

JD (10) DB

10/20/11

① A lot of resources are being used on this issue. It seems excessive and has taken too long.

② It is a horrible ^{economic} time to put people out of work that work at the oyster factory. (5 families + 30 employees). It's a historic company established long before the park and should have been grandfathered in. We are encouraged to be locavores and buy within 100 miles of our living space. Removing the oyster company flies in the face of this. In addition, the County is making income from the business as are the restaurants. Oyster farming is good for tourism. It brings ~~the~~ money to the county. It's a "soft" (few impacts on the land) business.

• I'm 5 generations in Marin City. We've been going to the oyster farm for years. We've bought up to 300 oysters at a time for group camp outs. We've had people from Europe come to visit and enjoy group to the farm. We barbecue them there. We've met many many people at DBOC that come from as far away as Carmel that enjoy coming, picnicking & bringing their families there. We have friends from all over the US. who buy the jarred oysters and take them home.

COMMENTS

- I would like to see the conditions of the SUP altered to ^{support &} accommodate further studies. You would get money from DBOC to pay for ~~the~~ part of the studies. Studies would include: water quality, effects of activities (boats-human activities in the Estero).

Issuing the permit is an opportunity to fund research.

- I'm a ^{registered voter and} 39-year resident of Marin City (S. Rafael) ^{County} and I followed the controversy mainly in the Marin ~~IS~~ ^{County} & I'm not a member of a club or action committee regarding this issue. Previously I made comments about DBOC Special Use Permit EIS ~~in~~ November, 2010. DBOC is one of the many treasures of our national seashore. A healthy aquaculture outfit, run by local residents. It should be kept alive for the enjoyment of visitors and the benefit of county residents. Like the old lifeboat station at Chimney Rock, it could become an educational and historical focal point with an "oyster museum" starting with local Indian traditions etc. Maybe with the addition of Evvy Eisen's exhibit "Oyster Farm", this museum could be incorporated into the NPS visitor center. How about a unique solution connecting DBOC on cooperative, even friendly terms, with the NPS.

③ 10/20

COMMENTS

- Oyster shells benefit western snowy plovers. (as confirmed by S.F. ~~Drake's Bay~~ Bay Bird Observatory study)
- Drake's Bay Estero is not the habitat of the endangered snowy plover.
- Oyster shells only benefit snowy plovers when they are on shorelines. That is not a justification for this facility.
- There are many other sources of oyster shells. They don't need to come from DBOC. The site should be restored to wilderness.
- DBOC is not a visitor concession but a profiteering exploiter of the American public's natural resources.
- The California Coastal Commission recently reprimanded the DBOC for illegally operating in an area set aside for harbor seal protection.
- The NAS Report ~~sites~~ cites numerous areas where wild life can be impacted by commercial oyster operations. The NPS needs to include that in their EIS.

DB
10/20/11

Comments

4

- Has the NPS considered the possible consequences of removing oyster filter feeders on the promotion of toxic harmful algae blooms including those that produce domoic acid that kills marine mammals. The oysters are part of the eco-system functioning which at present is controlling the algae in a healthy condition. Can the result of removing these grazers be safely predicted. Since the blooming of toxic algae would be catastrophic.
- DRAKES ESTERO ^{is native} is very important to protect next year through Alt. A because it can provide many people with their first marine wilderness experience given the proximity to the bay area.
- Ranches in the Seashore will not be impacted through Alternative A and the DBEC and the shellfish industry should stop spreading fear to ranchers. If anything, designating wilderness next year protects ranches because wilderness protects the deal Congress made in 1976 to exclude ranches from wilderness.
- The ranches at Point Reyes could be models of more sustainable agriculture. In order to do that, they need to stay open, and that was the deal made with the private ranch owners. However, the oyster company has always operated on public waters which should now be returned to the public.

