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April 25, 2022

Craig Kenkel, Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes, CA 94956

RE: Tomales Point Area Plan

Dear Superintendent Kenkel,

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, and community science. River otters, although not a protected species, are sentinel apex predators that use every part of watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health.

For ten years, we have conducted intensive research on river otter populations within Point Reyes National Seashore (PRNS). Consistent with National Park Service (NPS) Management Policy 4.2, our "studies support the NPS mission by providing the Service, the scientific community, and the public with an understanding of park resources, processes, values, and uses that will be cumulative and constantly refined."

The following comments on the Tomales Point Area Plan (Plan) reflect our organizational mission; our understanding of laws and policies relevant to management of NPS lands generally and PRNS in particular; and our dual role as scientists working to understand the ecosystem function of the park's natural resources, and as members of the public on whose behalf these lands and waters have been entrusted to the care of the National Park Service.

As a general observation, we note that the public will not accept the validity of a planning process whose outcome is perceived to be a foregone conclusion. By characterizing the

purpose of the Plan as only addressing impacts of drought on Tule elk confined within the Reserve, rather than the larger issue of management of the elk as a wildlife resource within PRNS, NPS risks a loss of public faith in the process before it has even begun. The public may justifiably assume that NPS' main objective is to avoid adverse impacts to ranch leaseholders rather than to park natural resources.

Our specific comments are as follows:

1. The planning area and affected environment should be broadly defined, and not arbitrarily limited to the Tomales Point Tule Elk Reserve.

The public notice of the project effort mischaracterizes the 1998 Tule Elk Management Plan, which this project is intended to replace, as pertaining only to the 2,900-acre reserve at Tomales Point. At the time of the 1998 plan, all the elk present in at PRNS were confined to Tomales Point, but the plan holistically considered all of PRNS in its analysis of the affected environment. As a result, a free-range herd was established in the southern portion of the Philip Burton Wilderness Area. Replacing the 1998 plan with a management plan that considers only the 2,900 acres at Tomales Point would predetermine the outcome of the planning process as continued confinement of the elk at the reserve.

2. Management of the Tule elk as individual herds improperly serves the interests of ranchers rather than the protection of natural resources.

All the elk currently present in PRNS are descended from the 10 elk brought to Point Reyes in 1978, and should be managed as a single population, rather than as individual herds. The practice of managing individual herds is the direct result of elevating the interests of ranch leaseholders over the protection and preservation of wildlife and other park natural resources, contrary to NPS management policies, the Organic Act, and the PRNS enabling legislation. The 2020 General Management Plan Amendment (GMPA), for example, dictates management strategies for the various herds based solely on their perceived or alleged levels of conflict with ranch operations.

The planning process should thoroughly examine the management implications of recent research on genetic isolation of wildlife populations¹, and habitat selection patterns of ungulates on wildlands in proximity to rangelands².

¹ Ralls, K., J. D. Ballou, M. R. Dudash, M. D. B. Eldridge, C.B. Fenster, R. C. Lacy, P. Sunnucks, & R. Frankham. 2018. Call for a Paradigm Shift in the Genetic Management of Fragmented Populations. *Conservation Letters*, 11(2), 1–6.

² Hughey, L.F., K.T. Shoemaker, K.M. Stewart, D.J. McCauley, J. H. Cushman. 2021. Effects of human-altered landscapes on a reintroduced ungulate: Patterns of habitat selection at the rangeland-wildland interface. *Biological Conservation*. Volume 257.

3. The planning effort should consider and analyze the reasonably foreseeable effects of climate change on feral and domesticated ungulates and the affected environment.

The Tule elk are only one of several species of ungulates currently present in PRNS. The GMPA did not consider the individual or cumulative effects of climate change on the affected environment, including those related to ungulate grazing. The current planning effort should consider and analyze those effects, as well as the likely combined effects of climate change and feral and domesticated ungulate grazing as stressors affecting ecosystem function and resilience. Such effects may include, among others, accelerated alteration of plant communities, resulting in reduced habitat for birds and insects; reductions in biodiversity; acceleration of soil compaction and erosion; and increased degradation of riparian and aquatic habits. The planning effort should identify management strategies to avoid such adverse impacts.

Thank you for considering our comments.

Respectfully,

A handwritten signature in cursive script that reads "Megan Isadore".

Megan Isadore
Executive Director
River Otter Ecology Project