big Basin Redwoods State Park and developing strategies to help improve the status of the species, including directed studies aimed at reducing the rate of nest predation. State Parks encourages this continued working relationship with important training, mapping, and sharing resource information for effective management at all state parks in this region.
- 31-6** State Parks supports the efforts and commitment of Sempervirens Fund and other partners in preserving the Santa Cruz Mountains Heatland, and welcomes the opportunity to collaborate on future planning and actions that will achieve long range goals for State Parks in the Santa Cruz Mountains and central California coastal region.



Comments submitted by email to generalplan@parks.ca.gov

August 9, 2012

California State Parks
 Planning Division
 Big Basin Redwoods SP Planning Team
 P.O. Box 942896
 Sacramento, CA 94296-0001
 Email: generalplan@parks.ca.gov
 Fax: (916) 653-4458

RE: Preliminary General Plan/Draft EIR for Big Basin Redwoods State Park

Dear California State Parks Planning Division,

The Center for Biological Diversity (“Center”) submits the following comments on the General Plan and Draft Environmental Impact Report (“DEIR”) for Big Basin Redwoods State Park. The Center is a non-profit environmental organization dedicated to the protection of imperiled species, their habitats, and the environment through science, policy, and environmental law. The Center has more than 378,000 members and online activists throughout the United States. The Center has a long history of working to protect the marbled murrelet and its old-growth habitat in California and across the species’ range.

The Center has submitted two prior comment letters, supported by scientific studies, to California State Parks regarding the General Plan. These letters include our October 29, 2010 letter to the California State Parks Planning Division (CBD 2010) and our June 29, 2011 letter to California State Parks, the California Natural Resources Agency, the Department of Fish and Game, and the Ventura and Sacramento offices of the U.S. Fish and Wildlife Service (CBD 2011), commenting on the Preferred Alternative of the Draft General Plan which was made publicly available in March 2011.¹ Those letters outlined our concerns over the continuing decline of the federally threatened and California endangered marbled murrelet population in the Santa Cruz Mountains (also called the central California population), including Big Basin Redwoods State Park (“Big Basin SP”). This population decline is being driven in large part by unsustainable nest predation by raven and Steller’s jay populations that are being sustained at unnaturally high densities by human food subsidies from campgrounds and picnic sites in old-growth murrelet nesting areas. Those letters and cited studies, which are hereby incorporated by reference, discussed why the Preferred Alternative would lead to the continuing decline of the

¹ Copies of these letters and accompanying exhibits, as well as copies of works cited in this letter, are provided by email as a pdf attachment to this letter. Please include all of these letters and exhibits in the administrative record of proceedings for this project.

marbled murrelet in Big Basin SP, and recommended necessary changes to recover the murrelet population. Because the DEIR did not address many specific points raised in those letters, the Center reasserts those points in these comments.

32-1(cont.)

These comments focus on three main issues regarding the General Plan and DEIR. These comments (1) summarize the comprehensive body of science on the status, threats, and needed conservation measures for the marbled murrelet in Big Basin SP and the greater Santa Cruz Mountains, information which was improperly omitted from the Environmental Setting section of the DEIR; (2) discuss how the General Plan will have significant, adverse effects on the marbled murrelet; and (3) outline the legal deficiencies of the Draft EIR.

I. The comprehensive body of science on the status, threats, and needed conservation measures for the marbled murrelet in Big Basin SP and the greater Santa Cruz Mountains, which should have been included in the Environmental Setting section of the DEIR

32-2

A large body of science has documented that (1) the marbled murrelet population in the Santa Cruz Mountains is experiencing a rapid population decline and faces a high risk of extinction in the near future absent immediate and significant improvements in management; (2) Big Basin SP has the largest remaining stand of old-growth habitat for murrelets in this region and thus is a priority area for murrelet conservation; (3) a primary driver of the ongoing decline is unsustainably high nest predations by corvids that is being driven by food subsidies from the high number of visitors in Big Basin and other State Parks; (4) a scientific study estimated that corvid predation must be reduced by ~60% to stabilize the population and that corvid predation must be reduced even more to recover the population; (5) trash management and corvid control have been inadequate to reduce corvid predation to levels that will reverse the murrelet population decline and recover the population; and (6) studies and data indicate that the relocation of campgrounds and picnic areas from old-growth nesting areas, in addition to other management measures, is necessary to recover the murrelet population. These studies are discussed in detail below. As outlined in Section III of these comments, the DEIR failed to disclose much of this information in its Environmental Setting Section, as required by CEQA.

A. The Santa Cruz Mountains marbled murrelet population is experiencing a rapid population decline and faces a high risk of extinction in the near future absent immediate and significant improvements in management

The marbled murrelet population in Big Basin SP and the greater Santa Cruz Mountains region is highly vulnerable to extinction. Due principally to logging of more than 90% of its old-growth habitat in addition to increases in predation, the central California population has been reduced to less than ~600 individuals, suffers from extremely low breeding success, and is physically and increasingly genetically isolated from the next closest population in northern California (Peery et al. 2010). This small population is experiencing a continuing decline that is being partially masked by the dispersal of northern birds into the central California region; however, these migrants are not contributing enough young to rescue the resident central California population (Peery et al. 2010).

Marbled murrelet reproductive success in the Santa Cruz Mountains appears to have declined by an order of magnitude over the past century and is now too low to sustain the population (Peery et al. 2004, 2006, Beissinger and Peery 2007). Reproductive success has been estimated based on the ratio of hatch-year to after-hatch-year individuals detected on the water in July and August, termed the “juvenile ratio.” Juvenile ratios between 1996 and 2009 were extremely low ranging between 0 in 2008 to 0.063 in 2001 (Peery and Henry 2010). Beissinger and Peery (2007) found that current productivity in central California is 8 to 9 times lower than estimated for marbled murrelets in the late 19th and early 20th centuries, and that current juvenile ratios are at levels expected to lead to population declines. Beissinger and Peery (2007) concluded that conserving murrelets will require increasing the juvenile ratio to 0.2 to 0.3 (USFWS 2009).

Mean annual rates of decline for the Central California population have been estimated at 2.5 to 6.2% (McShane et al. 2004) and 5 to 10% (Peery and Henry 2010). In Big Basin SP, the average numbers of occupied site behavior detections declined from 55 in 1995 to 5 in 2002, and activity levels have remained low since 2002 (Suddjian 2009a). In its 5-year review, the U.S. Fish and Wildlife Service projected that this population has a 100% probability of extinction within 40 years, and within 20 years using lower (and more likely) reproductive rates (McShane et al. 2004). Scientists have concluded that at present the central California population “is not viable because mortality rates greatly exceed birth rates” (Peery et al. 2010: 704), and that this population should be treated as a separate management unit due to its relative geographic, genetic, and demographic isolation (Friesen et al. 2005, Peery et al. 2010). Clearly the marbled murrelet is perilously close to extinction absent significant changes in management by California State Parks and other state and federal agencies. This declining population cannot tolerate any additional stressors or harms.

B. Big Basin SP has the largest remaining stand of old-growth habitat for murrelets in this region and thus is a priority area for murrelet conservation

California State Park lands, including Big Basin, Butano, and Portola State Parks, encompass the largest remaining stands of old-growth murrelet nesting habitat left in central California. Big Basin SP has the largest remaining stand (4,400 acres) of old-growth redwoods left in the Santa Cruz Mountains, provides critical nesting habitat, and thus is a priority area for murrelet conservation. Because the majority of the murrelet’s remaining old-growth habitat occurs on State Park lands, California State Parks, in partnership with DFG and USFWS, has the clear responsibility to ensure the murrelet’s survival and recovery on State Park lands.

C. Anthropogenically enhanced corvid populations are a primary factor in the low reproductive success and associated decline of marbled murrelets in the Santa Cruz Mountains

As summarized by Peery and Henry (2010) and Peery et al. (2004), a primary factor leading to marbled murrelet declines and low nesting success in the Santa Cruz Mountains is high nest predation of eggs and chicks by corvids, particularly by Steller’s jays (*Cyanocitta stelleri*) and common ravens (*Corvus corax*), that have increased in number due to human food subsidies. Steller’s jays and ravens have been documented to prey on murrelet eggs and chicks in

the Santa Cruz Mountains (Singer et al. 1991, Peery et al. 2004, Suddjian 2009b), and are the cause of nest failure for 67 to 81 percent of nests in Big Basin and Butano State Parks (Peery et al. 2004).

32-3 (cont.)

Steller's jay and common raven abundance has increased dramatically in the Santa Cruz Mountains in recent decades with particularly high densities near campgrounds and nearby murrelet nest sites (Peery and Henry 2010). Peery and Henry (2010) detected Steller's jays and ravens at elevated densities at known murrelet nest sites "probably due to the placement of campgrounds within murrelet habitat" (p. 2). Surveys by Suddjian (2005) in the Santa Cruz Mountains similarly found that Steller's jays were 8.8 times more abundant in campgrounds or their immediate vicinity than in control areas more than 300 m from campgrounds, picnic areas, or residential areas, while ravens were 28 times more abundant in campgrounds. Steller's jay densities were significantly positively correlated with the number of occupied campsites (Suddjian 2005, USFWS 2009).

Corvids are more abundant near campgrounds because of anthropogenic food subsidies in and around campsites (Liebezeit and George 2002, Suddjian 2005, 2009b, Marzluff and Neatherlin 2006, Peery and Henry 2010). Suddjian (2005) observed in Big Basin SP and other Santa Cruz Mountains parks that Steller's jays pilfered spilled garbage and food scraps in camps especially at grills, fire rings, and water spigots, stole unattended food in camps, and were fed directly by campers. Steller's jays and ravens "are attracted to campgrounds and other areas of parks with high human use, where human food is often readily available. Consequently, previous studies and general observations in the Santa Cruz Mountains have typically found both Steller's Jay and Common Raven to be much more numerous at campgrounds than away from campgrounds" (Suddjian 2005: 1).

The USFWS in its 5-year review concluded that State and County Parks in California have high nest predation rates due to increases in predator populations in recreational areas:

The increase in predators in association with human presence (recreation sites or housing), and therefore the probability that predators will depredate a murrelet nest, is likely to be particularly important in California where 76 percent of habitat within 0.5 mile of known occupied sites and detections occur either within or immediately adjacent to lands managed primarily for recreation (e.g. National, State and County Parks in the coastal redwood ecosystem) (G. Goldsmith in litt 2009). (USFWS 2009: 48-49).

D. Corvid predation must be reduced by ~60% to stabilize the population and even more to recover the population

32-4

Peery and Henry (2010) concluded that that reducing predation by corvids would have an important effect on lowering extinction risk for central California marbled murrelets and "likely constitutes an effective means for recovering a declining murrelet population in central California." The study estimated that a 40% reduction in predation reduced extinction risk drastically from 95.8% to 4.6% over 100 years, and a 60% reduction resulted in a stable population (e.g. when the proportion of breeders, reneating rates, and corvid predation rates were

assumed to be 0.77, 0.13, and 0.69, respectively). Recovering the population, as mandated by the Endangered Species Act, would require an even greater reduction in predation rate.

E. Trash management and corvid control have been inadequate to reduce corvid predation to levels that will reverse the murrelet population decline and recover the population

Management was initiated in 2005 in Big Basin, Portola, and Butano State Parks to reduce corvid nest predation by reducing food subsidies and through lethal corvid removal (Suddjian 2009b). These projects have been funded largely through oil spill restoration funds through the Natural Damage Resource Assessment Program administered by the Office of Spill Prevention and Response and the Oil Spill Trustee Councils.² The efforts in the State Parks have included public education, replacing some old dumpsters and garbage cans with “animal proof” bins, and some raven removal in 2005; outreach improvements and some raven removal in 2006; installation of new garbage bins at Big Basin SP in 2007; more focused raven removal and improved garbage collection at Big Basin in 2009; the installation of some food lockers and improved raven removal in 2010; and the installation of new food lockers throughout Big Basin and Butano and the initiation of controlled taste aversion studies in Butano and Portola in 2012 (see http://www.dfg.ca.gov/ospr/NRDA/restore_monitor_reports.aspx).

Monitoring data indicate that these programs have not reduced nest depredation to levels that do not jeopardize the murrelet population and that reverse the murrelet population decline. First, the juvenile ratio estimated from at-sea surveys averaged 0.048 from 2007 to 2011, whereas the juvenile ratio would need to reach 0.2 to 0.3 to conserve the population (Beissinger and Peery 2007, USFWS 2009). Available trends in raven and jay abundance in Big Basin SP since 2005 when trash and corvid management measures were initiated indicate that Steller’s jay and raven abundance in campground sites has not significantly changed (2005- 2008)³ (Suddjian 2009b).