JD
10/20/11

COMMENTS

1

- IT'S TOO PRECIOUS A PLACE TO NOT RESTORE TO WILDERNESS.
- ALT A. IS BEST ALTERNATIVE FOR THE PEOPLE & WILDLIFE.
- THE NPS STANDS FOR NATIONAL PARK SERVICE NOT NATIONAL AQUACULTURE SERVICE. ACTS B-D ARE HIGHLY INAPPROPRIATE FOR THE NPS.
- PROTECTING WILDERNESS WILL NOT IN ANYWAY IMPACT ~~WILDERNESS~~^{RANCHING} IN THE PARK.
- IT'S NOT THE NPS' JOB TO PROMOTE AQUACULTURE OR OTHER LUXURY PRODUCTS IN DRAKES ESTERO.
- BAY AREA & CALIF. RESIDENTS CAN GET OYSTERS FROM TOMALES & HUMBOLDT BAYS BUT THERE'S NO REPLACEMENT ANYWHERE FOR DRAKES ESTERO MARINE WILDERNESS.

10/20/11

JD

(2)

- RETURN THE HABITAT TO THE HARBOR SEALS.

- DBOC, THE OYSTER INDUSTRY, AND THEIR LOBBYIST HAVE FORCED TAXPAYERS TO SPEND \$5 MILLION TO ENTERTAIN DBOC'S DESIRE TO COMMERCIALIZE WILDERNESS

- THE OYSTER CO. SCIENTISTS & INDUSTRY SCIENTISTS ARE MISLEADING & PRESENTING FLAWED INFORMATION TO BUST THE WILDERNESS ACT.

- INCREASING GLOBAL (OVER) POPULATION MAY BE A REASON FOR MANY THINGS FOR A GLOBAL SOCIETY TO ADDRESS, BUT IT IS NOT A REASON TO KEEP THE OYSTER CO. IN DRAKES ESTERO. OYSTERS ARE A LUXURY FOOD ITEM

10/20/11
JD

3

- WHY SHOULD A FOR-PROFIT COMPANY HAVE ACCESS TO PROFIT FROM PUBLIC LANDS. IT SHOULD BE RESTORED TO NATURAL HABITAT FOR THE ENJOYMENT OF EVERYONE! NOT THE PROFIT OF A FEW.
- IT'S THE NPS'S RESPONSIBILITY TO PROVIDE US W/WILDERNESS AT DRAKES ESTERO BUT NOT THE NPS'S RESPONSIBILITY TO PROVIDE US W/FOOD.
- I PREFER THAT THE NPS ADOPT ALT A. OPERATOR OF DBOC KNEW LEASE WAS TO EXPIRE IN 2012.
- IMPACTS TO WILDLIFE ARE SIGNIFICANT ENOUGH TO DENY ~~ISSUING~~ ISSUING A NEW 10-YR PERMIT.
- EXISTING CONDITIONS MAKE THIS AN OPPORTUNITY TO MAXIMIZE PUBLIC FUNDS TO RESTORE POTENTIAL WILDERNESS TO FULL WILDERNESS.

10/20/11

JD

(4)

THE

- IN THE ABSENCE OF ^{THE} CERTAINTY OF IMPACT TO THE ENVIRONMENT, WE SHOULD FAVOR HUMANITY OVER VEGETATION + ANIMALS.
- FOLLOW THE LAW. THE LEASE EXPIRES NOV. 30, 2012, AND THE ESTERO SHOULD CONVERT TO WILDERNESS.
- LAND WAS SET ASIDE FOR PROTECTION & WILDERNESS AND SHOULD REMAIN PROTECTED & WILD.
- DRAKE'S ESTERO SHOULD BE ALLOWED TO BECOME FULL WILDERNESS AS MANDATED BY CONGRESS & PROMISED TO THE PUBLIC.
- I'LL QUADRUPLE THE ANNUAL RENT OF THE OYSTER FARM & CLOSE IT DOWN.

