

Sierra Club
San Francisco Bay Chapter
PO Box 2663
Berkeley, CA 94702

May 25, 2021

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

Re: The Loss of 152 More Elk in the Tomales Point Elk Reserve

Dear Superintendent Kenkel:

The Sierra Club has become extremely concerned about the Seashore's management of the 2,600-acre Tomales Point Elk Reserve where tule elk are held captive behind an 8-foot, woven-wire fence. The Seashore allowed 254 individual elk (47% of the population) to die there during the 2012-2015 drought while the wild, free-roaming Drakes Beach and Limantour herds increased. We are now in another drought. The Seashore allowed another 152 elk (34% of the population, so far) to die in the Tomales Point enclosure last year. During that same period, the Drakes Beach herd increased by one individual and the Limantour herd declined by nine individuals, possibly due, in whole or in part, to the Woodward Fire.

The Sierra Club fears that with this current drought year, which may be the worst drought year ever for Point Reyes, another 100 to 200 captive elk will be lost. And it's possible that 2022 could be another drought year. Something needs to be done. The Park Service cannot enclose elk or other wildlife behind an 8-foot tall, woven-wire fence without being responsible for their needs.

Water

The Sierra Club and many others have been very concerned about whether the captive elk have had adequate water sources in the enclosure, especially during these droughts. The Seashore has responded that water sources in the form of creeks, springs and seeps have been adequate and provided a map marking water locations. Concerned citizens have visited many of the Seashore's marked sites and found they are often just elk hoof prints in wet soil with small amounts of water in the hoof prints and they have concluded that the elk cannot survive on those small amounts of water.

Because of that, concerned citizens have placed troughs filled with water in the elk enclosure on at least three occasions. Each time, the Seashore has removed them. The last time this occurred was earlier this month.

The Sierra Club has just learned that the Seashore's outreach coordinator, Melanie Gunn, wrote in a May 17, 2021, email to a concerned citizen that "[t]he National Park Service (NPS) is anticipating providing water to the tule elk at Tomales Point as many of the seeps, springs, and creeks are drying during this drought." (Emphasis added.) This statement comes only a couple of weeks after the Seashore emptied and confiscated the most recent water troughs mentioned above.

Forage

Water is not the only issue. The Seashore has readily admitted on numerous occasions that the captive elk lack adequate forage in times of drought. The Seashore has also made clear that the forage at Tomales Point lacks two essential minerals, namely copper and selenium. Six necropsies done last year showed that those six elk starved to death and were chronically deficient in copper and selenium. The two wild, free-roaming Drakes Beach and Limantour herds don't seem to have these problems, as witnessed by the absence of similar die-offs. While the Seashore has emphasized for many years that the problem has been more due to a lack of forage than a lack of water, there was no mention by Ms. Gunn of any plan to also provide forage and mineral blocks containing copper and selenium for the dying elk.

This situation is inhumane and unacceptable. The Seashore should prepare a General Management Plan Amendment (GMPA) for management of the Tomales Point lands. The 1980 GMP is now 41 years old and barely mentions Tomales Point and the captive elk. While a 1998 elk plan was written, it did not purport to be an updated GMP. It only addressed what to do with an excess number of elk in the enclosure. It did not address how Tomales Point should be managed, including whether it is even a suitable location for elk given its obvious problems with water, forage and minerals. Furthermore, it was written 23 years ago. Things have changed significantly since then, including the deaths of over 400 elk in recent years, increasing droughts and climate change. The Park Service's own policies recommend that GMPs be reviewed and updated every 10 to 15 years.

The GMPA should be accompanied by an EIS. Finally, because the captive elk will continue to die during the drought, the Seashore must ensure that no more die during the GMPA planning process by committing to provide adequate water, forage and minerals to each of the four Tomales Point elk herds as needed.

Elk are dying now. The Sierra Club would appreciate a response to this letter in the next two weeks. Finally, because the GMPA/EIS for the ranching area includes an alternative (F) that would free the captive elk from Tomales Point and thus solve

this captive elk situation, we request that this letter be included in the administrative record for the ranching GMPA.

Sincerely,

s/Olga A. Bolotina
Chair, San Francisco Bay Chapter

cc:
Secretary of the Interior
Asst. Secretary for Fish, Wildlife and Parks
Director, National Park Service
Regional Director, National Park Service