

Drakes Bay Oyster Company

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Dear Ms. Dettmer and Ms. Haage:

This letter acknowledges receipt of the California Coastal Commission's September 12, 2007 letter which transmitted the Commission's Report entitled, "*Effects of Oyster Mariculture on the Natural Resources in Drake's Estero*" (the "Commission Report"). By this letter, Drake's Bay Oyster Company ("DBOC") addresses one conclusion in the Commission Report regarding alleged impacts to harbor seals. The Report's conclusion that DBOC's operations are impacting harbor seals is based entirely on a single 75-minute Trip Report prepared by the National Park Service ("NPS"). As we detail below, the Report's narrative and the attached NPS Drakes Estero map both contain false and misleading data upon which the Coastal Commission relies for its recommendations to eliminate half the oyster farm. As a result, we request the Coastal Commission disclaim any reliance on the NPS Trip Report.

Under separate cover numerous other issues in the Commission Report will be addressed. However, it is critical to address these two particular issues from the NPS Trip Report right now because of their inflammatory nature. It is imperative that the Coastal Commission, other regulatory agencies, and the public do not rely improperly on the Commission Report as evidence of environmental harm that did not occur and that the errors be corrected as soon as possible.

Overview – Executive Summary
Altered Maps, False Accusations and Other NPS Distortions and Irregularities

This letter describes a series of issues – each emanating from a single NPS Drakes Estero Trip Report. To assist your review of this letter, this section outlines and highlights the numerous issues raised. A pattern of distortions and irregularities emerge throughout these events and circumstances. This letter addresses the following:

- **Drakes Bay Oyster Company Rejects NPS Allegations of Harbor Seal Harm Cited by Coastal Commission**
- **NPS Report Alleges Major Harbor Seal Disturbances, Consequently Interferes with NPS Permit Discussions**
- **Drakes Bay Oyster Company Oyster Boat Not In Estero at Time of NPS Alleged “Observation”**
- **NPS Fails to Record Data from Trip Report in Official NPS Database, Fails to Mention April 26, 2007 Trip Report in Subsequent May 8 Public Testimony Plus May 8 and May 11 Versions of Official NPS Drakes Estero Report**
- **NPS Fails to Communicate Harbor Seal Disturbances to Drakes Bay Oyster Company or California Department of Fish and Game**
- **Drakes Bay Oyster Company, Others File Data Quality Act Complaint with U.S. Department of the Interior Over Falsification of Drakes Estero Data and Claims by NPS**
- **NPS Avoids Accountability by Withholding Harbor Seal Data Despite Numerous FOIA Requests and Unfulfilled Promises to Disclose**

- **More NPS Irregularities: NPS Altered Aquaculture and Seal Habitat Maps**
- **Conclusions and Recommendations - DBOC Requests Coastal Commission Amend Letter, Recommendations**

Drakes Bay Oyster Company Rejects NPS Allegations of Harbor Seal Harm Cited by Coastal Commission

The DBOC states that the allegations by the NPS of environmental harm and disruption to harbor seals are false. The Coastal Commission, in its mariculture effects report, cites and relies upon a single Trip Report (April 26, 2007, 3:45 pm to 5:00 pm) which claims DBOC significantly disturbed harbor seals. According to the Commission, this Trip Report alleged that between 4:10 pm and 5:00 pm, on April 26, two oyster workers were observed to “*disturb 90 hauled out harbor seals, of which 7 adults and 7 pups flushed into the water.*”

As a single anecdotal observation, the NPS Trip Report cannot be relied upon. The “observation” date, locations, and times are factually incorrect, raising serious questions about the authenticity and integrity of this Trip Report. Moreover, the “observation” was never entered into the official NPS harbor seal database, in violation of NPS protocols. Furthermore, the handling of this Trip Report contributes to an already disturbing pattern of scientific misconduct on the part of the NPS.

DBOC operations include the placement of oysters in certain areas pursuant to our lease. We maintain the oysters in accordance with the California Department of Fish and Game (CDFG) protocols established with NPS and the National Marine Fisheries Service, which expressly provide for placement of oysters on sandbars designated in Drakes Estero as EUN and OB among others throughout the Bay. Additionally, we point out that we are growing oysters on the same islands, beaches and sandbars as they have been grown for decades. What we do is not new. How we do it is not new.