10/20/11

JD/DS

5

- POINT REYES NS IS A PLACE FOR THE ENJOYMENT OF THE WILDERNESS, THE OYSTER BUSINESS WITH ITS BUILDINGS AND BOATS ON THE BAY SHOULD NOT BE PART OF THIS EXPERIENCE.

- HAVE PICKED UP A LOT OF DEBRIS FROM THE OYSTER OPERATION, THAT IS WHY ALTA IS THE MOST APPROPRIATE.

- I DRIVE A TRUCK FOR A LIVING. I CAN'T AFFORD OYSTERS. I'M MAD. OYSTER GUYS, TAKE YOUR BUSINESS ELSEWHERE.

- o We feel uneasy about a net result of continuing farming and ranching with cattle and livestock while denying aquaculture farming for the same humane and ~~res~~ reasonable purposes.
- o I have been fighting to create and protect Point Reyes National Seashore for over 50 years. I feel very strongly that the wilderness should be protected indefinitely and the oyster farm should be terminated as was mandated by Congress on Nov. 30, 2012.
- o I support Alternative A, 'No Action'. I want to thank the NPS for a ~~thoughtful~~ thorough EIS, but ultimately, this is a MAERU decision whether you believe in the protection of our public lands and the importance of wilderness or whether you believe that the use of public lands for private profit is appropriate.

- I recommend that ^{if} the current lease ends in Nov. 2012, then ~~and that~~ the lease shall pay for previous and current habitat damage. If the current lease is extended for 10 years, see above and ~~pay~~ for mitigate for future years.

- Loss of eel grass is measured in ~~length~~ length. Confirm that impact to habitat is represented regardless of width of SCAR. There is a difference between a 2 foot cut and 15 foot cut.

- I Am afraid if the lease does not end in 2012 it will continue on past ^{even} 2022 And on.

- I recommend that the lease ends in Nov. 2012. It is a pristine wilderness habitat and any introduced species, native or non-native, impact the environment as a whole. Aqua-culture throughout the world has had a negative impact on native species - animals and plants.

- Please don't set a precedent for breaking the National Wilderness Act. Return the park to the public in 2012.

Return the Habitat to the Seals.

- The Oyster Company is visually obtrusive. It is noisy, smells bad, and completely destroys the natural feeling of the place.
- Return #Drakes Estero to habitat for birds, seals, and other wild life.

Please Return to Natural Habitat.

- The NAS 2009 Report came to a conclusion which was not supported in fact by its comprehensive Analysis of environmental impacts to Drakes Estero in particular, by invasive species.
- Impacts from invasive species to eel grass, native mollusks and birds should be a major adverse impact.
- I have met many people from out of town that make it a point to picnic, barbeque oysters, and enjoy the atmosphere. My family has been going to the Oyster farm for 50 years. I hope Alternative D goes through and the Oyster farm remains.

10/20/11 Jb.

• It's a shame the Park Service did not employ ecological modelling to ~~to~~ predict the water quality and pelagic ecosystem consequences of ~~the~~ removing oysters.

• Why would we want to model the water quality in relation to the oyster operations when it's my park, not your private business space? I have relatives fighting in Afghanistan for our PRISTINE National ~~Park~~ Parks. You can't afford oysters on a soldier's salary.

• Please follow the legislative intent of Bill Bagley,

John Burton, and Pete McCloskey as described in their joint letter to the Dept. of Interior, Secretary,

COMMENTS

LP 10/20/11 ①

- PLEASE SELECT ALTERNATIVE D.
- PLEASE SELECT ALTERNATIVE A AND RESTORE IT. THE NATURAL HABITAT NEEDS TO BE LEFT ALONE TO RESTORE ITSELF.
- PLEASE SELECT ALTERNATIVE C. IT IS A GOOD BALANCE BETWEEN THE ENVIRONMENT AND OYSTER PRODUCTION. OYSTERS ARE FILTERS AND DON'T CONTRIBUTE VERY MUCH POLLUTION TO THE BAY -- IN FACT, THE OPPOSITE.
- IF THE OYSTER CO. GETS ITS EXTENSION, THEN, THE NPS STAND FOR "NOTIONAL" PARK SERVICE (I.E., IT WILL BE A PARK IN NAME ONLY).
- PLEASE SELECT ALTERNATIVE. ~~IF~~ KEEP PEOPLE IN JOBS. MAINTAIN THE PREMISES AS IS FOR TOURISTS AND THOSE OF US THAT PURCHASE OYSTERS ON A REGULAR BASIS.

