Correspondence ID: 1 **Project:** 33043 **Document:** 36704

Name: felix, jeff

Address: [redacted]
USA

Outside Organization: Unaffiliated Individual

Received: Oct,14,2010 00:00:00

Correspondence Type: Web Form

Correspondence: Drakes Bay will not be a wilderness area until the oyster farm is gone. We, the people, agreed to designate it as a wilderness area years ago. That wish has not changed. A contract was completed in good faith with that in mind. A society with any integrity must keep its contracts. To break this contract would be a travesty.

So that there is no confusion this citizen's opinion is that the oyster company must honor its contract and close its business in 2012 as promised. There is no reason not to do this and to do otherwise would simply reflect that certain politicians are in the back pocket of deep pocket investors who intend to exploit our national parks for profit.

Correspondence ID: 2 **Project:** 33043 **Document:** 36704

Name: Gordon, Scott

Address: [redacted]
USA

Outside Organization: Unaffiliated Individual

Received: Oct,15,2010 12:37:03

Correspondence Type: Web Form

Correspondence: My family has been going to Johnson's on Drakes Bay for decades. We have always enjoyed the oyster farm as part of a day trip to Point Reyes along with Limantour and the other beaches and the lighthouse itself. Point Reyes is clearly one of the most beautiful parts of California.

Kevin Lunny has done an outstanding job modernizing the operation, in an ecologically friendly way, being respectful of the delicate environment surrounding the site. Does anyone have a more vested interest in pristine water than an oyster farmer?

The Park Service got off on the wrong foot in this issue, we can all agree. But here is a great chance to recover. We do not want to lose this wholesome, fun, educational, nutritional family place to visit.

Please extend the lease of the Drake's Bay Oyster Farm!

Scott Gordon

Correspondence ID: 3 **Project:** 33043 **Document:** 36704

Name: Martin, Roland

Address: [redacted]
USA

Outside Organization: Retired businessman Unaffiliated Individual

Received: Oct,15,2010 14:00:32

Correspondence Type: Web Form

Correspondence: To: National Park Service. Subject: Drakes Bay Oyster Company.

Gentlemen, please take note of my strong support for the extention of DBOC's benign, job supporting, operation for the next 10 year period. My reasons for the continuence are many, but include the following salient points. 1) Oyesters have been harvested in this area for hundreds, perhaps thousans of years. Never has this activity harmed the environment. 2) The DBOC provides an organic, highly nutritious, product to California's markets, which, if not produced locally, would have to be imported from other states or countries. Why penalise a local business to enrich a distant business? 3)The DBOC provides incomes for local families that would not exist but for the oyster beds located in the territory. The local dairies will not expand their operations to absorb the lay-offs. 4) An objective of the NPS in serving the public is to attract people,including tourists , to parks, not to dicourage visitors. Evicting DBOC would discourage visitors and reduce park income from this resource. I, and my family and friends have enjoyed visiting the DBOC, buying their product and learning about the importanct of oyesters in the environment. Oysters, as you know, thrive only in unpollutedwarers - by definition they do not pollute nor does their harvesting. 5)There are many more positive and productive reasons to continue the harvesting of oysters but there seems to be some in NPS management that simply don't want DBOC to exist. I have not seen the service make a compelling argument for their desire to eliminate this productive attraction. Roland Martin

---

Correspondence ID: 4 **Project:** 33043 **Document:** 36704

Name: Coopersmith, Paul

Address: [redacted]
USA

Outside Organization: Unaffiliated Individual

Received: Oct,17,2010 12:32:12

Correspondence Type: Web Form

Correspondence: Drakes Bay Oyster Company's owners knew full well, when they took over the company from the Johnsons, that their lease would expire in 2012. I ardently

believe that allowing them to extend their lease beyond that date would set a terrible precedent, one that could lead to further commercialization of our National Parks.

As someone who has been hiking in the National Seashore several times a week, for going on twenty years, I would like to see the park eventually returned to its original, wild state. Making an exception for the Lunnys could encourage others, such as the remaining ranching families, to sue the Park Service to make exceptions for them, as well. And who's to say that after another ten years of DBOC's "farming" oysters in the Estero, they won't be back suing the Park Service for yet another extension?

A contract is a contract. Please don't allow DBOC to open Pandora's Box, for the sake of more profits for a family that is already among the wealthiest in the area.

Correspondence ID: 5 **Project:** 33043 **Document:** 36704

Name: Tiscornia, Mary L

Address: [redacted]
USA

Outside Organization: Marin Watch Unaffiliated Individual

Received: Oct,17,2010 15:13:31

Correspondence Type: Web Form

Correspondence: I strongly support extending the Oyster Farm lease to the Lunnys in Tomales Bay for 10 years with the option to renew. Having agriculture in West Marin and the Park provides needed local, inexpensive, rich in protein food, jobs, housing and a multiplying effect on the hurting local economy with little or no adverse effect. It would contribute to local and state taxes, diversity, encourage tourism and reduce the need to import the highly in demand oyster. As well as being safe it is a business that strengthens the community, education and local causes. Given that the Parks original MANDATE was to preserve the CULTURAL and HISTORICAL as well as the natural environment it is would not be out of context to allow such a use and to my view to not do so and lose such a positive force in the Park would would be horribly misguided.

Thank you for your consideration

Mary Tiscornia

Correspondence ID: 6 **Project:** 33043 **Document:** 36704

Name: Gorder, Barbara

Address: [redacted]
USA

Outside Organization: Undisclosed Location Unaffiliated Individual

Received: Oct,21,2010 12:41:45

Correspondence Type: Web Form

Correspondence: Please save the Drakes Bay Oyster Farm! What Drakes Bay Oyster Means to Our Community Almost 40% of California's Shellfish Production, All Marketed Locally in the Bay Area

Drakes Bay oysters comprise almost 40% of California's shellfish production and are marketed exclusively in the Bay area. Even still, the demand for oyster products far exceeds the state's production level, and the majority of shellfish products consumed in the state are imported from the Pacific Northwest and the Atlantic and Gulf states.1 Without Drakes Bay oysters, the Bay area would have to import an additional ~38,000 lbs of oysters each week.2 Importing from Seattle would generate 577 tons of carbon per year; importing from the Chesapeake bay would generate 1800 tons; and importing from Tokyo would generate 3600 tons!3 And at a time when America's seafood trade deficit (at $10 billion) is second only to foreign oil, every shell counts when it comes to local seafood.

Oysters are an amazing foodsource. Oysters require no feed, no fertilizers, no chemicals, and no cultivation. Drakes Bay Oyster Farm produces 500,000 lbs of shucked oyster meat each year on less than 150 acres of water bottom. It is estimated that it would take over 30,000 acres of pasture to produce the equivalent amount of protein on grass-based beef operation. Oysters are nature's best source of the trace mineral zinc, with up to 100mg per gram (second on the list is ginger root at 7mg per gram!).4 Zinc is good for your skin, your immune system, and speeds up healing after an injury.5 Oysters have also been recently promoted as one of ten flu fighting foods.6

Oysters are a prized part of many cultures, especially those from Asia, Central America, and Northern Europe. Every day, we see people of diverse backgrounds and ethnicities visiting the oyster farm.

30 Jobs and Housing for Families

The oyster farm is the second largest employer within Point Reyes National Seashore, employing 30 full time workers and providing housing for many of them. In an area that traditionally only offers farm employment opportunity to men on the dairy farms and beef ranches, the oyster farm employs both men and women. These families have been a part of the community here in West Marin, some for multiple generations. We see them at school, at church, at the local store, and the barber shop. It is unlikely they would be able to stay if the oyster farm had to go.

Educational and Ecological Benefits

Drakes Bay Oyster Farm is the only farm within Point Reyes National Seashore that is open to the public. Visitors are given the rare opportunity to fully experience and understand the history of agriculture within the Point Reyes National Seashore, the sustainable farming practices used around and within Drakes Estero, and the sensitive balance of both producing food and protecting nature in the important working landscapes of Marin County.

As the state's last operating oyster cannery, Drakes Bay Oyster Farm has a unique resource: piles and piles of oyster shells. Over $10,000 worth of shell has been donated to the Native Oyster Restoration Project in the San Francisco Bay.7 The shell has been used to create a reef onto which native oyster seed can attach. The farm has also donated shell to the Western Snowy Plover Recovery Project. The shells provide excellent camouflage for adults, eggs, and chicks, increasing plover nest density and nesting success.8

Drakes Bay Oyster Farm is also responsible for more water sampling, oyster meat sampling and phytoplankton sampling than any other sampler on the California coast. These data are crucial to the state of California's monitoring programs to ensure environmental protection, public health, and further scientific awareness of marine biotoxins.

Aside from these indirect contributions, oysters themselves have been found to be beneficial to the ecosystem. The National Academy of Sciences writes: "The literature on estuarine ecosystems and restoration identifies oysters as a major contributor to maintaining or restoring water quality and as important biogenic habitat for demersal fishes and mobile crustaceans [...] oysters typically have largely beneficial biogeochemical functions in estuarine and lagoonal ecosystems."9

The World Wildlife Fund also writes: "Filter-feeding bivalves (clams, mussels, scallops and oysters) make up approximately one-quarter of the world's aquaculture production [...] Unlike most fin fish and crustaceans, filter-feeding bivalves feed on naturally occurring phytoplankton at the base of the food chain. This eliminates the need for external feed inputs. Also, these shellfish often improve water quality by filtering sediment and excess nutrients. Shellfish gear and culture practices can influence the diversity and abundance of fish and invertebrates in surrounding waters and benthic substrates. The complex three-dimensional habitat created by shellfish can be beneficial because it often is colonized by a diversity of vertebrate and invertebrate fauna. A more indirect environmental benefit is that, because this type of seafood depends on clean water, coastal communities that farm bivalve shellfish are highly committed to protecting water quality." Thanks! Barbara Gorder

---

Correspondence ID: 7 **Project:** 33043 **Document:** 36704
Name: Dollberg, Susan
Address: [redacted]
USA
Outside Organization: GGNPC Unaffiliated Individual
Received: Oct,21,2010 12:45:44
Correspondence Type: Web Form
Correspondence: NPS,

I am 100% in favor of granting Drake's Bay Oyster Co. and the Lunney family permission to continue their oyster farming and sales business on Drake's Bay. I have visited the farm and met the Lunneys on several occasions and fully support their methods of cleaning and preserving Drake's Estero. I have seen evidence that through their methods of conservation and farming the water is cleaner than it has been in many years and that some native estero grasses are coming back. My feeling is that they are the perfect stewards of this beautiful area and that they deserve to continue their operations; both to preserve precious jobs and to continue to foster the successful management of Drake's Estero which they initiated when they took over the present lease. So much has been accomplished on their watch, they deserve the right to continue their efforts for the next 10 years and into the future.

I believe that each area of NPS parkland should be considered individually, NOT under a blanket rule. Please consider renewing the lease for Drake's Bay Oyster Co. and the Lunney family.

Thank you, Susan Dollberg

Correspondence ID: 8 **Project:** 33043 **Document:** 36704
Name: buckley, peter k
Address: [redacted]
USA
Outside Organization: center for ecoliteracy Unaffiliated Individual
Received: Oct,21,2010 12:47:18
Correspondence Type: Web Form
Correspondence: I am familiar with the discussion concerning the above project, and understand the concerns of the NPS. Nonetheless, all things considered, the overall life and vitality of the park and the community will be enhanced by allowing continued operation of the Drakes Bay oyster Company. I am saying this with confidence in my informed understanding of the issues, and while the NPS concerns are important, I do not feel they are determinative of the issue. Thank you for your review. Peter Buckley

---

Correspondence ID: 9 **Project:** 33043 **Document:** 36704
Name: Caindec, Cara
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,21,2010 12:58:16
Correspondence Type: Web Form
Correspondence: Hi there, I live in Marin County and we are blessed to live in a place where we can help our earth through locally farmed food. Drakes Bay Family Farm has been an important educational, environmental steward, and employer in our community, and I'd like to see them continue their operations.

