

**DRAKES BAY OYSTER COMPANY**  
17171 Sir Francis Drake Blvd., Inverness, CA 94937

California Coastal Commission  
Attn: Cassidy Teufel  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

March 16, 2010

Re: Coastal Development Permit Application No: 2-06-003 – Response to CCC letter dated 03/09/2010

Dear Cassidy,

This letter will attempt to answer all of the questions and requested clarifications included in your letter dated March 9, 2010. We have also revised our project description and it is attached to this letter.

We will provide you an update on the revisions to the NPS special use permit when an update is available.

The following responses refer directly to the numbered items contained in your letter.

1. The non-motorized barges are 30' long and 10' wide.
2. The seawater intake pipe is 4" in diameter. The pipe feeding the hatchery is 2" in diameter. The discharge pipe from the hatchery is 4" in diameter.
3. The manifold feeding the outdoor setting tanks is 2" in diameter. The discharge pipes (one from each of the five tanks) are 2" in diameter. Each of the 2" discharge pipes increase to 6" in diameter.
4. Two of the five setting tanks are 10' in diameter and 4' deep and three of the tanks at 7' in diameter and 4' deep.
5. One of the pumps is always running to provide water to the hatchery and setting systems. During non-working hours, the one horsepower pump provides enough flow. While employees are washing oysters, the five horsepower pump provides enough flow for the hatchery and the washing. The pumps never operate simultaneously. They are actually wired and controlled so that only one pump can operate at any one time.
6. The outdoor setting tanks are filled and remain full for about 4 days during the setting period. After 4 days, to feed the juvenile oysters and cool the water slowly, raw seawater flows through tanks at about 5 GPM for the next 3 days.
7. The seawater pumps are powered by electric motors.
8. The schedule 40 PVC channel markers will be approximately 8' long, placed vertically, and pushed into the substrate approximately 2'. The pipes will extend approximately 6' above the substrate. The portion of the pipe that is visible above the water line will vary based on tide level. Approximately 10 channel markers will be installed to assist in navigation.
9. Approximately 20 people live on site. There are 15 bedrooms available and the total number of people living at the site varies.

10. Please note that the November 14 letter stated that the fully approved area (area 17) is 25.46 acres. This area is the only fully approved growing area in California and therefore important to distinguish. There is another 1033 acres of conditionally approved growing area available within DFG lease number M-438-01. The total is 1059 acres. DBOC is currently using roughly 150 acres of bottom bags, floating systems and racks combined. The total acreage used varies throughout the year. Also, specific areas may or may not have continuous shellfish production. For example, a growing area may go fallow for a period of time following harvest before the area is re-planted.
11. Our records identify approximately 7 acres of rack culture (the NPS has calculated the racks at 8 acres). The balance currently in use is about 140 acres.
12. Per the November 14, 2008 submittal, about 3.75 acres of existing racks were in need of repair.
13. About 25% of the racks needing repairs are currently in use. This varies depending on the time of year, larvae availability, larvae & spat survival and level of repairs needed.
14. The bents are 12' X 12'
15. Yes, there are six horizontal 2X4 rails.
16. The rails are placed on 2'5" centers.
17. Once planted, the racks are typically inspected quarterly.
18. Cluster oysters are beach hardened an average of approximately 2 months.
19. Cluster oysters are usually beach hardened after they have been broken apart.
20. French tubes replace the Japanese hanging cultch method and can be used on all racks.
21. We do not have an exact footprint for the clams. I believe that the clams currently occupy less than 10 acres.
22. Clams are grown in the same growout bags as single oysters, but require less maintenance than single oysters. Clam bags located on the bottom inspected regularly and are usually maintained annually.
23. Juvenile clams (seed) are grown in floating bags or trays for up to 6 months. After this stage (1/4" – 3/8"), they are planted in bottom bags at final density (roughly 250 clams per bag). The clams are usually allowed to grow to harvest size without rebagging.
24. Single oysters need to be sorted and rebagged approximately 4 times during their growout cycle. Oysters need to be sorted and replanted approximately every three months.
25. Currently, immature oysters are brought to the shoreside facility by boat/barge where they are sorted and rebagged.
26. French tubes and bagged cultch are kept in the setting tanks for one week.
27. Small seed remains in the hatchery for approximately one month following setting.
28. Water from the setting tanks is discharged, unfiltered, into the estero.
29. The seawater intake is screened using plastic mesh with ¼" openings.
30. The seawater intake is located roughly 50' from the shoreline near the setting tanks.

As previously discussed, we believe Section 30411 of the Coastal Act is relevant to the CDP for offshore activities.

Please feel free to give me a call if you need any more information.

Sincerely,

Kevin Lunny