Comments

10/20/11 LP (2)

- Please Select Alternative D. It encourages Marin-ites to be local-ivores or eating local products within 100 miles of our home.
- The existing facility owner should maintain the ~~entire~~ entire area with no expense to taxpayers, I have used the facilities, and I find him to be a conscientious corporate citizen.
- The lands were committed to be Wilderness after a certain period of time in private use. That commitment should be honored. Restoring native habitats benefits all the wildlife and the people, not just one particular interest.
- California ~~is~~ is ranked the ^{2nd} ~~most~~ most business-unfriendly state. Let's not chase away another taxpayer.
- Insofar as the oyster company is an asset, it so enhances the use of the park for hiking, biking, swimming, kayaking, and enjoying organic oysters. It is a win-win situation.

Comments

10/20/11 LP ③

- I support Alternative A - No Action, allowing the oyster company to continue their commercial operations within such a relatively pristine and unique undeveloped coastal estuary only threatens the native flora and fauna and ecological systems within the estuary. The oyster shells and structures provide substrate for non-native invasive fouling invertebrates and algae, the excrements of the oysters add excess nutrients into the system and ~~increase~~ increase the potential for harmful algal blooms (HABs). That ⁱⁿ turn can cause eutrophication, as well as an overabundance of organisms that harm eelgrass. The presence of motor boats used for the oyster operations creates a potential for oil and fuel leaks that will threaten the health of the harbor seals and other wildlife.

- Please Select Alternative A. My take on the environmental document is that the oyster operation will create unacceptable impacts to wildlife and delay the process of converting to full wilderness designation.

Comments

10/20/11

LP

(4)

- Examine WQ differences between Tomales and Drake's related to ^{oyster} taste and contaminants in the water.
- Why do ~~my~~ tax dollars have to be used for this company to use our land for their private business and for our park staff to devote resources to evaluating their business instead of wildlife.

NPS DESCRIBES "EVIDENCE FOR
LONG TERM SPATIAL DISPLACEMENT OF BREEDING
& PUPPING HARBOR SEALS by shellfish
AQUACULTURE OVER 3 DECADES

NO EVIDENCE EXISTING IN NPS DATABASE
TO SUPPORT CLAIM ON THE CONTRARY,
HARBOR SEALS WERE DRIVEN INTO
the ESTERO in 2003 & 2004 (PRIOR to DBOC)
by an ELEPHANT SEAL !!!

