

October 27, 2011

Comments on Draft EIS DBOC SUP
c/o Superintendent, PRNS

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Drakes Bay Oyster Company.

I have gone through the EIS and would list my concerns for Alternatives B, C and D. These alternatives all have degrees of harm compared to Alternative A:

Millions of oysters introduced per year, which filter out food base organisms
Miles of racks in the waters of Drakes Bay which obstruct animal movements
Noisy boat trips daily, no matter how many, some through beds of eel grass, to attend to oysters.

All the above are harmful or disturbing, to some degree, to the native plants and animals.

The local operator of the oyster company by most accounts is a nice guy, but he seems to be well connected, politically. But, these should not be deciding factors on whether a lease should be extended 10 years. Our small local community has been seriously divided on this issue. I believe decisions on national park issues should not be based on local arguments. and science should have precedent over politics.

Extending a lease for a commercial operation in a designated wilderness area sets a bad example nationwide. I would be opposed to a Charles Darwin or Jesus and his disciples operating an oyster farm in national park waters.

And as listed above, millions of introduced oysters, for commercial gain by one private individual, filter out a lot of plankton from the waters of Drakes Estero, which diminishes the food base for all the native filter feeders that in turn contribute food to higher levels of the local food pyramid. Larger fish, birds and seals have all had their food supply diminished. I don't know the conversion rate for pounds of plankton to one pound of oyster flesh, but ecologists often use 10:1 I read in the EIS that 500,000 + or - pounds of oysters have or can be produced per year. We're speaking of millions of pounds of plankton taken out of the food pyramid. To me, this is the most harmful effect of having an oyster farm in any national park waters.

From my training as an ecologist, I support Alternative A: Wilderness over oyster farming. And do we repeat this scenario in 10 years if present lease is extended?

Sincerely,

Russell Ridge
Russell Ridge

Retired Professor of Biology



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Comments regarding the Draft EIS for the Drakes Bay Oyster Company Special Use Permit:

I have watched and taken part in the "Environmental movements" develop^{ment} for almost 75 yrs. now from L.I., N.Y. (Brownie/scouts), to Vermont camp, college in Maine, Brooklyn Bot. Garden, CU Boulder, CO, NPS, SCA Wash. state, and now 54 yrs in the Bay Area, and have been mostly happy, but now, ~~as~~ many good ideas do, I think it's "gone off the deep end" in some cases. There is something called reasonable balance by some of us.

Having a commercial business producing food is an honest endeavor and is an asset in West Marin. The Oyster farm and ranches predate the establishment of the National Seashore, and are part and parcel of the same landscape fabric and culture of food production within an environmentally treasured area in West Marin. To denigrate one as a commercial venture in a newly designated 'pre-wilderness' area and to have the other designated differently using a more benign term 'pastoral district' is convoluted at best. The ranches are commercial food producers as well and both should be treated equally as renewable resources. To force the Oyster Farm out of business with questionable evidence of environmental damage has seriously harmed my once high regard for the National Park Service.

Turning this decision into some kind of a popularity contest with all this emotion and misinformation is an insult,
 2010 NEPA

A renewable permit should be given to the Oyster Farm with reasonable regulation (not geared to putting it out of business!).

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