

Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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Caryl Hart, PhD, Chair
California State Park and Recreation Commission
PO Box 942896
Sacramento, CA 94296-0001

Re: General Plan and Draft Environmental Impact Report for Big Basin Redwoods State Park

Dear Dr. Hart and Commissioners:

On behalf of the Pacific Seabird Group (PSG) and in consideration of the detailed comments and suggestions provided below, we request that at its May 17 meeting the Commission direct California State Parks to revise its General Plan (GP) and Draft Environmental Impact Report (DEIR) for Big Basin Redwoods State Park. While we recognize and appreciate that State Parks has proposed several actions that are helpful to Marbled Murrelets (*Brachyramphus marmoratus*) in California, where this species is listed as threatened under the federal Endangered Species Act (ESA), we are concerned that the current version of the GP does not provide sufficient protection for nesting habitat for this declining species.

The PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from 14 nations, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, Peru, and the USA. The PSG's members include biologists and scientists who have research interests in Pacific seabirds, government officials who

manage seabird refuges and populations, and representatives of nongovernmental organizations and individuals who are interested in marine conservation. For more than two decades, PSG members have undertaken and published on world-class research to identify gaps in understanding, resolve important scientific aspects of the biology and conservation of Marbled Murrelets, and contribute to or lead the development of federal recovery plans for listed seabird species. The PSG's annual scientific meetings have served as objective, open forums through which government, university, and private-sector biologists contribute to and advance the development of best management practices for conserving and recovering this species in the United States and throughout its range.

In this letter, we highlight ecological and life history information about Marbled Murrelet biology, detail the most significant issues that are relevant to the GP, provide a list of recommended changes, and highlight what we believe are positive actions in the current draft GP.

The Marbled Murrelet was listed under the ESA in 1992 primarily because of substantial losses of nesting habitat through logging and development in coastal forests of Washington, Oregon, and California (USFWS 1992). An objective of the murrelet recovery plan (USFWS 1997) is to stabilize and then recover the population by maintaining or increasing productivity and removing or minimizing threats to survivorship. Protecting terrestrial habitat, both occupied and unoccupied, including maintaining nesting habitat, protecting and enhancing large blocks of contiguous forest cover, and minimizing predation and disturbance is essential for ensuring the recovery of this species (USFWS 1997:131-146). If murrelets are to survive in California over the next century, it is critically important to protect all remaining suitable habitat.

The amount of mature and late-successional habitat suitable for murrelet nesting is significantly below historical minimums in coastal areas: the extent of old-growth forest currently in California has been reduced by more than 96 percent from pre-logging levels (Larsen 1991). This is especially true from Mendocino County south through San Mateo County where murrelets are particularly impacted by the reduced amount of remaining suitable nesting habitat and increased pressure from development and recreation. State Parks lands, including Big Basin, Butano, and Portola parks, contain the largest remaining stands of old-growth murrelet nesting habitat remaining in central California, and murrelet conservation should be a high priority at all of them.

The central California population of murrelets is genetically distinct from murrelet populations to the north (Friesen et al. 2005, Peery et al. 2010). With less than 600 individuals remaining, this population is highly imperiled. Sustained low recruitment, primarily from extremely low breeding success, is the main reason for their continued decline in this area (Beissinger and Peery 2007, Peery and Henry 2010, USFWS 2012). The primary factor affecting breeding success is high nest predation by corvids—Steller’s Jays and Common Ravens—whose populations have dramatically increased in number because of a natural range expansion of ravens into the Big Basin State Park area (Halbert 2012) and human food subsidies, especially in and near campgrounds (Peery et al. 2004, 2010). Addressing the predation and human food issues are paramount in reversing the population declines in central California.