Moreover, even with increased effort to improve trash management, substantial food subsidies to corvids would be difficult, if not impossible, to eliminate given the high volume of human use at Big Basin SP campgrounds, picnic areas, and the food concessionaire in the Headquarters region. The trash management problem is largely a “crumb control” problem. As described by Suddjian (2009b), campers bring a lot of food and inevitably produce crumbs and food scraps at camp sites, grills, garbage dumps, and wash areas. Campers sometimes feed animals, unattended food can be robbed by corvids in a matter of seconds, unattended garbage bagged up in campsites is easily pilfered by animals, garbage bags are left in front of dumpsters rather than being put in dumpsters, and at times dumpsters are overfull and open to access by animals. In addition, campers at Big Basin SP are not given appropriate washbasins for washing dishes, and food scraps collect at spigots. As summarized by Suddjian (2009b, 2010), human foods are continually available to corvids at occupied State Park campgrounds:

² See http://www.dfg.ca.gov/ospr/NRDA/summary_restore_projects.aspx for marbled murrelet-related projects in the Santa Cruz Mountains funded by the Apex Houston, Command, and Luckenbach Trustee Councils.

³ Reports for 2010-2012 are not yet available.

Human foods are continually available to corvids in varying degrees at occupied campgrounds. Food is occasionally (but regularly) offered directly to wildlife by campers, but is also widely available as discarded or fallen scraps or fragments, garbage left at camp sites, dog food left in the open, food fragments stuck on grills at fire rings, and at water spigots where dishes are rinsed. Food left unattended during the day or improperly stored at night is commonly plundered by wildlife. Additionally, in some parks food is readily available at trash receptacles that permit animal access, spillage by animals, are left open, or are too full to close properly. Another human-related food source, although more rarely available than human food, was road killed mammals, such as squirrels, raccoons and skunks on campground roads or other park roads. (Suddjian 2009a: 3).

Jays were frequently seen inspecting occupied campsites for food, and were quick to capitalize on opportunities to steal unattended food, or to search for food in just-vacated sites. Jays were observed taking advantage of spilled garbage, stealing unattended food in camps, being fed directly by campers, and picking food fragments from campfire grills and at water spigots. Human foods taken by jays during the surveys were similar to those mentioned in Suddjian (2004). (Suddjian 2010: 8).

Information presented at the March 2011 Pacific Seabird Group-sponsored Marbled Murrelet Technical Committee (a gathering of ~25 state and federal agency staff, scientists, and NGO staff working on marbled murrelet management and conservation) indicated that Redwood National and State Park, which has invested greatly in food storage bins, animal-proof trash bins, and public education about trash management, has not reduced its corvid populations enough to avoid harm to marbled murrelets. The 2011 Corvid Monitoring Report from Redwoods National and State Park concluded that “there is no trend to indicate that jay density in the campgrounds is decreasing in response to RNSP corvid management actions” (RNSP 2012).

F. Recovering the marbled murrelet in Big Basin SP will require a suite of conservation measures that include relocating campgrounds and picnic areas from old-growth nesting areas

The marbled murrelet in Big Basin SP and the Santa Cruz Mountains region is perilously close to extinction, and will require a suite of effective, immediate conservation measures to reverse its decline. The primary threats are habitat loss and nest depredation, and thus conservation measures must include habitat protection and management that reduce nest depredation (by more than 60% as suggested by one recent study).

As described above, there is a clear causal chain linking human visitation in the murrelet’s old-growth nesting habitat in Big Basin SP, and particularly the use of campgrounds and picnic areas, with reduced murrelet reproductive success, through enhancement of corvid populations and associated increases in nest predation. Evidence suggests that trash management will help but will not eliminate the food subsidy problem in Big Basin SP due to the sheer abundance of visitors dropping food scraps and crumbs (RNSP 2012). Several studies have

indicated that relocating campgrounds and picnic areas from old-growth nesting habitat is necessary for marbled murrelet recovery and survival:

Campgrounds, parks, and other outdoor public-use sites are often placed in remote areas or in the remnant fragments of pristine habitat (e.g. old-growth forest) that are often inhabited by threatened and endangered species. Because corvids are often attracted to areas of human use, maintaining campgrounds in these locations may increase the potential impacts of corvids on the species of concern. To limit the impact of corvids, campgrounds and other recreational sites should be placed in locations away from areas used by species of concern (see Raphael et al. in press). This management action will take cooperation between research biologists, land managers, and park planners. This action should be considered throughout the state at all public areas that have listed species and corvids present. In addition, seasonal closures of certain areas (e.g. beaches for plovers) may be necessary. (emphasis added). (Liebezeit and George 2002: 71).

Approximately half of known murrelet nests in central California are within 1 km of heavily used campgrounds in a single state park, indicating that significant gains in viability could be achieved by targeting efforts in small areas providing corvid food subsidies. (Peery and Henry 2010: 1).

Current nesting habitat in central California is largely restricted to campgrounds in state parks, where handouts from campers attract corvids, and corvid populations have increased greatly throughout the region since 1966 (Liebezeit & George 2002). Relocating campgrounds away from old-growth nesting habitat might reduce nest predation. (Peery et al. 2004: 1095).

In Big Basin SP, the Blooms Creek, Sempervirens, and Jay Camp campgrounds are located in the most important murrelet habitat, and should be the top priorities for relocation. Picnic areas should be consolidated to a few locations that have stringent trash management measures and public education in place. Finally, the Food Concessionaire in the Headquarters region should be relocated outside the old growth, to the Saddle Mountain entrance gate area, for example.

II. The General Plan will have significant adverse impacts on the marbled murrelet

The General Plan has several fatal weaknesses, most notably that it will have significant adverse impacts on the marbled murrelet. As discussed below, (a) the General Plan fails to adequately disclose and discuss the precarious status of the marbled murrelet in Big Basin SP and the scientific evidence supporting the need for significant, immediate changes in management to prevent the extinction of the central California population; (b) the Plan will increase visitation, visitor infrastructure, and associated visitor impacts within murrelet old-growth nesting habitat in Big Basin SP; and (c) the Marbled Murrelet Management and Conservation Goal and Guidelines are vague, non-binding, and inadequate to reverse the population decline towards extinction.

32-6 (cont.)

32-7

A. The General Plan fails to adequately disclose and discuss the precarious status of the marbled murrelet in Big Basin SP and the scientific evidence supporting the need for significant, immediate changes in management to prevent the extinction of the central California population

The General Plan briefly discusses marbled murrelet ecology and conservation on pages 2-51, 3-9, 4-17, and 4-56. The sections do not disclose the high risk of extinction for the marbled murrelet in Big Basin SP and other regional parks in the near future. The Plan fails to make clear that human food subsidies in campgrounds and picnic areas are a major contributor to this decline. The Plan also fails to disclose the science-based measures that are needed to recover this population, which include a more than 60% reduction in nest predation (Peery and Henry 2010) and the relocation of campgrounds and picnic areas out old-growth nesting habitat (Liebezeit and George 2002, Peery et al. 2004).

B. The General Plan will increase visitation, visitor infrastructure, and associated visitor impacts within murrelet old-growth nesting habitat in Big Basin SP, which will have significant, adverse impacts on this declining population

The General Plan should reduce, and not increase, visitation, infrastructure, and visitor impacts in the murrelet's remaining old-growth nesting habitat. The murrelet has already lost ~90% of its old-growth nesting habitat in the Santa Cruz Mountains region. Maintaining the ecological integrity of all remaining suitable habitat⁴ is critical for the persistence of this population (Pacific Seabird Group 2010). The best remaining old-growth habitat located in Big Basin SP is already heavily impacted by a high concentration of visitor facilities including seven campgrounds, five picnic areas, a network of trails and roads, and complexes of stores, visitor centers, and other facilities. However, the General Plan will increase visitation and add infrastructure in or adjacent to old-growth nesting habitat.

As acknowledged several times in the Plan, the General Plan will increase visitation in Big Basin SP (5-12, 5-18, 5-42), which will increase impacts on marbled murrelets:

With complete development of all proposals, park visitation is likely to increase. This would be due to the proposed improvements and development of additional day use and overnight facilities, interpretive opportunities, and improvements to park circulation, including new trails and trail connections from the park to regional trails, and multi-modal opportunities to access the park and surrounding areas. Additional directional and informational signage and interpretive information outside the park boundaries (on the highway, in other state and regional parks, and in the community) should raise the park's profile as a destination for recreational opportunities and the appreciation and enjoyment of natural and cultural resources. (5-42)

⁴ While large, contiguous blocks of old-growth habitat such as in Big Basin SP provide the best habitat, all remaining occupied and unoccupied suitable habitat is important, regardless of its size, in light of the fact that so little old-growth remains in California, including small stands with old-growth characteristics (Pacific Seabird Group 2010).

The General Plan will also increase camping facilities and infrastructure in or adjacent to old-growth nesting habitat, which will lead to significant, adverse impacts on the murrelet. First, in the Park Headquarters and Sky Meadows, the Plan will (a) rehabilitate the historic lodge for visitor use; (b) build up to 10 overnight cabins in the Sky Meadows areas including expanded parking and utilities infrastructure; and (c) allow for development of additional staff housing, trailer pads and amenities in the Lower Sky Meadow residence area (5-7). Second, the Plan will build trails, expand trailhead parking, and add trailside camps within the State Wilderness Area of Big Basin SP, particularly within the new 390 acre acquisition in the northeast corner which encompasses or is adjacent to old-growth nesting habitat (5-9); this will expand the footprint of human disturbance in murrelet habitat, and impacts in these more remote areas will be difficult to monitor and control. Third, the Plan will add visitors by fully utilizing the recently acquired Little Basin property, including the potential construction of a new overnight lodge with dining facilities and more cabins (5-9 to 5-10). In doing so, the General Plan squanders an important opportunity to enhance marbled murrelet conservation by closing campgrounds in old-growth nesting habitat and relocating them to the Little Basin campground which is outside of old-growth habitat. The Little Basin property has 40 tent sites and 14 cabin sites and therefore has significant capacity to relocate campers from old-growth campgrounds. Blooms Creek, Sempervirens, and Jay Camp campgrounds are priorities for closure.

C. The Marbled Murrelet Management and Conservation Goal and Guidelines are vague, non-binding, and inadequate to reverse the population decline towards extinction

The Marbled Murrelet Management and Conservation Goal and eight Guidelines (4-17 to 4-18) are vague, contradictory, non-binding, and inadequate to reverse the murrelet population decline towards extinction. A principal problem with the Goal is that it seeks to “implement actions to minimize marbled murrelet population decline” while at the same time purportedly is working “toward the long-term recovery and survival of the Santa Cruz Mountains marbled murrelet population” (4-17), which are contradictory statements. The correct, legally mandated goal under the U.S. Endangered Species Act is to recover the species, which necessitates reversing--not minimizing--the population decline. Therefore, implementing actions to increase murrelet population size (such as reducing nest predation by more than 60%) should be a key component of the goal.

Similarly, the Guidelines should be mandatory measures that ensure marbled murrelet survival and recovery (i.e. population growth) in the Park. However, the existing guidelines are non-binding (i.e. guideline 7), vague, and could even lead to management that is less comprehensive than that which is already occurring. One fatal flaw of the guidelines is that, unlike Alternative 1, there is no mandate to reduce visitor impacts by relocating or closing campgrounds and picnic areas in old-growth habitat. Guideline 7 only requires the park to “consider” relocating or rotating camping and/or picnic areas: “where possible, consider relocating camping and/or picnic facilities or rotating use in areas with marbled murrelet habitat” (4-18). As discussed above, given the intense visitation and ongoing visitor impacts in the most important murrelet habitat, the guidelines should mandate the relocation of campgrounds and picnic areas out of old-growth habitat into less sensitive habitats, such as Saddle Mountain, Little Basin, or second-growth habitat bordering the park boundary (existing and/or acquired).

Additionally, the five picnic areas in old-growth habitat (which are additional to campground picnic areas) should be consolidated to facilitate effective trash control.

32-7

Second, the guidelines should require comprehensive, binding measures for trash management, corvid control, and public education that improve upon existing measures that have proven inadequate to reverse the murrelet population decline. However, the guidelines only recommend improvement on “waste patrol and cleanup in visitor use areas” but do not require improvements in other aspects of trash management, corvid control, and visitor education. Indeed, under these vague guidelines, it is possible that the State Parks could do less than existing management measures.

