

DRAFT – NOT FOR DISTRIBUTION OR PUBLIC REVIEW

National Park Service
U.S. Department of the Interior



Point Reyes National Seashore

July 27, 2007;

Drakes Estero



Photo © Robert Campbell

**July 27, 2007 secret version of the Drakes Estero Report:
how it differs from the May 11 public version of the Report,
and what it tells us about the NPS knowledge of their false
harbor seal claim against the oyster farm**



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- When Senator Feinstein held Olema meeting on July 21, 2007, she instructed National Park Service to take Drakes Estero Report (“*A Sheltered Wilderness Estuary*”) off the PRNS/NPS web site (most recent version May 11, 2007), to post corrections to false claims against the oyster farm, to get independent scientific review of claims, and to give Dr. Goodman the NPS harbor seal data. Jarvis was put in charge of all matters concerning the oyster farm and Drakes Estero.
- The NPS took the Drakes Estero Report off of their web site on July 23, and on July 25, posted corrections to two of their numerous false claims, both of which (in May) had been shown to be misrepresentations of published scientific studies.
- **Six days after Olema meeting, on July 27, 2007, the NPS created a fifth revised or “corrected” version of the Drakes Estero Report. This version – “not for distribution or public review” – was hidden – undisclosed to the public – until the NPS submitted only this version (and not May 11 version) to the National Academy of Sciences panel reviewing the Drakes Estero Report, along with 100 other reports and documents. The NAS released these documents to the public in late August, 2008, some 13 months after this secret version was created.**



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Drakes Estero



In the May 11, 2007 version of the Drakes Estero Report, Neubacher and Allen claimed that the oyster farm had caused an 80% decline in harbor seals in 2007 vs. 2005 at one unnamed subsite.

Q. What happened to the 80% decline claim in secret July 27 version?

A. NPS secretly deleted the 80% claim but never told the public.

On July 21, Senator Feinstein instructed Regional Director Jarvis to give Dr. Goodman the NPS harbor seal data. NPS officials knew that the NPS data did not support their claim. They secretly deleted their false claim before giving Goodman the data, but never told the public.

■

May 11, 2007 (public version #4): False Claims in NPS
Drakes Estero Report (*Drakes Estero, A Sheltered Wilderness Estuary*)

oyster feces

FALSE



oyster feces

[July 27 non-public version]

beneath

eelgrass

In 2007, with 63 active oyster racks, this amounted to at least 8 acres of lost eelgrass cover [July 27 non-public version]

ecology

fish

[July 27 non-public version]

harbor seals

[July 27 vers.]

[July 27 version]

May 11, 2007 Conclusions

Oyster farming impacts on the ecological communities of Drakes Estero

- A USGS researcher stated that a source for sediment fill in the estero was from oyster feces and from structures trapping sediment.
- Eelgrass beds are found in all suitable habitats within Drakes Estero, except between active oyster racks, where they do not exist due to shading and possibly other effects. In 2003, 38 active oyster racks, this amounted to at least 1.5 acres of lost eelgrass cover
- Oyster racks and bags provide structural habitat that does not naturally occur in the estero except in limited areas. The equipment and structures change the community composition and provide habitat for invasive, non-native species.
 - Invasive organisms were found on the hard substrates provided by the oyster racks in Schooner Bay. These organisms were limited in Estero de Limantour where no oyster facilities exist.
 - The invasive non-native species, *Didemnum spp.*, is commonly present on oyster racks and is a highly aggressive, invasive species that could alter Drakes Estero ecology.
 - Schooner Bay, where there are many oyster racks, supported a different fish community than Estero de Limantour where no mariculture occurs.
- Clam abundance is reduced under oyster racks, possibly due to changes in bottom sediment composition or increased predation by fish and decapod crustaceans attracted to the oyster racks. In parts of Drakes Estero, clams are found in extremely high densities away from racks - up to 250 per meter squared.
- The oyster operation is a potential source for many invasive species because non-native species hitchhike on oysters and equipment that are brought to the estero.
- Placement of oyster bags and racks in intertidal mudflats and sand bars displace wildlife such as shorebirds and harbor seals because of spatial coverage of racks and disturbance by oyster operations. In 2007, oyster bags and disturbance have reduced one sub colony by 80%

