

AC
10-19-11
It's Supt. of PRNS to perform his/her duty to protect this Estuary (Drake's Bay). Commercialization of DBOC in this Estuary will expire by law in 2012. You need to change the law to create a new lease for DBOC.

This is the only recoverable estuary on the Pacific Coast! It's of vital importance to begin the recovery of this Estuary in 2012. At that time, the base of the foodchain can begin its recovery. Native bi-valves will begin to recover because the plankton will then become available because DBOC oysters will no longer threaten the base of the food chain.

10/18/2011

AT

• Stop commercial exploitation
of our National Parks

DBOC provides extremely
healthy food for SF Bay
area.

Att. C is bad because
it rewards illegal behavior.

Production increased, w/o
proper permits

AT
10-18-11

There should be another
alt. that includes a phase-out
period at the end of the permit
period - (if extended for another
10 years)

Don't have a good definition
of wilderness as it applies to
PRNS - wilderness is not the
same at Yellowstone as it is in
PRNS. Visitor use at PRNS much
higher density than in Alaska,
Wyoming, etc.

Not in favor of ~~extension~~
extending lease of DBOC
because it would mean 10 more years
of negative impact to the natural
systems. More difficult to get those
systems to come back.

AT
10-18-11

PRNS ~~should~~ should reward DBOC
for being responsible stewards of
the Estero rather than punishing them.
They have found ways of protecting nature
while producing food. Very important
to the future,

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10-18-11

Since DBOC was here
when PRNS was established
there should be an additional
alternative that allows it to continue
operating within PRNS

For^{or's} ATT. A because it protects
public trust resources and avoids
continuing commercial activity in
a designated wilderness area.

Allowing DBOC to ^{precedent} continue operating
would set a ~~precedent~~ despite
wording in 2009 law allowing
commercial operation in a NP.

AT 10-18-11
EIS should do more to identify location of non-native oysters and clams outside the production area.

As evidence of them spreading outside the current production area.

Preserving wilderness policy in Drakes Estero should take priority over any other consideration. Perpetuating a commercial use would set a dangerous precedent with respect to other wilderness areas of the NP.

1962 Estab. PRMS recognised Darry + Ranching + small organization engaged in oyster and fishing. Further notes - none of these activities are incompatible with the plans of the NPS.

Why is Diane Feinstein
DBOC's advocate?

AT
10-18-11

This issue has really
divided the community.

~~The EIS should~~

AC
10-18-11

A supplement to the EIS should review
other potential wilderness areas in NPs
that have terminated non-conforming
commercial uses.

This ^{PRNS} is not a local park. It is a
National Park. It is the duty of
the Supt of their Park to manage it
in accordance of the goals of the
NP system. This is a special park w/
Seashore status.

Section 318 (c) defines ag.

property "lands which were in regular use for ag. ranching or dairying."

DBOC should not be removed, because it was included in the legislation.

Regarding wilderness, the area was neither undeveloped nor ~~primeval~~ at least 164 years prior to Est. of NWPS in 1964.

Ag. interests had to be included in the PRMS in order to establish it so

that it could be established as a

NP. Bad idea to allow ranches,

commercial use was a bad idea.

Shouldn't be expanded. ^{IF} End contradictions

end it by increasing ecological integrity.

10-18-11

AT 10/18

No conflict in the continuation of the DBOC as a "prior existing non-conforming use" and wilderness designation of the Estero as it is ^{explicitly} stated in the legislative history of the 1976 PR wilderness Act.

Harbor seals are a prior existing conforming use in the Estero. When oyster operation takes place near seal pupping areas it creates a conflict.

Support Alt. "E." - which is support DBOC should continue operating into perpetuity.

AT
10-18-11

Unclear in Draft EIS who
owns housing, commercial operation, +
who is responsible agency.

How ~~many~~ much of DBOC operation ~~is~~ and
housing is in potential wilderness.

What will the plan be for
beach clean up if the permit
is issued. Not in EIS!