Drakes Bay oysters comprise almost 40% of California's shellfish production and are marketed exclusively in the Bay area. Even still, the demand for oyster products far exceeds the state's production level, and the majority of shellfish products consumed in the state are imported from the Pacific Northwest and the Atlantic and Gulf states.1 Without Drakes Bay oysters, the Bay area would have to import an additional ~38,000 lbs of oysters each week. 2 Importing

from Seattle would generate 577 tons of carbon per year; importing from the Chesapeake bay would generate 1800 tons; and importing from Tokyo would generate 3600 tons! 3 And at a time when America's seafood trade deficit (at $10 billion) is second only to foreign oil, every shell counts when it comes to local seafood.

Oysters are an amazing foodsource. Oysters require no feed, no fertilizers, no chemicals, and no cultivation. Drakes Bay Oyster Farm produces 500,000 lbs of shucked oyster meat each year on less than 150 acres of water bottom. It is estimated that it would take over 30,000 acres of pasture to produce the equivalent amount of protein on grass-based beef operation. Oysters are nature's best source of the trace mineral zinc, with up to 100mg per gram (second on the list is ginger root at 7mg per gram!).4 Zinc is good for your skin, your immune system, and speeds up healing after an injury.5 Oysters have also been recently promoted as one of ten flu fighting foods.6. Oysters are a prized part of many cultures, especially those from Asia, Central America, and Northern Europe. Every day, we see people of diverse backgrounds and ethnicities visiting the oyster farm.

Respectfully submitted,

Cara Caindec

Correspondence ID: 10 **Project:** 33043 **Document:** 36704
Name: Patch, Linda A
Address: [redacted]
CAN
Outside Organization: None Unaffiliated Individual
Received: Oct,21,2010 13:10:18
Correspondence Type: Web Form
Correspondence: Greetings, I'm a long-time Marin resident (still own a house in Fairfax) living near Vancouver, British Columbia for a few years while my husband works on projects for Disney. We sure miss Marin! For many years we'd go out and get oysters, and we are so sorry to hear that they might discontinue the oyster farm. Please do everything within your power to foster sustainable agriculture and farming. The oyster farm should be able to co-exist with other land/water uses and provides jobs and income. Additionally, most (if not all) of the people who drive out to pick up oysters do other sightseeing, eat, shop, etc. and can help stimulate the local economy. I hope when we come back in 2 years, we can still go out and get oysters at Drake's Bay! Many thanks, Linda Patch (95 Frustuck Ave., Fairfax, CA 94930 and 2200 Panorama Drive #75, Port Moody, BC, Canada V3H5M2; lpp_65@hotmail.com, 778-919-8767)

Correspondence ID: 11 **Project:** 33043 **Document:** 36704
Name: Lonergan, Carol
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,21,2010 13:46:13
Correspondence Type: Web Form
Correspondence: Drakes Bay oysters comprise almost 40% of California's shellfish production and are marketed exclusively in the Bay area. Despite that, the demand for oyster products far exceeds the state's production level, and the majority of shellfish products consumed in the state are imported from the Pacific Northwest and the Atlantic and Gulf states. Without Drakes Bay oysters, the Bay area would have to import an _additional_ ~38,000 lbs of oysters each week. Importing from Seattle would generate 577 tons of carbon per year; importing from the Chesapeake bay would generate 1800 tons; and importing from Tokyo would generate 3600 tons! And at a time when America's seafood trade deficit (at $10 billion) is second only to foreign oil, every shell counts when it comes to local seafood.

The Drakes Bay Oyster Farm is the 2nd largest employer within Point Reyes National Seashore, employing 30 full time workers _and_ providing housing for many of them. In an area that traditionally only offers farm employment opportunity to men on the dairy farms and beef ranches, the oyster farm employs both men AND women. These families have been a part of the community here in West Marin, some for multiple generations. We see them at school, at church, at the local store, and the barber shop. It is unlikely they would be able to stay if the oyster farm had to go.

Drakes Bay Oyster Farm is the only farm within Point Reyes National Seashore that is open to the public. Visitors are given the rare opportunity to fully experience and understand the history of agriculture within the Point Reyes National Seashore, the sustainable farming practices used around and within Drakes Estero, and the sensitive balance of both producing food and protecting nature in the important working landscapes of Marin County.

As the state's last operating oyster cannery, Drakes Bay Oyster Farm has a unique resource: piles and piles of oyster shells. Over $10,000 worth of shell has been donated to the Native Oyster Restoration Project in the San Francisco Bay, and has been used to create a reef onto which native oyster seed can attach. The farm has also donated shell to the Western Snowy Plover Recovery Project: these shells provide excellent camouflage for adults, eggs, and chicks, increasing plover nest density and nesting success.

Drakes Bay Oyster Farm is also responsible for more water sampling, oyster meat sampling and phytoplankton sampling than ANY other sampler on the California coast! These data are _crucial_ to California's monitoring programs, to ensure environmental protection, public health, and further scientific awareness of marine biotoxins.

Aside from these indirect contributions, oysters themselves have been found to be beneficial to the ecosystem. The National Academy of Sciences writes: "The literature on estuarine ecosystems and restoration identifies oysters as a major contributor to maintaining or restoring water quality and as important biogenic habitat for demersal fishes and mobile crustaceans [...] oysters typically have largely beneficial biogeochemical functions in estuarine and lagoonal ecosystems."

The World Wildlife Fund also writes: "Filter-feeding bivalves (clams, mussels, scallops and oysters) make up approximately 1/4 (!) of the world's aquaculture production [...] Unlike most fin fish and crustaceans, filter-feeding bivalves feed on naturally occurring phytoplankton at the base of the food chain; this eliminates the need for external feed inputs. Also, these shellfish often _improve water quality_ by filtering sediment and excess nutrients. Shellfish gear and culture practices can influence the diversity and abundance of fish and invertebrates in surrounding waters and benthic substrates. The

complex 3-dimensional habitat created by shellfish can be beneficial, because it often is colonized by a diversity of vertebrate and invertebrate fauna. A more indirect environmental benefit is that because this type of seafood depends on clean water, coastal communities that farm bivalve shellfish are HIGHLY committed to protecting water quality."

Please issue your Special Use Permit for a period of 10 years to Drakes Bay Oyster Company, and keep thousands of oyster-eating Californians happy.

Correspondence ID: 12 **Project:** 33043 **Document:** 36704
Name: Atwood, Robert C
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,21,2010 14:48:20
Correspondence Type: Web Form
Correspondence: Please don't renew any lease for the oyster company on Drakes Estero. This was the original agreement and they should be held to it under the law. There are hardly any pristine wilderness wetlands left on the west coast of the United States. Wildlife should be able to have a tiny bit of what is left. People have taken over and filled in the vast majority of wetlands. Why not let wildlife have a tiny fraction of what is left? - especially since the land is already owned by the federal government and doesn't need to be purchased. I have no qualms about all the land based farms continuing at PORE but Drake's Estero should be allowed to be a pristine wilderness for wildlife not a spot for commerce. Commerce has the vast majority of land already in California. Why not let this one very small part be commerce free? Public boating in Drakes Estero should also require a special written use permit by the public since large rafts of birds are spooked into the air by kayakers. The primary goal of the National Park Service should be to protect beautiful natural areas for future generations of children. Children really enjoy seeing wildlife. Children have ample opportunity to see business and commerce in all the cities. People who want oyster farms have these in Tomales bay already. What is in very short supply is pristine coastal bays that wildlife can reside in unhampered by commerce and private real estate. Please try to support what little wildlife is left and not commerce. Do some seafood restaurants across the country and a few politician who eat oysters from Drakes Estero really have priority over the purpose of the National Park service?

Correspondence ID: 13 **Project:** 33043 **Document:** 36704
Name: Wiens, Nancy
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,21,2010 16:43:46
Correspondence Type: Web Form
Correspondence: I support the issuing of a permit to Drake's Bay Oyster Co. because of their care for the Bay while the grow and harvest oysters for these many years.

Correspondence ID: 14 **Project:** 33043 **Document:** 36704
Name: Savage, Charles W
Address: [redacted]
USA
Outside Organization: Point Reyes National Seashore Association Unaffiliated Individual
Received: Oct,21,2010 17:49:03
Correspondence Type: Web Form
Correspondence: October 20, 2010

DBOC SUP EIS c/o Cicely A. Muldoon Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station , CA 94956

Re: Drakes Bay Oyster Company Special Use Permit Environmental Impact Statement L7617

Dear Ms. Muldoon,

The National Park Service (NPS) has requested public comment to evaluate the potential issuance of a Special Use Permit for commercial oyster operations within Drakes Estero at the Point Reyes National Seashore. The public comment will be used by the NPS to identify topics and concerns to be addressed in the preparation of an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA).

I have enjoyed visiting the Point Reyes National Seashore for the past 40 years and I am a member of the Point Reyes National Seashore Association. On my hikes along the Estero and Bull Point trails I have become concerned with the extensive development of the Drakes Bay Oyster Company's commercial operations. The proliferation of floating piers for shellfish cultivation and workers using motorized craft for servicing the piers have clearly disrupted flocks of resting migratory birds and marine life and are at odds with the NPS's Project Objective to "Manage natural and cultural resources to support their maximum protection, restoration and preservation" in Drakes Estero.

I am writing therefore to state my position that the Secretary of the Interior should not issue a Special Use Permit for an additional 10 years to the Drakes Bay Oyster Company (DBOC) for the commercial harvesting and processing of shellfish in Drakes Estero. Instead, Drakes Estero should finally be granted full wilderness designation and protection as envisioned under the 1976 Point Reyes Wilderness Act.

I understand that the Point Reyes National Seashore was created by an Act of Congress in 1962. Congress later designated the Drakes Estero as potential wilderness in the 1976 Point Reyes Wilderness Act . In 1972, the Johnson Oyster Company, with operations in Drakes Estero, sold its property to the NPS which in turn allowed the Johnson Oyster Company to continue commercial operations until 2012 under a Reservation of Use and Occupancy with a Special Use Permit.

Congressional Committees clearly expressed the 1976 Act's intent to eventually convert lands and waters designated as potential wilderness to full

wilderness status:

"As is well established, it is the intention that those lands and waters designated as potential wilderness additions will be essentially managed as wilderness, to the extent possible, with efforts to steadily continue to remove all obstacles to the eventual conversion of these lands and waters to wilderness status." (House Report No. 94-1680, at 3) (1976)

The Department of the Interior's Office of the Solicitor issued a legal opinion in February 2004 stating that:

" The Park Service is mandated by the Wilderness Act, the Point Reyes Wilderness Act and its Management Policies to convert potential wilderness, i.e., the Johnson Oyster Company tract and the adjoining Estero, to wilderness status as soon as the non conforming use can be eliminated."

In 2005, the DBOC purchased the Johnson Oyster Company subject to the existing Reservation of Use and Occupancy and associated Special Use Permit set to expire on November 30, 2012. DBOC has submitted a request for the issuance of a new Special Use Permit for 10 years once the existing Permit expires in 2012.

For the Secretary of the Interior to grant a new 10 year Permit would be incompatible with the wilderness protection afforded adjoining marine areas in the Estero de Limantour, Limantour Spit and the Marine Protected Areas of Drakes Estero. Further, issuance of a new Permit would be inconsistent with Congressional intent that Drakes Estero receive full wilderness protection in November 2012 with the cessation of all commercial operations.

In addition, the 1999 Marine Life Protection Act (MLPA) mandates a coast wide system of Marine Protected Areas (MPAs) for California that are marine or estuarine areas set aside to protect and conserve marine life and the integrity of marine ecosystems. Within the Point Reyes National Seashore, the Point Reyes State Marine Reserve (SMR) currently includes parts of Drakes Bay and the southern part of Drakes Estero and prohibits the commercial harvesting and processing of shellfish (mariculture) in those protected areas. The adjoining Estero de Limantour SMR includes all of Limantour Estero and also prohibits commercial shellfish operations.

While the Drakes Estero State Marine Conservation Area (SMCA) north of the Point Reyes SMR currently allows for commercial shellfish mariculture, the Drakes Estero SMCA Plan also states that "If at any time, it becomes feasible to create a SMR at Drakes Estero, this proposal recommends doing so." Allowing the existing Special Use Permit to expire in November 2012 without a new Permit as requested by DBOC would finally allow all of Drakes Estero to be fully protected under the Pt Reyes Wilderness Act and the MPLA.

