



5/9/2022

Tomales Point Area Plan
c/o Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RE: Scoping Comments on the Tomales Point Area Plan for Point Reyes National Seashore

The Resource Renewal Institute (RRI) appreciates the opportunity to provide the scoping comments before the National Park Service (NPS) initiates a formal National Environmental Policy Act (NEPA) process for the 2,900-acre Tomales Point Tule Elk Reserve (the planning area).

Since the 1970s, RRI's founder, the late-environmentalist Huey Johnson, has dedicated energies to the protection of the lands, waters, and wildlife of Point Reyes National Seashore for current and future generations. For example, In the 1970s, Huey founded the Trust for Public Land and, through that organization, acquired various parcels from the RCA Corporation in the 1970s. In 1976 and 1977, the Trust for Public Land announced the purchase of 2,300 acres (G Ranch and what is now Niman Ranch/Commonweal area) of coastal Marin property for eventual inclusion into the Golden Gate National Recreation Area (GOGA) and Point Reyes National Seashore (PORE). More recently, RRI has dedicated significant volunteer and staff time and resources to research NPS management of PORE and GOGA lands and to participate in various public processes related to aforementioned management.

RRI has read the NPS letter dated March 31, 2022, and understands the intent of the planning effort is to replace the *1998 Tule Elk Management Plan for Tomales Point* and to update the park's General Management Plan as it relates to the planning area. To date, we are aware that the NPS has identified multiple issues as part of the planning effort including: the maintenance or removal of the tule elk fence; population management of the Tomales Point tule elk herd; supplemental water for the elk; wilderness management; and visitor use and infrastructure at Pierce Point Ranch. Finally, we applaud the NPS at PORE for providing meaningful opportunities for Tribes to participate in decision-making process that affect tribal interests.

RRI's scoping comments intend to provide substantive comments regarding management activities with the Tomales Point Area; however, we also acknowledge that the outcomes associated with the Tomales Point Area Plan (TPAP) are predicated on assumptions about adjacent land management practices found in the NPS Record of Decision (ROD) for the General Management Plan (GMPA) completed at PORE and GOGA, which is currently being challenged in court. As such, we provide a collection of proposed alternatives for the TPAP NEPA process that provide dynamic responses to management challenges currently being experienced in the planning area. RRI recommends that TPAP alternatives recognize the connection between the planning area and the adjacent lands at PORE, to the south of the Tomales Point Area.

Problem Statement

The public has expressed concern over the NPS management of the Tomales Point tule elk herd, which has resulted in numerous die-offs in recent years.

Between 2012 and 2015 the population at Tomales Point declined by approximately 50% dropping from 540 to 283¹. The loss of animals is believed to be related to drought conditions, mineral deficiencies, and a population level above carrying capacity within the enclosure.

Once again, in in 2021, the NPS announced² a die-off of 221 elk in the Tomales Point Herd. Since then an additional 72 tule elk have died. As proposed during the 2012-2015 drought, the loss of animals is believed to be related to drought conditions, mineral deficiencies, and a population level above carrying capacity within the enclosure.

During each die-off incident, the free-ranging tule elk herds in PORE did not experience any die-offs, with populations remaining stable or declining slightly.

These “boom and bust” cycles had been anticipated in numerous publications and white papers developed since tule elk were reintroduced to PORE. Large mammalian herbivores in a restricted reserve may grow to a number that exceeds the ability of the habitat to sustain them (McShea et al. 1997b). This finite amount of food resources, when coupled with the effects of crowding, was anticipated to eventually lower reproductive rates, increase mortality, and lead to a reduction in the rate of population growth. (Porter 1992).

In addition to overpopulation, tule elk at Tomales Point are known to suffer from nutritional copper deficiencies due to poor soil/forage and Johne's disease, a cattle-borne paratuberculosis which transplanted elk likely to have been contracted from cattle at PORE between 1978 and 1979 (Gogan and Barrett 1986).

As a result of recent droughts, and the die-offs of tule elk at Tomales point that followed, the general public demanded a response. Initially, activists delivered water to the tule elk at Tomale Point. Eventually, the NPS bowed to public pressure and decided to forgo their “hands-off” management policy, and have delivered water and mineral supplements to the Tomales Point tule elk herd. Questions remain about the viability of a business-as-usual management strategy for the Tomales Point Area. Since the release of the 1998 Tule Elk Management Plan, new questions exist about vegetative succession and forage quality since the cessation of ranching in the planning area. In addition, climate-induced uncertainty in precipitation patterns and air temperature have revealed new questions about hydrology in the planning area. Both of these issues affect tule elk population dynamics, along with other wildlife species—including threatened and endangered species.