Sign a proposal for this ~~is~~ have
it enforced by NPS

Thank you for this format - Not have to
listen to the tirade.

uta.
ered.
are
helming
DOI

AT
10/18 Under any of the alternatives have an organized twice yearly volunteer effort, using non-motorized watercraft to clean up all the debris that is ^{generated and is} outside the boundaries the DBOC developed areas. For instance: pressure treated wood, oyster bags, plastic tubes, plastic lids.

There should be a 5 mph, no wake zone within the Estero because it disturbs wildlife, creates shore erosion, excessive noise, flushes & marine life and various birds.

Experience of natural sounds is important to me. In favor of getting rid of the oyster operation to protect the soundscape.

There are better, less expensive and more appropriate ways of supporting jobs.

AT
10/18

In the event that the DBOC ceases operation, what will happen to the local employees?

10/18/11 db

• I think that when it became a National Seashore the families and businesses that were already here were taken into consideration, except for the oyster farm. The family that now operates it has studied how to operate it in an ecological way. For example, the type of oyster was carefully chosen to not be able to breed in that environment. It does not touch the Estero in any way, except to clean the water. The family has cleaned both the land and the water. It is no longer a blight, it reflects the care that should be taken. It is a model of ecologically responsible management of a small local use of the land.

• The EIS artificially inflates the ^{socioeconomic} value of DBOC's oysters production within California's oyster industry so the impact analysis is faulty. Humboldt City produces more than 70% of California's oysters so DBOC's production is 30% minus what we know to be growing elsewhere and what is growing elsewhere that we don't know about. DBOC's proprietary data ~~is~~ lacks integrity.

• The Park Service does not have the legal authority to grant a renewable permit which would exponentially tarnish the Wilderness Values that are to be protected for the public interest.

10/18/2011
JD ①

- NO ACTION IS THE RIGHT ACTION, TO PROTECT THE WILDERNESS.
- ONLY ACTION CONSISTENT W/NPS POLICIES IS THE NO ACTION.
- BELIEVE ALL AMERICANS DESERVE A MARINE WILDERNESS EXPERIENCE.
- CONCERNED ABOUT SPREAD OF DIDEMNUM. NOW SEEN ON EEL GRASS.
- CONCERNED THAT EIS DOES NOT CONSIDER DBOC VIOLATIONS TO HARBOR SEAL REGULATIONS PER CA. COASTAL COMMISSION.
- CONSULTANT FOR DBOC SAYS NPS HAS SPENT APPROX. \$5 MILLION SINCE 2008. IS THIS TRUE?
- WHY WOULD NPS CONSIDER ANY EXPANSION BEYOND ORIGINAL S.U.P.?

10/18/11
JD (2)

- ALLOW PERMIT TO EXPIRE. ~~REMOVED~~
- DON'T ALLOW BIG MONEY TO LEGISLATE PUBLIC POLICY.
- WHAT PART OF NPS MISSION DON'T PEOPLE UNDERSTAND?
- PAY MORE ATTENTION TO VIEWSHED ISSUES IN FINAL EIS. OYSTER FARMING IS INCONSISTENT W/A PRISTINE VIEW.
- EIS SHOULD LOOK ^{MORE} AT PLASTICS AND THEIR IMPACTS ON BIRDS & OTHER WILDLIFE & WETLANDS.
- GO WITH ALT A.
- WHAT IMPACTS TO LOCAL FOOD SYSTEM SHOULD OYSTER CO. PERMIT EXPIRES.
- DRAKES ESTERO IS PART OF A NAT'L PARK & LOCAL CONCERNS ABOUT FOOD IS NOT THE ISSUE. ISSUE IS PRESERVING A NAT'L PARK AS INTENDED BY CONGRESS.