I understand that in December 2009 the DBOC was fined $62,0000 by the California Coastal Commission for illegally operating in a harbor seal protection area in Drakes Estero. The waste of tax dollars to monitor and police DBOC's aggressive commercial operations outweighs any benefit to the general public. After 40 years, Drakes Estero finally deserves protection from commercial operations in order to promote the restoration of a vital marine habitat and sanctuary. Under both Federal and State laws affecting the Point Reyes National Seashore, the legislative intent has been to protect the integrity of marine ecosystems and to sustain and protect marine life populations. The request by DBOC for a new Special Use Permit to continue the commercial harvesting and processing of shellfish within Drakes Estero is both inconsistent and incompatible with the adjoining designated Wilderness and SMRs. Commercial interests should not be allowed to subvert the overriding public interest to protect and sustain the vital marine ecosystem of Drakes Estero. To do otherwise would set a dangerous precedent that would eviscerate existing protection afforded to designated land and marine areas under the Wilderness Act and the Point Reyes Wilderness Act.

Sincerely yours,

Charles W. Savage Attorney at Law

Cc: Senator Dianne Feinstein Senator Barbara Boxer Representative Lynn Woolsey

---

Correspondence ID: 15 **Project:** 33043 **Document:** 36704
Name: Harrington, Margaret
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,21,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Re: Drake's Bay Oyster Farm at Point Reyes

I am an avid environmentalist. I also recognize there has to be give and take between "man" and the environment. The Drake's Bay Oyster Farm has been around a long time and I am impressed with their responsibility to the environment. I like having oyster and I like having oyster farmers as they keep a close eye on the quality of the water. I would hope there can be a reasonable compromise between the Pt. Reyes National Park and the decent peoples of Drake's Bay Oyster Farm.

Correspondence ID: 16 **Project:** 33043 **Document:** 36704
Name: Holtzman, Jed
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,21,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Hello. I have been visiting Point Reyes National Seashore for over 10 years, and I consider it one of the most majestic landscapes on the planet. I am also a

conservation scientist and a regular volunteer in both the Coho & Steelhead Monitoring Program and the Harbor Seal Monitoring Program at PRNS, as well as occasionally participating in the Habitat Restoration Program.

I am writing to STRONGLY OPPOSE the proposed permit extension for oyster operations in Drake's Estero. The estero is an extremely rare and sensitive ecosystem and a pupping location for vast amount of harbor seals. Oyster boats have repeatedly been seen passing very close to the haulout sites, causing seals to flush into the water. Hauling out is necessary for the seals to maintain temperature, lactate, birth and raise their young, and molt. When seals and pups are flushed into the water by man-made stimuli like oyster boats, we are negatively impacting their welfare. This is/should be prohibited by the Marine Mammal Protection Act, which clearly states that the mammals should be given a wide berth.

Thank you for the opportunity to comment on this matter.

Correspondence ID: 17 **Project:** 33043 **Document:** 36704
Name: Aucoin, John L
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,22,2010 08:06:59
Correspondence Type: Web Form
Correspondence: I am strongly in favor of continuing operations at drakes bay oyster co.

Correspondence ID: 18 **Project:** 33043 **Document:** 36704
Name: Zaremba, Alison
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,22,2010 10:20:10
Correspondence Type: Web Form
Correspondence: I am writing in support of the Drakes Bay Oyster Company receiving an extended lease of ten years to continue their farming operation at Point Reyes. I have been following this story. Every year, for the past twenty five, a group of about 40 friends, have gathered at Heart's Desire Beach for an oyster feed. We always drive out to the oyster company, early in the morning, to buy our bags of oysters. It has always been a special experience, and I've never been given any indication that the the company was doing anything environmentally unfriendly. Along the way we pass many old dairy farms, still receiving special leases to continue their operations at Point Reyes. I support them, too. It's all part of the charm and beauty of the place.

Please give me a yes vote for the oyster company. A California taxpayer, fan, and environmentalist.

Alison Zaremba

Correspondence ID: 19 **Project:** 33043 **Document:** 36704
Name: Chittenden, David
Address: [redacted]
USA
Outside Organization: Many environmental orgs Unaffiliated Individual
Received: Oct,22,2010 18:02:27
Correspondence Type: Web Form
Correspondence: This oyster operation has been operating for many years. They serve a mainly locals and some tourists. Their prices are fair. From what I have seen they try to be environmentally friendly I cannot believe that terminating their contract will greatly benefit our environment. What it will do is to alienate more small business operators and encourage some vocal citizens to be angry at environmental organizations and the NPS. Closing this business is in my opinion a big no win PR situation David and Claudia Chittenden

---

Correspondence ID: 20 **Project:** 33043 **Document:** 36704
Name: Bernstein, Richard I
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,22,2010 23:59:55
Correspondence Type: Web Form
Correspondence: Let the Drakes Bay Oyster company continue to operate. The operation is ecologically sound. Fills an economic need and supplies a nutritionally healthy and safe product. It also draws people to Drake's Bay and therefore is a positive contributor to acquainting visitors to the area.

In the past the company has been subjected to erroneous environmental impact reports, so the EIR's are somewhat suspect. The general area has a somewhat depressed economy so why destroy a business that has positive attributes for West Marin and the GGNRA.

Over a longer time span the area will be restored to it's prior wilderness although Native Americans once gathered oysters in the same area. While today's methods are differentshell mounds attest to prior human activity.

Be smart, extend their lease.

Sincerely,

Richard I. Bernstein, MD

Correspondence ID: 21 **Project:** 33043 **Document:** 36704
Name: N/A, Robin
Address: [redacted]
USA
Outside Organization: SMBC Unaffiliated Individual
Received: Oct,23,2010 07:50:48
Correspondence Type: Web Form
Correspondence: My main concern is to ensure that over-harvesting of the oyster beds does not occur. If Drakes Bay Oyster Co. can show that they have a plan to "farm" the oyster beds in a sustainable manner, AND if the NPS can successfully monitor that commitment and take action to prevent over-harvesting, I am in favor of extending the license of the Drakes Bay Oyster Co. for 10 more years. Sincerely, Robin

---

Correspondence ID: 22 **Project:** 33043 **Document:** 36704
Name: Woo, Celeste M
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,23,2010 08:53:03
Correspondence Type: Web Form
Correspondence: I would like to see the Drake's Bay Oyster lease end in 2012 as stipulated in the original lease agreement. I feel that the preservation and restoration of the Pt Reyes National Seashore in its natural, wild state is of utmost importance. The national parks are a small part of the nation's landscape and should be kept in their most pristine, original states so that all people can have a place to enjoy nature and experience the beauty and peacefulness that it can bring to our lives. If the lease is extended I think it will be a bad precedent and we will begin to see other commercial ventures initiated or expanded in other national parks. It will send a message to all that our parks welcome and encourage business exploitation of our natural environment. We need to keep some lands wild for future generations.

Correspondence ID: 23 **Project:** 33043 **Document:** 36704
Name: Wack, Ray F
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,23,2010 10:01:58
Correspondence Type: Web Form
Correspondence: Comments on Drake's Bay Oyster Company EIS 23 Oct 2010 Dear NPS, I live and Fairfield CA and travel 1.5 hours to Point Reyes Seashore 6 ? 8 times per year to enjoy all the seashore has to offer. I am very thankful that we, the citizens of the USA and the park service have designated this area as a National Seashore and protect it from degradation. The Seashore is an area of many uses ranging from wilderness to dairy farms. I hike the trails, frequent the visitor centers and sit on the beaches. Some of my trips are highlighted by stopping at the Drake's Bay Oyster Farm. In my opinion, the Farm should be granted another 10 year permit. The farm is an excellent steward of the environment. As a veterinarian working in the field of ecosystem health, I am confident in saying that the oysters actually improve the water quality of the area which is not helped by the dairy farms. The land operations of the oyster farm have less impact than the dairy and cattle operations which are permitted in the seashore. I feel that this sustainable oyster operation is a win-win situation for the NPS. The environmental impact of the operation is well mitigated and is an ideal partnership with the NPS. I strongly support the approval of a 10 year permit for continued operations.

Sincerely, Ray F. Wack

Correspondence ID: 24 **Project:** 33043 **Document:** 36704
Name: Verstraete, Frank J
Address: [redacted]
USA
Outside Organization: Audubon, Pt. Reyes NSA Unaffiliated Individual
Received: Oct,23,2010 10:17:52
Correspondence Type: Web Form
Correspondence: I would like to express my strong support for granting the special permit. The Drakes Bay Oyster Company is an integral part of the many wonderful things Point Reyes has to offer. Oyster farming does not cause any pollution of note and oysters act as a sentinel for good water quality.

Correspondence ID: 25 **Project:** 33043 **Document:** 36704
Name: Hoag, Wyn
Address: [redacted]
USA
Outside Unaffiliated Individual

Organization:
Received: Oct,23,2010 11:09:44
Correspondence Type: Web Form
Correspondence: As a biologist and professional photographer, I have traveled to almost every national park and monument in the West. There are no other large estuary systems that are safely wilderness. Our estuaries are the source of life for so many of our ocean fish and mammals. Thus the NPS decision to make this ONE estuary wilderness was a deeply considered decision. We must not waver on this commitment.

Secondly, Drake's Oyster cam in AFTER this NPS decision and signed a contract that the would be OUT by 2012. In every way possible they have not honored their word.

Finally, for NPS to reverse or postpone their previous wilderness, sets a terrible precedent for businesses that want to get their way in the parks.....just follow the path Drakes Oyster has blazed. An postponing will only lead to more postponing--this will NEVER become the wilderness NPS intended.

Correspondence ID: 26 **Project:** 33043 **Document:** 36704
Name: di piazza, daniele d
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,23,2010 13:10:36
Correspondence Type: Web Form
Correspondence: my understanding is that drake oyster bay company agreed to a lease that would expire in the near future. after the speciific date, the property would transfer to the point reyes sea shore. i would prefer that that original contract be observed. it would help make the sea shore whole.

Correspondence ID: 27 **Project:** 33043 **Document:** 36704
Name: Margolis, Alan j
Address: [redacted]
USA
Outside Organization: prns association Unaffiliated Individual
Received: Oct,23,2010 18:42:33
Correspondence Type: Web Form
Correspondence: As a longtime neighbor of the seashore and speaking as a concerned individual, I believe that the DBOC should be offered an extension of their permit/lease. The case of DBOC depredations on seal haul outs has not been made. The low impact and organic nature of their operation seems clear from my longstanding view. The wilderness statute seems draconian in this instance. Needless to say all appropriate regulations and oversight should be enforced as the lease extension is granted. Alan J. Margolis MD

Correspondence ID: 28 **Project:** 33043 **Document:** 36704
Name: N/A, N/A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 08:27:44
Correspondence Type: Web Form
Correspondence: The Drakes Bay Oyster Co. should be moved out of it's present location for two reasons:

1. The Wilderness Act - This activity is not permitted within the scope of the Wilderness Act and this activity should cease.

2. This company entered into an agreement to end this operation. No one put a gun to their head to make them sign and now they hide behind local political support to reverse this agreement. I disagree with this precedent.

It really doesn't matter if the resources are impacted either negatively or positively, that's not the issue.

This is public land, it does not belong to the Drakes Bay Oyster Co. Suck it up DBO Co., you signed the agreement, you need to live up to your end of the agreement.

Correspondence ID: 29 **Project:** 33043 **Document:** 36704
Name: N/A, N/A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 08:43:53
Correspondence Type: Web Form
Correspondence: As an agricultural use of the bay, given the agricultural nature of the surrounding areas in Marin County, I believe the oyster company is acceptable. Please approve. Thank you.

Correspondence ID: 30 **Project:** 33043 **Document:** 36704

Name: Davis, Ron
Address: [redacted]
USA
Outside Organization: None Unaffiliated Individual
Received: Oct,24,2010 09:20:09
Correspondence Type: Web Form
Correspondence: Mr. Lunny purchased the oyster co. under full disclosure that the permit to operate would be expiring soon. The shellfish he produces are non-native and therefore a detriment to the Tomales Bay environment.

