
**National Park Service
US Department of the Interior**



Point Reyes National Seashore

**TOMALES POINT AREA PLAN
CIVIC ENGAGEMENT**

Public Comment Summary Report

June 2023

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Acronyms and Abbreviations

GMP	General Management Plan
NEPA	National Environmental Policy Act
NPS	National Park Service
PEPC	Planning, Environment and Public Comment
Plan	Tomales Point Area Plan
Reserve	Tomales Point Tule Elk Reserve
Seashore	Point Reyes National Seashore

Introduction

Tomales Point Tule Elk Reserve (Reserve) is a 2,900-acre area located within Point Reyes National Seashore (Seashore). More than 85 percent of the Reserve is located in the Phillip Burton Wilderness Area. The remaining area of the Reserve supports public access and the historic Pierce Point Ranch buildings and interpretive exhibits. Since 2013, two historic drought events have occurred, impacting the tule elk population and other resources within the Reserve. The National Park Service (NPS) is beginning a planning process to address complex wildlife, resource, and wilderness management issues at Tomales Point. It is anticipated that the planning process will culminate in a Tomales Point Area Plan (plan). The National Park Service anticipates that the National Environmental Policy Act (NEPA) compliance for the plan will be an environmental assessment. The plan will inform wilderness and tule elk herd management decisions at Tomales Point for the future. The intent of the plan is to replace the 1998 Tule Elk Management Plan for Tomales Point and to address, where appropriate, any updates to the park's General Management Plan (GMP) as it relates to the Tomales Point area. Issues identified to date that would be addressed in the planning process include the following:

- maintenance and/or removal of the tule elk fence;
- population management of the Tomales Point elk herd;
- supplemental water for the elk in times of need;
- wilderness management
- visitor use and traffic control; and
- infrastructure management at Pierce Point Ranch.

This comment analysis report provides a summary of the public comments received during civic engagement for the Tomales Point Area Plan. On March 31, 2022, the National Park Service sent a letter distributed electronically to interested parties for public review and comment. The National Park Service also notified the public of the proposed plan through a news release that was distributed electronically. The news release was posted on the park's website and on the Tomales Point Area Plan project's site on the NPS Planning, Environment and Public Comment (PEPC) site. The public comment period was open from March 31 until May 2, 2022. During the comment period, the PEPC website was unavailable due to maintenance from April 29 through May 1, 2022. As a result, the public comment period was extended until May 9, 2022. The public was encouraged to submit their comments electronically through the NPS PEPC website. The park also accepted public comments in writing (hard copy via mailing or hand delivery). All hard copy comments received (postmarked by May 9, 2022) were transcribed into the PEPC system for analysis.

Definition of Terms

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, or petition. Each piece of correspondence is assigned a unique identification number in the PEPC system.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition to the use of a potential management tool, additional data regarding an existing condition, or suggestions for additional considerations in the impact analysis. Comments were determined to be substantive or non-substantive using Section 4.6, *Circulating Environmental Assessments and Environmental Impact Statements, Soliciting Public Comments, and Responding to Comments*, of the NPS NEPA Handbook as guidance.

Substantive comment: Section 4.6 of the NPS NEPA Handbook defines a substantive comment as a comment that does one or more of the following:

- Question, with reasonable basis, the accuracy of information in materials
- Question, with reasonable basis, the adequacy of the environmental analysis
- Present reasonable alternatives other than those presented in the materials
- Cause changes or revisions in the proposal

In other words, substantive comments raise, debate, or question a point of fact or analysis.

Public Comment Analysis

The NPS PEPC database was used to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic. The database produces tallies of the total number of correspondences and comments received, can sort and report comments by a particular topic, and provides demographic information on the source of each correspondence. During the civic engagement public comment period for the plan, the National Park Service received 4,264 pieces of correspondence from all 50 states, the District of Columbia, and 20 countries. Commenters have the opportunity to list an agency or organization when entering their information and commenting in PEPC. The majority of correspondence were submitted by unaffiliated individuals; therefore, an agencies or organization was not identified. Two correspondences were submitted from non-governmental agencies including the Western Watershed Project and Center of Biological Diversity.

Comment analysis is a process used to compile and combine similar public comments into a usable format for review and analysis. Comment analysis helps the project team and decision-makers in organizing, clarifying, and addressing technical information pursuant to NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

A coding structure was developed to capture the content of all comments received and to help sort comments into logical groups by topic and issue. The analysis of public comments involved assigning the codes developed in the coding structure to comments received in letters and PEPC comment entries. All comments were read, reviewed, and analyzed. All substantive comments were summarized by developing concern statements and these concern statements are listed in the following section.