A comprehensive trash management program should include (a) the installation of numerous animal-proof, user-friendly trash bins in all human-frequented areas, making sure that bins are large enough not to flow over; (b) large, animal-proof food storage containers in all campsites; (c) dish-washing facilities inside buildings with prohibitions on washing dishes at outside spigots; and (d) highly visible, user-friendly signs in all human-frequented areas educating visitors to discard trash in animal-proof bins and refrain from feeding birds and other wildlife, including signs posted at all trailheads, periodically spaced along trails, and at all visitor facilities--all campsites, visitor centers, nature centers, stores, picnic areas, bathrooms, parking lots, and the like. These signs should be apparent everywhere. At present, visitors can spend a weekend walking around the Park and remain completely unaware that endangered murrelets inhabit the Park and that it is essential not to feed birds and other wildlife to protect murrelets.

A comprehensive corvid management program should include the implementation of conditioned taste aversion which has proven to be successful in reducing egg predation in laboratory and field trials in Redwood National Park (Gabriel and Golightly 2011). This technique was implemented in Portola and Butano State Parks in 2012 and should be a priority for implementation in Big Basin SP.

A comprehensive public education program should highlight the precarious existence of the marbled murrelet in central California, the importance of not feeding jays, ravens, and other wildlife, and the importance of reducing visitor impacts in the murrelet old-growth habitat, keeping in mind that most visitors are unlikely to see or hear murrelets but should feel inspired to care about their conservation. This program should be an integral part of the park’s interpretive outreach; murrelet displays should be included in the visitor center and nature center; and every visitor should be made aware of murrelet conservation issues when entering the park and paying entrance fees.

III. The DEIR Is Legally Inadequate

Before State Parks may approve the General Plan, it must certify an EIR that complies with the substantive and procedural requirements of the California Environmental Quality Act (“CEQA”). *See generally* Public Resources Code section 21000 *et seq.*; *see also* 14 Cal. Code Regs. § 15000 *et seq.* (“CEQA Guidelines”). An EIR is “the heart of CEQA.” *Laurel Heights Improvement Ass’n v. Regents of University of California*, 47 Cal. 3d 376, 392 (1988) (“*Laurel Heights I*”) (citations omitted). It serves as “an environmental ‘alarm bell’ whose purpose it is to

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alert the public and its responsible officials to environmental changes before they have reached ecological points of no return. The EIR is also intended to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action. Because the EIR must be certified or rejected by public officials, it is a document of accountability.” *Id.* (citations and internal quotations omitted). Where an EIR fails to fully and accurately inform decision-makers, and the public, of the environmental consequences of proposed actions, it does not satisfy the basic goals of the statute. *See* Pub. Res. Code § 21061.

As explained in detail below, the DEIR fails to meet CEQA’s minimum standards. First, the DEIR fails to provide an adequate and informative description of the General Plan’s environmental setting, particularly with respect to the description of existing conditions threatening the survival and recovery of marbled murrelet populations in Big Basin SP. As a result, neither decision-makers nor the public can meaningfully assess the Plan’s impacts on the marbled murrelet or evaluate mitigation measures and alternatives to lessen those impacts on this endangered species. Second, the DEIR provides no support for its determination that the General Plan will have no significant impact on the marbled murrelet. Third, the DEIR’s analysis of alternatives to the General Plan is inadequate.

For all of these reasons, the DEIR fails to comply with CEQA. Adoption of the General Plan and certification of the DEIR would have significant impacts on the endangered marbled murrelet and would violate state law. State Parks therefore cannot approve this General Plan unless and until it recirculates a revised DEIR that meets all applicable legal standards.

A. The DEIR Lacks an Adequate and Informative Description of General Plan’s Environmental Setting

The DEIR’s analysis of the project’s environmental effects must begin “a description of the physical environmental conditions in the vicinity of the project.” CEQA Guidelines § 15125(a). Public knowledge of the regional setting is “critical to the assessment of environmental impacts,” and “[s]pecial emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project.” CEQA Guidelines § 15125(c). An inaccurate, incomplete, or misleading account of the environmental setting makes it impossible for the public, decision-makers, or reviewing courts to conclude that an EIR adequately identified and analyzed a project’s environmental effects. Courts have invalidated EIRs as a matter of law due to the omission of information about a project’s setting that undermined accurate analysis of environmental effects. *See Galanie Vineyards v. Monterey Peninsula Water Management District*, 60 Cal. App. 4th 1109, 1121-22 (1997); *San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus*, 27 Cal. App. 4th 713, 729 (1994).

An accurate description of the environmental setting also is critical because existing conditions normally constitute the “baseline” for determining the significance of environmental impacts. CEQA Guidelines § 15125(a). Investigating and reporting existing conditions are “crucial function[s] of the EIR.” *Save Our Peninsula Committee v. Monterey County Board of Supervisors* 87 Cal. App. 4th 99, 122 (2001) (“SOPC”). Again, “without such a description, analysis of impacts, mitigation measures and project alternatives becomes impossible.” *County of Amador v. El Dorado County Water Agency* 76 Cal. App. 4th 931, 953 (1999). Decision-

makers and the public must have the ability to weigh the project's effects against "real conditions on the ground." *City of Carmel-by-the-Sea*, 183 Cal. App. 3d at 246. "Because the chief purpose of the EIR is to provide detailed information regarding the significant environmental effects of the proposed project on the physical conditions which exist within the areas, it follows that the existing conditions must be determined." *SOPC*, 87 Cal. App. 4th at 120 (internal quotation marks omitted).

The General Plan will directly affect the future of the marbled murrelet in Big Basin SP and the greater Santa Cruz Mountains and will have a significant influence on whether this species will continue to persist or forever be lost from this region. Thus, it is imperative that the public have all available information on the status, threats, and needed conservation measures for the murrelet to understand the impacts of the General Plan on this endangered species, and to weigh mitigation measures and project alternatives. However, the DEIR's description of existing conditions for the marbled murrelet--including the description of the status, threats, and needed conservation measures for this endangered species--lacks crucial information.

As summarized in detail in Section I, there is a comprehensive body of science on the status, threats, and conservation for the marbled murrelet in Big Basin SP and the greater Santa Cruz Mountains. However, the DEIR fails to disclose the following points: (1) the marbled murrelet population in Big Basin SP and the Santa Cruz Mountains faces a significant extinction risk in the near future; (2) because Big Basin SP supports the largest remaining stand of murrelet habitat in the Santa Cruz Mountains, maintaining a viable population of murrelets in Big Basin SP is critical for murrelets to persist in this region; (3) a primary driver of the ongoing decline is unsustainable nest predation by corvids that is being driven by food subsidies from the large number of visitors, and particularly campers and picnickers, in the murrelet's old-growth habitat in Big Basin and other State Parks; (4) a recent study estimated that corvid predation must be reduced by ~60% to stabilize the population and even more to recover the population; (5) trash management and corvid control has been inadequate to reduce corvid predation to levels that will reverse the murrelet population decline and recover the population; and (6) studies and data indicate that the relocation of campgrounds and picnic areas from old-growth nesting areas, in addition to other management measures, is necessary to recover the murrelet population.

Without this information, it is impossible for members of the public or State Parks decision-makers to evaluate the significance of the General Plan's impacts to the marbled murrelet. The DEIR's omissions leave the public entirely in the dark as to the fact that the survival and recovery of the species are in jeopardy, precisely due to existing human activity in old-growth nesting habitat. Without this information, the public and decision-makers cannot accurately comment on or assess the General Plan's proposal to further increase camping and recreation in these essential habitat areas. The DEIR is thus inadequate as a matter of law, and must be revised and recirculated before the General Plan can be approved.

B. The DEIR provides no support for its determination that the General Plan will have no significant impact on the marbled murrelet

The discussion of a proposed project's environmental impacts is the core of an EIR. *See* CEQA Guidelines § 15126.2(a) ("[a]n EIR shall identify and focus on the significant

environmental effects of the proposed project”). CEQA requires that an EIR be detailed, complete, and reflect a good faith effort at full disclosure. CEQA Guidelines § 15151. The EIR should provide a sufficient degree of analysis to inform the public about a project’s adverse environmental impacts and allow decision-makers to make intelligent judgments. *Id.* Thus, the information regarding the project’s impacts must be “painstakingly ferreted out.” *Environmental Planning and Information Council of Western El Dorado County v. County of El Dorado*, 131 Cal.App.3d 350, 357 (1982). Further, CEQA requires that an EIR consider not only a project’s direct impacts, but also its foreseeable indirect impacts and cumulative impacts.

The DEIR concluded that there would be no significant impacts on the marbled murrelet from the General Plan.⁵ Specifically, the DEIR concluded that:

Compliance with general plan guidelines would ensure that future development and improvements within Big Basin Redwoods SP would not result in significant disturbance or losses of sensitive plant communities, special status plants, special status wildlife, or wildlife habitats; thus maintaining any impacts of project implementation at a less-than significant level. (5-22).

This determination, however, has no factual support. As explained below, in making this unsupported determination, the DEIR fails to disclose the General Plan’s significant impacts--including direct, indirect, and cumulative impacts--on the marbled murrelet. These inadequacies go to the heart of CEQA’s informational purpose, and thus require that the DEIR be revised to provide a complete and accurate analysis of the proposed General Plan’s impacts on the marbled murrelet and feasible mitigation for those impacts, as required by law.

The DEIR included only a cursory section addressing the Plan’s impacts on the marbled murrelet (5-21) that provided no support for the conclusion that the Plan will have no significant impacts:

The general plan recommends actions, in coordination the USFWS and CDFG, for the long-term recovery and survival of the marbled murrelet, state-listed as endangered and federally-listed as threatened (see guideline Murrelet 1). Included are guidelines for minimizing recreational facility development in areas of marbled murrelet nesting habitat and in other special status species habitat. In addition, noise-producing activities such as construction or maintenance activities would be minimized during the breeding season and would comply with applicable federal and state regulations (see guidelines Special Animals 3 and Murrelet 1). Human food and garbage will be controlled with wildlife-proof trash containers and public education that addresses the detrimental effects of these materials on wildlife (see guideline Wildlife 6). (5-21).

⁵ The DEIR’s “threshold of significance” is “a substantial adverse effect, either directly 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 the California Department of Fish and Game or U.S. Fish and Wildlife Service” (5-19).

This section fails to disclose or analyze the effects of increased camping facilities and visitor infrastructure in and adjacent to the murrelet's old-growth nesting habitat in the Park Headquarters, Sky Meadows, and Backcountry/Wilderness regions as described in Section II of these comments. There is a clear causal chain linking visitation in the murrelet's old-growth nesting habitat in Big Basin SP, and particularly visitor use of campgrounds and picnic areas, with reduced murrelet reproductive success, through enhancement of corvid populations and associated increases in nest predation. Thus, added camping facilities and infrastructure are extremely likely to have significant adverse impacts on the murrelet and its habitat. Because the murrelet population is currently declining towards extinction, it cannot withstand any additional stressors, and the cumulative impacts of the increased camping facilities and infrastructure should have been analyzed and deemed significant.

Furthermore, to the extent the DEIR relies on "guidelines" for "minimizing" impacts to the murrelet, it does so unlawfully. Such "minimization" measures *are* mitigation measures, CEQA Guidelines § 15370(b), and must be treated as such under the statute. CEQA's specific requirements for mitigation measures are intended to ensure those measures are enforceable and are actually implemented. *See Fed'n of Hillside and Canyon Ass'ns v. City of Los Angeles*, 83 Cal. App. 4th 1252, 1260-61 (2000); *see also* Pub. Res. Code § 21081.6. CEQA prohibits public agencies from approving projects with significant environmental impacts unless all feasible mitigation measures to minimize those impacts are adopted. *See* Pub. Res. Code §§ 21002, 21002.2(b), 21081. Mitigation measures must be "fully enforceable," either through conditions of approval or through incorporation into a project itself. CEQA Guidelines § 15126.4(b). Where feasible mitigation measures exist, a public agency cannot approve a project without specifically finding that legally adequate measures have been incorporated into the project. *See* Pub. Res. Code § 21081(a)(1). An agency also must adopt a mitigation monitoring and reporting plan to ensure that measures are actually implemented following project approval. Pub. Res. Code § 21081.6(a)(1); CEQA Guidelines § 15097. If mitigation is infeasible, the agency must make a specific finding to this effect, and must adopt a statement of overriding considerations before it can approve the project. Pub. Res. Code § 21081(a)(3), (b); CEQA Guidelines §§ 15091(a)(3), 15093.