Correspondence ID: 31 **Project:** 33043 **Document:** 36704
Name: Alddridge, Mari A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 10:04:45
Correspondence Type: Web Form
Correspondence: We believe that the oyster Company should be permitted to continue their operation. The operation has no impact on the ecosystem. This is obvious since there has been many years of oyster farming in the area (since the Americn Indians resided there) and the water, land and air are still as pure and untouched as if there were no operation. this operation is a legacy to man's relationship with nature and his ability to create a harmonious balance. It also provides enjoyment, ecological awareness and a tourist point of interest to ecotourists. I have lived in the Bay Area all my life and I have enjoyed Visiting Drakes Bay Oyster Co. (used to be called Johnstons Oysters)over the years with family and friends in the same way as I have enjoyed hiking the trails of Point Reyes National Seashore. They are "tradition" to me. The Drakes Bay oyster company is in my soul. I would be sad to see one more beautiful established tradition taken away.

Correspondence ID: 32 **Project:** 33043 **Document:** 36704
Name: Johnson, Marcia D
Address: [redacted]
USA
Outside Organization: citizen/Pt. Reyes Association Unaffiliated Individual
Received: Oct,24,2010 11:38:51
Correspondence Type: Web Form
Correspondence: Greetings:

I am very opposed to expanding oyster operations in Drakes' Estero. We hike up at Pt. Reyes almost every week, and know the area very well. Drakes' Estero is too important as a habitat for birds, rays, other fish, and food sources that putting in more man-made oyster beds should not even be an option.

Please, please, DO NOT allow Drake's Bay Oyster Company to continue to harvest from their oyster operations in Drakes' Estero.

Thank you for you time.

Sincerely,

Marcia Johnson

Correspondence ID: 33 **Project:** 33043 **Document:** 36704
Name: Bry, William I
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 14:04:51
Correspondence Type: Web Form
Correspondence: I am in favor of extending the Drakes Bay Oyster Company's permits to operate in their current location.

Rather than soiling the waters, oysters filter agricultural and other pollutants out of the water leading to a healthier ecosystem while providing a sustainable food source rich in protein and nutrients. Drakes Estero has been, and is now, a vibrant, healthy, and stable home to a flourishng seal colony, as well as a large population of small sharks and rays that are thriving alongside oyster farm activities.

I am a Marin county resident for 22 years. I have enjoyed many aspects of Point Reyes National Seashore including hiking, cycling, and camping. My favorite activity, however, has been kayaking on Tomales Bay and Drakes Estero. I have never found Drakes Bay Oyster Farm, previously operated as Johnson's Oyster company, to be a hinderance to my enjoyment of the Estero, or to have a negative effect on the wildlife of the Estero. In fact, the personnel have always been very hospitable to kayakers, providing restroom facilities and parking (not to mention excellent oysters cocktails at the end of a satisfying day). On one occasion, years ago, they even rescued a member of our party who was unable to paddle in against the wind and tide.

It is clear that the Park Service has been pushing a one sided agenda, misrepresenting scientific data, installing hidden cameras and curtailing public commentary by disallowing open debate. It is time for the Park Service to redirect their energies towards enhancing the experience of visitors to Point Reyes

and cease their persecution of the oyster farming activities.

Correspondence ID: 34 **Project:** 33043 **Document:** 36704
Name: Kallins, Wendi A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 15:46:16
Correspondence Type: Web Form
Correspondence: I support the continuation of the Oyster Farm. It is evident that there really is no compelling environmental reason to deny this continuation of the permit. It serves an important purpose in our community by providing a local food source at a time when we need to more towards greater sustainability. This need is much more urgent than any desire to create a "wilderness" area that is, in fact, not wilderness but is already an area with lots of human intrusion already. The latest discovery that it was kayakers, and not Oyster farm boats that disturbed the Harbor Seals serves as an example of this.

Correspondence ID: 35 **Project:** 33043 **Document:** 36704
Name: Havel, Richard J
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 17:53:44
Correspondence Type: Web Form
Correspondence: I have lived in Marin County for 53 years and have maintained a home in Inverness for 32 years. I was on the faculty of Medicine at the University of California San Francisco from 1956 where I am currently Professor of Medicine Emeritus. I am a member of the U.S. National Academy of Sciences and have served on Its National Research Council, including the Board on Life Sciences and have chaired its Food and Nutrition Board. I am well aware of the history of the Point Reyes National Seashore and the Drakes Bay Oyster Company under its original and current ownership. I have maintained an active interest in the recent controversy surrounding the latter. For many years I participated in the annual bird count in the Creamery Bay area of the Seashore. My wife, Virginia Havel, who was a founder of the Marin County Environmental Forum and is a member of the Marin Conservation League, shares my general views on continuation of the oyster operation in Drakes Estero beyond 2012.

Drakes Estero is recognized to be a unique natural resource which, In my opinion, should become a wilderness after 2012 as originally planned. Any commercial operation within the Estero is incompatible with this designation. I believe it to be most unfortunate that the question as to possible detrimental effects of the oyster operation on harbor seals or other biota has become the principal topic dominating the debate surrounding that broader, more fundamental issue. Whether the past conduct of the NPS in this regard has been proper or otherwise should not influence the decision of the NPS about the status of the Estero. Although the views of residents of West Marin, such as myself, or of the broader Bay area need to be taken into account, the Park Service must ultimately give primary consideration to the long-term value of the Estero to all Americans. Effects of a decision to continue the oyster operation beyond 2012 on commercial operations in other national parks should also be a significant consideration, regardless of their proximity to local communities.

Although the oyster operation in the Estero is large as compared with those in Tomales Bay, as a scientist with expertise in human nutrition as well as preventive cardiology, I wish to point to some facts that may not be well understood about the importance of the oyster industry to the health of Americans. Like many other seafoods, oysters are rich in high-quality protein and long-chain omega-3 fatty acids. Given the production of oysters in this country and their protein content (about 7% of the wet weight of the animal), average annual per capita consumption of oyster protein is, however, less than 50 grams: this is less protein than is consumed by an average adult in a single day. Oysters are clearly not a dietary staple and are likely consumed only occasionally, even by most people in Marin County.

Correspondence ID: 36 **Project:** 33043 **Document:** 36704
Name: Tremolada, Errol
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 19:16:26
Correspondence Type: Web Form
Correspondence: I live in Marin County. My wife and I spend a lot of time in Point Reyes, multiple days a week. We are strong supporters of our parks and we are concerned about the larger impact on the park system should the Drakes Bay lease be renewed. We are very familiar with the Estero and do believe that it should be granted full wilderness status. Our national treasures are very important and we, as Marin County residents, need to do all we can to expand our most cherished park. We should have a focus on expanding our parks whenever possible and this is a great opportunity to do so. Please take a stand for parks and grant the Estero full wilderness status.

Correspondence ID: 37 **Project:** 33043 **Document:** 36704
Name: Tremolada, Alison
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 19:19:32
Correspondence Type: Web Form
Correspondence: I live in Marin County. My husband and I spend a lot of time in Point Reyes, multiple days a week. We are strong supporters of our parks and we are

concerned about the larger impact on the park system should the Drakes Bay lease be renewed. We are very familiar with the Estero and do believe that it should be granted full wilderness status. Our national treasures are very important and we, as Marin County residents, need to do all we can to expand our most cherished park. We should have a focus on expanding our parks whenever possible and this is a great opportunity to do so. Please take a stand for parks and grant the Estero full wilderness status.

Correspondence ID: 38 **Project:** 33043 **Document:** 36704
Name: Lacerra, Susan
Address: [redacted]
USA
Outside Organization: citizen Unaffiliated Individual
Received: Oct,24,2010 22:02:15
Correspondence Type: Web Form
Correspondence: Dear Park Service,

Please allow the oyster company to continue operating. They are a Marin institution, work well with the community, manage the land responsibly, are great for tourism and produce a tasty product as well.

Thank you and Kind Regards, Susan Lacerra Fairfax, CA

Correspondence ID: 39 **Project:** 33043 **Document:** 36704
Name: MacMillan, Gail L
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,24,2010 23:39:40
Correspondence Type: Web Form
Correspondence: My comments are hardly original, but deeply felt.

. The Drake's Bay estero is a designated wilderness-to-be area. . A commercial business does not belong in such an area. . Our beloved Senator who thought to support this endeavor has wisely withdrawn her support. . Mr. Luny knew that the oyster farm lease was going to expire when he purchased this illicit business. What does this say of his intentions? . A dozen jobs, or 10 times that, is not worth the continued exploitation of the estuary/bay. . Let 'shoppers' go support the Tomales Bay oyster fishery and jobs there! . No more precedent setting. We have to stop this now before bigger business gets involved (who knows when the Chamber of Commerce will come riding over the hill)

I am just a retired social worker who lives 35 miles away, but everyone I know who loves Pt. Reyes, feels the same way. We visit Pt. Reyes for a wilderness experience, not a commercial, one that can be found everywhere else!

Thank you

Correspondence ID: 40 **Project:** 33043 **Document:** 36704
Name: Serriere, Emmanuel & Gwen
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,25,2010 02:09:57
Correspondence Type: Web Form
Correspondence: We support the idea to extend the lease to the current oyster operation. The new renters improved the area tremendously and, as far as we know, respecting the environment. We believe this operation to be a fixture of this part of the Park. The current family tends to be willing to continue to protect the area as well. We love oysters, especially the small ones offered there as opposed to the mammoth one offered the other side of Tamales Bay.

Correspondence ID: 41 **Project:** 33043 **Document:** 36704
Name: Noves, Ingrid E
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,25,2010 09:35:56
Correspondence Type: Web Form
Correspondence: Please support the Drake's Bay Oyster Company and allow them to continue providing the locally produced excellent food and jobs that they do so well. Though I am a dedicated environmentalist, I see no significant harm to the environment being done there, and the benefits are enormous. Let them continue! Thank you.

Correspondence ID: 42 **Project:** 33043 **Document:** 36704
Name: Morse, Constance C
Address: [redacted]
USA

Outside Organization: Unaffiliated Individual
Received: Oct,25,2010 10:00:58
Correspondence Type: Web Form
Correspondence: RENEW OYSTER FARM LEASE!

Correspondence ID: 43 **Project:** 33043 **Document:** 36704
Name: Snell, John
Address: [redacted]
USA
Outside Organization: US citizen and resident in California for 36 years Unaffiliated Individual
Received: Oct,25,2010 14:23:55
Correspondence Type: Web Form
Correspondence: Clean water and man-made noise in Point Reyes National Seashore limit commercial use of Drakes Bay. As a minimum, petroleum (gas and diesel) powered boats and vehicles should be prohibited. Although some electric motor powered boats and vehicles are relatively quiet and non-polluting, they scare away wildlife (on the land and in in the water) and endanger their habitat. Point Reyes National Seashore should be limited to wildlife and hikers. Commercial industry should not be allowed to take advantage of a park paid for by individual tax payers.

Correspondence ID: 44 **Project:** 33043 **Document:** 36704
Name: Bartholomew, Alice J
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,25,2010 14:40:18
Correspondence Type: Web Form
Correspondence: I believe the oyster farm's permit should be extended. Farming of oysters has minimal, if any, damaging impact on the waters of Drakes Estero. The farm has been there for years and is an "institution", a place to stop on the way to and from hikes, picnics and whale watching. The farm is good for the economy of the county. Although I believe in wilderness areas, I feel that some uses are compatible. The oyster farm is one such use. It certainly has less of a deleterious impact than cattle grazing in Point Reyes National Seashore.

Correspondence ID: 45 **Project:** 33043 **Document:** 36704
Name: Carolan, Kate
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,25,2010 15:30:28
Correspondence Type: Web Form
Correspondence: I am a park volunteer and a supporter of wildlife. I also know that there are so few places like Drake's Estero left in the country today.I remember when the Lunnys took over the oyster operation and it was clear that the operation would last until 2012. This really has nothing to do with oysters and more to do with the wilderness that should be protected. The park should do its job. Protect the wildlife that is in the estero for generations to come, as opposed to allowing private citizens to have a business insde the estero. They knew that this would end in 2012. Why are we even discussing this? A deal should be a deal. I did surveys for FMSA in Bolinas Lagoon for years. They finally stopped the surveys as they had the conclusive data they needed. Humans (especially in boats,kayaks) disturb seals . Lets get the humans out of the estero and then see what happens. The Lunny's have already stated that this is a "hobby" for them and that they make their $ in paving. they should stick to the beef farming and try to stay with in the parks regulations for that, which they can't seem to do either. At least this is not done in the estero. thanks and good luck

---

Correspondence ID: 46 **Project:** 33043 **Document:** 36704
Name: Robbins, Janet
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,25,2010 16:33:18
Correspondence Type: Web Form
Correspondence: It is my belief that Drakes Bay Oyster Company practises a clean, sustainable, local agriculture, hires local people, provides food and great public benefit for local populations. I have seen and read nothing that shows it endangers the other natural life of Drake's Estero. Please let it continue to be an important part of the community.