¹ <http://www.marini.com/environment-and-nature/20150416/drought-likely-culprit-in-die-off-of-tule-elk-herd-on-tomales-point>

² <https://phys.org/news/2021-04-scores-tule-elk-died-reyes.html>

RRI believes the following alternatives should be considered to address the management challenges the NPS currently faces in the planning area:

Proposed Alternatives

A. No Action Alternative

The “No Action” alternative is required by the National Environmental Policy Act (NEPA).

B. Elk Fence Removal Alternative

The “boom and bust” cycles associated with the artificial island ecosystem at the northern end of the National Seashore are a direct result of a 7-foot-tall, 2.4-mile elk fence at Tomales Point that bifurcates the planning area from the result of the Point Reyes Peninsula. Gogan and Barrett (1986) state: “There is an inherent conflict in attempting to manage within a Park Service natural zone an ungulate population existing under unnatural conditions, i.e., restrained by fencing to a small area without any opportunity to disperse.”

The presence of the elk fence was a stipulation associated with transplanting tule elk to PORE. In their 1971 “Report on Survey of Potential Transplant Sites for Tule Elk”, the California’s Tule Elk Interagency Task Force stated: “An elk fence is mandatory, to the extent they cannot move to adjacent private lands and cause depredation problems or to adjacent service lands where dairy cattle are grazing.”

If the existence of the elk fence is predicated on concerns regarding conflicts on adjacent NPS lands where dairy cattle are grazing, there is an opportunity to explore the possibility of fence removal based on the newly developed NPS’s ROD Succession Policy for beef and dairy ranches at PORE and GOGA. The ROD and Succession policy both demonstrate the potential for conversion of dairy ranches to beef ranches in the near future, or the conversion of commercial cattle ranches to lands management by Tribal governments, or possible closure of ranch operations altogether.

Removal of the elk fence would have little effect on wilderness, so long as cattle cannot move into the wilderness area.

This alternative helps the NPS meet CDFW elk management goals for the confined herds, including:

The management goals for the confined herds are to: 1) reduce the number of confined herds and reduce the frequency for removing excess animals; 2) enhance habitat within enclosures; and 3) enhance opportunities for public use and enjoyment of elk that includes wildlife viewing

and education. Specific objectives and actions for each goal are listed below. Department regional and headquarters staff will perform the identified actions.

Goal 1. Reduce the number of confined herds and the frequency for removing excess animals.

Objective 1.1. Eliminate one or more confined herds by 2025.

Goal 2. Enhance habitat within enclosures.

Objective 2.1. Enhance elk habitats by at least 5% by 2028.

Goal 3. Enhance opportunities for public use and enjoyment of elk that include wildlife viewing and education.

Objective 3.1. Increase elk viewing and educational opportunities by 20% by 2023.

C. Elk Range Expansion Alternative

Elimination of the range restriction for the confined herd would satisfy CDFW goals as expressed in the 2018 Elk Conservation and Management Plan; however, the NPS could use this planning process to envision the re-establishment of a health tule elk population on a range which has returned to a natural successional regime outside of the planning area.

In addition to removal of the elk fence, an elk range expansion alternative might include management policies that prioritize the restoration of native coastal prairies

As a result of the presence of Johne's disease in tule elk at Tomales Point, CDFW will not permit the translocation of tule elk at PORE. The NPS's 1998 Tule Elk Management Plan acknowledges "...management strategies such as...terminating cattle leases may provide for a disease-free herd on the Seashore."

One issue is whether herbivore populations 'in the absence of predators will inevitably grow too large and cause long-term damage to the vegetation, causing a severe population decline as animals experience large die-offs due to starvation. An alternate outcome is that declining food resources will slow elk reproduction, combined with a moderate increase in elk mortality, which will allow the vegetation to recover. This process would lead to a series of modulated swings of population growth and decline, a process that has been called 'natural or self regulation' as it does not involve the limitation of elk numbers by active reduction on the part of wildlife managers (Wagner et al. 1992, Yellowstone National Park 1997).

RRI believes this alternative is consistent with overall elk management plan goals and objectives from the California Department of Fish and Wildlife (CDFW) 2018 Elk Plan. In particular, this alternative can support CDFW's primary goal: "*In consideration of current habitat capacity,*

other land uses, and long term environmental changes, improve elk habitat conditions and population levels.” To achieve this goal, CDFW recommends the following objectives:

Objective 1.1: Continue/complete projects to estimate population abundance, distribution, habitat use, and demographics to provide managers with additional information to make adaptive management decisions.