Public Comment Summary

General Comment: Farming/Ranching

Concern Statement: Although outside of the scope of the Tomales Point Area Plan, commenters stated that the needs of wildlife should be prioritized and ranching in the Tomales Point Area should be phased out and prohibited. Ranching is causing ecological damage at Point Reyes National Seashore including impacts to wildlife, habitat, soil, water quality, air quality, and visitor use and experience. In addition, allowing ranching contradicts current climate change mitigation efforts at the Seashore. Removing ranching from the Seashore would allow the opportunity to restore ranch lands and let native coastal prairie and scrub reestablish.

Concern Statement: A commenter stated that the plan should not include the management of ranch lands as the fence is a clear boundary for the Tomales Point area.

Concern Statement: Although outside of the scope of the Tomales Point Area Plan, commenters discussed the economic impacts of the plan on the National Park Service and the ranches. Some commenters expressed concern that the National Park Service is spending money that effectively supports the ranches. Other commenters suggest that damage caused by elk on ranching operations and facilities causes an economic impact to ranches. Commenters suggest the National Park Service should analyze the economic effects of the proposed plan on the National Park Service and the ranches.

Concern Statement: Commenters suggested that the ranches should be removed from the Seashore except Pierce Point Ranch. This ranch could be developed as a working model of a 19th Century ranch with only a few cattle and a few dairy cows.

Concern Statement: Commenters stated there should be a balance of agricultural use and preservation of natural resources and native flora and fauna at the Seashore. Commenters offered additional suggestions including ranchers at the Seashore provide stewardship of the land; Elk management should be focused on dairies; and ranching provides an educational opportunity for visitors.. In addition, one commenter stated that studies have shown that elk generally avoid cow pastures when elk and cattle are in close proximity.

General Comment: Fence

Concern Statement: Commenters stated that if the fence remains it should be maintained to ensure any damaged or hazardous sections of fence are removed to protect the elk from being injured. Commenters also suggested providing elk friendly fencing, variations in the fencing, and migration corridors that would allow safe opportunities for the three different elk herds to connect.

Concern Statement: Commenters suggested removing the fence in the Tomales Point Area to allow wildlife including the tule elk to roam freely and to allow visitors access to the entire park. The removal of the fence should be a top priority as it would increase genetic diversity among the tule elk, allow natural population control, and would provide the opportunity for restoration of the native coastal prairie and scrub habitat. In addition, the elk fence is degrading the wilderness character of the Phillip Burton Wilderness Area. Commenters stated that the Seashore should not use park funds to maintain the fence and provide water and nutrition to the tule elk.

General Comment: Support Protection of Tule Elk

Concern Statement: Commenters are in support of preserving the native tule elk population at Tomales Point. Addressing the welfare of the tule elk should be the Seashore's top priority as tule elk benefit the land and will enhance the Seashore overall. Commenters suggested removal of the fence, allowing elk to roam free, and providing water and minerals during drought conditions. Commenters also suggested the Seashore partner with the Federated Indians of Graton Rancheria¹ to establish a wildlife sanctuary to further protect the elk from hazing, culling, and starvation.

General Comment: Support Population Control of Tule Elk

Concern Statement: Commenters stated that the Seashore should manage a healthy population of tule elk at Tomales Point by continuing culling, use of birth control, tule elk removal and translocation, or through a limited hunting season. Allowing the tule elk to roam free in the park will create additional problems with ranching, introduce Johne's Disease, cause soil erosion, impact water quality, and cause visitor safety issues.

Concern Statement: The Tomales Point Area Plan should establish a carrying capacity for tule elk so that the elk population can be maintained, have enough food and water, and have positive effects of the coastal prairie and scrub habitat.

General Comment: Impacts to Tule Elk

Concern Statement: Commenters stated that the Tule Elk Reserve at Tomales Point does not provide adequate water and food for the current tule elk population. As a result, hundreds of tule elk are dying each year. Culling tule elk results in inbreeding and a loss of genetic diversity which can lead to weakness, illness, disease, and death of tule elk.

General Comment: Management Strategies for Tomales Point

Concern Statement: Tomales Point should be managed in accordance with the Organic Act, Wilderness Act, and the Seashore's enabling legislation. It was suggested that the National Park Service should collaborate with the Federated Indians of Graton Rancheria and scientists to manage the park resources. Commenters stated that the plan should include the following strategies:

- Restoration of native coastal prairie and shrubland.
- Removal of invasive species including the invasive radish.
- Removal of private cattle and dairy operations through revision of the Succession Policy to permanently retire leases.
- Removal of the elk fence so visitors and wildlife have access to the entire Seashore.
- Creation of a wildlife sanctuary.
- Limit elk management to dairy operations and include hazing by dogs.

¹ Federated Indians of Graton Rancheria is commonly referred to as Coast Miwok or First Nations.

- Management of archaeological sites and cultural landscapes.
- Management of rare, threatened, and endangered species including California red-legged frog, salmonids, snowy plovers, rare butterflies, and rare plants.
- Management of Pierce Point Ranch as an interpretive program for visitors.
- Management of the Philip Burton Wilderness Area, including the development of a Wilderness Plan.
- Enhancement of the trail system at the Seashore with trail connections to Tomales Point.
- If needed, use of wildlife friendly fencing.