***NPS Report Alleges Major Harbor Seal Disturbances,
Consequently Interferes with NPS Permit Discussions***

The Commission Report arrived at the very time DBOC is in the middle of Permit discussions with the NPS. However, the NPS Trip Report is so disturbing and inaccurate that we are compelled to halt our internal evaluation of our pending NPS permit. This is delaying our scheduled meetings with NPS while we address their allegations of harm and disruption to harbor seals.

According to the Commission's Report:

The seasons of greatest concern are probably the spring and fall migratory periods and winter for birds and the breeding and pupping season (March–June) for harbor seals. In Drake's Estero, both human presence and boat operation are potential sources of disturbance to birds and harbor seals. For example, an oyster operation boat was observed to disturb 90 hauled out harbor seals, of which 7 adults and 7 pups flushed into the water, and around 300 black brant, which were flushed from an eelgrass bed where they were feeding (Allen 2007).

In this statement, the Coastal Commission is relying on one Trip Report by a NPS staff scientist that accuses DBOC of committing operational misconduct and environmental harm.

***Drakes Bay Oyster Company Oyster Boat Not In Estero
at Time of NPS Alleged "Observation"***

We can say with certainty that the NPS Trip Report is wrong. The NPS Trip Report states that on April 26, 2007 a white oyster operations boat about 20' long disrupted seals. However, DBOC does not operate a 20' white boat. We do, however own and operate a 16' white boat, but it was not near island sandbars EUN or OB at the time of the NPS "observation." In fact, **the DBOC boat was not operational due to engine problems**. The boat engine was being repaired on April 26. It was not in the Estero that day.

Therefore, it is not possible for NPS to have observed our staff and our boat disrupting harbor seals on this date or at this time. This event, if it occurred, did not occur with anyone associated with DBOC.

NPS Fails to Record Data from Trip Report in Official NPS Database, Fails to Mention April 26, 2007 Trip Report in Subsequent May 8 Public Testimony Plus May 8 and May 11 Versions of Official NPS Drakes Estero Report

The Trip Report was dated several days after NPS Superintendent Neubacher told Marin County Board of Supervisor's President Steve Kinsey that "*environmental consequences of the [DBOC] operation do not warrant facilitation of the necessary permits and regulatory actions required for the current owner to operate.*" In other words, the Park Superintendent said that because of environmental misconduct in and to the Estero, NPS would not proceed with permits for DBOC. Specifically, Kinsey reported to Senator Feinstein in the Board of Supervisor's letter, "*The County has been informed by the Point Reyes National Seashore Superintendent, Don Neubacher, that Park staff members believe any oyster operation would be harmful to the biological resources of the estuary, including impacts on young harbor seals as well as the prolific beds of eel grass surrounding the operation.*"

Despite the fact that the Trip Report describes environmentally harmful conduct, NPS has not previously cited it as evidence of environmental harm. Superintendent Neubacher did not, for example, discuss the Trip Report when he addressed the Marin County Board of Supervisors on May 8, 2007. The Trip Report could have instantly become the "poster child" for DBOC wrongdoing and so-called environmental criminal misconduct. Instead, the Trip Report is neither discussed in meetings or public testimonies, nor ever shared with DBOC. And now it surfaces in the middle of our permit negotiations with the NPS as the centerpiece of the Commission Report's conclusion of impacts to seals.

Consider the following.

- (1) **Data From the April 26 Trip Report Not in NPS Database.** Based on the limited access to official NPS harbor seal database records presently made available to us, there is no record of this Trip Report or the data allegedly generated from it. In fact, there is no entry of any kind for April 26, 2007 in terms of either seal counts or seal disturbances. Moreover, the numbers and facts mentioned in this April 26 Trip Report do not correspond to data entered for any other April date in the database.
- (2) **NPS Trip Report Fails to Adhere to NPS Data Management Plan.** The April 26 Trip Report begins by stating that it was conducted to count harbor seals during the peak

pupping season. Yet if indeed these observations were really made, and were part of the harbor seal monitoring program, NPS policies required the timely entry of the data into the official database. The NPS Data Management Plan also requires that the data “*are free from error and bias.*” These procedural errors preclude NPS from relying on the Trip Report independent of its inaccuracies and/or falsehoods.