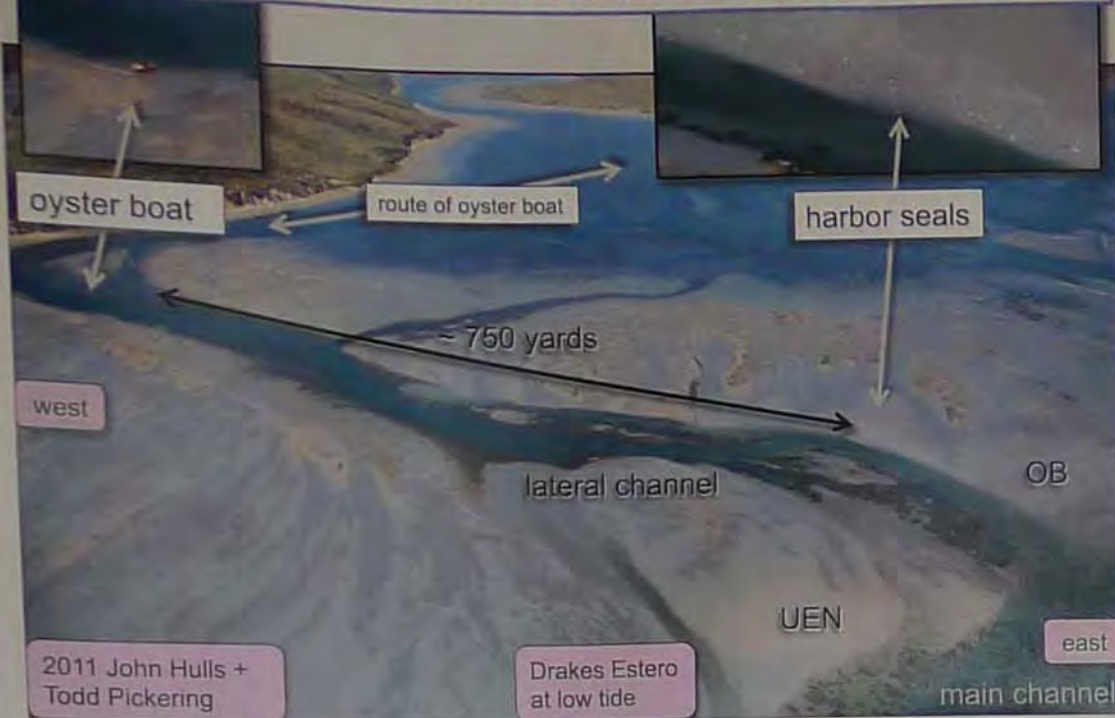
After many years of NPS CLAIMS of
OVERWHELMING HARM Why is there

NO DATA, NO EVIDENCE TO SUPPORT IT
AND

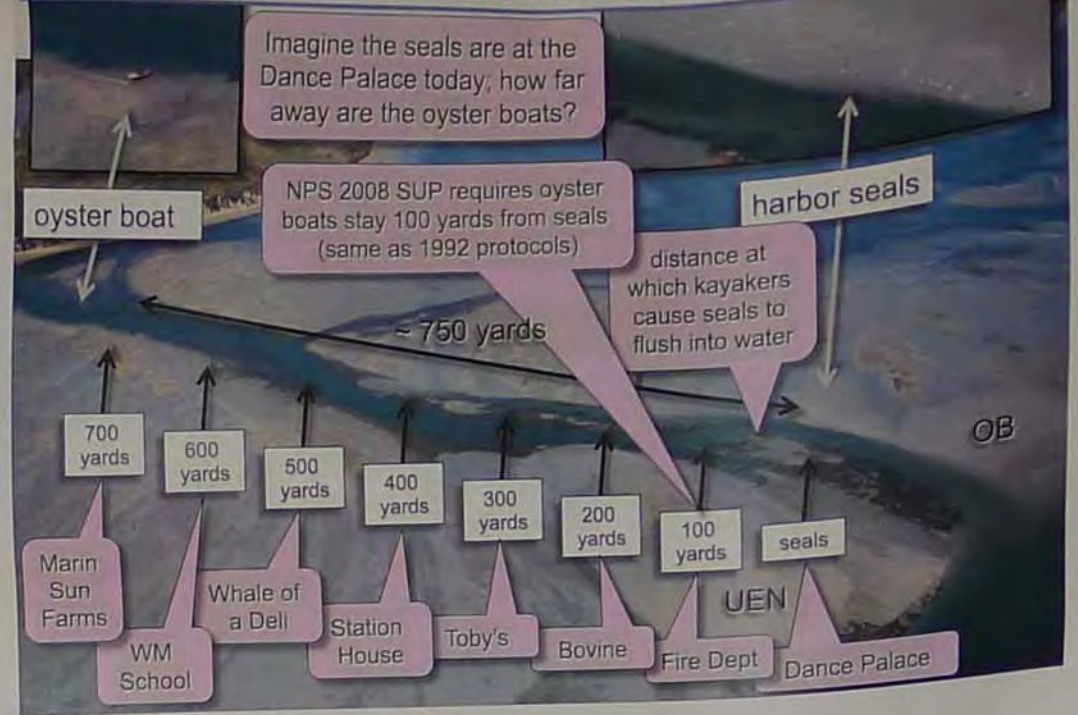
all there is is HYPOTHETICAL
POTENTIAL

FUTURE impacts without
evidence to support ~~the~~ EVEN THOSE CLAIMS ?