As discussed in Part II.C of this letter, the General Plan's "guidelines" are impermissibly vague and non-binding. Moreover, there is no factual support for the DEIR's apparent conclusion that these guidelines will avoid significant impacts. Again, the DEIR must be revised and recirculated, not only to provide adequate disclosure and analysis of the General Plan's significant impacts, but also to propose mitigation and minimization measures that meet CEQA's requirements.

C. The DEIR's analysis of alternatives to the General Plan is inadequate

An EIR must analyze a reasonable range of alternatives to the proposed project, and the analysis of alternatives lies at the "core of an EIR." *Citizens of Goleta Valley v. Bd. of Supervisors*, 52 Cal. 3d 553, 564 (1990). "Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process....[Courts will not] countenance a result that would require blind trust by the public, especially in light of CEQA's fundamental goal that the public be fully informed as to the

environmental consequences of action by its public officials.” *Laurel Heights I*, 47 Cal. 3d at 404. A reasonable alternative is one that would feasibly attain most of the project’s basic objectives while avoiding or substantially lessening the project’s significant impacts. *See* Pub. Res. Code § 21100(b)(4); CEQA Guidelines § 15126.6(a). A valid alternatives section must include a meaningful analysis, including quantitative analyses where possible, comparing the proposed project’s environmental effects with those of a particular alternative capable of reducing the project’s significant unmitigable impacts. *See* CEQA Guidelines § 15126.6(b); *Laurel Heights I*, 47 Cal. 3d at 401-04.; *Kings County Farm Bureau v. City of Hanford*, 221 Cal. App. 3d 692, 732 (1990). There must be enough information in the EIR itself to facilitate public understanding of why an alternative was, or was not, adopted. *See Save Round Valley Alliance v. County of Inyo*, 157 Cal.App.4th 1437, 1458 (2007).

The DEIR’s analysis of alternatives lacks a legally adequate evaluation of the comparative merits of the alternatives and the feasibility of the alternatives. The DEIR provides two environmentally superior alternatives: Alternative 1 (Facilities Removal and Increased Resource Protection) and Alternative 2 (Wilderness Expansion). However, the DEIR provides no justifiable explanation as to why Alternatives 1 and 2 are not feasible.

Alternative 1 proposes removing some or all of the existing campgrounds and picnic areas within the old-growth forest; relocating some camping and picnic areas from Headquarters to Little Basin; relocating the food concessionaire, administrative, and maintenance offices to Saddle Mountain and to Little Basin; adapting the Headquarters historic buildings for interpretation and education; removing long-term parking from the Headquarters area; and establishing a visitor shuttle system to park destinations. The DEIR acknowledges the clear environmental benefits of Alternative 1, including the benefits to the marbled murrelet (5-45).

However, the brief evaluation of why Alternative 1 was not selected has no factual support:

Visitor surveys indicate a strong interest to maintain the opportunities to enjoy the traditional camping, hiking and picnicking experiences at Big Basin, which is part of its legacy for family traditions in past, present, and future generations. With the few areas suitable for development outside the old growth forest and within current state park ownership, this alternative was not selected because it would result in the loss of recreational facilities currently serving visitors to the Santa Cruz Mountains region, and would not address the increasing recreational demands for visitor camping, group picnic areas, and tent-cabin facilities. (5-45).

First, the evaluation is incorrect in stating that Alternative 1 will result in the loss of recreational facilities, since this is not a necessary outcome of this alternative. Alternative 1 proposes removing *some or all* of the existing campgrounds and picnic areas within the old-growth forest and relocating them to Little Basin. Under this alternative, if only the Blooms Creek campground (52 sites) were to be removed due to its location in prime murrelet nesting habitat and its campers were relocated to the newly acquired and formerly private Little Basin facility (40 tent sites, 14 cabins), there would be no net loss, and instead a slight net gain, in camping facilities in Big Basin SP (e.g. 52 site loss, 54 site gain). Alternative 1 also proposes

relocating the food concessionaire, administrative, and maintenance offices in the Headquarters old-growth region to Saddle Mountain and Little Basin, and adapting these vacated historic buildings for interpretation and education. The relocation of recreational facilities to areas outside of the old-growth, while retaining use of the buildings in the old-growth for educational purposes, would result in a net gain, instead of a net loss, in total facilities for visitors.

Second, without providing any support, the DEIR's evaluation asserts that there are few areas suitable for development outside the old growth forest and within state park ownership, implying that there is limited ability to remove and relocate campgrounds, picnic areas, and other visitor facilities from the old-growth. As demonstrated by the Preferred Alternative, there is clearly room to relocate facilities to the Saddle Mountain and Little Basin areas. For example, the Preferred Alternative will "develop a park welcome center for primary visitor contact, orientation, park information, and campground registration, with provisions for park administration accessibility, restrooms, parking, meetings, training, potential concessions, special event activities, and picnic areas" at Saddle Mountain (Table 4-1), and "consider a concession-developed and operated overnight lodge with dining facilities and additional cabins" at Little Basin (Table 4-1). Clearly these two areas have the capacity for large-scale facilities relocation. There are likely other areas in the Park outside the old-growth habitat where facilities could be relocated, but those options were never analyzed in the DEIR.

Third, the DEIR's evaluation asserts that there is "increasing recreational demands for visitor camping, group picnic areas, and tent-cabin facilities" without providing any factual support. In fact, the tallies of park attendance levels from 1999 to 2011 (Table 2-1) show a substantial decline, not an increase, in total park attendance and overnight camping since the early 2000s that predates the economic downturn. Clearly, these declining trends in visitation do not support the assertion of "an increasing recreational demand."

The evaluation of Alternative 2 is similarly unsupported by fact. Alternative 2 proposes to convert the backcountry to an expanded wilderness within Big Basin SP, with the removal of roads, a prohibition on mountain bikes and motorized equipment, and the removal of developed trail camps within the wilderness area. Many facilities in the Headquarters area would also be relocated to other areas of the Park. The evaluation of Alternative 2 is limited to two brief paragraphs that highlight the recreation and wildlife benefits, but conclude that the alternative is infeasible based on the following rationale: "An expanded wilderness could potentially increase fire danger and public safety because of a longer response time to get to these remote roadless areas. Park enforcement could also be compromised for similar reasons" (5-46). However, no facts or analysis are presented to support this rationale.

In sum, the DEIR lacks a legally adequate discussion of these alternatives and their feasibility, as required by CEQA.

IV. Conclusion

For the foregoing reasons, the General Plan will result in significant, adverse impacts on the marbled murrelet, and the DEIR fails to satisfy CEQA's minimum requirements. State Parks cannot lawfully certify the DEIR or approve the General Plan based on the document as written.

Rather, State Parks must ensure that the numerous flaws in the document are corrected and that the DEIR is recirculated for further public comment and scrutiny by decision-makers.

Please include this letter and all attached references in the administrative record of proceedings for the General Plan. Please feel free to contact me with any questions or concerns.

Sincerely,



Shaye Wolf, Ph.D.
Center for Biological Diversity
(415) 632-5301
swolf@biologicaldiversity.org

List of attached references:

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- CBD. 2010. Comment letter RE: Big Basin Redwoods State Park General Plan, submitted by the Center for Biological Diversity to California State Parks Planning Division, dated October 29, 2010.
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Response to letter 32 – Shaye Wolf, Ph.D. – Center for Biological Diversity

32-1 State Parks would like to thank the Center for their dedicated work in protecting the marbled murrelet and its old growth habitat in California. We received your two earlier comment letters in October 2012 and June 2011, and considered your recommendations in preparation of the general plan's preferred alternative. We incorporated several of your recommendations in the form of goals and guidelines presented in Section 4.4 Parkwide Goals and Guidelines on pages 4-10 through 4-18. Our responses below are directed to the issues and comments outlined in your letter, and include reference charts and cited literature.

We would, however, object to your characterization of the population decline being driven "in a large part" by nest predation. While nest predation appears to be a problem, there are a number of other issues which must be considered. To focus on one aspect of the bird's survival may significantly skew results, and not only result in a waste of resources but the extinction of the species. Furthermore, there are many estimates of the numbers of these birds left, and 600 is certainly one of the lowest estimates. Other estimates range from 1400-1700 (Oceanlink Info/Biodiversity/murrelet.html) to 800 (Metroactive.com).

32-2 Our response to the following comment: **A. The Santa Cruz Mountains marbled murrelet population is experiencing a rapid population decline and faces a high risk of extinction in the near future absent immediate and significant improvements in management.**

The Santa Cruz Mountains marbled murrelet population has been in decline. Land surveys conducted by Suddjian correspond with data from the Breeding Bird Surveys for the area. However, while ocean based surveys have also shown a marked decrease, there was an apparent increase in 2009. The CBD overstate the findings of Peery et al. (2010) by stating that the decline was partially masked by the dispersal of northern birds into the central California region. The authors only conjecture that the increase in their abundance index for 2009 may have been the result of an influx of birds from the north.

As mentioned earlier, Suddjian (2010) does indicate a decline in detections between 2001 and 2002 and the level of detections has remained low. However, from 2002 to the present, there has been no discernible trend. So although detections of murrelets remain disturbingly low, there is no indication of continued population decline. While this is good in itself, the population numbers are still of concern. State Parks is

willing to work collaboratively with DFG, USFWS and other interested partners on strategies to help improve the status of the species. .

While it is clear that park management plays a vital role in preservation of habitat and may play a role in reducing pressure on the marbled murrelet, there is no data or literature that supports the statement that with "...immediate and significant improvements in management " the species probabilities of survival will be improved.

State Parks agrees with the following comment: **B. Big Basin SP has the largest remaining stand of old-growth habitat for murrelets in this region and thus is a priority area for murrelet conservation.** We do not agree with the second sentence in the paragraph, in that because a majority of the murrelet's remaining old growth habitat occurs in the State Park lands. State Parks, along with DFW and USFWS, has the clear responsibility to ensure the murrelet's survival and recovery on State park lands. There are a number of factors that may account for the decline in the marbled murrelets, including declines in available food of the coast. In addition, significant numbers of birds may be far off shore. USDA Forest Service Gen. Tech. Rep. PSW-152 1995. In addition, the figure of 60% reduction of corvid predators appears to be overstated. Peery and Henry (2010) suggest that targeting nest predation by 40% coupled with a modest increase in often-hatch-year survival could potentially result in stable population growth. This propensity to overstate the facts is an issue that runs through the whole letter.

32-3 Our response to the following comment: **C. Anthropogenically enhanced corvid populations are a primary factor in the low reproductive success and associated decline of marbled murrelets in the Santa Cruz Mountains.**

There are many factors contributing to the apparent low reproduction success - nest predation is but one. Peery et al. (2003) point out that in some years, "...reproduction of marbled murrelets in central California is limited by food availability..." Indeed, analysis of carbon isotopes indicate a shift in the trophic diet level of marbled murrelets and have lead Becker and Beissinger (2006) to suggest that over the historic record, "Decreased prey resources have caused murrelets to fish further down on the food web, appear partly responsible for poor murrelet reproduction..."

On the contribution of predation to the decline, McShane et al. (2004) states, "Predation, particularly during the breeding season, is the most documented cause of mortality, but its demographic importance, relative to other causes is not known" and that, "Predation on adults may be especially important to the survival of the species because demographic models indicate that adult mortality may have a greater impact on murrelet population growth than juvenile survival or nesting success (productivity)". Predation on adults by peregrine falcons has been documented within this population Singer et al. 1995.

As a point of clarification, we should also point out that the estimates for corvid-caused nest failures found in Peery et al. (2004) and reported in your comment letter as 67 to 81 percent are incorrect. These numbers do not represent the number of nest failures due to corvids, rather they are the estimates of corvid contribution to the percent of known nest predation. The assertion of 67 to 81 percent being the predation rate (Peery et al. 2004) was corrected in Peery and Henry 2010, where these percentages are correctly attributed in the model. Based on the data presented in Peery et al. (2004), the actual percent of failure attributable to corvids is 25 percent (4 out of 16 nest failures), with an upper maximum estimate, if all possible predated numbers are added to the total of known, of 69 percent (11 out of 16).

With respect to enhanced populations of corvids, we have re-examined the trend data cited in Peery and Henry (2010) and found the wrong data set was used. Peery and Henry, used the Audubon Christmas Bird Count (CBC) data from the Santa Cruz Mountains (CASC). However, Big Basin State Park does not fall within the CASC count area but rather within the Ano Nuevo (CAAN) count area (**figure 1**).

