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*Park:* Point Reyes National Seashore  
*Project:* Drakes Bay Oyster Company Special Use Permit Environmental Impact Statement  
*Document:* Draft Environmental Impact Statement Drakes Bay Oyster Company Special Use Permit

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*Keep My Info Private:* No

December 9, 2011

Department of Interior Point Reyes National Seashore Attn: DBOC SUP DEIS 1  
Bear Valley Road Point Reyes Station, CA 94956

Dear Secretary Salazar and National Park Service:

The Marin Conservation League has a long history of promoting the preservation of open space in Marin County and has written previously on this issue. The EIS, and supplemental material from the National Academy of Science earlier study, have been used to evaluate the impacts to a potential continuation of the Drakes Bay Oyster Company Special Use Permit (SUP) for ten years. Although the "no project" alternative as described in the EIS has some environmental benefits over other uses, the Board of Directors of the Marin Conservation League recently voted to support a ten-year extension of the permit at the current footprint, or Alternative B.

*Comments:* The prevailing sentiment was that the estero will not be a "wilderness" even without the oyster farm because it is impacted by the dairy farms and the road that surround it. The historic use of oyster farming has become a resource in the close by Bay Area community with a world renowned culinary tradition. Although the EIS claims only 2.5% of the Park visitors visit the oyster facility (or, presumably, eat them at the Drakes Bay Visitor Center) for many local visitors it is an important reason to visit Seashore.

This is not to say that the habitat values of the estero should not be protected or enhanced even with the oyster facility. Since assuming responsibility for the oyster farm from the Johnsons, the current owner has improved the operations considerably. There are more improvements to be made and we encourage developing a partnership that will identify and implement ways to improve the operation. Two of the issues addressed in the EIS were invasive snails and protection of eelgrass. The eelgrass has improved and expanded over the years which the National Academy of Science suggested could be as a result of the oysters. The Park

Service and the DBOC should explore ways to continue the benefits and reduce the negative impacts such as the trails carved by boats servicing the oysters. Perhaps cages around the propellers would help.

The invasive snails will be an ongoing problem with or without the oyster facility. We recommend that more stringent protocols be set up for importing the oyster seed without invasive snails. The EIS did not consider any mitigation measures for reducing the impacts of the oyster farm, other than for removing their facilities at the termination of their permit.

Canoeing and kayaking have been facilitated by the launching area and parking lot at the on shore oyster buildings. More informational signs should be placed there with reminders for boating visitors to keep away from seals. In addition, signage could also educate visitors about the science of oyster development.

Instead of being a thorn in the side of potential wilderness, DBOC should be considered a low-key historic use with an extended lifespan if permitted for another ten years. Just as the dairy farms are part of the historic Seashore landscape, the oyster farm is part of the important local food production tradition of the Point Reyes peninsula.

Sincerely,

Susan Stompe, President

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