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



**Point Reyes National Seashore  
California**

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**TOMALES POINT AREA PLAN  
PUBLIC SCOPING**

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**Comment Summary Report**

**May 2024**

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## **Acronyms and Abbreviations**

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

# INTRODUCTION

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Point Reyes National Seashore (Seashore), located in Marin County, California, encompasses a unique diversity of landscapes and land uses across 71,000 acres, including more than 32,730 acres of land and water in the Phillip Burton Wilderness. The National Park Service (NPS) is developing the Tomales Point Area Plan (TPAP) to update the management guidance for Tomales Point, a 2,900-acre area located within the northern peninsula of the Seashore. More than 85% of the planning area is part of the Phillip Burton Wilderness. The remaining portion of the planning area includes facilities that support public access and recreation, the historic Pierce Ranch, and interpretive exhibits. Since 2013, two historic drought events have occurred, impacting the tule elk population and other resources within the planning area. The TPAP will address complex wildlife, resource, and wilderness management issues at Tomales Point. It will inform wilderness and tule elk herd management decisions at Tomales Point for the future. The plan will replace the 1998 Tule Elk Management Plan and revise the 1980 General Management Plan (GMP) for Tomales Point. 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
- Infrastructure management at Pierce Point Ranch

This comment analysis report provides a summary of the public comments received during public scoping for the TPAP. On August 25, 2023, the NPS electronically distributed a newsletter to interested parties for public review and comment. The NPS also notified the public of the proposed plan through an electronically distributed news release. The newsletter was posted on the Seashore’s website and the TPAP project’s site on the NPS Planning, Environment and Public Comment (PEPC) site. The public comment period was open from August 25 through September 25, 2023. 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 September 25, 2023) were transcribed into the PEPC system for analysis.

# DEFINITION OF TERMS

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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 National Environmental Policy Act (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**

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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 public scoping comment period for the TPAP, the NPS received 25,115 pieces of correspondence from all 50 states, the District of Columbia, four US territories (Puerto Rico, Guam, American Samoa, and the Virgin Islands), and 57 countries. Commenters have the opportunity to list an agency or organization when entering their information and commenting in PEPC. The majority of correspondence was submitted by unaffiliated individuals; therefore, agencies or organizations were not identified. Twenty correspondences were submitted from 21<sup>1</sup> non-governmental agencies including the Animal Defense Fund (Harvard Law Animal Law & Policy Clinic), Californians for Western Wilderness, Defense of Place, Environmental Action Committee of West Marin, Forest Unlimited, Klamath Forest Alliance and Environmental Protection Information Center, Madrone Audubon and Paula Lane Action Network, Marin Audubon Society, Marin Conservation League, Mission Rewild, National Parks Conservation Association, Our Planet Theirs Too, Inc., Project Coyote, Public Lands Conservancy, Resource Renewal Institute, Sacredamerica.org, Sierra Club, Turtle Island Restoration Network, Western Organic Dairy Producers Alliance, and Western Watershed Alliance.

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

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<sup>1</sup> One letter was submitted representing two organizations, Klamath Forest Alliance and Environmental Protection Information Center, hence only 20 correspondences representing 21 organizations.

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**

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### **Accessibility: Make the Park More Accessible**

**Concern Statement:** Commenters suggested that improving accessibility for all visitors is recommended, including disabled visitors, noting this would increase opportunities for enjoying Point Reyes' natural landscapes and wilderness.

### **Affected Environment: Rare or Unusual Vegetation**

**Concern Statement:** Commenters suggested that the environmental assessment should include analysis of impacts to rare and special status plants, particularly in relation to any anticipated changes to plant populations based on elk grazing, given potential change in size, location, and movement of the herd, and suggested measures to mitigate impacts to special plants.

**Concern Statement:** Commenters suggested that an understanding of the presence, occurrence, and value of native vegetation is important to address in the environmental assessment. Commenters made reference to several specific plants, such as northern coastal prairie bunchgrass, tufted hairgrass, California Meconella, and Point Reyes Blennosperma, which grows in one of the overflow parking lots at Pierce Ranch.

### **Affected Environment: Historic Structures**

**Concern Statement:** Commenters noted that the dairy ranches in the pastoral zone adjacent to the elk fence are included in the Historic District and the area of potential effects (APE) for this action, and suggested that the NPS needs to consider the potential impacts to the Historic District designation due to free-roaming elk within the APE. Commenters also suggested that the area outside of and adjacent to the designated project area should be included in the EA to account for how the cultural landscape and historical resources, including the leased ranching operations adjacent to the reserve, might be impacted over time.

### **General Comment: Alternatives**

**Concern Statement:** Commenters expressed concern that elk would be culled or otherwise harassed under alternative C.

**Concern Statement:** Commenters suggested that the EA should consider how enhanced visitor use and infrastructure improvements might impact the elk.

**Concern Statement:** Commenters suggested that the proposed action should be altered to ensure adequate water supply for elk, by enhancing naturally occurring water features and/or retaining the emergency water features permanently or for a transition period.