Although Steller's jays have increased in numbers, on the landscape scale, re-examination of the CBC data show no change in the overall abundance (**figure 2**). However, Breeding Bird Surveys over the same landscape appear to show a decrease in abundance of Steller's jays in recent years (**figures 3 and 4**). In addition, Suddjian (2010) illustrates that while densities of jays are higher near the campsites, these numbers have decreased significantly over the period of record and in apparent correlation with management changes. We should point out that the contribution of jays to egg predation (in predation experiments) did not vary with proximity to campgrounds (Marzluff and Neatherlin 2006). We also note that within the Santa Cruz Mountains and over a 14 year period,

the single documented nest predation recorded for Steller's jay was over 500 meters from any campsite.

Although common raven numbers have increased, based on the data provided in the CBC the increase has been on a much larger scale than Big Basin State Park. The recent increase in raven numbers has occurred throughout the region and has been observed in both the CBC and BBS data (**figures 2, 4 and 5**). While State Parks will continue efforts to reduce numbers of ravens within its boundaries, it's clear that solutions to landscape level increases in ravens will need to include region-wide education and control efforts (Liebzeit and George 2002).



Figure 1. Location of Audubon Christmas Bird Counts and Big Basin State Park. Data used in Peery et al. (2010) to characterize corvid trends was drawn from Santa Cruz (CASC) counts and not from the Ano Nuevo (CAAN) counts. Source: <http://birds.audubon.org/documents/kmz-file-christmas-bird-count-circles-us-google-earth>

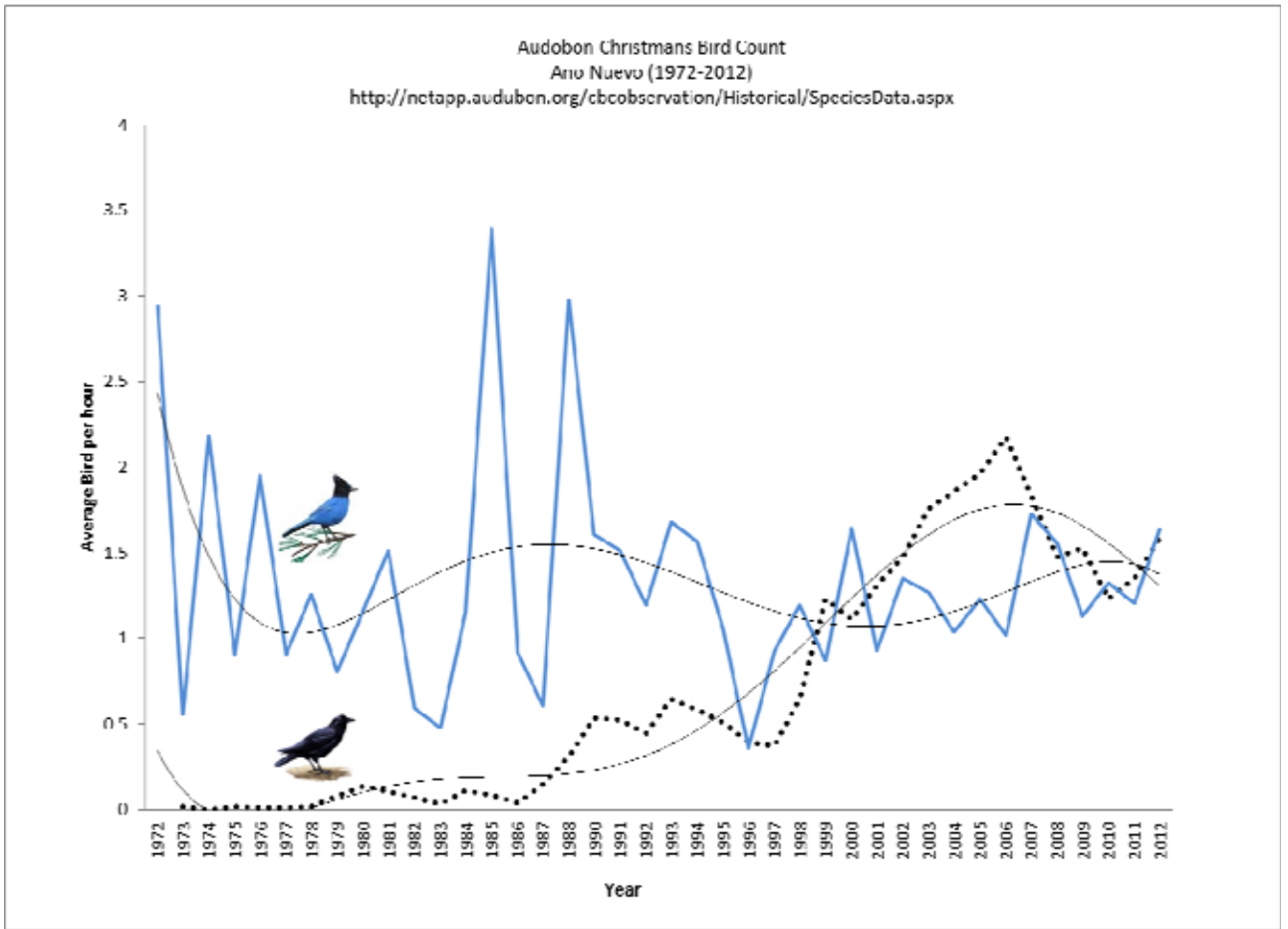


Figure 2. Audubon Christmas Bird Count Ano Nuevo data from 1972 to 2012. Steller's jay shows no trend in landscape level abundance estimates. For common ravens, the graph shows an increasing trend in landscape level abundance estimates. This trend in the abundance index decreased from 2005 – 2010 and may be on the increase again.

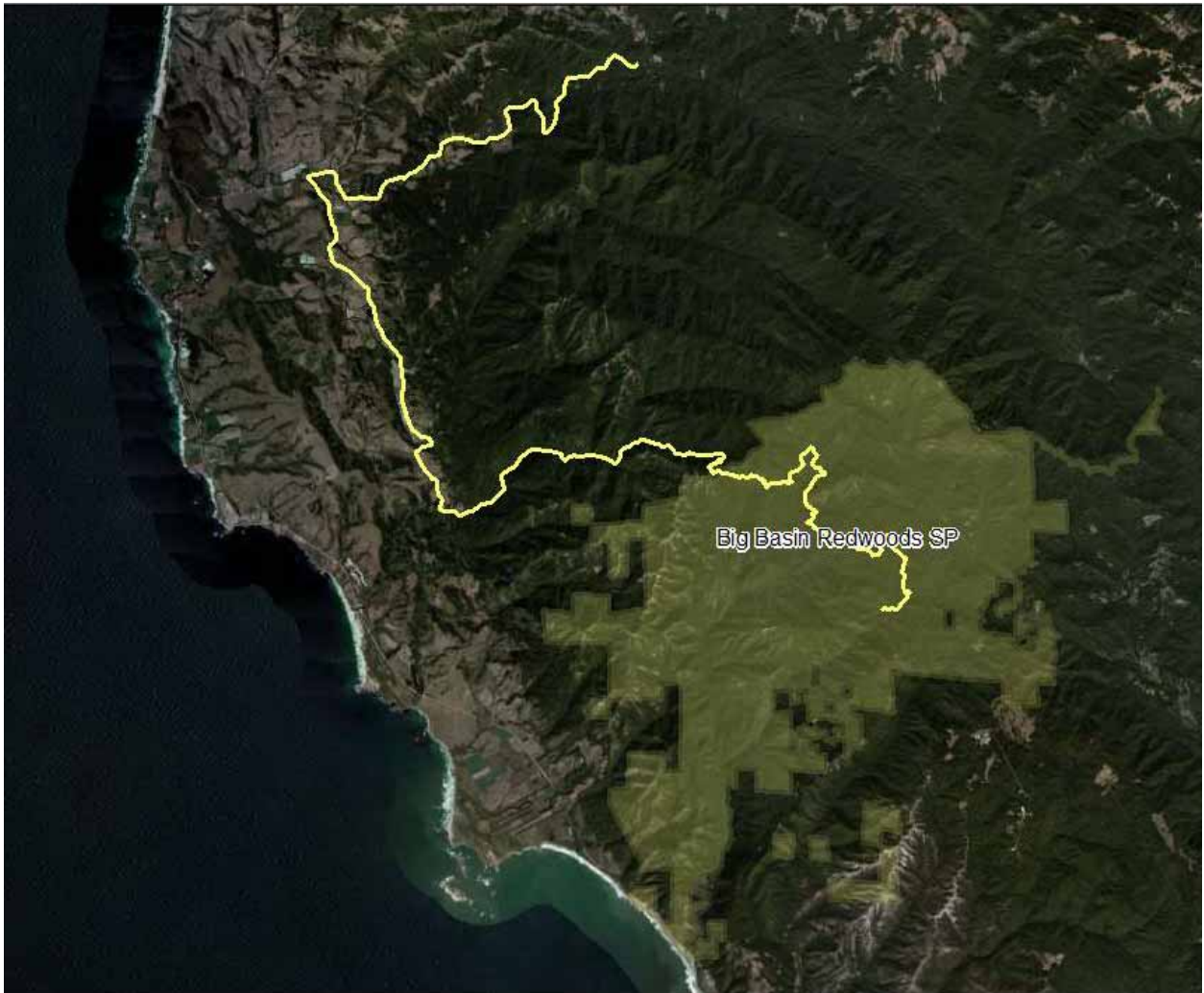


Figure 3. The Pescadero Route of North American Breeding Bird Survey and Big Basin State Park. Source: http://www.mbr-pwrc.usgs.gov/bbs/geographic_information/GIS_shapefiles_2010.html