Objective 1.2: Increase elk populations by at least 10% statewide where human- elk conflicts are expected to be minimal.

Objective 1.3: Improve the quality/quantity of elk habitats by at least 5%.

Objective 1.4: Determine the genetic diversity and areas of hybridization within EMUs, and identify EMUs that may benefit from translocations and habitat connectivity projects.

Ongoing and future management efforts will likely involve translocation of surplus elk to improve the status of an existing population, maintain or increase genetic interchange between isolated populations

D. Tule Elk Corridor Alternative

Tule elk in California have been through a series of genetic bottlenecks with undetermined effects. The population of tule elk at Point Reyes' has been estimated to contain the lowest level of genetic variation (or heterozygosity) of all the herds in the state of California, based upon an analysis of translocations and bottlenecks (McCullough et al. 1996). This low level of genetic variation is due to CDFW policy that prohibits the translocation of tule elk from PORE due to the prevalence of Johne's disease. The Point Reyes elk herd relies on its genetic makeup and diversity to cope with ' the challenges of its environment (*see aforementioned challenges in the Problem Statement*). T

Wildlife in National Seashores is managed as part of ecosystem processes that are not actively constrained or manipulated, except where necessitated by law, policy, or valid need (NPS Management Policies 1988). Tule elk at Point Reyes are a component of the original native fauna and do not pose an immediate threat to life or property (Hughey et al. 2021).

Critical Information Required for the NEPA Process

Effective conservation and management of elk requires reliable information on population size, density, age structure, fecundity (birth rates), mortality (death rates), sex ratio, and their use of habitats throughout the year and over time. This information will be necessary in the planning process moving forward.

In California Department of Fish and Wildlife's (CDFW) *Elk Conservation and Management Plan* (2018), CDFW state's that they are currently collaborating with the NPS to 1) identify/establish specific vegetation management thresholds for Tomales Point; and 2) determine the prevalence of Johne's disease within tule elk at Tomales Point. RRI understands that the former was scheduled to be completed in 2021, while the later work is ongoing. Please provide the most up-to-date information on both of these processes with CDFW to help RRI and the public ascertain a more complete understanding of forage availability and disease prevalence within the planning area.

Please disclose the current costs for maintenance of the elk fence at Tomales Point.³

Please disclose costs associated with the removal of the elk fence at Tomales Point.

Please disclose the Tomales Point elk management activities (e.g., hazing) and associated costs.

Please produce information on water resources within the planning area, such as stock pond, spring, and seep abundance, distribution, and estimated productivity. Please produce visual aids (i.e., maps) that present spatial and topographical characteristics of these water resources.

Please disclose the annual costs associated with providing supplemental water and mineral supplements, to date, to provide the public with the full costs associated with that program.

Please produce an inventory of threatened and endangered species within the planning area. Please provide visual aids (i.e., maps) that present spatial representation of species distribution within the planning area.

Please produce an inventory of flora and fauna within the planning area. Please provide visual aids (i.e., maps) that present spatial representation of species distribution within the planning area.

Please produce visual aids (i.e., maps) that present spatial and topographical representation public recreational opportunities within the planning area.

³ RRI is aware that the fence isolating elk at Tomales Point has been maintained through repair and replacement, as necessary, since its erection in 1980. At the time of the 1998 Tule Elk Management Plan, the fence's annual cost was estimated at \$800. In 1989 a cyclic maintenance rehabilitation of the fence cost \$33,000, and was expected to last 15 year—to 2004. RRI is unaware if other cyclic maintenance rehabilitation of the fence has taken place, and if so when.

Conclusion

In 1979, a statewide tule elk management plan was prepared by the Tule Elk Interagency Task Force with an overall goal "to ensure the continued growth of healthy, free-roaming tule elk herds of sizes that are ecologically compatible with the suitable habitats of California."

The Tomales Point elk herd's limitation to Tomales Point is a historical artifact of their reintroduction onto an area bounded by historic ranches areas intent to restrict their movements to a protected preserve. If they are to remain as part of the Seashore's fauna and ecological processes, they should eventually become free- ranging throughout most of the Seashore's zones where conditions allow.

RRI believes that the management decisions born out of this planning process can help the state of California realize this long-held vision for the tule elk.

Sincerely,



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