A photo you won't find in the dEIS: oyster boats stay >700 yards away from the harbor seals and don't disturb them



A photo you won't find in the dEIS: oyster boats stay >700 yards away from the harbor seals and don't disturb them



On March 22, 2011, Dept. of the Interior released the public version of the Frost Report by Field Solicitor Gavin Frost



Two weeks before NPS scientists published Becker 2011 paper, Field Solicitor Gavin Frost found that their "mistakes stem from the refusal ... to modify their intuitive, but **statistically and scientifically unproven, belief** that DBOC mariculture activities ..." disturb harbor seals in Drakes Estero. Frost concluded NPS scientists showed "**bias**," "**advocacy**," "**troubling mind-set**," "**mishandled**" data, and "**willingness to allow subjective beliefs ... to guide scientific conclusions**." Frost found the NPS scientists had **violated the NPS Code of Scientific & Scholarly Conduct**.

Draft Environmental Impact Statement Drakes Bay Oyster Company Special Use Permit

- NPS 281,000 photographs that reveal no DBOC disturbances were dismissed from dEIS; 3 1/2 years of secret photo data rejected.
- **Becker, Press, & Allen 2011 paper provides the only data in dEIS of harm to harbor seals. Without it, NPS has no impact data.**
- The dEIS claims a "**potential to adversely affect seals in the future**" and proposes mitigation measures – poison pills to eliminate DBOC.
- Mitigations apply to all alternatives and will put DBOC out of business.
- Mitigations should apply to known impacts. This is a misuse of NEPA.

- Redraw **lease boundaries** to exclude many shellfish beds
- Eliminate vital **boat routes**
- Eliminate **access** to necessary CDPH sampling stations
- Restrict number of **boats**
- Restrict number of **barges**
- Restrict number of **hours** of boat use to half current use
- Restrict total **harvest levels**

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- The dEIS establishes the basis for a domino effect on ag in PRNS.
- The dEIS claims that the six ranches surrounding Drakes Estero are the primary source of nonpoint-source pollution in Drakes Estero.
- The oysters help clarify the water (e.g., the eelgrass has doubled).
- Once Drakes Estero is designated "wilderness," and without oysters, the ranches surrounding it will be eliminated as the source of pollution.
- Their elimination will mark the end of agriculture in the Seashore, and a huge blow for sustainable, local, organic agriculture in Marin County.

The dEIS states: "Six cattle ranches are located within the Drakes Estero watershed. ... fecal coliform levels in most of Drakes Estero have been shown to intermittently rise after rain events associated with runoff from pastures within the watershed... Continued ranching in the vicinity of the project area has the potential to impact the following resources: water quality and socioeconomic resources."

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Once Drakes Estero is designated "wilderness," and without oysters, the six ranches surrounding it will be eliminated as the source of pollution.



3

NAS 2009 Conclusion: NO MAJOR
 ADVERSE IMPACT SENATOR FEINSTEIN
 LEGISLATIVELY INSTRUCTED NPS TO FOLLOW NAS. Why
 did NPS find OPPOSITE?