Correspondence ID: 47 **Project:** 33043 **Document:** 36704
Name: Hunt, Michael E
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,25,2010 20:28:20
Correspondence Type: Web Form

Correspondence: Oysters My family does not buy oysters from Drakes Bay Oyster Co. We always bought our oysters from Mr. Johnson. We would by jars of shucked extra small oysters as we like to eat them raw and the larger they are, the less sweetness they have, and the more of that awful green stuff they contain. When it was Johnson's, the oysters in the "extra small" jar were always extra small. We bought jars of oysters from Drakes Bay Co. three times. Each time the jar was labeled "extra small" but contained a few extra smalls, a few smalls, a few mediums and a few large oysters. The quality control seemed to be lost. So, we found Hog Island where we now by our extra small oysters in their shells and they're always all extra small. I've gotten so good at shucking. I can shuck 50 oysters in less than 20 minutes! The reason I would like Drakes Bay Oyster Co. to remain open is because, as I understand, they supply the bay area and beyond more than 50% of the oysters that are produced in Marin and served in restaurants and food markets. I really don't want to shift that burden to the Hwy. 1 oyster companies. I don't want to drive all the way to Marshall to be told that they're "sold out". Also, how much of Tomales Bay would become oyster beds if Drakes Bay was forced to move there. I can just see the signs: "OYSTER BEDS! NO FISHING, NO BOATING, NO SWIMMING, DON'T EVEN LOOK!" Oysters don't pollute, they actually help clean the water. That's why so many non-profit organizations are trying to re-introduce them to the San Francisco Bay. Although I'm not all that keen on their product (or, at least their size control), I have noticed how much cleaner and neater the grounds are at Drakes Bay. If it was a ballot measure, I would vote to continue their lease.

Correspondence ID: 48 **Project:** 33043 **Document:** 36704
Name: N/A, N/A
Address: [redacted]
USA
Outside Organization: Pt Reyes National Seashore Assoc Unaffiliated Individual
Received: Oct,25,2010 22:05:31
Correspondence Type: Web Form
Correspondence: I am against a renewal of a 10 year permit to the Oyster Company. I would like to see the area restored to its natural habitat for non-commercial uses. It seems totally inappropriate that the owner even ask for a renewal, as it is my understanding that the owner knew at the outset that the permission to use the area was for a LIMITED time only.

Correspondence ID: 49 **Project:** 33043 **Document:** 36704
Name: Ruzick, Robert
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,26,2010 10:43:46
Correspondence Type: Web Form
Correspondence: Over maybe 40 or more years I have been to the oyster farm facility and have seen many improvements in the past few years. It seems to me that the present owner has been a good neighbor to the park. Most of the non-bias information I have read says that the oysters are not a detrimental factor to the bay and if anything, are a benefit. I think this oyster farm is a plus to the National Seashore and hope their lease is renewed.

Bob

Correspondence ID: 50 **Project:** 33043 **Document:** 36704
Name: Hartnett, Kendra K
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,26,2010 11:55:38
Correspondence Type: Web Form
Correspondence: I fully support extending the oyster operation in Drake's estero and issuance of a special use permit. Oysters are a part of the environment there and this potentially allows a opportunity for an alliance between a public resource and a private farm to benefit the environment and the general public by protecting a food source as well as keeping oysters in the bay. Why not consider working with the oyster company for things like re-introducing native oysters or having them help cultivate for plantings elsewhere? Frankly, the seals are much more likely to be accustomed & less bothered to the regular activities of the oyster farm then the sporadic approaches of individual or kayak tourists. While the area is deemed a POTENTIAL wilderness, it is not one yet, and here is a unique opportunity for the NPS to do something good for the environment AND people by creating a mutually beneficial partnership with the oyster farm.

Correspondence ID: 51 **Project:** 33043 **Document:** 36704
Name: Dowie, Mark
Address: [redacted]
USA
Outside Organization: Marin Media Institute Unaffiliated Individual
Received: Oct,26,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Comments to NPS re DBOC Submitted my Mark Dowie, ret. University of California

Until I retired in 2007 I taught a course at the UC Berkeley Graduate School of Journalism entitle Getting it Right: Crafting a Scientifically Sound Report. The course was designed for any journalist or future journalist covering any beat in any medium who would one day be faced with a complex scientific controversy. I designed the course because practicing journalism in a technological culture requires of all reporters and editors a clear understanding of how science works.

The essence of the course stressed the importance of soundness in both the practice and coverage of science. I also emphasized the importance of sound science in the formulation of public policy and the importance, for both reporters and their audience, of understanding of and respect for the scientific

method. Were I still teaching that course, what has happened over the past three years inside the National Park Service, in regards to the Drakes Bay Oyster Company would be offered as a case study.

Why a case study? Because during those three years almost every tenet of sound science was either abused, violated, distorted or ignored, not only by environmentalists opposing the extension of a lease for DBOC, but also by Park leadership and some of the Park Service's best scientists, all in the interest of a policy that had no scientific veracity whatsoever.

In the interest of defending their decision not to renew an aquaculture lease, Park Service leaders bought into clearly specious arguments, while themselves bending and violating the very essence of scientific research. During an era when the federal government was, from top to bottom, either ignoring or abusing science, as a matter of policy, it should not have been surprising to see it happening here or anywhere else. But the National Park Service, which unlike most other agencies was founded on scientific principles, should not have been following the example of other agencies. But unfortunately they did. Culture is infectious.

To their credit, some NPS staffers and some of it's scientists have since admitted making serious mistakes in basic research, misinterpreting data, and persisting in scientific conclusion that had no merit whatsoever. They should be praised for their admissions. However, there remain in the Park Service's leadership people who have yet to admit their mistakes. If even one of them stepped forward and said: "I was mistaken. I relied far too long on data I have since come to realize was dead wrong. I therefore withdraw my opposition to extending the DBOC lease and recommend that Secretary Salazar grant the oyster farm another ten years of operation in the Seashore," this entire controversy would disappear in a heartbeat, a community that has been riled in unfortunate conflict would be restored to relative peace and the harbor seals, which were coming and going from Drakes Bay long before the oyster farm existed would flourish under the clearly cautious and responsible stewardship of the oyster farm's new management.

I know my remarks do not reflect directly on the environmental impact of DBOC on Drake's Esteros. I'm frankly less qualified to weigh in on that subject than I am to detect scientific fraud and abuse, and that I have seen it here. I really write to say that I see an opportunity for a science-based agency to reverse course and begin the long process of restoring the American public's faith in sound science and honest government.

Correspondence ID: 52 **Project:** 33043 **Document:** 36704
Name: Selchie, Moreva L
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,26,2010 18:34:40
Correspondence Type: Web Form
Correspondence: To the NPS:

I'm in favor of no extension on the Drake's Oyster Co. lease, and the changing of the whole Drake's Estero to the wildlife protected, noncommercial status of the adjoining Limantour Estero, as was intended.

I've kayaked in Drake's Estero over twenty years, and have always felt the deep, perhaps intuitively experienced difference between the vibrancy of the nonfarmed part as compared to the oyster farmed part. The nonfarmed part is alive, vibrant, almost triumphant with birds and batrays and seals. My feeling contains the concerns for seals and the whole ecosystem, but encompasses more - the feeling for the estero as itself. It should be honored for all beings. It should no longer be used for individual financial gain and should not be subject to profit decisions. The Dept. of the Interior, the National Park Service, and the Point Reyes National Seashore hold the Estero in trust for the whole country, and this was intended in the original legislation.

It would set a terrible US precedent to yield it, against that intent, to private financial gain. The quality of a business at any given time is no valid argument for leasing an intended part of the national heritage to that business.

I would hope that, in the event the lease is not renewed (as the current owner had no right to expect it would be) the Seashore would restore the farmed area slowly, gently, and with as little disruption as possible to the ecosystem.

Thank you for your consideration,

Moreva Selchie

Correspondence ID: 53 **Project:** 33043 **Document:** 36704
Name: Preston, Tallula
Address: [redacted]
USA
Outside Organization: Campus Sustainability Council at University of California at Santa Cruz Unaffiliated Individual
Received: Oct,26,2010 20:45:28
Correspondence Type: Web Form
Correspondence: Hello, I strongly support the re-issuance of the Special Use Permit for commercial oyster operations within Drakes Estero at Point Reyes National Seashore. It is both a powerful example of sustainable aquaculture as well as a healthy way of maintaining the valuable estuarine environment. As a student, a scholar, a seafood lover, an environmental conservationist and a third generation Marin-ite I hope that you issue a continued permit to Drake's Bay Oysters. Thank you for your consideration.

Thank you, Tallula Preston

Correspondence 54 **Project:** 33043 **Document:** 36704

ID:
Name: Willis, Debra L
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,27,2010 03:59:33
Correspondence Type: Web Form
Correspondence: I regret that I am unable to attend a meeting, however, I am expressing my opinion in this comment box.

Preserve Drakes Estero, the only marine wilderness on the West Coast. National park wilderness is for wildlife and public enjoyment, not private commercial use. Please do not make a change in the current policy.

The National Park Service's (NPS) top priorities in decision-making should be providing maximum protection of wilderness resources and giving full effect to the 1976 Point Reyes Wilderness Act. The NPS must consider the peer-reviewed research that concludes potential and real adverse impacts from the oyster operation on wilderness resources.

Drakes Estero is home to several endangered plants and animals, including eelgrass, harbor seals, and birds, including Black Brant and Great Egrets. Yet industry wants the waters for its motorized oyster boats and wants the sandbars reserved for its oyster bags (at the expense of harbor seals). The NPS should prioritize the long-standing wilderness designation vision over commercial private use. Again I urge NPS: please do not make a change in the current policy.

Correspondence ID: 55 **Project:** 33043 **Document:** 36704
Name: Stenberg, Becky V
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,27,2010 11:14:44
Correspondence Type: Web Form
Correspondence: In my opinion, the oyster farm lease should be extended. The politics of the situation have been truly incredible, with the Machiavellian tactics by the National Park Service resulting in costs to the taxpayers of over $2 million. Politics aside, the decision to make Drakes Estero a potential wilderness area was made at a time when people were newly enthusiastic about the environment, and not very well educated about it. From an environmental standpoint, it is ridiculous to try to separate the estero from the watershed surrounding it. Approximately 2000 cattle graze that watershed, part of the agricultural heritage the National Seashore is supposed to preserve. The increased amount of nutrients and pathogens that run off into the estero as a result make wilderness impossible. In the northern reaches of the estero, coliform counts are so high after 7/10ths of an inch of rainfall in 24 hours, that harvesting is prohibited by the California Department of Health Services for one week. The increased levels of nitrogen that result from the bovine runoff can result in large plankton blooms, causing anoxic buildup on the bottom when they die off. Oysters utilize the plankton for food, thus reducing the potential for the buildup, and benefiting their own growth as well. Removal of the oyster farm would likely upset the balance of nutrients which has come about over the past 70 years in the estero. Recognizing the increasing world population and the need for increased protein production, I feel that it would be a waste to break up this environmentally friendly partnership of shellfish and bovines. This situation provides a unique opportunity to showcase a mutually beneficial and environmentally friendly partnership. Surely the oyster operation will need to adhere to high environmental standards, recognizing that they are operating within a National Seashore. They will have to make concessions to the harbor seals and avoid leaving unsightly debris about. Mr. Lunny has already made considerable progress in making his farm and retail area an asset to the park.

Correspondence ID: 56 **Project:** 33043 **Document:** 36704
Name: Schnapf, David
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,27,2010 12:51:46
Correspondence Type: Web Form
Correspondence: Dear National Park Service ?