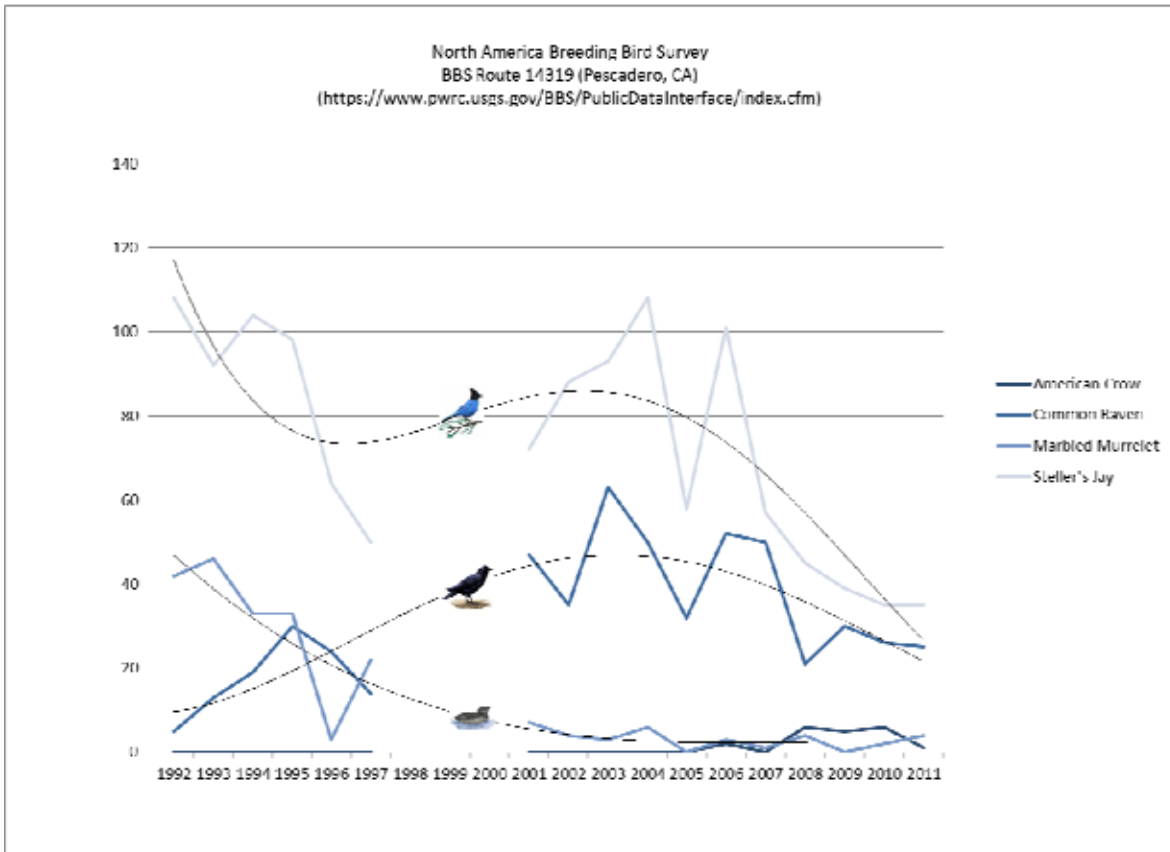
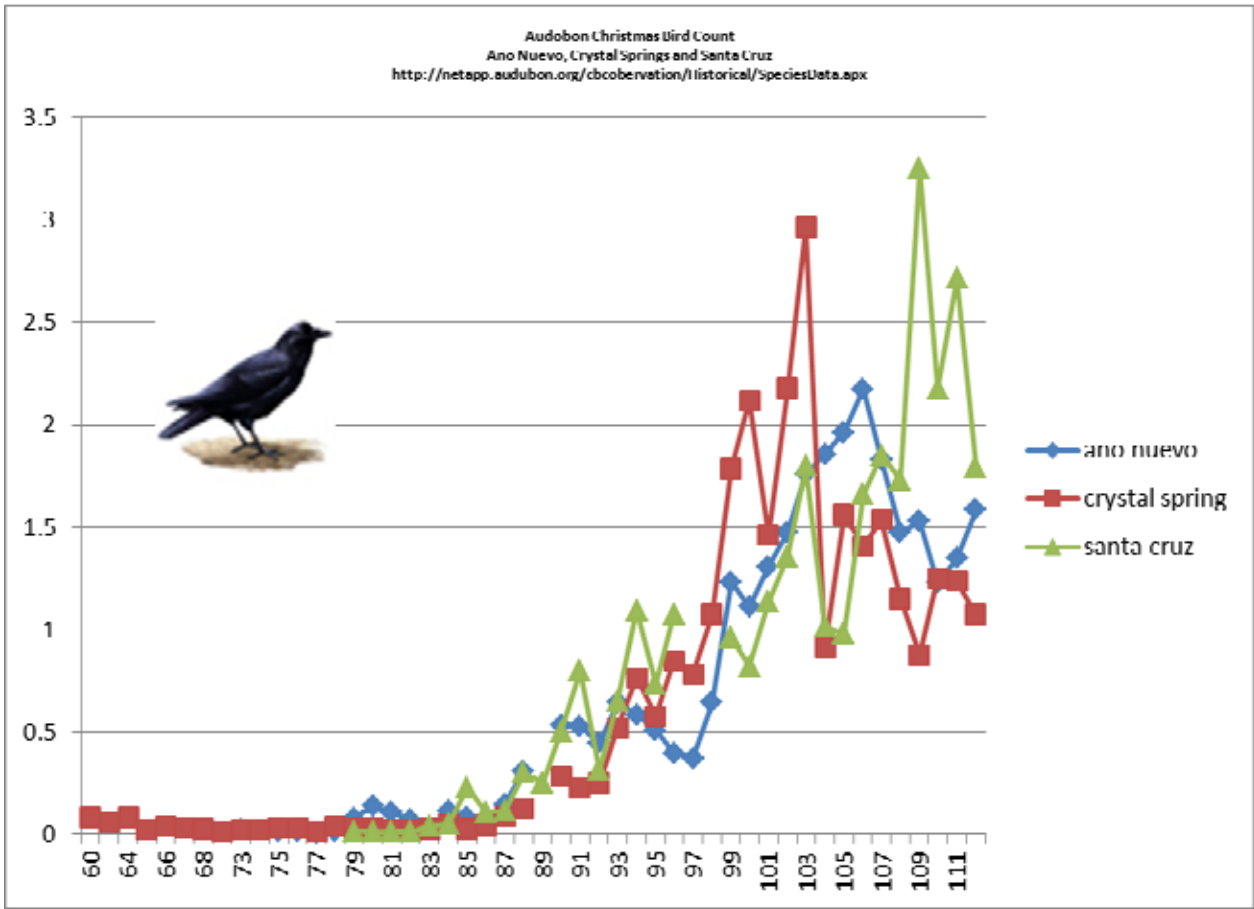


Figure 4. Data from the North American Breeding Bird Survey illustrating landscape level changes in the species of interest. Note that the peak and slight decline in the raven trend seen here corresponds with the trend seen in the Audubon Christmas Bird count results.



32-4 Our response to the following comment: **D. Corvid predation must be reduced by ~60% to stabilize the population and even more to recover the population.**

The 60% rate has no meaningful management translation and overstates the findings of Peery et al (2010). The 60% level is a theoretical construct that refers to a reduction in the overall rate of predation attributed to corvids under the assumption that nest predation due to corvids is at the maximum of 82% of total nest predation AND that Pnest has increased. The authors point out the sensitivity of the model to Pnest and that, absent its increase, nest predation would have to be completely eliminated.

On its face value, because there is no discernible functional relationship (linear or otherwise) between predator abundance and predation rate, there is no way to determine just how many corvids would need to be removed in order to achieve the 60% reduction in the rate of predation. In a study of predation rates on terns, a single individual gull was responsible for 85% of the predation and its removal from the population alone dropped the predation rate to near zero (Magella and Brousseau 2001).

With respect to meeting a specific target rate or not, as there have been no continued investigations into predation rates, State Parks cannot speak to any change in predation rates. Calculating the nest predation rate is difficult. Peery et al. (2004) estimate of overall nest mortality at 84% is based on 14 years of accumulated data. The data are from 1989 to 2002, during which time only 19 nests were discovered and in no single year were more than 6 nests found – in most years only one nest was found.

Although there is no new data regarding nest predation rates, it appears that corvid reduction and trash management have resulted in benefits to murrelets by reducing jay abundance (Suddjian 2010). Has it been enough? There is no evidence either way. Use of the adult to juvenile ratio as a indicator of management actions, as your letter suggests, has two problems: 1) because it is not a direct measure of nest success, it also includes many other factors that affect reproduction (e.g., food availability and trophic changes) and; 2) there are only 3 survey points within the literature, not enough to establish a trend.

Improved trash management and corvid depredation efforts began in Big Basin State Park in 2005. Therefore, citing Suddjian (2005) and the conditions that existed prior to management actions does not address the question of whether or not management has been effective. Overall jay

abundance has declined, including significant declines within Big Basin State Park (Suddjian 2010). Common raven numbers have also declined in overall abundance although with no significant trend. In 2009, ravens within Big Basin State Park exhibited the lowest productivity since the study began (Suddjian 2010). In addition, Suddjian (2009) points out that very low numbers within Butano and Portola State Parks campgrounds provide some indication that ongoing garbage management MAY be responsible for reduced jay counts WITHIN campground areas. State Parks looks forward to future data points to see if these data points are aberrations or if they reflect actual change and if they are applicable lessons to apply throughout pertinent park units.

State Parks continues its support for predator control and directed studies aimed at reducing the predation rate including egg aversion studies as a prudent measure.

32-5 Our response to the following comment: **E. Trash management and corvid control have been inadequate to reduce predation to levels that will reverse the murrelet population decline and recover the population.**

The statement lacks real meaning or basis as there is neither data nor literature to suggest what corvid populations should be reduced to, nor is there any data or literature regarding current predation rates. The existing predation rates were calculated as of 2002 and were based upon the fate of a total 19 nests over a 14 year period (Peery et al. 2004). There have been no subsequent studies with respect to either predation or the predation rate within the central coast population. Therefore, there is no information regarding the efficacy of management actions vis-à-vis the rate of predation. There are, however, data that show that jay numbers within the park have significantly declined as a direct result of park management (Suddjian 2010). Although corvid numbers are poorly correlated with the rate of predation and there is little evidence of a linear relationship between corvid abundance and predation (Luginbuhl et al. 2001), it is prudent to take measures that may help reduce the rate of nest predation. Towards this goal, State Parks is working with DFG and USFWS to promote and support methodologies that in addition to controlling the numbers of predators, would directly address the rate of predation. One such measure is the experimental egg aversion treatments proffered by Gabriel and Golightly (2011).

32-6 Our response to the following comment: **F. Recovering the marbled murrelet in Big Basin SP will require a suite of conservation measures that**

include relocating campgrounds and picnic areas from old growth nesting areas.

As previously stated, State Parks is willing to work collaboratively with DFG, USFWS and other interested partners on strategies to help improve the status of the species, including directed studies aimed at reducing the rate of nest predation. From the citations quoted above, there is neither data nor literature to substantiate your claim that removing campgrounds and picnic areas from old-growth nesting areas will result in murrelet reproductive success. As previously mentioned, there are many factors contributing to the apparent low reproduction success. The General Plan already includes a guideline for possible removal or relocation of campgrounds and picnic areas in the old-growth forest. This guideline **Murrelet 7**, on page 4-18, states that *"Where possible, consider relocating camping and/or picnic facilities or rotating use in areas with marbled murrelet habitat."* In addition, the adaptive management methodology is identified on pages 4-74 through 4-86 to further guide management actions toward desired outcomes in protecting wildlife species and their habitats.

The following potential management action will be added to the final general plan, Table 4-1, fourth column, first row titled: Potential Management Actions and Monitoring Activities:

- Relocate/remove developed recreation facilities or rotate use in the murrelet's old-growth nesting habitat.

32-7 Please see responses 32-1 through 32-6 above.

32-8 Contrary to the letter writer, who has placed all his eggs in one basket, e.g., that nest predation is the "primary cause" for the decline of the Central Coast Marbled Murrelet population; the literature is replete with many different reasons for the decline. USFWS has not issued a Biological Opinion (BO) that would serve as substantial evidence as to what constitutes a cause-and-effect relationship. The letter writers have overstate findings speculated without evidence and cherry-picked dates to support their theory.

Literature Cited – The following references will be added to the General Plan, Chapter 6, References.

- Ainley, David G, Allen, Sarah G. and Spear, Larry B. Chapter 34, Offshore Occurrence Patterns of Marbled Murrelets in Central California USDA Forest Service Gene. Tech. PSW-152 1995
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- Suddjian, D.L. 2005. Draft Summary of 2005 Marbled Murrelet Monitoring Surveys in The Santa Cruz Mountains. Prepared for Command Oil Spill Trustee Council.
- Suddjian, D.L. 2010. Draft Summary of 2009 Marbled Murrelet Monitoring Surveys in The Santa Cruz Mountains. Prepared for Command Oil Spill Trustee Council.
- Suddjian, D.L. 2010. Draft Summary of 2009 Corvid Monitoring Surveys in The Santa Cruz Mountains. Prepared for Command Oil Spill Trustee Council.

From: Elisha Hess <delicious_life@hotmail.com>
Sent: Wednesday, August 01, 2012 7:06 PM
To: General, Plan
Subject: general plan comments on big basin eir

Elisha Hoyt
 Davenport resident

1: West Waddell water quality
 2: Santa Cruz Metro access
 3: Invasive species ratification
 4: Wireless technology/radiation

1: The treatment plant along West Waddell is inadequate during peak usage and has proved to be a source of contamination. Usage of composting toilets or other alternatives should be considered.

2: Santa Cruz Metro service should be offered along highway 1, as it was prior to last years cuts.

3: Invasive plant species such as French Broom should be addressed aggressively without the use of toxic chemicals. Hand pull methods are a more sound ecological choice.

4: Cell towers & smart meters should not be allowed within the park.

Thank you for your time and consideration.

Elisha Hoyt
 P.O. Box 7260
 Santa Cruz, Ca 95061

33-1

Response to letter 33 – Elisha Hoyt

33-1 The wastewater collection system and treatment plant at Big Basin was rehabilitated in 2010 to meet safety standards for water quality and environmental protection. Restrooms are upgraded and water storage and distribution systems are replaced as necessary to avoid contamination of Waddell Creek. The park uses vault toilets and composting type toilets where appropriate in the backcountry areas.

State Parks will continue to work with the counties and others to encourage bus service to the Headquarters area and Waddell Beach, and consider alternatives to reduce the impacts from vehicle emissions.

State Parks follows all applicable state and federal laws, as well as internal policies regarding the use of pesticides and herbicides. As stated in our Department Operations Manual Pest Control Policy 0702: It is the policy of the Department to initiate pest control only when necessary to protect public health and safety, facilities, and cultural and natural resources. The Department shall avoid the use of chemical

pesticides until all non-chemical methods have been explored and found by the Department to be inadequate. Control efforts shall be in accordance with other Department policies on plant and animal resources, cultural resources, and facility management.

Currently, there are no plans to install cell towers in the park. Smart meters are required to be installed by law, and State Parks cannot pay to exclude smart meters from the park. Also refer to letter responses 25-3 and 26-5.