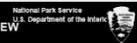
July 27, 2007 Conclusions

Oyster farming impacts on the ecological communities

- Eelgrass beds are found in all suitable habitats within Drakes Estero, except beneath active oyster racks, where they do not exist due to shading and possibly other effects. In 2007, with 63 active oyster racks, this amounted to at least 8 acres of lost eelgrass cover. Approximately 50 additional acres were also affected, likely from boat propeller damage.
- Oysters that are grown in Drakes Estero likely play an important role in the deposition of fine-grained sediment, and in the trapping of sediment.
- Oyster racks and bags provide structural habitat that does not naturally occur in the estero except in limited areas. The equipment and structures may change the community composition and abundance of species and provide habitat for invasive, non-native species.
 - Invasive organisms were found on the hard substrates provided by the oysters and oyster racks in Schooner Bay.
 - The invasive non-native species, *Didemnum sp. A*, is commonly present on oyster racks and was discovered on natural habitat within the estero. Oyster processing methods have the potential to spread *Didemnum* by creating large numbers of fragments that can colonize new areas.
- The oyster operation is a potential source for invasive species because non-native species may hitchhike on oysters and equipment that are brought to the estero.
- Placement of oyster bags and racks in intertidal mudflats and sand bars displace wildlife such as shorebirds, black brant and harbor seals because of spatial coverage of racks and bags, and disturbance by oyster operations.

July 27, 2007;

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Drakes Estero



Photo © Esther Campbell

False claims deleted in July 27, 2007 non-public version

- A USGS researcher stated that a source for sediment fill in the estero was from oyster feces and from structures trapping sediment.
 - Schooner Bay, where there are many oyster racks, supported a different fish community than Estero de Limantour where no mariculture occurs.

In 2007, oyster bags and disturbance have reduced one sub colony by 80%

May 11, 2007 Conclusions

Oyster farming impacts on the ecological communities of Drakes Estero

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Conclusions expanded in July 27, 2007 version

- Eelgrass beds are found in all suitable habitats within Drakes Estero, except beneath active oyster racks, where they do not exist due to shading and possibly other effects. In 2007, with 63 active oyster racks, this amounted to at least 8 acres of lost eelgrass cover. Approximately 50 additional acres were also affected, likely from boat propeller damage.
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July 27, 2007 Conclusions

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- Oyster racks and bags provide structural habitat that does not naturally occur in the estero except in limited areas. The equipment and structures may change the community composition and abundance of species and provide habitat for invasive, non-native species.
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FALSE

[July 27 non-public version]

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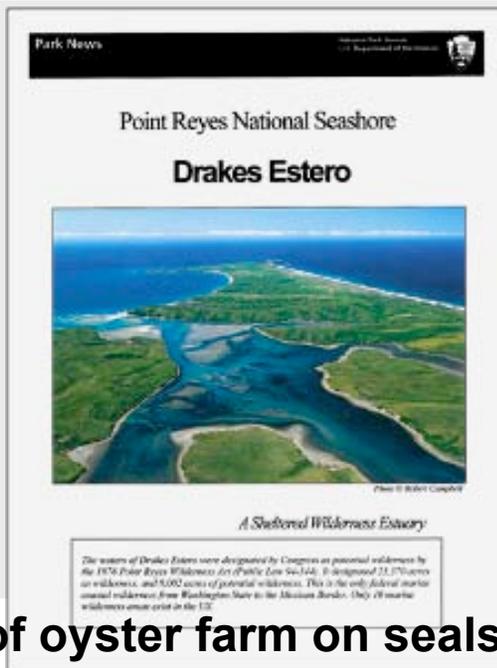
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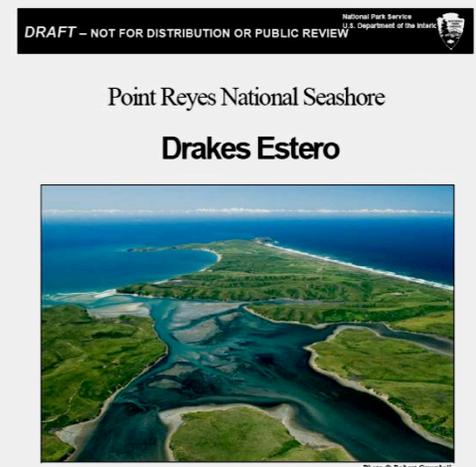
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The NPS claim that in 2007 vs. 2005, the oyster farm had caused an 80% decline in harbor seals at one unnamed subsite, so prominent in **May 11, 2007 public version**, was secretly deleted from the **July 27, 2007 non-public version**



Impact of oyster farm on seals:
"One area where 250 seals nursed more than 100 pups two years ago, have around 50 total seals including around 25 pups in 2007, an 80% decline." [May 11, 2007]



HARBOR SEAL CLAIM DELETED – 80% HARBOR SEAL DECLINE CLAIM IS COMPLETELY ABSENT FROM SECRET VERSION OF THE REPORT
[July 27, 2007 non-public version]