These comments are submitted in connection with the NPS' potential issuance of a Special Use Permit for the continuation of commercial oyster operations within Drakes Estero at Point Reyes National Seashore. My interest is this issue is comes from being a frequent visitor to the park and an environmentalist at heart. I have no financial interest in the matter and have not been motivated to submit comments by any organization. While I am a member of several "environmental" organizations, my comments do not reflect the opinions of any organization. I do not particularly like to eat oysters.

Most of the land encompassed in the park has not been wilderness for over 100 years. While I would generally support the goal of returning the park to its natural, wilderness state, such a goal seems impractical as long as extensive dairy farming is permitted to continue in the heart of the park.

Any effort to return the park to a natural state should start with a plan to eliminate dairy farming. Visitors to the park are almost certain to be aware of pervasive dairy farming operations, but very few ever encounter the oyster farm. The large numbers of dairy cattle roaming over the hills in the park have a very profound impact on the environment ? far greater than any impact associated with oyster growing. Dairy farming impacts both the terrestrial and aquatic environment, including Drakes Estero, as many of the farms are located on lands that drain into the estuary. It makes no sense to stop a small low-impact oyster farm, without a plan to eliminate dairy farming.

Let me add that early in my career, during the Carter administration, I was an enforcement attorney for the U.S. Environmental Protection Agency, with responsibility for implementation of the Clean Water Act. EPA's inability to address water pollution from agricultural sources has been one of its greatest failures. While I suspect that the dairy farms in the park are subject to tighter controls regarding runoff, the reality is that contaminated runoff is impossible

to fully contain, particularly during the winter storms that frequent the area.

Unlike oyster farming, there is no natural connection between dairy farming and the seashore. Dairy farms can exist most anywhere and, indeed, California already has more than it needs. The sole connection between dairy farming and the park is historic, and I am sympathetic to view that this historic connection is worth preserving. But as long as extensive dairy farming is allowed to continue, the park will never be a wilderness. Thus, it would make no sense to eliminate an oyster farm in the name of wilderness as long as dairy farming is preserved.

If there is a good reason to allow continued operation of dairy farming, i.e., history, then there is also good reason to allow continued operation of oyster farming. Marin county is a showcase for a robust and varied local agriculture movement. We take great pride in growing our own ? at the highest possible quality. Oyster farming is a unique part of the local scene and is truly connected to pristine aquatic areas, such as exist in Drakes Estero. Thus, oyster farming fits well with community goals, while having minimal impact on the park experience as it currently exists.

It also makes no sense to entertain the idea that Drake's Estero alone can be designated a micro aquatic wilderness area while nothing is done to restore the rest of the park to a wilderness state. The idea of a micro wilderness is weak to begin with, and isolating the estuary from upland uses ignores ecological reality ? the estuary is profoundly impacted by its drainage area. The drainage area, as noted, includes dairy farms.

In summary, I support the goal of returning Point Reyes National Park to its natural state, starting with the elimination dairy farming. Unless and until there is a plan to address the dairy farms, I favor the continuation of the existing oyster farm.

David Schnapf

Correspondence ID: 57 **Project:** 33043 **Document:** 36704

Name: Kutchins, Herb

Address: [redacted]
USA

Outside Organization: Unaffiliated Individual

Received: Oct,27,2010 00:00:00

Correspondence Type: Web Form- NOTE: This correspondence (except the last 2 paragraphs) was also submitted as a comment at the 10/26/2010 public scoping meeting.

Correspondence: Scoping session statement

My name is Herb Kutchins. I'd like to briefly state my credentials as an environmentalist. I have been a member of the Environmental Action Committee of West Marin (EAC) Board of Directors, of the Sierra Club's Marin Group Executive Committee and of the Club's Bay Chapter Ex-Comm. I served as co-chair of the Marin's Group's Conservation Committee. During my tenure with EAC, I persuaded the board to reverse its long standing position and instead to oppose the yearly erection of a dam across Lagunitas creek, one of the first steps in a long process that eventually led to the establishment of the Giacomini Wetlands. I did the same thing in regard to the Lagunitas dam with the Sierra Club, and in addition I helped convince the Marin Group and the Bay Chapter to support the closure of the West Marin Landfill, again overcoming initial opposition to this position. One more thing, I recruited Gordon Bennett who has led the opposition to the oyster farm, to serve on the Sierra Club's Marin Group Ex-Comm. I say all of this not to toot my own horn, but as a preface to saying that as a committed environmentalist, I disagree strongly with the positions that both organizations have taken on the oyster farm.

I don't believe they have produced valid scientific evidence to support their positions, and I think their approach to environmental protection by creating empty wilderness reflects an outmoded conservation strategy that many international environmental organizations have abandoned, in part because they understand that the best stewards are often those who are already on site and have a vested interest in maintaining the environment. I think the Lunny's may be the people who can provide the resources and incentives to assure the best environmental protection for Drake's Estero.

I would like to ask for answers to five questions about the EIS process that the Park is undertaking.

First: Who has the burden of proof? What are the criteria the Park will use to decide whether or not the oyster farm meets acceptable environmental standards? One Park official has said that the Lunnys must show that the oyster operation will provide positive benefits to the ecology of Drake Bay. If this is true, it represents a shift in the burden of proof employed in most EIS investigations. Usually it is up to the opponents of a proposed activity to demonstrate that it will be environmentally harmful to permit the work. The suggested standard for this EIS reverses accepted procedure.

There are some good reasons to believe that the Lunny's will improve the environmental quality of Drake's Bay by continuing to clean up the shameful mess left by the oyster business's former owner. In addition, there is evidence that, in and of itself. growing oysters in the bay will improve water quality. But that is beside the point.

The point is that it is up to the opponents of the oyster operation to demonstrate that it will be harmful to proceed. Thus far they have not produced any evidence to show that the oyster operations have harmed the Estero, and the Park's own data, a series of a quarter of a million photographs directly contradict statements made by Park authorities and other opponents that the oyster company has damaged the Estero. To summarize, I ask the Park to explain up front what criteria it will use in formulating its EIS.

Second: What is an "expedited EIS?" How does it differ from the usual EIS? Why has the Park service waited until the last minute to require one? Is it usually the Park's practice to require an EIS before it extends leases at the Seashore?

From what little that has been reported, the target date for completion of the EIS is summer of 2012. What happens if the EIS contains negative findings that suggest that no new permit should be issued to grow oysters? If a response is required to refute these conclusions, the proceedings may extend beyond the time when the current lease for the oyster farm lapses. If this happens, will the oyster operation be permitted to continue until the appeals are completed? Or will the Lunny's be forced to go out of business without recourse to the full measure of protections usually available in EIS proceedings?

Third: Evaluation of the data. How was the organization selected that will evaluate the scientific data offered to support or to argue against the continuation of the oyster farm? Is it true that the person responsible for managing the EIS for the company worked for the Park Service for thirty years before he retired?

I do not want to question the motives or the honesty of the current or former Park service researchers. I have great personal regard for those that I know. But I do believe that it is inappropriate to ask people closely associated with the National Park Service to provide an independent analysis of the data, and to impartially judge the validity of conflicting data and interpretations. In order to have a really meaningful EIS, it behooves the Park Service to engage a reputable independent evaluator who is acceptable to the Lunny's. To restate the question: How will the Park Service assure that the data included in the EIS will be unbiased?

Fourth: What factors determined the choice of venue for these sessions. Hearings in West Marin and at the Bay Model make sense in terms of allowing interested parties to express their opinions. The third meeting, in Berkeley, especially at REI, is not one that will encourage the full range of opinion that it is supposed to engender. Instead, it is likely to favor those individuals, factions and organizations who have already voiced opposition to the Oyster Farm.

As you may be aware, in a recent poll conducted by the Marin Independent Journal, 90% of the respondents indicated that they favored a 10 year renewal of the oyster farm's lease. This poll is in no way conclusive, but a meeting in Berkeley is more than likely to be skewed strongly against the oyster farm. To put it in context, what would happen if the Park decided to hold one of its three meetings on Fishermen's Wharf in San Francisco? It is a safe bet that opponents of the proposed lease would call foul. In light of this, is it appropriate to ask that any meetings outside of Marin be held in a place that will encourage participation by as diverse a group as is possible?

Five: Why has the Park abandoned previous procedures that allowed for direct, open testimony at the three scoping sessions? As the Park has described the scoping sessions, they will consist of a series of predetermined information booths where Park workers will address previously unrevealed topics. People attending the sessions will be able to make their comments verbally or on 3X5 note cards to the people at the booths. The comments will then be summarized by the attendants at the booths. The whole process is designed to limit direct testimony and to edit it.

The rationale that has been offered, that it will encourage quieter voices to be heard makes no sense. The design will prevent people whether they are noisy or quiet from fully airing their opinions, and will further abridge these statements at the discretion of Park personnel. What steps can interested parties take to remedy the obvious shortcomings in the Park's procedures and encourage full and open discussion of the issues?

I hope that you will provide satisfactory answers to these five questions, before you proceed further with the EIS process.

Please note that I submitted this statement in one of the boxes provided at the first scoping session at the Dance Palace in Point Reyes Station. In the paper copy I made one small error. The sentence "This poll is in no way conclusive, but a meeting in Berkeley is more than likely to be skewed strongly against the oyster farm" erroneously read "This poll is in no way conclusive, but a meeting in Berkeley is more than likely to be skewed strongly against the oyster farm's opponents." Please note this correction in reviewing my paper submission.

One last item, In the material presented at the scoping session, the requirement for doing an EIS was not explained. Although the need for an EIS as part of the NEPA law was explained, what was missing was any explanation for why the NEPA law was applied in this case. Do all extensions of leases or special use permits require the application of NEPA rules, in particular, the requirement of an EIS?

Oyster Testimony

My name is Herb Kutchins. I'd like to briefly state my credentials as an environmentalist. I have been a member of the Environmental Action Committee of West Marin (EAC) Board of Directors, of the Sierra Club's Marin Group Executive Committee and of the Club's Bay Chapter Ex-Comm. I served as co-chair of the Marin's Group's Conservation Committee. During my tenure with EAC, I persuaded the board to reverse its long standing position and instead to oppose the yearly erection of a dam across Lagunitas creek, one of the first steps in a long process that eventually led to the establishment of the Giacomini Wetlands. I did the same thing in regard to the Lagunitas dam with the Sierra Club, and in addition I helped convince the Marin Group and the Bay Chapter to support the closure of the West Marin Landfill, again overcoming initial opposition to this position. One more thing, I recruited Gordon Bennett who has led the opposition to the oyster farm, to serve on the Sierra Club's Marin Group Ex-Comm. I say all of this not to toot my own horn, but as a preface to saying that as a committed environmentalist, I disagree strongly with the positions that both organizations have taken on the oyster farm.

I don't believe they have produced valid scientific evidence to support their positions, and I think their approach to environmental protection by creating empty wilderness reflects an outmoded conservation strategy that many international environmental organizations have abandoned, in part because they understand that the best stewards are often those who are already on site and have a vested interest in maintaining the environment. I think the Lunny's may be the people who can provide the resources and incentives to assure the best environmental protection for Drake's Estero.

I would like to ask for answers to five questions about the EIS process that the Park is undertaking.

First: Who has the burden of proof? What are the criteria the Park will use to decide whether or not the oyster farm meets acceptable environmental standards? One Park official has said that the Lunnys must show that the oyster operation will provide positive benefits to the ecology of Drake Bay. If this is true, it represents a shift in the burden of proof employed in most EIS investigations. Usually it is up to the opponents of a proposed activity to demonstrate that it will be environmentally harmful to permit the work. The suggested standard for this EIS reverses accepted procedure.

There are some good reasons to believe that the Lunny's will improve the environmental quality of Drake's Bay by continuing to clean up the shameful mess left by the oyster business's former owner. In addition, there is evidence that, in and of itself. growing oysters in the bay will improve water quality. But that is beside the point.

The point is that it is up to the opponents of the oyster operation to demonstrate that it will be harmful to proceed. Thus far they have not produced any evidence to show that the oyster operations have harmed the Estero, and the Park's own data, a series of a quarter of a million photographs directly contradict statements made by Park authorities

and other opponents that the oyster company has damaged the Estero To summarize, I ask the Park to explain up front what criteria it will use in formulating its EIS.