- (3) **Trip Report Results Not Mentioned in NPS Testimony.** NPS Superintendent Neubacher and NPS/PRNS Lead Scientist Allen, author of the Trip Report, both testified before the Board of Supervisors on May 8, 2007 about harm to harbor seals from the oyster farm. However, neither referenced the April 26 Trip Report. If this observation occurred, it was omitted from NPS testimony which occurred only 12 days later. In their testimony on May 8, the Superintendent and the Lead Scientist made other claims about the impact of the oyster farm on the harbor seals, but never mentioned this allegedly key Trip Report. We note that the other claims made on May 8 are not supported by their own database (and neither was the Trip Report).
- (4) **Trip Report Data are Not Mentioned in May 8 or May 11 Versions of Official NPS Drakes Estero Report.** NPS Superintendent Neubacher released a new version of his official report “*Drakes Estero: A Sheltered Wilderness Estuary*” on May 8, the day of the Marin County Board of Supervisors hearing. Three days later, NPS then posted yet another new – *now amended* – version of their report on the NPS web site dated May 11, 2007 which contained a number of changes from the May 8 version. Although a major section of that NPS report focuses on oyster farm impacts on harbor seals, the April 26 Trip Report is neither mentioned in the text nor cited in the references (even though 27 other references are cited).
- (5) **Trip Report Results Not Submitted to Marine Mammal Commission.** NPS contacted the Marine Mammal Commission immediately prior to the May 8 hearing. In his testimony, the Superintendent claimed the Marine Mammal Commission was “*going to take it up*” as an issue of “*national*” significance. The NPS lead scientist then testified that the Marine Mammal Commission was going to “*bring it up in their next Commission meeting because it has national significance.*” However, this Trip Report was not provided to the Marine Mammal Commission by NPS prior to or after the May 8 hearing.

As of their next meeting, August 28 and 29, the Marine Mammal Commission had not received any official data from the NPS.

(6) **NPS Database Reveals 95% of Harbor Seal Flushes – Highest Form of Harbor Seal Disturbances – Come From Park Visitors, Aircrafts, Hikers, Kayakers, Others.**

Until April 29, 2007, and during its then two and a half years of oyster farm ownership, there is not a single seal flush observation in the NPS database attributed to DBOC operations. The NPS database reveals that fewer than 5% were attributed to DBOC, each of which allegedly occurred after the Superintendent challenged the oyster farm.

According to NPS, an event causing a harbor seal to “flush” is considered the most serious – and most detrimental – of disturbances. Park visitors alone account more than 1,100 of the almost 2,900 flushing events recorded in NPS’ official database. Aircraft accounted for 741. Birds accounted for 482. Predators accounted for 163. Examination of the NPS harbor seal database over the three years that we have owned DBOC (2005-2007) shows that the oyster farm has caused very few of the seal disturbances. NPS’ database records 2,864 seals being flushed into the water by disturbances during the March-May three month period during each of the past three years. The first recording in the database of flushing attributable to DBOC is on April 29, 2007 indicating that five seals were flushed into the water. Interestingly, the next and only other recording is on May 8, the very day of the Marin County Board of Supervisors hearing, in which the database records 113 seals getting flushed (the coincidence factor is troubling) into the water by an oyster boat. That means that 96% of all flushes attributed to the oyster farm occurred on one day (the day of the hearing) and after two and a half years of operation. The NPS database shows that harbor seals are disturbed. Seal disturbances from DBOC are, at best, minimal.

The NPS April 26, 2007 Trip Report – not in the NPS data base. Overlooked in NPS May 8 testimony. Not shared with the Marine Mammal Commission. Not in the May 8 version of the Drakes Estero Report. Not in the revised May 11 version of this ever-changing NPS Report.

This is especially inexplicable since this Trip Report records 14 seals getting flushed into the

water due to the oyster operation, the first recording to date during the two and a half year ownership of DBOC by the Lunny family, and the largest reported disturbance prior to the May 8 hearing. If indeed this first observation of seal flushing by the oyster operation actually occurred at the time and place reported, then we might have expected it to be recorded in the database, which it was not, and reported in the early May testimony and reports, which it was not. Yet, suddenly this phantom NPS Trip Report was provided to the Commission as the primary evidence of environmental mismanagement and misconduct on the part of DBOC – many months after the fact.

NPS Fails to Communicate Seal Disturbances to Drakes Bay Oyster Company or California Department of Fish and Game

Administrative due diligence should have required some level of action by NPS as a result of the April 26 Trip Report. Instead NPS, in the face of that Trip Report, apparently took no action as a result of this seal disturbance observation. Nothing seems to have been done with this Trip Report until NPS submitted it to the Commission as THE example of oyster farm disturbances which in turn, justified the Commission Report's harbor seal mitigation recommendations.

