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Park: Point Reyes National Seashore
Project: Tomales Point Area Plan
Document: Tomales Point Area Plan - Public Scoping Comment Period

Name: Kevin Proescholdt
Address: PO Box 9175
City: Missoula
State: MT
Postal Code: 59807
Email Address: wild@wildernesswatch.org; kevinp@wildernesswatch.org
Organization: Wilderness Watch
Keep My Info Private: No

September 22, 2023

Point Reyes National Seashore Attn: Superintendent Tomales Point Area Plan 1
Bear Valley Road Point Reyes Station, CA 94956

Dear Superintendent Kenkel:

Comments: Enclosed are comments from Wilderness Watch on the scoping newsletter for the Tomales Point Area Plan (TPAP). Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. We provided input in the past on this proposal. We are pleased to see the change in direction in this scoping newsletter and commend the National Park Service in coming up with a proposed action that is much more in keeping with proper administration of the Wilderness and National Seashore. We do have some important suggestions, directed at the proposed action, that would improve it even more.

Introduction

The scoping newsletter indicates the project area is 85 percent Wilderness. Thus, preserving the Wilderness is of utmost importance. The National Park Service (NPS) proposed action is a commendable plan that is the right direction. Our comments that follow focus mainly on the following:

- The proposed action (Alternative B) would implement, as the part of the alternative title indicates, an "unconfined elk herd" by removing the elk fence just outside of the Wilderness. Removing this fence is a positive step in administration of this portion of the Wilderness.

- The proposed action would also remove water structures in the Wilderness. This too is a positive direction and should be done in a manner compatible with Wilderness, without the use of motorized equipment.
- There are some actions that could be (not mandated) proposed for Wilderness, that are trammeling actions and incompatible with Wilderness.

Lastly, since the goal is to allow the elk to be wild, might it make sense to expand the project area to the entire National Seashore? Would better address an unconfined elk herd?

Wilderness and the Proposed Action

The proposed action contains important proposals, many of which would greatly improve the wild character of the Phillip Burton Wilderness in the project area. The proposed action items, taken from the scoping newsletter, are reprinted below with questions and comments about those points.

Remove existing elk fence. Consider adding a fence to exclude cattle from Tomales Point.

The elk fence, located entirely outside of the Wilderness according to the map in the scoping newsletter, is a most serious problem. Its removal is necessary to meet the minimum necessary for preservation of the area as Wilderness as required under the 1964 Wilderness Act. That said, would any new cattle fence be in the Wilderness and would it prevent elk movement? If the answer is yes to either of those questions, it should be dropped. If so, rather than build a cattle fence, cattle should be removed from the National Seashore as per the original agreement.

Discontinue provision of supplemental water and minerals for tule elk. Remove all existing, non-historic supplementary water systems.

The removal of these supplementary water systems is positive, especially in Wilderness where such structures are generally prohibited. However, it should be done in Wilderness without the use of motorized or mechanized equipment. It would be informative for the NPS to provide to the public a list and a map showing these structures as well. What would constitute a historic supplementary water system and where would such systems be located? We find it hard to believe any water system as meeting the extent necessary for the preservation of the area as Wilderness. Please provide more details.

Retain historic, cultural landscape features, unless they are incompatible with natural resources.

What are considered historic, cultural landscape features? Without more information, we are a skeptical whether such features would meet the extent

necessary for the preservation of the area as Wilderness. Please provide more details.

Inventory and manage invasive plant species, which may include manual removal and use of herbicides.

The use of herbicides is a trammeling action incompatible with Wilderness. Herbicides also can have negative impacts on non-target species.

Evaluate use of prescribed fire to meet desired conditions of native plant communities.

Human-ignited fire in Wilderness is a trammeling action incompatible with wilderness preservation. Further, frequent fire tends to favor annual invasive species over native ones. It is better to allow natural fire to occur, to the extent possible, in Wilderness.

Terminate vegetation monitoring projects that rely on the use of the twelve elk exclosures and remove elk exclosures. Encourage further vegetation research at Tomales Point that does not rely on the installation of permanent infrastructure within the Phillip Burton Wilderness.

This is a positive direction. Again, this should be done by wilderness-compatible means, without the use of motorized equipment or mechanized or motorized transport.

Improve and maintain the Tomales Point and McClures Beach trails to better protect resources while also providing access.

These are both wilderness trails and should be the minimum necessary for preservation of the area as Wilderness. What kind of improvements are planned? Any maintenance and/or improvements must be done by wilderness-compatible means. More information would be important to share with the public.

Improve visitor use management for Tomales Bay beaches and coves through refinement of the camping program (e.g., site-based reservation system) or other options. Permitted camping locations may be limited to protect natural and cultural resources. Additionally, daytime use of beaches could also be limited to protect natural and cultural resources.

Visitor use management is obviously needed. It may be better to consider a permit system rather than specific camping sites. There needs to more site-specific information on this issue.

Thanks again for the opportunity to comment. Please keep us updated on this plan.

Sincerely,

Kevin Proescholdt Conservation Director Wilderness Watch PO Box 9175
Missoula, MT 59807

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