Sent: Thursday, July 19, 2012 4:23 PM
To: General, Plan
Subject: Big Basin Draft EIR

Hello –

The County of Santa Cruz has just become aware of the circulation of the draft EIR for the Big Basin General Plan. As a responsible agency regarding development within the coastal zone, we are concerned that we have not been involved in the process to date, and that we were not directly notified of the comment period that is now less than two weeks from ending. CEQA Guidelines 15086(a)(4) require consultation with the county in which the project is located. In fact, one of your key proposals is to “Coordinate with Santa Cruz County to identify road improvements and county maintenance that may be necessary to maintain public vehicle access on Little Basin Road from Highway 236 to the Little Basin property.”

Of particular concern are the potential impact to roads, and the failure to address potential sandhills habitat, and potential presence of the American badger.

Please let us know how you intend to include the County of Santa Cruz in this EIR process. Matt Johnston

Environmental Coordinator
County of Santa Cruz
(831) 454-3201

34-1

From: [Matt Johnston](#)
To: [General Plan](#)
Cc: [Steve Wiesner](#)
Subject: RE: Big Basin Draft EIR
Date: Wednesday, August 29, 2012 11:42:43 AM

Hi Dave –

I passed on the EIR to our Public Works department and I know they had concerns over the increase in use on Little Basin Road, a county maintained road that is already in poor condition. I don’t believe they had assigned anyone to draft a comment letter, but the primary concern they expressed was that the document states that the Park will “Coordinate with Santa Cruz County to identify road improvements and county maintenance that may be necessary to maintain public vehicle access on Little Basin Road from Highway 236 to the Little Basin property.” DPW is not clear on what is meant by that, and when this would take place, as the use has already increased to the point where county residents along Little Basin Road are complaining of the increased hazards of driving that road. The document does not clearly identify the increase in use on that road as a potentially significant impact, beyond the statement above, and that statement seems to imply that the County may be responsible for increased maintenance. This also seems to be a deferred mitigation, if a significant impact is identified.

I would propose that rather than coordinate at some future date with the County, that State Parks set up a meeting at the earliest convenient time with Assistant Director Steve Wiesner to discuss this aspect of the General Plan update, and incorporate the results of that meeting into the final EIR.

Matt Johnston

34-2

Response to letter 34 – Matt Johnson, County of Santa Cruz

- 34-1** The general planning process began in 2001 and continued off and on for many years. Public meetings were held and planning notices and newsletters were posted and mailed out to over 800 people on our mailing list. Our mailing list included over 13 Santa Cruz county agencies and departments who were sent these notices. The mailing list is updated regularly as old addresses and names change. Thank you for providing the names of the current County of Santa Cruz Planning Director, Environmental Coordinator, and 5th District Supervisor.
- 34-2** Please see Master Response (B) on Saddle Mountain and Little Basin development impacts.

The county-owned/maintained Little Basin Road is a public road that presently serves as the primary vehicle access to the state park property at Little Basin, which has been in place for many years. It also serves several private residences along this road. At this broad stage of planning, the general plan guides the Department to coordinate with Santa Cruz County on identifying road improvements and county maintenance actions as indicated by guideline Little Basin 6. State Parks will continue to monitor and evaluate the visitor use at Little Basin and the county road conditions to address problem areas and make recommendations to the County regarding the community's needs. State Parks has as much right to use a public road as other users, and there are mechanisms to coordinate with others to work out shared cost or mitigation. For any new development, State Parks will coordinate with the County of Santa Cruz and Caltrans to initiate traffic and engineering studies for Little Basin Road and its intersection with Highway 236. We agree that such a meeting between State Parks and the County's Assistant Director could be beneficial to discuss future road maintenance on Little Basin Road and to coordinate future actions to address the potential road problems due to visitor and resident traffic on Little Basin Road.

Chapter 4

RECOMMENDED CHANGES TO THE GENERAL PLAN

This chapter contains recommended revisions to the Preliminary General Plan/Draft EIR for Big Basin Redwoods State Park made subsequent to its public release and the public review process. All revisions are a result of responses to comments detailed in Chapter 3 of this document. Text revisions are organized by the page numbers that appear in the Preliminary General Plan/Draft EIR. The Final General Plan/EIR may include additional minor revisions in order to ensure accuracy of information presented in the plan.

Revisions to text in the General Plan/EIR are shown with a strikethrough or underline. Text that has a ~~strikethrough~~ has been deleted from the General Plan/EIR. Text that has been added is presented as single underlined.

Pages ES-7 and 4-65: The final general plan will update the current status of the Caltrans bridge replacement project, and modify the text in the guideline Waddell Beach 3 to read as follows:

Waddell Beach 3: ~~Provide review and input to Caltrans on their planning and design for the proposed Highway 1 bridge replacement at the mouth of Waddell Creek to promote desirable hydrological, riparian, and estuarine conditions and facilitate safe vehicle ingress and egress from Highway 1. As part of a fully integrated plan for both sides of the highway, incorporate day use parking (approx. 50 -100 spaces), distributed on either the inland side of Highway 1 depending on resource constraints and future roadway alignment, with safe pedestrian access along Waddell Creek from the inland side of the highway to the Waddell Beach.~~

Page ES-8, bullet 3: In reference to the public access terminology, the following general plan text and guidelines will be revised as follows:

- Develop a bicycle camp and walk-in campground facilities at a location either adjacent to the horse camp or in an open area along the existing road north of the day use parking lot. Consider alternative forms of camp facilities, such as yurts or tent cabins, with provisions to serve backpackers and touring bicyclists utilizing the California Coastal Trail (CCT) and Highway 1 Pacific Coast Bike Route (PCBR) Trail.

Page 2-18, last paragraph: The final general plan will reflect the updated water information for Little Basin to read as follows:

~~Little Basin's existing sewage system (septic tanks) and potable water storage system serviced services the campground. Two wells at Little Basin have provided for domestic use, fire, and landscape maintenance and a water treatment plant is was located on the property. During drought years, potable water was trucked in to service the campground during peak summer months. In the summer of 2012, a new pipeline was installed from Big Basin to four existing water storage tanks located in the Little Basin campground (two domestic and two for fire protection). The current operator is exploring alternatives to upgrade the water supply and distribution system. With the new waterline to serve Little Basin, trucking water will no longer be necessary. Also, the existing water plant at Little Basin could be removed and the building used for other purposes.~~

Page 2-24, end of first paragraph: additional text additions were made as follows:

Since becoming a part of Big Basin Redwoods State Park, the Little Basin area has been incorporated and fully connected to the state park's water system. In 2012, a new pipeline was installed from the Big Basin Gatehouse to four new water storage tanks located in the Little Basin campground (two domestic and two for fire protection).

Page 2-31, second paragraph: Existing Air Quality information will be revised as follows:

The majority of Big Basin Redwoods SP is located within the northernmost portion of the NCCAB which includes Santa Cruz, San Benito and Monterey counties. A small portion of the park that is located in San Mateo County is included in the southern portion of the San Francisco Bay Area Air Basin (SFBAAB). The main emission sources in the NCCAB are the Moss Landing Power Plant, ~~a large cement plant at Davenport located approximately 11 miles southwest of Big Basin,~~ agricultural activities, and vehicle emissions from Highway 101 traffic. Though separated by the Coast Range (Santa Cruz Mountains) to the south, wind can move air pollution from the SFBAAB to the NCCAB. The NCCAB is a non-attainment ~~zone~~ area for ozone and PM10. This applies to California air quality standards only. The area actually attains the National Ambient Air Quality Standards for ozone, PM10 and PM2.5. The NCCAB also meets the California standard for PM2.5. The nearest air monitoring site ~~is~~ was approximately 11 miles south of the park in Davenport, ~~but is no longer in operation. However, recent monitoring data from Davenport is useful for describing conditions in the project area.~~ Two air quality components of concern are ozone and particulate matter.

Page 2-32, second paragraph: Updated information on Particulate Matter will be revised as follows:

Sources of ambient PM include: combustion sources such as trucks and passenger vehicles, off-road equipment, industrial processes, residential wood burning, and forest/agricultural burning; fugitive dust from paved and unpaved roads, construction, mining, and agricultural activities; and ammonia sources such as livestock operations, fertilizer application, and motor vehicles. In general, combustion processes emit and form fine particles (PM2.5), whereas particles from dust sources tend to fall into the coarse (PM10) range. The Davenport station often recorded the highest PM10 readings in the entire NCCAB and also had the greatest number of exceedances of the State PM10 standard. These exceedances were often due large in part to naturally occurring sea salt, which fortunately has no known health effects. A similar environment likely exists in the Rancho del Oso and Waddell Beach Specific Areas.

Page 2-40: The final general plan will reflect text corrections that were made in the second paragraph to read as follows:

Other significant creeks and rivers with portions of their headwaters within the boundaries of Big Basin Redwoods SP are Scott Creek, Boulder Creek (a tributary of the San Lorenzo River) ~~San Lorenzo River (a tributary of Boulder Creek),~~ and Año Nuevo Creek.

Page 4-15, Special Status Animals

Forty-one special status animal species are confirmed or strongly suspected to occur within the boundaries of Big Basin Redwoods SP and suitable habitat exists within the park for an additional nine species. Ten of the species with confirmed sightings in the park have state and/or federal listing status. These are the American peregrine falcon, brown pelican, California black rail, California red-legged frog, coho salmon, marbled murrelet, San Francisco garter snake, steelhead (central California coast ESU), tidewater goby, and western snowy plover. Tidewater gobies have historically been found in Waddell Creek and the creek has been designated critical habitat. Tidewater gobies were reintroduced in 1991 and were extirpated by high outflows in 1998. Appropriate management should be provided for all special status animal species.

Page 4-16, Special Animals: New guideline will be added as follows:

Special Animals 7: Manage the Waddell Creek Beach critical habitat to support breeding western snowy plovers, implementing seasonal beach closures, trash management, interpretive signage, and any additional protective measures to ensure habitat suitability for breeding birds. Also, State Parks will continue to support efforts by the USFWS to reintroduce tidewater goby into Waddell Creek, should such efforts be proposed by the USFWS.

Page 4-30: New Goal and Guideline:

Coastal Access Goal: *Maintain the quality and continuity of public access and Highway 1 as the primary public access corridor, scenic vantage point and recreational resource within the boundaries of the Park.*

Access 6: Protect the scenic qualities and maintain continuity of the California Coastal Trail (CCT) and Pacific Coast Bike Route (PCBR) along Highway 1 through the park, with safe shoulder widths, support facilities such as bike racks at destination points, and the proposed bike camp at RDO.

Page 4-33: New Guideline:

Trails 8: Provide for protection and signing of existing coastal trail segments as part of the CCT, where suitable public trails already exist. Also, identify the remaining links necessary to provide a continuous, safe CCT route through the State Park that minimizes exposure to automobile traffic. In new development projects and during preparation of the unitwide Roads and Trails Management Plan, consider the findings and recommendations of the 2002 Coastal Conservancy report titled: Completing the California Coastal

Trail and the Monterey Bay Sanctuary Scenic Trail planning process currently underway.

Page 4-52: New Guideline will be added to address staffing needs.

Staffing and Facilities 6: Provide sufficient staffing to conduct perimeter patrols and surveillance in the backcountry areas for resource protection and visitor safety purposes.

Page 4-59: To further guide the protection of Sky Meadow and its associated habitat, a description of Sky Meadow, with additional goals and guideline revisions, will be added to page 4-59 of the General Plan as follows:

Sky Meadow:

The Sky Meadow area is comprised of the Lower Sky Meadow residential area and the Sky Meadow group camp, located on either side of a four-acre wet meadow. The structures providing staff housing within the 1940s residential area are clustered in a flat grassy area surrounded to the north by remnant native perennial bunchgrasses and chaparral transitioning to a Douglas-fir and oak-dominated canopy. The south side of this developed area is bordered by mature coast live oak and well-spaced old growth redwoods and Douglas-fir. A spur road off Sky Meadow Road provides access to the group camp along a gentle ridge dominated by old growth redwood clumps, huge Douglas-fir and mature coast live oak and madrone. The first parking area for the group camp sits below a wet swale where the forest floor is dominated by sedges, rushes and an uncommon occurrence of California fescue. Saturated soils are evidenced by several large uprooted trees. Sky Meadow itself is a wet meadow with rhizomatous sedges, rushes and large patches of California oat grass and Santa Barbara sedge. The perimeter is surrounded by clusters of redwoods, large coast live oaks and Santa Cruz Mountain oaks.