10/18/11
JD ③

- COST OF DOCUMENT PREPARATION SHOULD BE BORNE BY APPLICANT.
- WHAT ARE IMPACTS OF MOTOR BOATS IN ESTERO? (eg. RADIOS, NOISE, HUMAN INTRUSION) ESPECIALLY DURING SENSITIVE TIME OF YEAR LIKE SEAL PUPPING SEASON.
- PROFITS FOR DBOC ARE FINE BUT WHAT IS THE COMPENSATING VALUE FOR PUBLIC?/
- IS RENT WORTH SACRIFICING THE WILDERNESS ESTERO?
- ALT "E". ESTERO DOES NOT FIT THE "UNTRAMMELED" QUALIFICATIONS OF 1964 WILDERNESS ACT; THEREFORE IT SHOULD REMAIN AN OPERATING OYSTER FARM, BUT LEASE SHOULD BE PUT UP FOR COMPETITIVE BIDDING.
- IF ALT A FAILS ! THERE IS ~~IS~~ A NEW 10-YR PERMIT, DBOC SHOULD PUT UP RESTORATION MONEY IN THE FORM OF AN ESCROW SO THEY (DBOC) CAN'T NEGOTIATE OUT OF IT.

10/18/11
JD (4)

- PLEASE PROTECT THE RARE DESIGNATION OF WILDERNESS. IT'S A SPECIES IN NEED OF PROTECTION. DECADES AGO, MANY PEOPLE FOUGHT FOR IT.
- NPS REPORTS ON HARBOR SEALS ARE BASED ON EXCELLENT SCIENTIFIC WORK. SHOULD BE HELD-UP AS A MODEL FOR OTHER SCIENTISTS.
- NPS REPORTS ON HARBOR SEALS ARE BASED ON STATISTICAL SLIGHT-OF-HAND & SHOULD BE ELIMINATED FROM EIS.
- OYSTER FARM VS 4,000 HELICOPTERS / YEAR CHOPPING UP BIRDS, DISTURBING NESTING, NOT TO MENTION VISITORS? ARE YOU SERIOUS?
- SECT'Y OF INTERIOR HAS LEGAL & MORAL OBLIGATION TO HONOR THE PROMISE OF A MARINE WILDERNESS, FREE FROM COMMERCIAL EXPLOITATION.
- EIS ANALYSIS OF SHOREBIRDS & BRANT UNDERESTIMATE THE NEGATIVE IMPACTS THAT CAN BE CAUSED BY COMMERCIAL OYSTER OPS.

10/18/4
JD (5)

- The DEIS DID NOT BUT SHOULD CONSIDER THE POSSIBILITY THAT GENETIC MINING COULD OCCUR THROUGH THE PROCESSING OF LARGE AMOUNTS OF SHELLFISH. SIMILAR SUCH MINING HAS OCCURRED IN YELLOWSTONE WHEN BIOLOGICAL ENTREPRENEURS HAVE REMOVED ENZYMES SPECIFIC TO THE HOT SPRINGS AND HAVE PATENTED THIS GENETIC MATERIAL THAT BELONGS TO THE PUBLIC w/out ANY COMPENSATION OR CONSIDERATION TO NPS.

- IF 10-YR S.U.P. IS ISSUED, COMMERCIAL OPERATION SHOULD BE REQUIRED TO PAY FAR MORE THAN CURRENT \$2,800/YR.

- THIS IS NOT ABOUT OYSTERS & SEALS. IT'S ABOUT PRESERVING THE ONLY REMAINING MAKING WILDERNESS ON THE PACIFIC COAST, AS MANDATED BY THE WILDERNESS ACTS OF 1976.

- QUESTION IMPACT ANALYSIS AROUND ECONOMICS THAT ~~REMOVING~~ OYSTERS FROM ESTERO ~~WILL HAVE~~ SHOULD NOT BE CONSIDERED AN ADVERSE IMPACT. BECAUSE SHELLFISH MARKET IS NOT INDISPENSABLE.

