

Alliance for Local Sustainable Agriculture - ALSA

PO Box 1316 • Pt. Reyes Station, CA 94956 • 415-663-8618 • alsamarin.org

August 31, 2009

Timothy J. Ragen,
Executive Director
Marine Mammal Commission
4340 East-West Highway, Suite 700
Bethesda, MD 20814

Sent via Facsimile

Dear Director Ragen:

This letter concerns your recent visit to Point Reyes National Seashore (PRNS) as part of an ongoing Marine Mammal Commission (MMC) investigation of disturbances of Harbor Seals in Drakes Estero.

National Park Service (NPS) data clearly identifies clambers, kayakers, hikers, airplanes and predators as responsible for over 99% of Harbor Seal disturbances in Drakes Estero. We are consequently both dumbfounded and alarmed that the MMC has chosen to ignore these disturbances and investigate instead the oyster farm, which, according to the NPS' own data, is the source of less than 1% of those disturbances. In choosing this course of action, the MMC has placed itself in the position of having to rely on data and conclusions already identified as unfounded by the National Academy of Sciences (NAS) panel convened to investigate this very question.

Prior to your visit to the oyster farm last week, you quite properly agreed that you and your chief scientist would go out into the Estero and review the resource as an essential element of the MMC investigation. This would have enabled you to evaluate, among other issues, the actual distance between oyster farm activities and Harbor Seal haul out areas.

We are deeply disturbed to learn that, upon your arrival on Tuesday morning, August 25, you elected not to go into the Estero and not to review actual conditions directly pertinent to the matter you have been tasked to investigate.

Given the unsavory history of the PRNS administration's behavior in this matter, we are forced to conclude that you have abandoned a science-based approach to addressing the question of Harbor Seal disturbances in the Estero in favor of one rooted in hearsay and ideology. You have, regrettably, chosen to follow the lead of the same individuals whom the National Academy has already shown to be completely unreliable sources of information around this issue.

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We support an MMC investigation into Harbor Seal disturbances, where the data shows such disturbances to be significant. We adamantly oppose such an investigation if the only data considered is a politically selected subset, the insignificance of which has already been confirmed by NAS investigators.

We urgently request that you immediately broaden the scope of the MMC investigation to include all known sources of seal disturbance in Drakes Estero. Anything less constitutes a shameful abdication of MMC responsibility to both the resource and the public trust.

Very truly yours,



Jeffrey A. Creque, Ph.D.

cc: Secretary of the Interior, Ken Salazar
Senator Dianne Feinstein
Senator Barbara Boxer
Congresswoman Lynn Woolsey

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TO: FROM:

Timothy Ragen

Donna Yamagata

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Marine Mammal Commission

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Drakes Estero

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REC'D AUG 31 2009