Second: What is an "expedited EIS?" How does it differ from the usual EIS? Why has the Park service waited until the last minute to require one? Is it usually the Park's practice to require an EIS before it extends leases at the Seashore?

From what little that has been reported, the target date for completion of the EIS is summer of 2012. What happens if the EIS contains negative findings that suggest that no new permit should be issued to grow oysters? If a response is required to refute these conclusions, the proceedings may extend beyond the time when the current lease for the oyster farm lapses. If this happens, will the oyster operation be permitted to continue until the appeals are completed? Or will the Lunny's be forced to go out of business without recourse to the full measure of protections usually available in EIS proceedings?

Third: Evaluation of the data. How was the organization selected that will evaluate the scientific data offered to support or to argue against the continuation of the oyster farm? Is it true that the person responsible for managing the EIS for the company worked for the Park Service for thirty years before he retired? I do not want to question the motives or the honesty of the current or former Park service researchers. I have great personal regard for those that I know. But I do believe that it is inappropriate to ask them to provide an independent analysis of the data, and to impartially judge the validity of conflicting data and interpretations. In order to have a really meaningful EIS, it behooves the Park Service to engage a reputable independent evaluator who is acceptable to the Lunny's. To restate the question: How will the Park Service assure that the data included in the EIS will be unbiased?

Fourth: What factors determined the choice of venue for these sessions. Hearings in West Marin and at the Bay Model make sense in terms of allowing interested parties to express their opinions. The third meeting, in Berkeley, especially at REI is not one that will encourage the full range of opinion that it is supposed to engender. Instead, it is likely to favor those individuals, factions and organizations who have already voiced opposition to the Oyster Farm.

As you may be aware, in a recent poll conducted by the Marin Independent Journal, 90% of the respondents indicated that they favored a 10 year renewal of the oyster farm's lease. This poll is in no way conclusive, but a meeting in Berkeley is more than likely to be skewed strongly against the oyster farm's opponents. To put it in context, what would happen if the Park decided to hold one of its three meetings on Fishermen's Wharf in San Francisco? It is a safe bet that opponents of the proposed lease would call foul. In light of this, is it appropriate to ask that any meetings outside of Marin be held in a place that will encourage participation by as diverse a group as is possible?

Five: Why has the Park abandoned previous procedures that allowed for direct, open testimony at the three scoping sessions? As the Park has described the scoping sessions, the will consist of a series of predetermined information booths where Park workers will address previously unrevealed topics. People attending the sessions will be able to make their comments verbally or on 3X5 note cards to the people at the booths. The comments will then be summarized by the attendants at the booths. The whole process is designed to limit direct testimony and to edit it.

The rationale that has been offered, that it will encourage quieter voices to be heard makes no sense. The design will prevent people whether they are noisy or quiet from fully airing their opinions, and will further abridge these statements at the discretion of Park personnel. What steps can interested parties take to remedy the obvious shortcomings in the Park's procedures and encourage full and open discussion of the issues?

I hope that you will provide satisfactory answers to these five questions, before you proceed further with the EIS process.

Signed

Herb Kutchins

[redacted]

[redacted]

Correspondence ID: 58 **Project:** 33043 **Document:** 36704
Name: Nackley, Bonnie
Address: [redacted]
USA
Outside Organization: none/does not apply Unaffiliated Individual
Received: Oct,27,2010 15:53:50
Correspondence Type: Web Form
Correspondence: I wish to add my support of classifying Drakes Estero in Pt.Reyes National Seashore as a wilderness area and non renewing oyster bed leases as was intended.

Correspondence ID: 59 **Project:** 33043 **Document:** 36704
Name: Miller, Jeff
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,27,2010 17:27:11
Correspondence Type: Web Form
Correspondence: I support wilderness status for Drake's Estero, since it is a critically important estuary for native wildlife. I am opposed to extending the lease for oyster farming in the estuary. I am a West Marin resident.

Correspondence ID: 60 **Project:** 33043 **Document:** 36704
Name: Lambert, Charles
Address: [redacted]
USA
Outside Organization: Food Systems Working Group Unaffiliated Individual
Received: Oct,27,2010 21:34:41
Correspondence Type: Web Form
Correspondence: I support the renewal of the Special Uses permit to the Drakes Bay Oyster Company. It is both the most sustainable source of protein offered to humans as well as a beneficial filtration system for the estuarine environment. Please issue a new permit to keep Drakes Estero healthy and productive

---

Correspondence ID: 61 **Project:** 33043 **Document:** 36704
Name: Harkins, Carole & Ed
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,27,2010 23:47:34
Correspondence Type: Web Form
Correspondence: We were not able to attend the meetings but we do want to voice our support for DRAKES BAY OYSTER CO.

The granting of a new permit would be the right thing to do since they have certainly worked with integrity and care for the environment, at the same time providing needed jobs.

Correspondence ID: 62 **Project:** 33043 **Document:** 36704
Name: Schot, Glenn W
Address: [redacted]
USA
Outside Organization: Sierra Club Unaffiliated Individual
Received: Oct,28,2010 01:05:38
Correspondence Type: Web Form
Correspondence: I support the renewal of the oyster company's permit for an additional 10 years. As a concerned biologist I believe that the oyster company's operation has had an insignificant impact on the Drakes Estero environment and in some cases may actually be beneficial in reducing eutrophication. It is certainly the type of environmentally sound aquaculture venture our country should be encouraging. I am also disappointed by the methods used by individuals within the NPS and the Sierra Club to present false information to discredit and eliminate the oyster farm to appease their own agendas. Sincerely, Glenn Schot

---

Correspondence ID: 63 **Project:** 33043 **Document:** 36704
Name: schot, jana m
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 01:22:43
Correspondence Type: Web Form
Correspondence: Having visited Drakes Bay oyster farm for many years, I am writing in support of allowing this establishment to continue to operate. They offer the very best service and product. It has always been a wonderful thing to go back every trip to this area and see this business up and running, providing valuable

jobs to the local residence and selling the very best oyster to be found !

Correspondence ID: 64 **Project:** 33043 **Document:** 36704
Name: N/A, N/A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 07:33:33
Correspondence Type: Web Form
Correspondence: In considering the sustainability and the social economic impacts of Drakes Bay Oyster farm the dependency of the farm on undocumented labor should be considered. As long as the farm is dependent on an unsustainable immigration policy for its labor then the farm can not be considered sustainable. Supporters of the oyster farm state that it provides 30 good jobs, if these jobs are "good" then why, in this economy, are they dependent on undocumented labor? The simple reason is DBOC needs a workforce they can exploit. While management may be long term legal workers, the line workers are for the most part undocumented. This situation allows for the company to overlook safety, depress wages and subject female employees to sexual harassment. The times I have seen boats operated in the Estero by DBOC I have never seen life vest in the boats or on the workers. Even if the workers were strong swimmers the cold currents at the mouth make life vest essential. Oyster line workers can not depend on the seasonal nature of the work to feed, house and educate their families. The limited housing for workers is poor, the better housing units provided by the company are for management. I have seen workers in trailers with no heat and broken windows, it took enormous pressure from the local community and the Park Service for the Lunnys to bring their farmworker housing to minimal standards. Most oyster farmworkers can not afford to live in West Marin and must commute from outside Marin county. Health care for the work force is non-existent, the workers depend on the generosity of the community clinic for health services. If the Department of Interior decides to extend the lease of the oyster farm it must not allow the Lunnys to continue their exploitive labor practices. At the least DOBC should be required to e-verify if their workers have the right to work in this country.

Correspondence ID: 65 **Project:** 33043 **Document:** 36704
Name: Nylund, Carl A
Address: [redacted]
USA
Outside Organization: KC Rescue Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence:

Correspondence ID: 66 **Project:** 33043 **Document:** 36704
Name: Cossa, Fletcher
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 10:31:04
Correspondence Type: Web Form
Correspondence: Please preserve and protect Drakes Estero as wilderness in 2012.

Correspondence ID: 67 **Project:** 33043 **Document:** 36704
Name: Albert, Anthony D
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 10:32:31
Correspondence Type: Web Form
Correspondence: The 1976 Point Reyes Wilderness Act mandates the addition of Drakes Estero to the Philip Burton Wilderness in 2012, when a commercial oyster farm lease expires. Preserving the are is much more important than selling oysters.

Correspondence ID: 68 **Project:** 33043 **Document:** 36704
Name: Kelsonpetit, Ross
Address: [redacted]
USA
Outside Organization: Wilderness Watch Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: I urge you to preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

Correspondence ID: 69 **Project:** 33043 **Document:** 36704
Name: Hope, Jane H
Address: [redacted]
USA
Outside Organization: Wilerness Society Unaffiliated Individual
Received: Oct,28,2010 11:02:18
Correspondence Type: Web Form
Correspondence:

Correspondence ID: 70 **Project:** 33043 **Document:** 36704
Name: Szaszorowska, Magdalena
Address: [redacted]
GBR

Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to kindly ask you to Add Drakes Estero to the Philip Burton Wilderness. Please preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area. We need to protect the environment and save it for future generations. Yours Sincerely.

Correspondence ID: 71 **Project:** 33043 **Document:** 36704
Name: lash, cal
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 11:15:20
Correspondence Type: Web Form
Correspondence: Make Drakes Estero a wilderness.

Correspondence ID: 72 **Project:** 33043 **Document:** 36704
Name: Walker, David
Address: [redacted]
USA
Outside Organization: Walker Creations Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: It is imperative that we keep this area wild and NOT extend Drakes Bay Oyster Company's lease beyond 2012! This whole region should remain pristine and not subject to any continuing human exploitation, namely in this case, a rapacious oyster company. As such, the Drakes Estero MUST be preserved as part of the Philip Burton Wilderness, for ours, as well as, all future generations. Ergo, please, please, PLEASE do the right thing and NOT renew the lease!

Thank you,

Correspondence ID: 73 **Project:** 33043 **Document:** 36704
Name: Christ, M'
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 11:24:59
Correspondence Type: Web Form
Correspondence: An extension should not be granted. It's time to let the land and ecology of that area return to its natural state. Another decade of private profits shold not outrank present and future public good.

Correspondence ID: 74 **Project:** 33043 **Document:** 36704
Name: Gladstone, David m
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 11:27:17
Correspondence Type: Web Form
Correspondence: My wife and I request that the National Park Service preserve Estero as wilderness, rather than continue to allow it to be used for any commercial activity.

Correspondence ID: 75 **Project:** 33043 **Document:** 36704
Name: Walters, Betty J
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Sir/Madam:

Please preserve Drakes Estero as wilderness in 2012 rather than to continue to allow commercial activity in this important wildlife area. Thank you.

Correspondence ID: 76 **Project:** 33043 **Document:** 36704
Name: Stankrauff, Alison H
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Please secure Wilderness designation for Drakes Estero, the "ecological heart" of the Point Reyes National Seashore in California.

Thank You,

Alison Stankrauff South Bend, Indiana 46601

Correspondence ID: 77 **Project:** 33043 **Document:** 36704
Name: LEIPZIG, LAURA
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 11:35:19
Correspondence Type: Web Form
Correspondence:

Correspondence ID: 78 **Project:** 33043 **Document:** 36704
Name: N/A, N/A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Please preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

Correspondence ID: 79 **Project:** 33043 **Document:** 36704
Name: N/A, Dawn
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to urge the National Park Service to preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

I understand that the folks who (fairly recently!) purchased the land in question completely understood the terms of the lease for the oyster farming operation. The terms are for the lease to expire in 2012, and all commercial activity ceasing for the purpose of the land being included in the Point Reyes Wilderness.

In fact, the 1976 Point Reyes Wilderness Act MANDATES the addition of Drakes Estero to the Philip Burton Wilderness in 2012, when the commercial oyster farm lease expires.

I ask the National Park Service to act in service to the People, and work to enact the mandates of legislation passed by our US Congress.

