



United States Department of the Interior

NATIONAL PARK SERVICE

POINT REYES NATIONAL SEASHORE
POINT REYES, CALIFORNIA 94956

IN REPLY REFER TO:

L1425

September 19, 1991

Brian Hunter
Department of Fish & Game
P.O. Box 47
Yountville, CA 94599

Dear Brian:

In response to your August 21, 1991, letter concerning the impacts of Johnson Oyster Company (JOC) we would like to take this opportunity to comment on specific items.

1. Impacts on Marine Mammals

Continuing research by Ms. Sarah Allen-Miller conducted under National Park Service permit clearly indicates that oyster racks/beds are located on or within 100 feet of areas used by harbor seals to haul out and pup. According to Miller (1988) use of these areas throughout the Estero vary in response to season and tide levels with peak usage occurring during the spring months. Females with pups are predominantly found in the mid-regions of the Estero on lateral channels during low tides early to mid-breeding season, (Miller, 1988).

On page 3 of your August 21, 1991 letter you state that marine mammal populations have been "increasing in recent years." Yet data from California Department of Fish and Game (Hanan, 1991) show a population decline, (649 marine mammals in 1987 vs. 386 in 1990). Datum from Allen-Miller (personal communication) suggest that the harbor seal population in the Estero has not changed significantly in the past five years.

Operations at JOC have clearly "expanded" over the last five years with new beds or racks being constructed. Regardless of what JOC's production rates are, their usage of the Estero has expanded toward the mouth of the Estero.

Since Drakes Estero represents a primary breeding colony for harbor seals from central and northern California, any additional expansion by JOC clearly will have an impact on harbor seals.

Tom Moore wrote 8/21 JK

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Observations by park personnel and Allen-Miller indicate that several stake beds are immediately adjacent to or within 100 feet of haul-out sites, not 300 yards as suggested by your letter. We have enclosed a map that hopefully better represent where haul out site locations occur. Maps utilized in the past have generally been drafted from older USGS topographic maps which bear little resemblance to the bottom profiles which currently exist.

2. Debris and Litter

A visual inspection of the shoreline reveals a high concentration of debris from the operation. This debris includes empty black plastic bags, stainless steel wire still embedded in the substrate, plastic spacers, etc. It appears that when oysters are harvested, the structures are left in place and no attempt is made to clean up the unused items. Continued visitor complaints concerning poly-pipe, plastic lids, wire, etc., indicate that patrols by JOC are not as frequent or diligent as claimed by JOC. Recently, in a single 300 foot stretch of beach near Bull Point, we observed in excess of 60 pieces of wire, several empty bags and numerous pieces of poly-pipe. During a recent beach clean-up in September, 1990, the most common item collected was poly-pipe from Johnson Oyster Farm, accounting for approximately one-third of the debris collected.

As stated in our June 27, 1991, letter we are highly concerned by the impacts to marine mammal from any additional expansion by JOC. Any further impacts resulting from additional beds/racks would clearly be detrimental to the marine mammal population. We encourage the seasonal (March 15-June 15) closures of the lower half of the Estero to prevent marine mammal harassment.

Further, we encourage the DFG to take a more active hand in influencing JOC to clean the area of debris from their operations including the removal of items from unused or abandoned beds/racks.

Although our main concerns with the operation at JOC are its impact on marine mammals and park visitors, we feel that other areas of concern need to be addressed. Additional racks/beds may have effects on the eel grass beds and therefore impact fish spawning and other related activity. Additional beds/racks may further alter flow patterns and rates to the detriment of the Estero. Shorebirds may be impacted by disturbance caused by the

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harvesting operations and/or changes in vegetation caused by oyster racks.

We look forward to your response.