Meanwhile, in this intervening five months, NPS did not communicate with DBOC. Conversely, DBOC did communicate with the NPS when a NPS boat was observed in a closed area during pupping season, at high speed, at low tide on May 24, 2007. When DBOC staff witnessed this event, they reported it immediately. DBOC then contacted the Superintendent, but to date we have only received a partial and inadequate response.

This is alarming, in part, because there were one and a half to two months remaining in the seal pupping season when the alleged NPS observation occurred. NPS, having observed an "oyster farm boat" in the Estero causing environmental harm to some 90 seals and seal pups curiously elected not to send a letter, make a call or organize a meeting with DBOC. In addition, NPS did not communicate with CDFG, the agency which issues the Aquaculture Water Bottom Lease lease to DBOC.

This matter was so serious it was called to the Commission's attention months after the fact. At the time (and to this day), NPS elected a "no action" posture with both the regulating agency and the oyster farmer.

Drakes Bay Oyster Company, Others File Data Quality Act Complaint with U.S. Department of the Interior Over Falsification of Drakes Estero Data and Claims by NPS

On August 27, 2007 DBOC, joined by four other agricultural and environmental groups, filed a Data Quality Act (DQA) Complaint with the US Department of the Interior because of the seriousness of NPS' scientific misconduct.

NPS scientific misconduct became so serious that a DQA complaint was filed with the Department. There is a documented pattern of NPS data falsification and the April 26 NPS Trip Report must be considered in the context of overall data manipulations.

The Data Quality Act, enacted by Congress in 2001, requires that each Department and Agency issue guidelines that *“provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility and integrity of information (including statistical information) disseminated by Federal Agencies...”*

With regard to harbor seals, the DQA complaint states, at page 12:

Statements concerning impact on harbor seals lacks objectivity

The NPS Report makes unsupported and biased claims that increased oyster harvesting in Drakes Estero has decreased the harbor seal population. Specifically, the NPS Report cites personal observations by PRNS Scientist Sara Allen and park biologists about disturbances to seals by oyster operations, leading to a claim made in both the NPS Report and in public testimony that one sub colony declined by 80% in 2007. However, many of these “personal observations” are unsubstantiated, most significantly the 2007 claims. Moreover, previous Harbor Seal Monitoring Reports, co-authored by Allen do not discuss disturbances from oyster operations.

As Thomas Yeatts summarized in his Point Reyes Light article, the 2006 [NPS] Monitoring Report correlated annual seal population fluctuations with “food availability,” and noted that from 2005 to 2006 (when the number of oysters harvested increased), the number of pups in the Drake's Estero did not decrease. Of eight major pupping sites in 2006, Drakes Estero had the highest maximum count, at 347 pups. In the 2006 [NPS] Monitoring

Report listing of common disturbances, surveyors cited predators (bobcats and coyotes), hikers, recreational clam diggers, kayakers and “low flying large birds such as turkey vultures.” Forty-seven percent of disturbances were attributed to an “unknown cause.” The 2006 Monitoring Report attributes no disturbance specifically to oyster operations. In turn, the NPS Report attributes a 2007 disturbance exclusively to oyster operations, failing to reference disturbances by other predators observed in the 2006 Monitoring Report. See also Attachment 14 (May 2007 Research Summary of Harbor Seal Monitoring at PRNS noting that harbor seal population “may be at carrying capacity” and not listing oyster operations as a source of disturbance). The NPS Reports presentation of claims regarding oyster operations impacts on harbor seal populations are incomplete, biased, and do not meet objectivity under NPS Guidelines.

The DQA Complaint addresses a broad range of other issues including sediment, oyster racks, species diversity, and invasive species among others.

As a result of the April 26, 2007 NPS Trip Report and our comprehension of all the errors and implications it represents, we are presently evaluating whether to file a supplement to the pending Data Quality Act Complaint or to file a second independent complaint. Suffice to say, there is a growing pattern of scientific misconduct by NPS/PRNS.

NPS Avoids Accountability by Withholding Harbor Seal Data Despite Numerous FOIA Requests and Unfilled Promises to Disclose

DBOC’s letter to the Commission is necessarily incomplete and may even contain errors. Since the May 8 hearing, numerous Freedom of Information Act (FOIA) and other requests were submitted to the National Park Service, many expressly pertaining to data on harbor seals in Drakes Estero.