Respectfully, Dawn Gauthier

Correspondence ID: 80 **Project:** 33043 **Document:** 36704
Name: chase, celeste
Address: [redacted]
USA
Outside Organization: member Unaffiliated Individual
Received: Oct,28,2010 11:52:55
Correspondence Type: Web Form
Correspondence: I AM REQUESTING THAT THE OYSTER FARM IN PT. REYES NATION PARK NOT BE RENEWED. HAVING MAN INVOLVED IN THE PEOPLES' PLACES ALWAYS LEADS TO DESSTRUCTION OF THE NATURAL HABITAT.

IF THE REST OF OUR NATION EVER WAKES UP TO REALLY UNDERSTANDING WHAT IS BEING DONE WITH OUR PUBLIC LANDS, THERE WOULD BE A MAJOR BATTLE AND YOU WILL LOSE.

DO THE RIGHT THING.

Correspondence ID: 81 **Project:** 33043 **Document:** 36704
Name: Nune Blvd.z, Noris A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 11:53:55
Correspondence Type: Web Form
Correspondence:

Correspondence ID: 82 **Project:** 33043 **Document:** 36704
Name: Kramer-Dodd, Gay D
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 11:55:33
Correspondence Type: Web Form
Correspondence: Point Reyes National Seashore is a treasure on the northern California coast. I urge you to enhance this treasure by following the original intent of the 1976 Point Reyes Wilderness Act by adding the Drakes Estero to the Philip Burton Wilderness in 2012. Do not extend the commercial oyster farm's lease, please.

Thank you for your attention to this matter.

Correspondence ID: 83 **Project:** 33043 **Document:** 36704
Name: Coster, Janet D
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: PLEASE preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area, and do not extend the Drakes Bay Oyster Company's lease beyond its current expiration.

Our wilderness regions are fast being usurped in so many ways, and the ecological regions of Pt Reyes National Seashore is so precious. Please don't take any action that takes away from the further movement towards the pristine preservation of these lands.

Thank you.

Correspondence ID: 84 **Project:** 33043 **Document:** 36704
Name: Zuckerman, Barry
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Please preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

Correspondence ID: 85 **Project:** 33043 **Document:** 36704
Name: Feldman, Mark
Address: [redacted]
USA
Outside Organization: Wilderness Watch Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: I STRONGLY urge the National Park Service to PRESERVE Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area. DO NOT ALLOW THIS PERMIT TO BE EXTENDED!

The Secretary of the Interior granted the authority to extend the Drakes Bay Oyster Company's lease beyond its expiration. Now the National Park Service is preparing an Environmental Impact Statement (EIS) on possibly extending the permit another 10 years.

Correspondence ID: 86 **Project:** 33043 **Document:** 36704
Name: Hebberger, Jo Anna
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Wilderness Watch and several local organizations have been working to secure Wilderness designation for Drakes Estero, the "ecological heart" of the Point Reyes National Seashore in California. The 1976 Point Reyes Wilderness Act mandates the addition of Drakes Estero to the Philip Burton Wilderness in 2012, when a commercial oyster farm lease expires. Unfortunately, a rider attached to an Interior Appropriations bill granted the Secretary of the Interior the authority to extend the Drakes Bay Oyster Company's lease beyond its expiration. Now the National Park Service is preparing an Environmental Impact Statement (EIS) on possibly extending the permit another 10 years. Please preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area

---

Correspondence ID: 87 **Project:** 33043 **Document:** 36704

Name: N/A, N/A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: I'm writing to ask you to preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area. Please do not extend the Drakes Bay Oyster Company's lease beyond its expiration and not another 10 years.

Correspondence ID: 88 **Project:** 33043 **Document:** 36704
Name: Catlin, Ruth W
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 12:20:11
Correspondence Type: Web Form
Correspondence: I strongly urge the Park Service to allow the original lease for Drakes Bay Oyster Co. to expire in 2012.

As a park visitor since the 1970's; with my family since the early 1990's and a park volunteer since 2002, I have visited the Drakes Estero area numerous times.

I am impressed, inspired and renewed by it's unique qualities as a pristine wilderness area situated so close to a major urban area.

I believe that any human activity in this area impacts the wildlife especially the harbor seals who haul-out to have their pups in the oyster bed area.

Numbers of pups have decreased over the past several years. We all recognize that climate change will continue to occur but there are things we can do to off-set negative changes.

I believe allowing Drakes Estero to return to it's natural condition is one thing we can do that is already being planned for and supported by the public.

For the record, I do not eat oysters or beef. I do purchase dairy products and organic produce for my family that is raised and produced in Marin.

I do support local farmers but I support my local wilderness more.

Thank you for considering these comments.

Correspondence ID: 89 **Project:** 33043 **Document:** 36704
Name: Frakes, Melissa
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Drakes Estero is the "ecological heart" of the Point Reyes National Seashore in northern California, and as such should have Wilderness designation. The 1976 Point Reyes Wilderness Act mandates the addition of Drakes Estero to the Philip Burton Wilderness in 2012, when the lease expires for Drakes Bay Oyster Company, a commercial oyster farm.

Unfortunately, a rider attached to an Interior Appropriations bill granted the Secretary of the Interior the authority to extend the Drakes Bay Oyster Company's lease beyond its expiration. Now the National Park Service is preparing an Environmental Impact Statement (EIS) on possibly extending the permit another 10 years.

Drakes Bay Oyster Company has had 34 years to prepare for the cessation of their lease in the year 2012. This action should not be a surprise to the company and they should have acted accordingly to find a business model that was not contingent upon continuing operation beyond the end of their lease and the designation of the area as Wilderness. Adding 10 years to Drakes Bay Oyster Company's lease extends their time by another 30%. They've had long enough to come up with a new business model.

I am a former resident of the San Francisco Bay area, having lived in San Francisco and Petaluma for 18 years. Two of those years included daily drives along the back roads from my home in Petaluma through Point Reyes to my work place in Stinson Beach. I lived every day at the Point Reyes National Seashore. I hiked the area, I biked the area, I loved the area. Please let the area be what it was always intended to be - wild and free.

I urge you, the National Park Service, to preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

Thank you for your consideration.

Sincerely,

Correspondence ID: 90 **Project:** 33043 **Document:** 36704
Name: N/A, N/A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Add Drakes Estero to the Philip Burton Wilderness: Guardian readers will recall that Wilderness Watch and several local organizations have been working to secure Wilderness designation for Drakes Estero, the "ecological heart" of the Point Reyes National Seashore in California. The 1976 Point Reyes Wilderness Act mandates the addition of Drakes Estero to the Philip Burton Wilderness in 2012, when a commercial oyster farm lease expires. Unfortunately, a rider attached to an Interior Appropriations bill granted the Secretary of the Interior the authority to extend the Drakes Bay Oyster Company's lease beyond its expiration. Now the National Park Service is preparing an Environmental Impact Statement (EIS) on possibly extending the permit another 10 years. Please urge the National Park Service to preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

Correspondence ID: 91 **Project:** 33043 **Document:** 36704
Name: Guthrie, Barbara
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 12:49:35
Correspondence Type: Web Form
Correspondence: I urge the National Park Service to preserve Drakes Estero as Wilderness in 2012, adding this area to the Philip Burton Wilderness, rather than continuing to allow commercial activity in this important wildlife area. THis area is the ecological heart of the Point Reyes National Seashore, providing foraging and breeding grounds for birds, fish, and harbor seals. More baby seals are born in the estero than anywhere else along the Central Coast.

Please fulfill the promise made over 40 years ago, when Point Reyes National Seashore was created by the Point Reyes Wilderness Act of 1976. The Congressional record clearly reflects Congress' intent that the Estero's potential wilderness areas would receive full wilderness designation and protection once Johnson's operating rights expired in 2012.

Correspondence ID: 92 **Project:** 33043 **Document:** 36704
Name: Moore, Thomas E
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Please preserve Drakes Estero as a wilderness area by 2012, rather than renewing a commercial permit for an Oyster Company or any other commercial operation there. It forms the fundamental central focus of the Point Reyes National Seashore, and should be added as a preserve to the Philip Burton Wilderness, as earlier agreed upon.

Correspondence ID: 93 **Project:** 33043 **Document:** 36704
Name: Arnold, N/A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 12:52:07
Correspondence Type: Web Form
Correspondence: I am writing to urge you to allow the lease to expire on Drakes Estero and incorporate this gem into the Philip Burton Wilderness in 2012.

Correspondence ID: 94 **Project:** 33043 **Document:** 36704
Name: Donat, Maria
Address: [redacted]
USA
Outside Organization: The Nature Conservancy Unaffiliated Individual
Received: Oct,28,2010 12:55:36
Correspondence Type: Web Form
Correspondence: I believe strongly in the preservation of Wilderness areas. I also believe strongly in the preservation of existing farmlands, ranch land and aqua culture within the boundaries of the Point Reyes National Seashore (PRNS) When the PRNS was established the ranch lands within the Park boundaries had been in existence for more than 200 years. The Oyster company in the Drakes Bay estuary was also well established (although not well run). When the Oyster farm lease was taken over by the Lunny family changes were made to the operation of the farm. Much care has been given to minimize the environmental impact of the operation on the flora and fauna of the estuary. To my knowledge, the current owners of the lease use no fertilizers, hormones, antibiotics or pesticides. At the same time, the oysters filter the estuary waters and thereby help sustain its biodiversity.

My point is, when Point Reyes became a part of the National Park system it was not a wilderness and, ending the aquaculture lease in Drakes Bay will not achieve the goal of returning the Bay to "wilderness" status. Not as long as there are ranches and livestock surrounding the area. This peninsula is, after all, a

National Seashore encouraging thousands of visitors to drive their cars to the beaches and the hiking trails every weekend.

The PRNS was also an experiment in creating a park that could co-exist with an ongoing commercial operation of ranching and farming. These operations have been overseen by the Park services and their leases have been renewed since the inauguration of the PRNS and the experiment seems to be working. So why shouldn't the Drakes Bay Oyster Company lease be extended for another ten years? Accusations that their operation disturbs the harbor seals appear to be unfounded. Indeed, the Lunny family has proved to be a good steward of the environment. We should be encouraging this kind of conscientious commercial enterprise within the Park as long as it is well monitored by the Park services.

The issue of this lease has created much animosity in the West Marin community .... both pro and con .... and has harmed the reputation of the Park Service in respect to its handling of the collection of scientific information. The time has come to clarify and resolve the issue ... hopefully in favor of continuing the Drakes Bay Oyster Farm lease for another 10 years.

Sincerely, Maria Donat

Correspondence ID: 95 **Project:** 33043 **Document:** 36704
Name: Valentine, Jennifer
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 12:57:51
Correspondence Type: Web Form
Correspondence: keep parks free

Correspondence ID: 96 **Project:** 33043 **Document:** 36704
Name: Cianelli, Don A
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: Please preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

Correspondence ID: 97 **Project:** 33043 **Document:** 36704
Name: Clark, Loralee
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to urge the National Park Service to preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.

Correspondence ID: 98 **Project:** 33043 **Document:** 36704
Name: Mac Krell, Thomas
Address: [redacted]
USA
Outside Organization: Wilderness Society Unaffiliated Individual
Received: Oct,28,2010 13:32:47
Correspondence Type: Web Form
Correspondence: A deal is a deal. There can be no justification for extending these commercial oyster farm leases simply for the sake of corporate profits. Thirty-six years of exploitation of wilderness quallity lands and oceans is extremely generous. Follow the mandate of 1976 Point Reyes Wilderness Act as enacted. No further consideration of an extension should take place.

Thank you

Correspondence ID: 99 **Project:** 33043 **Document:** 36704
Name: Valtri Burgess, Vivian S
Address: [redacted]
USA
Outside Organization: Unaffiliated Individual
Received: Oct,28,2010 00:00:00
Correspondence Type: Web Form
Correspondence: The 1976 Point Reyes Wilderness Act mandates the addition of Drakes Estero to the Philip Burton Wilderness in 2012, when a commercial oyster farm lease expires.

Unfortunately, a rider attached to an Interior Appropriations bill granted the Secretary of the Interior the authority to extend the Drakes Bay Oyster Company's lease beyond its expiration.

Now the National Park Service is preparing an Environmental Impact Statement (EIS) on possibly extending the permit another 10 years.

Please don't allow this to happen.

Preserve Drakes Estero as Wilderness in 2012, rather than continue to allow commercial activity in this important wildlife area.