10/18/11
JD (6)

- ALT "E" - ALLOW DBOC TO CONTINUE TO OPERATE IN PERPETUITY.
- SUPPORT NO ACTION ALTERNATIVE, BECAUSE ONLY ONE THAT DOESN'T HAVE SIGNIFICANT LONG-TERM ADVERSE IMPACTS ON THE MARINE ENVIRONMENT OF DRAKES ESTERO.
- OUR NAT'L PARKS SHOULD BE PROTECTED FOR THE PUBLIC INTEREST & FUTURE GENERATIONS, AND ARE TOO IMPORTANT ~~TO~~ TO BE GIVEN^{AWAY} TO COMMERCIAL INTERESTS.
- WE DON'T HAVE A MARINE WILDERNESS ON THE WEST COAST EXCEPT FOR DRAKES ESTERO.
- ALLOWING THE PRIVATE ENTERPRISE TO CONTINUE IN A FEDERALLY PROTECTED WILDERNESS SETS A BAD PRECEDENT FOR THE REST OF THE NPS.
- INDUSTRIAL OYSTER OPERATIONS IMPACTS TO THE WETLAND ENVIRONMENT ^{COULD} THREATEN THE ESTUARY'S RESILIENCE IN THE FACE OF CLIMATE CHANGE & POSSIBLE SEA LEVEL RISE.

10/18/4
JD (7)

- PERMITTING THE OYSTER CO. OPERATIONS WOULD CONTINUE IMPACTS OF INVASIVE SPECIES INCLUDING NOXIOUS TUNICATES.
- OYSTER OPERATIONS HAVE SIGNIFICANT ~~TO~~ IMPACTS TO EEL GRASS, WHICH ALSO HAVE IMPACTS TO FEDERALLY-~~THAT~~ ENDANGERED STEELHEAD & BRANT.
- CDFIG HAS BEEN A LOBBYIST TRYING TO PROTECT THE $\frac{1}{2}$ OF ITS MARICULTURE DEPT INCOME THAT DBOC PAYS IN SPITE OF THE FACT THAT CDFIG HAS NO LEGAL RIGHTS IN DRAKES ESTERO. DEIS RECOGNIZES THIS FACT & PROPERLY EXCLUDES CDFIG FROM THE ESTERO.

• Support the Oyster farm - fresh oysters are really tasty.

• pg 262 of DEIS claims impact on 8% of eelgrass, 1% by oyster racks, 7% by scarring which means 99% of eelgrass is NOT negatively impacted since this 7% regenerates in 2 weeks. Recommend remove eelgrass as an impact topic from the DEIS.

• In Bolinas Lagoon hundreds of thousands of dollars were proposed to restore a few acres of eelgrass. Recommend upgrading eelgrass impact in the DEIS to significant.

• The existing structures are an eye sore which desecrates the visual, esthetic, and wilderness values for hikers within several square miles. Any expansion would exacerbate these detrimental impacts.

• I am opposed to extending any permit. In the event of uses extended, I urge the Park Service to require DBOC to pay for a bond to protect against any further environmental degradation, in addition to any fair market value rent.

• I believe that Drakes Estero belongs to All Americans and should not be claimed and exploited by one person for his own commercial enrichment.

Who Do We Believe?

Increase the Wilderness.

Why trade the impacts of the oyster farm for impacts (adverse) of Kayakers?

It's the Only Marine Wilderness between ALASKA and Mexico And it deserves to be protected.

Where is the data on impacts on every topic? ~~How~~ Use of the word "potential" is vague and inconclusive.

Why are red-legged frogs included as potentially impacted when they do not make their habitat in salt water?

Keep to Congress' ~~inter~~ original intent that it be wilderness.

The Baseline ~~should~~ ^{needs to} be consistent for all of the alternatives.

The Baseline must equal existing conditions.

The archaeological ^{cultural} resources include evidence of oyster collection by Native Americans ^{around the Estero} so it should not be dismissed as an impact topic. Estero was a food source for ^{native} N. Americans

The Wilderness Area designation for Drake's Estero is inappropriate: human access and usage.

The House Report accompanying the '62 Legislation mentions oyster farming and notes "none of these activities is incompatible with the plans of the NPS"

Is the masiculture lease open to public bid & if not, why not?

- 10/18/11 JG
- Why are harbor seals considered impacted when NPS data does not support such conclusions? There is 1 instance of harbor seal disturbance driving seals into the Estero.