Notwithstanding numerous requests, data has been repeatedly withheld from us and others assisting us. At various times, NPS insists “data” is predecisional. In other instances, NPS claims the privacy act prevents them from releasing it. These legal excuses are offered at the same time NPS testifies about the very same data and provides it selectively to certain groups (who then publish it).

You may recall, in a letter to us from Peter Douglas last June, he stated, “*the science advisor to the NPS, who has amassed 25 years of continuous data about the harbor seal nursery at the Estero...*” The NPS Western Regional Director, Jon Jarvis, recently informed Dr. Goodman, in the NPS’ official response to his FOIA request, that data prior to 1997 does not exist. This is neither credible nor plausible and is at odds with numerous NPS statements.

At the Olema meeting hosted by Senator Feinstein on July 21, 2007, NPS agreed to provide Dr. Goodman with a key or password to the database, copies of requested data, copies of reviews of the Drakes Estero Report and other documents relating to data (exchanges with USGS and others).

To date, NPS is withholding the vast majority of the requested information, data and documents requested regardless of agreements to do so. Some of data provided was in an unreadable format, absent any glossary, or without the appropriate “key” to read the data.

And, with the assistance of Rep. Woolsey, DBOC submitted a series of detailed questions to NPS about the NPS Drakes Estero Report. They have never been answered.

With full access to the “record,” DBOC will be able to address issues more comprehensively and more thoroughly.

More NPS Irregularities: NPS Altered Aquaculture and Seal Habitat Maps

As a result of the Commission Report to DBOC, it became evident that NPS prepared and circulated two NPS Drakes Estero Seal Habitat maps. One was provided to DBOC by NPS in 2005. The other was provided to the California Coastal Commission by NPS in 2007 and is cited in its September 12 Report. The maps are not the same. They are different. The changes are significant.

In early 2005, after DBOC acquired the oyster company, we met with NPS/PRNS officials to discuss seal haulout procedures and policies. Shortly thereafter, DBOC received a proposed Special Use Permit (SUP) from NPS that included a map identifying the seal haulout areas with specific boundaries.

The April 26, 2007 NPS Trip Report includes a NPS map identified as “*Drakes Estero*”

Aquaculture and Seal Habitat.” It has an NPS logo, but is neither dated nor numbered. Seal habitat and haulout boundaries identified on Sandbars OB and EUN were altered. This latest NPS map alters those boundaries to now include oyster bag areas that were not included on the original map. Examining this new NPS map, the Commission would now understandably believe oysters located within this changed haulout area represent either environmental mismanagement or operational misconduct on the part of DBOC with regard to harbor seals. This new map was not provided to DBOC. There have been no letters, no discussions, no disclosure, no explanation and no meetings with us about the altered map. DBOC does not know who else might have received this new map.

If there was a process to make changes to the haulout areas, DBOC was excluded from it. If there was new science to justify a change, it is being withheld.

For regulatory purposes, we now learn that NPS has produced a new, secret, undisclosed map which has the effect of manufacturing a regulatory and environmental conflict between the Coastal Commission and DBOC. It’s no wonder the Commission perceived that DBOC was harming the harbor seals.

It appears that NPS is using the Coastal Commission to generate an environmental conflict where none existed.

Conclusions and Recommendations ***DBOC Requests Coastal Commission Amend Letter, Recommendations***

An April 26, 2007 NPS Trip Report records harbor seal disturbances in Drakes Estero and attributes those disturbances to DBOC.

DBOC was not told. No call. No letter. No email. No notice. No warning. No meeting. CDFG, which permits DBOC, was similarly left in the dark. No administrative action of any kind is known to have occurred.

The same two-page NPS Trip Report contained a NPS-prepared “*Drakes Estero Aquaculture and Seal Habitat*” map. When this map was examined, DBOC learned that NPS unilaterally altered the boundary lines depicting Harbor Seal haulout areas to now incorporate areas where oysters have – for decades – been placed. This had the effect of manufacturing the appearance of

ecological wrong-doing and environmental mismanagement by DBOC.

DBOC was not told. The revised map was not provided to DBOC. According to CDFG, the new map was withheld from them as well.

This same NPS Trip Report results were not entered into the NPS database. A mere 12 days after the observation, it was not mentioned at the Board of Supervisor's public hearing. And, NPS failed to include those Trip Report results in either the May 8 or May 11 versions of the NPS Drakes Estero Report. Finally, the Trip Report results were not submitted to the Marine Mammal Commission.

