



June 25, 2026

Submitted via email to SPR.Commission@parks.ca.gov

California State Parks
Staff Liaison
State Park and Recreation Commission
P.O. Box 942896
Sacramento, CA 94296-0001

Re: Agenda Item 08 (July 2, 2026 agenda), Big Basin Redwoods State Park General Plan Supplemental EIR for the Reimagining Big Basin Redwoods State Park Facilities Management Plan and General Plan Amendments; Big Basin Redwoods State Park Proposed General Plan Amendment and Final Environmental Impact Report

Dear Commissioners,

These comments on the “Big Basin Redwoods State Park General Plan Supplemental EIR for the Reimagining Big Basin Redwoods State Park Facilities Management Plan and General Plan Amendments” (hereafter “FEIR”) are submitted on behalf of the Center for Biological Diversity (“Center”). The Center is a national, nonprofit conservation organization dedicated to the protection of endangered species and wild places with more than 1.8 million members and online activists. The Center has a long history of working to protect the marbled murrelet and its old-growth habitat in California and across the range, including our 2014 settlement agreement with State Parks requiring increased protections for marbled murrelets under the Big Basin Redwoods State Park General Plan.

The Center appreciates the numerous revisions to the Draft Supplemental Environmental Impact Report made in response to earlier comments dated July 17, 2025 and December 1, 2025, particularly to the Biological Resources Environmental Analysis and mitigation measures. These revisions will better support the conservation and recovery of the endangered Zone 6 marbled murrelet population.

However, the Center remains opposed to State Parks’ decision to select an alternative that includes building two campgrounds and multiple picnic areas in the core Old Growth Area for the endangered marbled murrelet, which will lead to known impacts to murrelets that could be avoided.

In response to the Center’s comments, the FEIR included the Reduced Facilities Alternative “similar to the proposed project but without Sequoia Group Camp, the trail camp on North Escape Road, or picnic areas in the Old Growth Area.”¹ However, State Parks in the FEIR chose not to analyze this alternative in detail even though it “would likely result in reduced impacts compared to the proposed project,” because “it would not *completely* avoid the project’s significant and unavoidable impacts.”

While this alternative reduces facilities in the Old Growth Area, as compared to the proposed project, it does not fully remove facilities from old growth redwood habitat. To provide a larger range of project alternatives and variation from the proposed project, Alternative B and Alternative C, as described in Section 4.6, *Natural Preserve Alternative*, and Section 4.7, *Old Growth Redwoods Avoidance Alternative*, respectively, have been selected for analysis instead. The Reduced Facilities Alternative, like Alternative B and Alternative C, would likely result in **reduced** biological resource impacts when compared to the proposed project, although to a lesser extent, and this alternative would not completely avoid the project’s significant and unavoidable impacts. Therefore, this alternative was not selected for analysis.²

The FEIR elsewhere states that the mitigation benefits of additional restrictions on camping and picnic areas in the murrelet’s core nesting habitat in the Old Growth Area under the Reduced Facilities Alternative “are not based on measurable thresholds” and are uncertain:

Assertions by commenters that additional restrictions on proposed uses in the old growth habitat would mitigate potential impacts on marbled murrelet nesting habitat to a less-than-significant level are not based on measurable thresholds and disregard the greater context of anthropogenic effects and uncertainty regarding factors contributing to the vulnerability of this species in Zone 6. Thus, this Supplemental EIR identifies and evaluates a suitable range of alternatives to the proposed project, though none would reduce impacts on marbled murrelet to a less-than-significant level.³

However, the scientific research cited in the FEIR, State Parks’ 2017 *Marbled Murrelet Landscape Management Plan for Zone 6*, Pacific Seabird Group’s 2024 *Terrestrial Habitat Management Recommendations for Marbled Murrelets*, as well as the Center’s earlier comments clearly establish that campgrounds and picnic areas in Big Basin State Park pose a threat to marbled murrelets by supporting unnaturally high densities of murrelet nest predators due to the availability of anthropogenic food sources. The threats from campgrounds and picnic areas are not uncertain. Regarding “measurable thresholds,” research shows that limiting anthropogenic subsidies can successfully reduce predator populations. The science is clear and substantial.

¹ FEIR at 2-11.

² FEIR at 3-7.

³ FEIR at 2-14.

In fact, the scientific evidence on the harms to murrelets from food subsidies from campgrounds and picnic areas is the reason that State Parks has been implementing its Crumb Clean program in Big Basin State Park for years and why State Parks chose not re-build the Blooms Creek, Sempervirens, and Jay Camp campgrounds in the Old Growth Area in the selected alternative. By the same token, building the Sequoia Group Camp, a trail camp on North Escape Road, and picnic areas in the Old Growth Area will have significant adverse impacts on marbled murrelets that could have been avoided selecting the Reduced Facilities Alternative which should have been fully considered in the EIR.

In sum, the Center strongly supports State Parks' decision not to re-build the Blooms Creek, Sempervirens, and Jay Camp campgrounds in the Old Growth Area under the General Plan Amendments. However, because substantial evidence shows that the decision to build the Sequoia Group Camp, a trail camp on North Escape Road, and picnic areas in the Old Growth Area will have significant adverse impacts on marbled murrelets that could have been avoided by selecting the Reduced Facilities Alternative which State Parks failed to fully consider, we urge the Commission not to certify the EIR or approve the General Plan Amendment at this time.

Sincerely,



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