Draft Environmental Impact Statement
 Drakes Bay Oyster Company Special Use Permit



Absence of "data" and "evidence" from draft Environmental Impact Statement (DEIS)

Environmental impact	"data" and "evidence" showing impact	Hypothetical "potential" for impact
overall	7*	514
seals	1	74
eelgrass	0	43
red-legged frog	0	10

* 7 = 1 for seals (Becker 2011) and 6 for noise measurements of oyster boats and onshore oyster operation

NPS dEIS based upon hypothetical "potential" impacts and not actual "data" or "evidence" showing impacts

Draft Environmental Impact Statement
 Drakes Bay Oyster Company Special Use Permit



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The one citation of "data" in the dEIS is from Becker 2011 which is why that paper is so key

Oyster farm has existed for nearly 80 years, and yet NPS has no data of impacts but only "potential" impacts; After millions of \$\$ on studies, shouldn't NPS have data?

Draft Environmental Impact Statement
 Drakes Bay Oyster Company Special Use Permit



The dEIS raises the specter that DBOC is a threat to seven different "special-status" endangered species

Environmental impact	"data" and "evidence" showing impact	Hypothetical "potential" for impact
overall	7*	514
seals	1	74
eelgrass	0	43
red-legged frog	0	10

dEIS presented "potential" impact with no data for seven endangered species including e.g. red-legged frog, Myrtle's silverspot butterfly, Western snowy plover, and CA least tern

Draft Environmental Impact Statement
 Drakes Bay Oyster Company Special Use Permit



The dEIS claims that DBOC might account for 1% (7 acres) of lost eelgrass due to shading by oyster racks ...

Environmental impact	"data" and "evidence" showing impact	Hypothetical "potential" for impact
overall	7*	514
seals	1	74
eelgrass	0	43
red-legged frog	0	10

... but the dEIS neglects to mention that eelgrass never existed at most racks, and from 1991 to 2007, eelgrass expanded 100% (368 acres), from 368 to 736 acres

Draft Environmental Impact Statement Drakes Bay Oyster Company Special Use Permit



The only reference to "data" for an environmental impact is this one harbor seal reference to Becker 2011

Environmental impact	"data" and "evidence" showing impact	Hypothetical "potential" for impact
overall	7*	514
seals	1	74

Concerning harbor seals, the dEIS states:

"In a recent review of the longterm data at Drakes Estero, Becker, Press, and Allen (2011) used a model-based approach to show that harbor seals preferentially use haul-out sites less when located near active oyster mariculture sites during years of high vs. low oyster harvest."

May 5 2009: National Academy of Sciences report

The NAS reported that resolving the controversy over the potential harbor seal disturbances "... would require a data collection system that could be independently verified, such as time and date stamped photographs. This verification is especially important in circumstances where there is an indication of a source of disturbance that could lead to a regulatory action, as was the case with disturbances attributed to DBOC."

"time and date stamped photographs"

Unknown to NAS, for two years since May 5 2007, NPS had cameras taking pictures every minute of every day, and had the detailed 2008 logs showing no DBOC disturbances.

NPS had two cameras for 3 1/2 years taking 281,000 photos
Why didn't NPS disclose the cameras to the NAS?

2008 NPS log: no disturbances of harbor seals by DBOC

People on	Boat mo	Boat enters OB channel
Boat leaves	Boat leaves	People on S OB site
Boat in	Boat at	Boat leaves channel
Boat near	Boat	Boat enters channel
Boat mo	Boat	People on S OB site
Boat le	Boat	Boat leaves channel
Boat in	Boat in	Boat enters channel
Boat l	People on	People on N OB site
Boat at	Boat	Boat leaves channel
Boat at	Boat	
Boat at	Heavy for	

- NPS said photos had not been analyzed, but NPS logs showed the photos had been analyzed in detail
- NPS said cameras were for studying wildlife, but NPS logs showed focus was on oyster boats & workers not wildlife
- NPS said DBOC caused seal disturbances, but NPS logs showed no DBOC disturbances to seals in 3 1/2 years

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Since 2007, our community has heard four generations of NPS claims of data showing the oyster farm is harming the harbor seals, but the first three are absent from dEIS