- I would like to see an Alternative that strikes a greater compromise than those presented.
- Why is eel grass indicated as negatively impacted, when the data in the EIS has shown it has doubled.
- I would like to thank the Park Service for taking their Mission seriously and doing their best to protect the lands in their care.
- On pg. 23, Chpt. 1, secondary references that include documents that have not been subjected to peer review or do not reflect direct on-site observations or measurements in accordance with a standard protocol, there for 281,000 photos qualify as secondary reference and must be included.
- I would like to see the impacts more clearly, concisely + ~~speci~~ specifically in the doc.

10/18/11 JLC

o Feinstein's Recent legislation required gov't to give them a Renewable lease. Why is this not part of the EIS?

o Why were the 200,000 photos of the farm operation not included in the data?

o I support the No Action Alternative. Oyster farming can be done in many other places ~~and~~ but the Estero is one of ^{the} few if not the only potential Marine Wildernesses.

o No SUP for DBOC.

o ~~Corey B.~~ There are challenges by credible scientists ~~that~~ about the data in the EIS. How ^{do I know} are those concerns are going to be answered. There needs to be a ~~dialogue~~ dialogue.

o I support the ~~concept~~ designation and concept of a Wilderness free of commercial enterprise. Somebody needs to speak up for those who love quiet and commerce-free zones.

o If the science is proven wrong, then the scientists should be held accountable.

o There should be an Alternative E for it to stay as is.

- The Comprehensive Restoration should be reconsidered AS AN ACTION ALTERNATIVE in light of the EIS evaluation of Alternative D, which includes significant added infrastructure and development to the Oyster facility. The stated reason for dismissing comprehensive restoration AS AN ALTERNATIVE WAS THAT IT WAS NOT PART OF THE SECTION 124 LEGISLATION. There needs to be A CONSISTENT AND LOGICAL APPLICATION OF CRITERIA.

- EIS should include AN ALTERNATIVE THAT WOULD ENCOURAGE NPS ENGAGEMENT, RESEARCH, AND INTERPRETATION SURROUNDING THE CONTINUATION AND PERFECTION OF ecologically sustainable shellfish aquaculture in partnership with Calif. Dept. of fish + GAME AND the leasee to provide A NATIONAL EXAMPLE AND SERVE AS ^{the} a jewel in crown of Pt. Reyes Nat'l. Seashore.

• The potential for harm from invasive species is adequate reason to halt the vector for the spread of invasive species; we don't need journals and journals of evidence.

• As a U.S. Citizen/Owner of the Estero, I am not in favor of granting profit to a commercial operation at the expense of my park.

• Pacific Oysters have gone feral in 17 countries. Let's get them out of the Estero before they go feral here.

• EIS does not adequately address plastic pollution discharge into marine sanctuary which on Nov 15, 2011 may become critical habitat for the leatherback sea turtle. Sea turtles die from plastic ingestion.

• I would like an Alternative Measure "Measure E" that would allow Drakes Bay Oyster Company to operate in perpetuity without mitigation that would interfere with the ability to survive.

- examine the impact of genetically engineered oysters / food sources on the environment & within the local / global food market
- there are no genetically engineered oysters in the world
- would like an Alternative E → new Special Use Permit with no mitigations because proposed mitigations would put oyster farm out of business → too restrictive
- The EIS should include the statistical significance of any data supporting the impact analysis used in EIS, e.g. impact of ranching operations on WQ.
- Alternative A is the only policy consistent with NPS policies.
- There is too much \$ (money) in the oyster business (and the tourism business is involved) for people to think clearly about the issues involved.

- The NPS should rely on science, tell the truth, and accept the general conclusions of 11 experts convened by the NAS, who stated that there are no signif. adverse effects from oyster operations.
- The NPS should not continue business with the oyster company for many reasons, including the laundry list of permit violations documented by Calif. Coastal Commission.
- Don't allow commercial exploitation to continue in National Park wilderness.
- The NPS should rely on independent science, tell the truth, and accept the general conclusions of 11 experts convened by the NAS, who stated that there are no signif. adverse effects from oyster operations.
- This gathering tonight is neither a hearing nor a workshop, as advertised. It is a carefully choreographed exhibit by NPS that does not make it easy for neutral or undecided bystanders to participate.