Lower Sky Meadow Headquarters Goal G: *Protect and preserve historic residences and associated features and structures that contribute to the nominated National Register Historic District located in the Lower Sky Meadow residential area.*

Lower Sky Meadow Headquarters Guidelines:

Headquarters C1: ~~Introduce up to 10 overnight cabins outside the Sky Meadow Residential historic district, along the road near the existing group camps and outside sensitive resource areas. These cabins will require an expansion of parking and utilities infrastructure in the vicinity to provide seasonal accommodations for individual or group use.~~

Lower Sky Meadow 1: Headquarters C2: Conduct site-specific surveys and investigations for sensitive plant and animal species protection, and coordinate with the Sempervirens Fund early in the site planning to locate new facilities and avoid dedicated trees and memorial groves.

Lower Sky Meadow 2: Headquarters C3: Allow for development of additional staff housing, trailer pads, and amenities outside of the designated National Register boundaries of the Lower Sky Meadow residence area when addressing future housing needs, to maintain the historic integrity of this significant 1940s residence area.

Sky Meadow Group Camp area:

Sky Meadow Group Camp Goal: *Provide for group recreation and preserve the wet meadow and surrounding old growth redwood and Douglas-fir forest habitats.*

Sky Meadow Group Camp Guidelines:

Sky Meadow Group Camp 1: Limit visitor use of the meadow to the existing historic Girl Scout camping platform and adjoining trail.

Sky Meadow Group Camp 2: Upgrade parking and utilities infrastructure to support continued use of existing facilities.

Sky Meadow Group Camp 3: Minimize disturbances to marbled murrelet breeding habitat by locating future visitor amenities outside the old growth forest.

Page 4-61, Guideline: Text corrections were made to this guideline as follows:

Highway 236-1: Coordinate with Caltrans to manage visitor and non-visitor traffic along Highway 236 through the park, and improve signage on Highway 9 locations at Waterman Gap and along Highway 236 at China Grade Road to redirect visitors to the south entrance at Saddle Mountain.

Page 4-66, Guideline RDO 6

RDO 6: Develop a bicycle camp and walk-in campground facilities (approximately 15 sites) at a location either adjacent to the horse camp or in an open area along the road north of the day use parking lot. Consider alternative forms of camp facilities, such as yurts, with provisions to serve backpackers and touring bicyclists utilizing the California Coastal Trail (CCT) and Highway 1 Pacific Coast Bike Route (PCBR) Trail.

Page 4-80 and 4-83 in Table 4-1:

Headquarters Area: Potential management action will be added to Table 4-1 as follows:

- Prior to construction of new facilities at Saddle Mountain, conduct traffic study for Highway 236, and implement road improvements as identified in the traffic study including appropriate signage to reduce traffic congestion and facilitate safe vehicle travel through the park.

Saddle Mountain: Potential management action will be added to Table 4-1 as follows:

- Conduct surveys to identify law enforcement problems and unresolved issues, and solicit public input in developing appropriate and effective management actions.

Goals and Guidelines: Additional text corrections were made as follows:

- Develop a bicycle camp and walk-in campground facilities, and consider alternative forms of camp facilities, such as yurts, with provisions to serve backpackers and touring bicyclists utilizing the California Coastal Trail (CCT) and Highway 1 Pacific Coast Bike Route (PCBR). Trail.

Natural Resources: Potential management action will be added to Table 4-1 as follows:

- Relocate/remove developed recreation facilities or rotate use in the marbled murrelet's old-growth nesting habitat.

Page 5-18, third paragraph, last sentence: Long-Term Operational Criteria Air Pollutant Emissions will be revised as follows:

Consequently, implementation of the general plan would not conflict with or obstruct implementation of MBUAPCD air planning efforts. Potential air quality impacts will be analyzed in greater detail when each specific element of the General Plan is considered. For instance, emissions associated with increases in motor vehicle activity would be evaluated using an emissions model such as CalEEMod. Estimated emissions would be compared to recommended thresholds, as described in Chapter 5 of the Air District's CEQA Air Quality Guidelines.

Page 5-40, first paragraph: Short-Term Construction-generated Criteria Air Pollutant Emissions will be revised as follows:

The air quality impacts from construction can be substantially reduced by the use of dust control measures and other construction best management practices (see guideline **Geology/Hydrology 5**). Dust control measures would be developed during site-specific planning. ~~Air quality may also be temporarily impacted by prescribed burning~~

programs or wildfires in the park. Under guideline **Vegetation 4**, the Department would use prescribed fire as part of a vegetation management strategy. This strategy would identify conditions under which prescribed burning would be allowed in order to minimize impacts to air quality. During the construction phase of specific projects, the following Best Management Practices will be considered for mitigating fugitive dust when applicable:

- Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
- Prohibit all grading activities during periods of high winds.
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area.
- Haul trucks shall maintain at least 2'0" of freeboard..
- Cover all trucks hauling dirt, sand, or loose materials.
- Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.
- Plant vegetative ground cover in disturbed areas as soon as possible.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all exiting trucks.
- Pave all roads on construction sites.
- Sweep streets if visible soil material is carried out from the construction site.
- Post a publicly visible sign which specifies the telephone number and person to contact regarding
- dust complaints. This person shall respond to complaints and take corrective action within 48
- hours. The phone number of the Monterey Bay Unified Air Pollution Control District should be
- visible to ensure compliance with Rule 402 (Nuisance).
- Limit the area under construction at any one time.

Air quality may also be temporarily impacted by prescribed burning programs or wildfires in the park. Under guideline **Vegetation 4**, the Department would use prescribed fire as part of a vegetation management strategy. This strategy would identify conditions under which prescribed burning would be allowed in order to minimize impacts to air quality. The following strategies were jointly developed by the California Department of Parks and Recreation and the Air District to mitigate smoke and to better inform nearby residents when conducting prescribed fires:

- Website - During the planning stage for burns likely to extend a week or more, set up an informational web-site that can be used to notify and inform residents about the burn. This could include information on the reason for the burn and the operational burn

plan. Following ignition, the site could show daily maps of the fire progress as well as smoke projections.

- Burn Size - When feasible, create smaller burn plots.
- Alternatives - When feasible, consider using chipping, hauling or pile burning as well as lop & scatter as alternatives.

Page 5-40, third paragraph: Impact Analysis will be revised as follows:

Implementation of guidelines **Utilities 1** through **Utilities 4** would evaluate the current park infrastructure, repair and upgrade the current water supply and distribution system, as necessary, identify utility needs, and develop recommendations for utility upgrades and replacement. The repair or replacement of older pipes and structures may contact hazardous materials such as asbestos. Removal and handling of these materials will be done in compliance with the Monterey Bay Unified Air Pollution Control District Rule 424 National Emission Standards for Hazardous Air Pollutants (NESHAPS).

Page 6-3 References: The following resource documents will be added to Chapter 6, References:

Monterey Bay Unified Air Pollution Control District

CEQA AIR QUALITY GUIDELINES Adopted October 1995, Revised: February 1997, August 1998, December 1999, September 2000, September 2002, June 2004 and February 2008

Waddell Beach Parking Report" (Coastal Commission staff file memorandum), dated Aug.2, 2010.

Completing the California Coastal Trail, produced in 2002 by the California Coastal Conservancy pursuant to SB 908 (especially see the "Principles for Designing the Coastal Trail" section, regarding Coastal Trail continuity and separation from motor traffic).

Scott Creek and Waddell Creek Bridge Replacements: Potential Physical and Biological Implications, Caltrans background report, May 2012. A synopsis of relevant sections follows:

Final 2009 5-Year Review for the Marbled Murrelet: U.S. Fish and Wildlife Service, Washington Fish and Wildlife Office, Lacey, WA, June 12, 2009

Ainley, David G, Allen, Sarah G. and Spear, Larry B. 1995 Chapter 34, Offshore Occurrence Patterns of Marbled Murrelets in Central California USDA Forest Service Gene. Tech. PSW-152

Benjamin H. B. and S.R. Beissinger. 2006. Centennial Decline in the Trophic Level of an Endangered Seabird after Fisheries Decline. Conser. Biol. 20(2) 470-479.

Gabriel, P.A. and R.T. Golightly. 2011. Experimental Assessment of Taste Aversion Conditioning on Steller's Jays to Provide Potential Short-Term Improvement of Nest Survival of Marbled Murrelets in Northern California. Report to National Park Service (agreement #J8485100027).

Liebeseit, J.R. and T.L. George. 2002. A Summary of Predation by Corvids on Threatened and Endangered Species in California and Management Recommendations to Reduce Corvid Predation. Calif. Dept. Fish and Game, Species Conservation and Recovery Program Rpt. 2002-02, Sacramento, CA 103 pp.

Luginbuhl, J.M., J.M. Marsluff and J.E. Bradley. 2001. Corvid Survey Techniques and the Relationship Between Corvid Relative Abundance and Nest Predation. J. Field Ornithol. 72(4):556-572

Magella, G. and P. Brousseau 2001. Does culling predatory gulls enhance the productivity of breeding common terns? Journal of Applied Ecology 38(1): 1-8.

Marzluff, J.M. and E. Neatherlin. 2006. Corvid response to human settlements and campgrounds: Causes, consequences, and challenges for conservation. Biol. Conser. 130(2006): 301-314.

McShane, C., T. Hamer, H. Carter, G. Swartzman, V. Friesen, D. Ainley, R. Tressler, K. Nelson, A. Burger, L. Spear, T. Mohagen, R. Martin, L. Henkel, K. Prindle, C. Strong, and J. Keany. 2004. Evaluation report for the 5-year status review of the marbled murrelet in Washington, Oregon, and California. Unpublished report. EDAW, Inc. Seattle, Washington. Prepared for the U.S. Fish and Wildlife Service, Region 1. Portland, Oregon.

Peery, M.Z., S.R. Beissinger, S.H. Newman, E.B. Burkett and T.D. Williams. 2004. Applying the Declining Population Paradigm: Diagnosing Causes of Poor Reproduction in the Marbled Murrelet. Conservation Biology: 1088-1098.

Peery, M. Z. and R. W. Henry. 2010. Recovering marbled murrelets via corvid management: A population viability analysis approach. Biological Conservation. 143:2414-2424.

Singer, S.W., D.L. Suddjian and S.A. Singer. 1995. Fledging Behavior, Flight Patterns, and Forest Characteristics at Marbled Murrelet Tree Nests in California. Northwestern Naturalist 76(1): 55-62.

Suddjian, D.L. 2005. Draft Summary of 2005 Marbled Murrelet Monitoring Surveys in The Santa Cruz Mountains. Prepared for Command Oil Spill Trustee Council.

Suddjian, D.L. 2010. Draft Summary of 2009 Marbled Murrelet Monitoring Surveys in The Santa Cruz Mountains. Prepared for Command Oil Spill Trustee Council.

Suddjian, D.L. 2010. Draft Summary of 2009 Corvid Monitoring Surveys in The Santa Cruz Mountains. Prepared for Command Oil Spill Trustee Council.

Appendix H, page H-1: The following paragraphs will be added to Appendix H, which summarizes the process to be followed for future park development within the Coastal Zone portion of the state park.

All future development, as defined by Coastal Act Section 30106, is subject to the provisions of the California Coastal Act including its provisions for delegation of coastal permit authority upon certification of a Local Coastal Program (LCP). Developments of all kinds within the CZ portion of the park are subject to first obtaining a Coastal Development Permit (CDP). Except for a small area of "original" jurisdiction in the vicinity of the Waddell Creek estuary, CDP applications are submitted to Santa Cruz County for review and hearings.

The County's standard of review is the Coastal Commission-certified LCP, including the LCP 's Land Use Plan and implementing ordinances. Certain actions contemplated in the Preliminary GP, such as reduction or relocation of the Waddell Beach parking area, may first require amendment of the County's LCP. Realignment of Highway 1 may similarly trigger the need for LCP amendment.

For qualifying public works projects, the Coastal Act also provides an alternative development review process that does not entail a locally-issued CDP. This process requires prior Coastal Commission approval of a Public Works Plan (PWP). At nearby Wilder Ranch State Park, for example, projects identified in the approved PWP do not need separate approval as CDPs. Although only rarely utilized, the PWP process is an available option for future State Parks (or Caltrans) projects subject to the California Coastal Act.

The CZMA, enacted in 1972, is the corresponding federal legislation. In accordance with the CZMA, the California Coastal Act and the various Local Coastal Programs comprise the federally-designated California Coastal Management Program (CCMP). In addition to its primary development review responsibilities under the California Coastal Act, an ongoing role for the Coastal Commission is to review Federal agency actions for consistency with the CCMP.

Appeals of County actions, original jurisdiction CDPs, requests for approval of PWPs, federal consistency matters, and any submitted LCP amendment requests are heard by the Coastal Commission at its regularly-scheduled meetings.