Concern Statement: Commenters suggested various studies to be completed within the Tomales Point Area that could potentially guide management of the area. These studies include the following:

- Assess soil health and erosion conditions by analyzing Residual Dry Matter.
- Assess water quality and quantity within Tomales Point.
- Cultural resources surveys.
- Threatened and endangered species surveys including rare plant surveys.
- Comparative studies of native/non-native species both inside and outside the elk enclosure.
- Comparative study of elk and cow grazing.

Issues: Cultural Resources Issues

Concern Statement: Commenters stated that cultural resources including indigenous artifacts and cultural landscapes should be surveyed. It was suggested oral histories from tribal representatives should be considered when preparing the analysis of cultural resources.

Concern Statement: Commenters stated that the Federated Indians of Graton Rancheria should be consulted to assist the park in the management of Tomales Point. The Miwok are experienced with living with tule elk, native vegetation, and other native wildlife; therefore, their recommendations should be prioritized. In addition, there should be interpretive displays of indigenous land stewardship practices within the Tomales Point Area.

Issues: Natural Resource Issues

Concern Statement: Commenters stated that invasive plants including ice plant, thistle, wild radish, and hemlock are located throughout the Seashore. Funds used for managing the tule elk fence should be spent on managing invasive species. Allowing elk to roam free would assist in vegetation control.

Concern Statement: Commenters stated that native wildlife should be prioritized in the Tomales Point Area Plan. The needs of native wildlife should be prioritized over ranchers. Livestock operations emit greenhouse gases, impact water quality, cause erosion, displace habitat, and encourage invasive species.

Issues: Park Management Issues

Concern Statement: Commenters noted that the Seashore does not have a Wilderness Management Plan for the Philip Burton Wilderness Area. Additional baseline information including desired future conditions, measurable and monitored indicators, monitoring plan, wilderness character description, and standards are needed to assess impacts to the Wilderness Area.

Issues: Visitor Use or Experience Issues

Concern Statement: Commenters stated that Pierce Point Ranch does not have adequate parking, picnic areas, restrooms, or hiking trails to accommodate the increase in visitor use. Additional picnic tables and benches, as well as other facilities, were suggested for this area.

Concern Statement: Commenters suggested additional visitor amenities and management to be included in the Tomales Point Area Plan. Suggestions included the following:

- Construct a natural history center in this area to educate visitors on the Coastal Miwok.
- Limit visitation in Tomales Point area.
- Increase enforcement of illegal visitor uses including walking dogs and biking on trails.
- Determine visitor sanitary and water needs at the trailheads.
- Install additional signage for visitors.
- Weekend shuttle system.
- Increase ranger/docent presence.

Concern Statement: The Tomales Point Area Plan should consider the increase in visitor use at the Seashore and establish visitor carrying capacities.

Concern Statement: Commenters stated that the wilderness character of the Philip Burton Wilderness Area should be maintained for the enjoyment of park visitors. Use of and maintenance of tanks, water lines, troughs, and all-terrain vehicles to supplement water and food for the tule elk in the wilderness area should be assessed.

Purpose and Need: Planning Process and Policy

Concern Statement: Commenters stated that Point Reyes National Seashore should be managed as one unit and not separate areas. A new GMP which would include Tomales Point should be prepared instead of an update to the 1998 Elk Management Plan. The GMP would include the goals and objective of the park including Tomales Point. Following the GMP, the Seashore should produce a Tomales Point Implementation Plan to focus not only on wilderness and the elk herd, but how to preserve natural resources while allowing visitor use. Commenters stated that the 2021 Ranching GMP indirectly made decisions on how areas outside the ranching lands would be managed. The Tomales Point Area Plan should cover Tomales Point, the ranching area, and other areas that were not included in the 2021 Ranching GMP.

Purpose and Need: Park Purpose and Significance

Concern Statement: Commenters stated that the Seashore should reject alternatives that are not in agreement with the Seashore's purpose and significance, which is to protect, restore, and preserve the natural environment while allowing public recreation.

Water Resources: Impact of Proposal and Alternatives

Concern Statement: Commenters suggested that the Seashore conduct a water study to analyze water availability for the Tomales Point elk herd. Commenters also suggested expanding the scope of water needs to areas outside of Tomales Point. South Pond I should be filled for the elk and water should be helicoptered in for the Plateau Herd. The Seashore should ensure that alteration of water sources does not impact other wildlife species. In addition, commenters stated that park funds should also be used for water quality monitoring instead of maintaining the elk fence. If the fence were removed, water at Abbotts Lagoon would be available for elk and other wildlife.

Document Accuracy

Concern Statement: One commenter noted that the acreage of Tomales Point (2,900 acres) presented in this public document is not consistent with past documents stating the acreage as 2,600 acres.