- The marine debris by the oyster business detracts from visitor experience and recreation, water quality, and wildlife habitat values in the park. The EIS inadequately addresses all three. For example, the EIS does not evaluate the effects of plastic mariculture debris on marine organisms within and beyond the Estero.
- The socioeconomic resource evaluation in the EIS does not accurately portray the net effect of oyster business on park visitation and the local economy. For example, the estimated 50,000 annual visitors to the oyster business are not solely in the Seashore to buy oysters. The EIS overstates the economic importance of the oyster business.
- A deal is a deal. The 1976 Pt. Reyes Wilderness Act and the intent carried into the existing SUP from the Act is clear and dictates Wilderness in 2012.
- Drake's Estero, as the ecological heart of the Park, is part of our national heritage and should not be privatized for commercial profits.

- The draft EIS did not adequately consider the possibility that Pacific oysters could go feral, particularly in light of global warming, and could become an invasive species that is impossible to remove from Drake's Estero.
- NAS scientists are not Popes or infallible. Scientific data previous and post-NAS report do not support quoted conclusions of their report.
- The EIS needs to include Alternative E - none of the above, and Alternative F, which would involve perpetually renewing the lease, as originally written by the 40-yr renewable lease.
- Without a summary of the environmental effects on the display boards, there can be no legitimate opinions about this project, unless every person sits down and individually reads the effects analysis.
- All the alternatives attempt to get rid of the oyster farm. There should be another alternative, which would allow the farm to stay and real study over several years and a genuine attempt to produce oysters while protecting nature should be encouraged and rewarded.

- This is a policy decision. The dEIS is mistakenly is based on a cause-effect standard for adverse ecological impacts, when it should be based on the clear mandate of the NPS to exercise precaution in favor of protection when in doubt.
- The continuation beyond 2012 of commercial operations and motorized boat use would be a clear violation of 1964 & 1976 Wilderness Acts.
- Please provide a specific timeline for the removal of commercial buildings.
- Continued cultivation of commercial species poses risks to native species and sets a dangerous precedent for introducing exotic species on NPS land for commercial exploitation.
- Environmental baselines in NEPA documents are required to be based on current conditions.
- The draft EIS fails to consider cultural, historical, and socioeconomic role of the oyster farm in West Marin, San Francisco Bay area, and California.
- Please justify decisions on data and show data.
- Local values and opinion are not being considered. National organizations and federal policymakers are ignoring local input, i.e., local surveys show overwhelming support for continuing and oyster farms. In other DOI jurisdictions, local values have prevailed regarding exceptions, i.e. subsistence hunting in Alaska wilderness.

- Oyster farming should not be treated differently than ranching operations. They were both here when the park was created, and they were both factored into the creation of the park. Both the oyster farms and ranching should be continued with controlled leases.
- The DEIS correctly distinguishes the Wilderness Zone from the Pastoral Zone. The oyster company is in the Wilderness Zone, and the ranches are in the Pastoral Zone.
- Given this week's news about salmon disease in B.C., not to mention the precautionary principle, the uncertainty and the potential for harm from invasive species are ample reasons to stop oyster cultivation.
- I think the Kayaking experience would be greatly enhanced with no commercial oyster operations because of noisy motorboats and all the oyster racks.
- The family that runs the operation works with U.S. Fish and Wildlife Service and UC Davis on the preservation of birds, plants, and other indigenous life. These benefits might possibly not be there without oyster operation.

LP 10/18/11 (7)

- The DEIS correctly analyzes sound impacts from oyster operation motorboats, but fails to analyze the significant, additional impact from the radios that oyster workers play while working. Harbor Seals do not like Mariachi music.

10/18/2011
SAH ①

COMMENTS

The format of the DBOC meeting did not include discussion, which is disappointing. || (People Agree)

The official Press Release did not include the lack of discussion in the open house meetings. This should have been included. || (People Agree)

There is not an alternative that would allow DBOC to stay past 10 years. This would result in job loss in the community.