**Concern Statement:** Commenters suggested that the proposed action should include additional measures to maintain healthy ecosystems and promote natural processes, including inventorying and restoring

native coastal prairies (including use of fire), and a cattle fence to protect wilderness from cattle on nearby ranches, and should also consider the future impacts of climate change on the ecosystems of Tomales Point. Commenters also recommended that pesticides not be used for management in this area to avoid inadvertent impacts on wildlife.

**Concern Statement:** Commenters suggested that visitor experiences should be improved through measures such as identifying a visitor carrying capacity and improving public education and interpretation.

**Concern Statement:** Commenters suggested that the NPS should relocate elk to other elk preserves throughout the state, in collaboration with tribal nations.

### **General Comment: Support Protection of Tule Elk**

**Concern Statement:** Commenters suggested that the NPS should better protect tule elk, and expressed concern that insufficient protections will continue to lead to the loss of elk. Concerns for tule elk management include population size and water and food sources. Commenters also expressed concern about illegal hunting and suggested that the park should do more to protect elk and prosecute those who illegally hunt.

### **General Comment: Support Removing Fence to Protect Elk**

**Concern Statement:** Commenters suggested that the removal of the fence should be a top priority as it would enhance genetic diversity among the elk, improve wilderness character, and fulfill the NPS mission. Commenters noted that the removal of the fence would allow wildlife like the tule elk to move more freely to access water sources and forage, allowing for a healthier and more stable population and ecosystem, especially during times of drought.

**Concern Statement:** Commenters suggested that a wildlife-friendly cattle exclusion fence should be added to prevent cows from nearby ranches moving north on Tomales Point while allowing the tule elk and other wildlife to roam freely, which would support the management priorities of the Elk Conservation and Management Plan and the Wilderness Act.

### **General Comment: Support Culling of Tule Elk**

**Concern Statement:** Commenters suggested that the NPS should continue to manage the tule elk population through culling, elk removal to another location, sterilization, and/or a limited hunting season due to concerns that an expanding, free-roaming elk population would create conflicts with nearby ranches and the park's ecosystems.

### **General Comment: Oppose Culling of Elk**

**Concern Statement:** Commenters suggested that the NPS should not use hazing, harassment, or culling techniques for management of tule elk if the elk fence is removed.

## **General Comment: Tule Elk Life History or Management Research Needs**

**Concern Statement:** Commenters suggested that more research into the genetic diversity of the elk is needed to assess its long-term viability and determine if translocation of elk from other locations is warranted. Commenters also suggested that the NPS should increase the connectivity between the park's herds and establish more free roaming herds within the Seashore's boundaries, which would also enhance genetic viability.

**Concern Statement:** Commenters recommended increased interagency management of the tule elk with the California Department of Fish and Wildlife and Graton Rancheria.

## **General Comment: Management Strategies for Tomales Point**

**Concern Statement:** Commenters suggested that the NPS should retain the elk fence to control the elk population and preserve agricultural uses.

## **General Comment: Scope of Analysis**

**Concern Statement:** Commenters suggested that a management plan limited to Tomales Point is inappropriate, the scope of analysis should be expanded to include a comprehensive restoration program for the entire seashore, and the management plan should address farming, ranching, and environmental issues across the entire park.

## **General Comment: Support protection of Indigenous Resources / Support Collaboration with Indigenous Groups**

**Concern Statement:** Commenters suggested that the NPS should do more to protect native wildlife and cultural resources, and should educate park visitors about the importance of indigenous peoples to the local ecosystem. Commenters also suggested that the NPS should partner with members of the Federated Indians of Graton Rancheria and other descendants of the Coastal Miwok to incorporate traditional ecological knowledge into the management and conservation of the park's natural and cultural resources.

## **General Comment: Information Needed for Analysis**

**Concern Statement:** Commenters suggested that additional studies and research are needed to adequately analyze the impacts of the elk fence removal and the subsequent migration of the tule elk into new regions within the park as well as outside the park boundaries. Recommended studies included measuring the current elk population and its birth and death rates to determine future population growth and total carrying capacity for elk on Tomales Point. Commenters suggested that having this additional information would provide for more effective management of the elk herd while reducing potential conflicts outside of the planning area.

**Concern Statement:** Commenters stated a need for further analysis of existing water sources on Tomales Point, elk water requirements, and elk utilization of existing sources before removing the supplemental water so that the elk have enough water to survive future droughts. Commenters were concerned that

some existing water supplies are not as robust as previously stated, and that the old stock ponds provide both a water source and a potential hazard to elk that get trapped while accessing drinking water.

## **General Comment: Issues – Wilderness Values**

**Concern Statement:** Commenters suggested that the Philip Burton Wilderness should be managed in accordance with the Wilderness Act, and management practices that detract from the wilderness character should be avoided, including the use of motorized vehicles for maintenance, the use of herbicides and prescribed burns to treat invasive plant species, and allowing certain types of recreation and high levels of visitation to occur.