- 2007: 1st NPS claim to SUPES that DBOC caused an 80% decline in harbor seals at one subsite: NOT IN dEIS
- 2007: 2nd NPS claim to CCC that DBOC disturbed harbor seals based on April 26 Trip Report: NOT IN dEIS
- 2008-'09: 3rd NPS claim to NAS that DBOC disturbances led to decrease in seals (Becker 2009 paper): NOT IN dEIS
- 2010-'11: 4th NPS claim to MMC that DBOC activity led to spatial displacement of seals (Becker 2011 paper): IN dEIS

dEIS only includes the 4th generation of NPS claims of harm by DBOC to harbor seals: other claims absent

2008 NPS log: detailed analysis of DBOC boats & workers

Date	Time	Activity
2008-5-8	8:53	Boat enters OB channel
2008-5-8	11:13	Boat leaves channel
2008-5-8	3:11	Boat enters channel
2008-5-8	3:15-3:44	People on S OB site
2008-5-8	3:45	Boat leaves channel
2008-5-10	8:25	Boat enters channel
2008-5-10	8:29-8:57	People on N OB site
2008-5-10	8:58	Boat leaves channel
2008-5-12	7:20	Boat enters channel

A. Because the NPS logs of 3 1/2 years of minute-by-minute, day-to-day photos showed not a single disturbance of the harbor seals caused by DBOC.

2008-5-13	10:38	Boat leaves channel
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Draft Environmental Impact Statement Drakes Bay Oyster Company Special Use Permit



The dEIS dismisses the NPS photos and detailed logs because of the lack of a NPS protocol for their analysis

The dEIS states:

"Because the collection of these photos was not based on documented protocols and procedures, the body of photographs does not meet the Department's standards for a scientific product. As a result, the photographs have not been relied upon in this EIS."

But dEIS includes other "data" without documented protocols, such as aerial photos, maps, and other data (e.g., 1982 & 1983 data from Allen's pre-NPS notebooks) from Becker 2011

dEIS dismisses 281,000 photos and NPS logs that showed no DBOC disturbances of harbor seals over several years

dEIS Chapter 1, Purpose of and Need for Action, Introduction References Used for Impact Analysis

Pg 23

Primary references are those for which evidentiary support is traceable to a source that complies with recognized standards for data documentation and scientific inquiry

References are inadequate to trace back claims made in the EIS, neither Title, Chapter, Page nor Paragraph is offered in the vast majority of citations.

Pg 23

Secondary references are those for which evidentiary support is **not directly traceable to a source that complies with recognized standards for data documentation and scientific inquiry.** Secondary references can include documents that have not been subjected to peer review or that do not reflect direct on-site observations or measurements in accordance with a standard protocol for data documentation. Examples of secondary references include presentation slides, field notes, and personal correspondence. This includes some of the information provided by CDFG, DBOC, and members of the public.

1/4 MILLION PHOTOGRAPHS, LOGGED AND ANALYZED QUALIFIES AS A SECONDARY REFERENCE IN THAT CASE!

ALL Special-Status Species are unaffected by DBOC and should be eliminated from the dEIS

Myrtle Silver Spot Butterfly
nowhere does the EIS state specifically how and by what method they are impacted

Red Legged Frog. Habitat is FRESH H₂O
NOT Salt H₂O ∴ no impact

Salmon - no impact is stated

Steelhead. Project is OUTSIDE their Habitat ∴ NO IMPACT

Leather Back Sea Turtle - dEIS SPECIFICALLY states that portion where it may inhabit DOES NOT exhibit typical NESTING OR foraging habitat FEATURES REQUIRED BY THEM ∴ NO IMPACT

NO IMPACT

NO IMPACT

NO IMPACT

NO IMPACT

NO IMPACT

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Special Status Species Continued

NO IMPACT

Western Snowy Plover - PROJECT AREA

is NOT at the mouth of the Estero where they make their habitat. ∴ NO IMPACT

NO IMPACT

CA. Least Tern - The closest population

is SF BAY - NOT ESTERO ∴

NO IMPACT