The PSG concludes that the GP and DEIR for Big Basin Redwoods State Park can be strengthened to better address these issues and concerns. To this end, we recommend the following changes:

- (1) Provide a secure source of funding for on-going murrelet monitoring, corvid control, and habitat management efforts, as well as for the efforts recommended below;
- (2) Create a park murrelet management team and develop an adaptive management program for the on-going monitoring of murrelet use and management of nesting habitat;
- (3) Produce a long-range, step-wise plan to relocate all camping and infrastructure currently in old-growth (e.g., Blooms Creek, Sempervirens, Jay Camp) to non-old-growth areas of the park (e.g., Little Basin and Saddle Mountain), beginning in areas with the highest numbers of murrelets. Add a new requirement in the Natural Resources section to “relocate/ remove campgrounds or picnic areas located in all areas being used by Marbled Murrelets for nesting.” Components of this plan should include:
 - a. Close Bloom's Creek Campground before the 2014 breeding season and relocate those campsites to the Little Basin Campground;
 - b. Remove the plans to create any additional housing, infrastructure, trails, and trailhead parking at Lower Sky Meadow and within the State Wilderness Area; and
 - c. Relocate the park grocery/food store to the Saddle Mountain area;
- (4) Implement murrelet audio-visual surveys (Evans Mack et al. 2003) at all campgrounds that have potentially suitable nesting habitat. Use the findings from these surveys to guide future actions as required in 1 and 2 above; and

- (5) Implement egg taste aversion projects in the Sempervirens Campground, at a minimum, and in other campgrounds or picnic areas as habitat conditions warrant and as funding is available.

In addition, because Portola Redwoods State Park and Butano Redwoods State Park also provide very important murrelet nesting habitat, we recommend that State Parks play an increased role in conservation and management of the Santa Cruz Mountains' murrelet population. Specifically, we recommend that State Parks collaborate with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service to prepare a management and recovery plan for the Santa Cruz Mountains population of the Marbled Murrelet. The plan should include provisions for habitat protection, targeted land acquisition, food and garbage management, public education, and corvid management. Members of PSG's Marbled Murrelet Technical Committee would be pleased to assist this planning effort.

The PSG recognizes that implementation of these recommendations will require additional funding, and we are also aware that less than a year ago the budget crisis was so severe that many state parks were proposed for closure. Nonetheless, we encourage State Parks to make a commitment to move in this direction and begin a search for the additional funds required for implementation.

Although the GP currently does not go far enough to protect the central California murrelet population, we applaud State Parks for including several provisions that should aid recovery, including restricting new construction of 10 overnight cabins and parking facilities in old-growth areas, relocation of the visitor center to Saddle Mountain, and development of all future facilities at Sky Meadow, outside of the old-growth forests. In the DEIR, State Parks acknowledges that the Preferred Alternative would result in significant, unavoidable impacts to murrelets and notes that some removal or relocation of existing recreation facilities may be necessary to protect significant resources and preserve plant and wildlife habitats in the old-growth forests. We support these modifications to the draft plan.

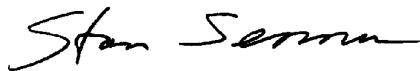
We also applaud State Park's implementation of the following corvid control strategies which utilize oil spill mitigation funds administered by the California Department of Fish and Wildlife's Office of Oil Spill Prevention and Response and by individual oil spill trustee councils:

- (1) Conducting comparative corvid abundance surveys in campgrounds and control areas in 2007, 2008, 2009, and 2012;
- (2) Performing 15 murrelet and corvid audio-visual surveys in the park each year, divided among 5 sites, from 2003 to 2011;
- (3) Spending over \$100,000 to install large food storage lockers at every campsite in the park;
- (4) Replacing all trash containers with new animal-proof trash cans and dumpsters;
- (5) Eliminating 175 ravens from Big Basin and other state parks from 2004 to 2013;
- (6) Hiring a full-time seasonal naturalist to educate park users about corvid-murrelet food issues;
- (7) Preparing an interpretive video on the murrelet, corvids, and human food subsidies, available to play on demand in the park visitor center; and
- (8) Preparing educational brochures and laminated placards about the corvid food subsidy and murrelet nest predation connection, and mounting a placard on every picnic table in the park.

Corvid surveys conducted in 2012 show a significant decrease in jay numbers, which is likely the result of these corvid control actions (Halbert 2012). The PSG strongly supports the above actions implemented by State Parks and urge that they be continued.

While the PSG recognizes and appreciates that these and other measures will benefit Marbled Murrelets in central California, we strongly encourage your consideration and adoption of the improvements to the GP outlined above. Thank you for this opportunity to provide comments, and please let us know if PSG and our members can provide further assistance.

Sincerely,



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