

Thank You!

Tomales Point Area Plan - Civic Engagement Comment Period

Your comments were successfully submitted.

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Park: Point Reyes National Seashore
Project: Tomales Point Area Plan
Document: Tomales Point Area Plan - Civic Engagement Comment Period

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Marin Conservation League (MCL) appreciates the opportunity to provide input on the scope for the Tule Elk and Tomales Point management planning process, issues to be addressed in an EIS, and any data or other items of interest to be considered. We offer the following items for your consideration:

Input to Scope:

- Consider a larger geographic scope, i.e., a larger project area than Tomales Point, that can address the importance of connectivity in wildlife habitat, and expanding the area further into the Philip Burton Wilderness. Evaluation of the use of elk friendly fences, as in the Willits Bypass project, and migration corridors, could create an opportunity to connect the three herds in a larger area, or in dispersed areas. (Here is a link to a YouTube video about the project. <https://www.youtube.com/watch?v=utqFkxJSUFU>)
- Consider expanding the scope to management of all three Tule Elk herds at the Park in order to better inform the Elk Management Plan for Tomales Point. For example, a DNA analysis for all three herds populations could identify if there is any benefit to augment genetic diversity by bringing in Tule Elk in from other populations.
- Consider expanding the scope of water needs to include neighboring water outside the Tomales Point enclosure.
- Consider expanding the scope to examine nutrition sources – types and quality of forage – present both within and outside the enclosed area. This would include analyzing specific nutritional needs and deficiencies, if any, of the enclosed herd reliant on available forage.

Issues to be addressed:

- Tomales Point Herd Management:
 - o Compare implications of various active management alternatives on the long-term capacity of habitat and optimum size/health of Tomales Point herd.
 - o Include possible variations in fencing.
 - o Explore various possibilities of managing elk and cattle in the same areas so all options of elk-cattle relations for each herd can be understood.
- Supplemental Water for Tomales Point Elk herd: Include a water study that analyzes upland creeks, base flow, ground water, and stock ponds and their hydraulic connections or

other influences with each other, both within and adjacent to the enclosure.

- Wilderness Act: Include a thorough study of provisions or waivers under the Wilderness Act that would permit actively managing the elk herd, such as supplementing water and/or nutrition. The anomaly of trying to manage "passively" the small and confined herd in the Wilderness should be addressed. It is a deliberate decision, and may be considered an active management activity.

Data and other items:

- Undertake comparison studies that may help inform management planning:
 - o Compare native plant and wildlife inventories inside and outside the enclosure to identify potential differences in presence/absence and health conditions with the elk grazing.
 - o In a similar comparison, identify non-native species inside and outside the enclosure to identify differences in presence/absence and threat to native vegetation communities with the elk grazing.
- Identify what wildlife species can migrate through the existing fence and what species are prohibited from moving through the enclosed area.
- Collect and analyze Residual Dry Matter for the elk range within the enclosure and assess soil health and erosion conditions
- Discuss the likely effects of climate change on the Point Reyes National Seashore (PRNS) and how it may impact the habitat conditions for the Tomales Point herd, assuming that the herd remains within the enclosed area. MCL recommends Scenario Planning for Climate Change. It is an "if this ..., then ..." approach. Climate change may accelerate very quickly in the near future and have a variety of impacts. It is important that PRNS prepare a plan that not only aligns with a reliable source for projections and likely impacts, but also strategizes how the Park will adapt and operate under a variety of likely and possible scenarios.

Thank you for considering these comments,

Terri Thomas
Vice President, Marin Conservation League
Chair, Parks and Open Space Committee

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