10/18/2011 || COMMENTS :

SAH ②

Why is the lease not open to competitive bidding?

The DBOC should be allowed to continue to operate. California can not afford to lose 50% of

Oyster cultivation land/area.
(and the employment opportunities the DBOC provides.)

- Upset w/Format, wish it was more of a dialogue. Including the opportunity w/Q & A.

Oyster farms & Ranches have been here for generations and should continue to be here; area ~~not~~ should not be returned to wilderness because they have been here for generations.

10/18/2011 COMMENTS

SAH ③

I am in support of Alternative A and think the park ~~should~~ has a responsibility of supporting Alternative A because it supports the Mission of The National Park Service.

The entire DBOC-EIS process has been/is a waste of public money, time and is a ~~sham~~. Sham.

In 3 years, 24/7 of the Park secretly photographing DBOC operations there was not one incident of seal disturbance by DBOC.

This shows the dedication + responsibility of DBOC's operations.

10/18/2011
SAH (4)

The most important issue is that Congress intended the Estero to be a wilderness area within a National Park and the DBOC's operation is in violation of that intent.

The existing Conditions-Onshore Operations map needs to be updated/edited to correctly portray the DBOC Onshore Operation (Specifically the

Main Dock → Conveyor → Processing plant.

10/18/2011
SAH (5)

COMMENTS:

This exhibit does not address comprehensive history of oyster culture on Pt. Reyes Peninsula.

There is a need to address federal vs state jurisdiction... NPS is over-reaching their mandate on this (DBOC) issue.

The entire notion of the the Pt. Reyes Peninsula reverting to wilderness is Euro-centric and absurd, ignoring thousands of years of human history.

10/18/2011

SMH (6)

Update the Existing Conditions -
Onshore Operations maps to
accurately portray the DBOC operations.

We can not afford to lose
local-sustainable agriculture
in a world with a growing ~~to~~
population and these Farms/dairies/
other small ag ~~business~~ businesses are
disappearing.

I am concerned with allowing
the oyster operation to continue will
lead to the further commercialization of
protected lands.

10/18/2011
SAH

There are ~~some~~ appropriate places
to grow oysters outside of National
Parks + Wilderness Areas.

A deal is a deal.

I have a growing distrust of the
Park's policy + ~~agency~~ agenda because
the unanswered controversy ~~is~~ and
challenges to their scientific data
(for example: Red-legged Frogs don't
live around salt water. And the
Seal disturbance from oyster beds are
750 ~~ft~~ yards away.

10/18/2011
SAH ⑧

Comments:

Extending the DBOC lease would be
grating a special privilege for private profit
on public lands at the expense of the
tax-payers right to enjoy ^{our} wilderness.
(public)

Johnson's contract with the US
government eliminated his right
to sell to anyone without the
US government having the first
right of refusal. (Item 14 of contract
on file at Marin Co.
land & deeds.)

10/18/2011
SAH (9)

COMMENTS

The requirement to implement oyster operations ~~with~~ ^{with} 1 FTE is inadequate because the large time needed to monitor, remedy violations + research best practices. With inadequate staffing, the EIS should anticipate worst case ~~scenarios~~ scenarios.

- The DEIS accurately ^{cited} the NAS 2009 report, various environmental impacts found. Indeed the NAS report's conclusions don't support their (NAS) own findings but the DEIS does.
- Resource management never benefits from misrepresentation of science.
- Wilderness requires a soundscape devoid of radio, motors, & mechanized equipment.

Comments :

SAH
10/18 (10)

NEPA requires baselines to be set on current conditions. ~~Therefore~~
Therefore, this EIS to be considered legitimate must include continuation of Oyster production under CA Dept. of Fish & Game Authority And a renewable SUP for the onshore facilities.

The DBOC is part of the Pt. Reyes culture + history and should be allowed to operate along with the ranches and lighthouse. We need them all to accurately portray the Pt. Reyes Area.

I Support Option A: NPS Mission to preserve public land serves the public good far more than DBOC's private business.