A NPS Trip Report, selectively submitted to the Coastal Commission, claimed that DBOC was disturbing and flushing harbors seals. At the date and time cited, our boat was not operational.

All of this occurs at a time when the NPS has already been caught fabricating and falsifying data. The level of scientific misconduct was so great that DBOC and others filed a Data Quality Act Complaint (presently pending).

These charges and accusations of harm are false. They are wrong. On behalf of the Lunny family and all who are involved with the Drakes Bay Oyster Company, we vehemently deny such accusations. These claims against us are irresponsible, unjustified and unsubstantiated. The NPS is undermining our business and, by its conduct, is defaming our good name.

As a result, we request the following:

- (1) The concluding paragraph in the September 12, 2007 Coastal Commission letter be stricken in its entirety at pages 6 and 7.
- (2) The Coastal Commission issue a supplementary letter declaring the April 26 NPS Trip Report to be invalid and inapplicable.
- (3) Recommendations 1 through 3 be deleted and in lieu thereof, we recommend the following: "The 1992 Record of Agreement Regarding Drakes Estero Oyster Farming and Harbor Seal Protection, developed in conjunction with National Marine Fisheries

Service, National Park Service, Point Reyes National Seashore and California, Department and Fish and Game, Department of Public Health and the Drakes Bay Oyster Company are affirmed and should, on an annual basis, guide DBOC operational activities during the March-June harbor seal pupping season.”

- (4) Would you please provide us with a copies of the required NPS Worksheets (*Point Reyes National Seashore Harbor Seal Survey AND Point Reyes National Seashore Harbor Seal Disturbance Survey*) that would have accompanied the Trip Report of April 26?
- (5) We request that a meeting be convened at the earliest opportunity with Dr. Dixon and others from the Commission staff as appropriate. The purpose of this meeting will be to go through the Commission Report, issue by issue.

Two additional matters. First, in light of contemporary challenges, DBOC would welcome any assistance from the Commission obtaining access to the harbor seal data in the NPS data base and in the NPS Inventory and Monitoring Program. Second, when we met at your office recently, you referenced, on numerous occasions, Commission “policy” with regard to shellfish and aquaculture. We have looked at the Commission’s web site, but are unable to locate these them. Would you please provide them?

Finally, a personal note. Some of the overall concerns that have been raised address issues over which we have little or no control (for instance, where eel grass grows, how much sediment flows into the Estero and similar issues). We control where DBOC boats go. We are responsible for the conduct of our boat operators and crews. We are – and have been – appalled at the endless stream of accusations and the resulting obligations to prove a negative – that DBOC did not do something. We respect the importance of the seals and their pupping areas as an important natural resource. We know that we adhere to the protocols that we and the federal and state agencies agreed upon. We are deeply offended by charges that we can only declare to be reckless and agenda-driven.

Throughout 2007, DBOC and the Lunny family have been slammed with one accusation after another – each emanating from the NPS. Everyone knows the stain of irresponsible false accusation is nearly impossible to erase. Yet, with each passing day, one-by-one, the NPS

accusations are discredited.

As previously noted, this letter only addresses a single issue and is not a comprehensive response to the Commission Report.

The Drakes Bay Oyster Company looks forward to working with the California Coastal Commission to address and to resolve this particular issue and all other outstanding matters. To the Commission, we pledge our cooperation, openness and transparency.

Next week, we will contact your office to schedule the requested meeting.

Respectfully Submitted,

Kevin Lunny

Nancy Lunny

cc: Don Neubacher, Superintendent, Point Reyes National Seashore
Jon Jarvis, Western Regional Director, NPS
Steve Kinsey, President, Marin County Board of Supervisors
Christine Chestnut, California Coastal Commission
Dr. John Dixon, California Coastal Commission

Attachments:

- (1) NPS Trip Report, April 26, 2007
- (2) Drakes Estero Map, NPS-Prepared Displaying Oyster Bag and Seal Areas
- (3) Drakes Estero Map, NPS-Prepared, Altered
- (4) Press Release, Filing the DQA Act Complaint, August 27, 2007
- (5) DQA Complaint, Submitted to Department of the Interior, August, 2007
- (6) Dr. Goodman to NPS Regional Director Jarvis, July 22, 2007 (Olema Action Items)