Sincerely,


John L. Sansing
Superintendent

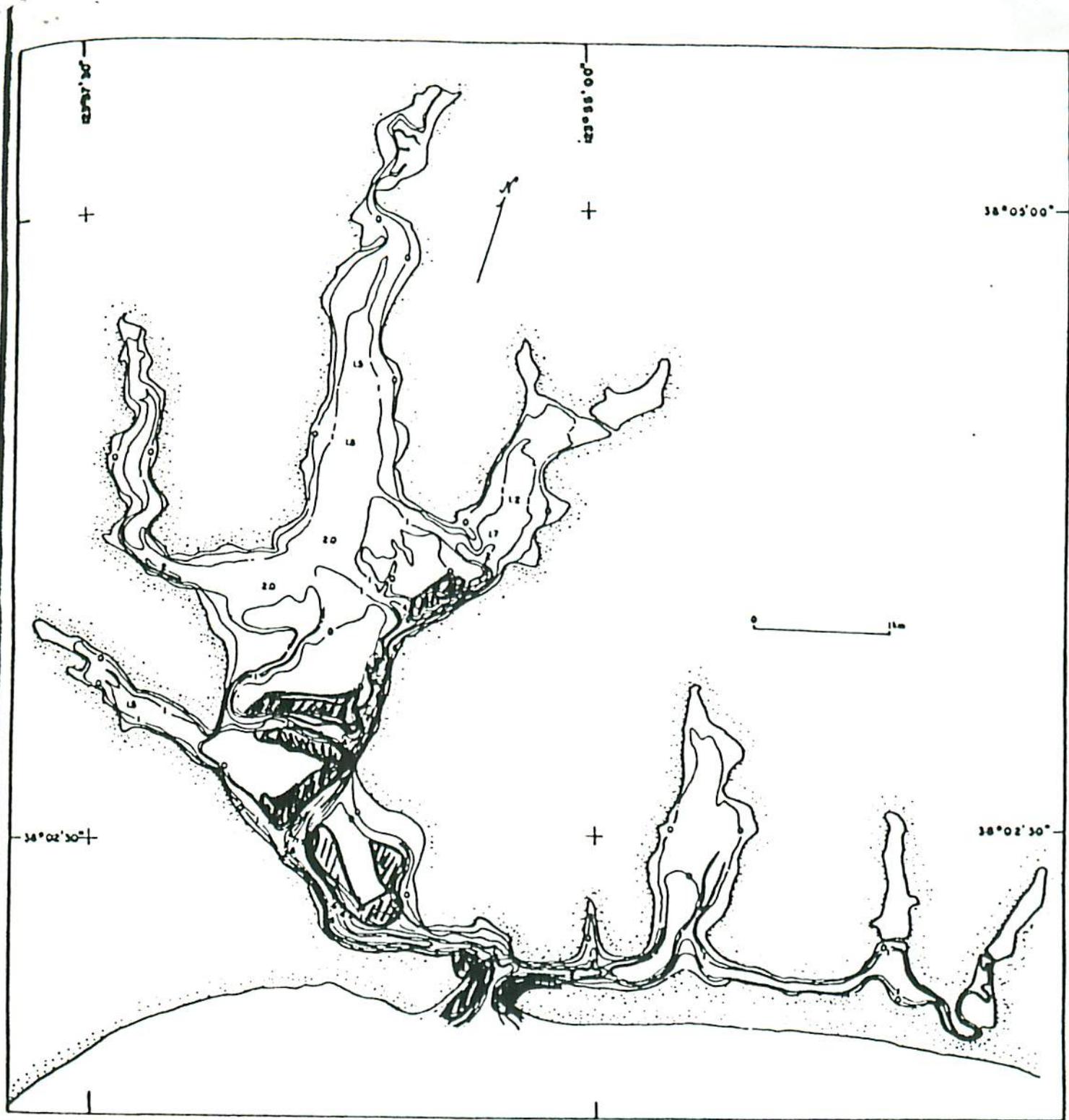
References Cited:

Miller, S.A., 1988. Movement and activity patterns of harbor seals at the Point Reyes Peninsula, CA. Master Thesis, U.C. Berkeley, 70 pages.

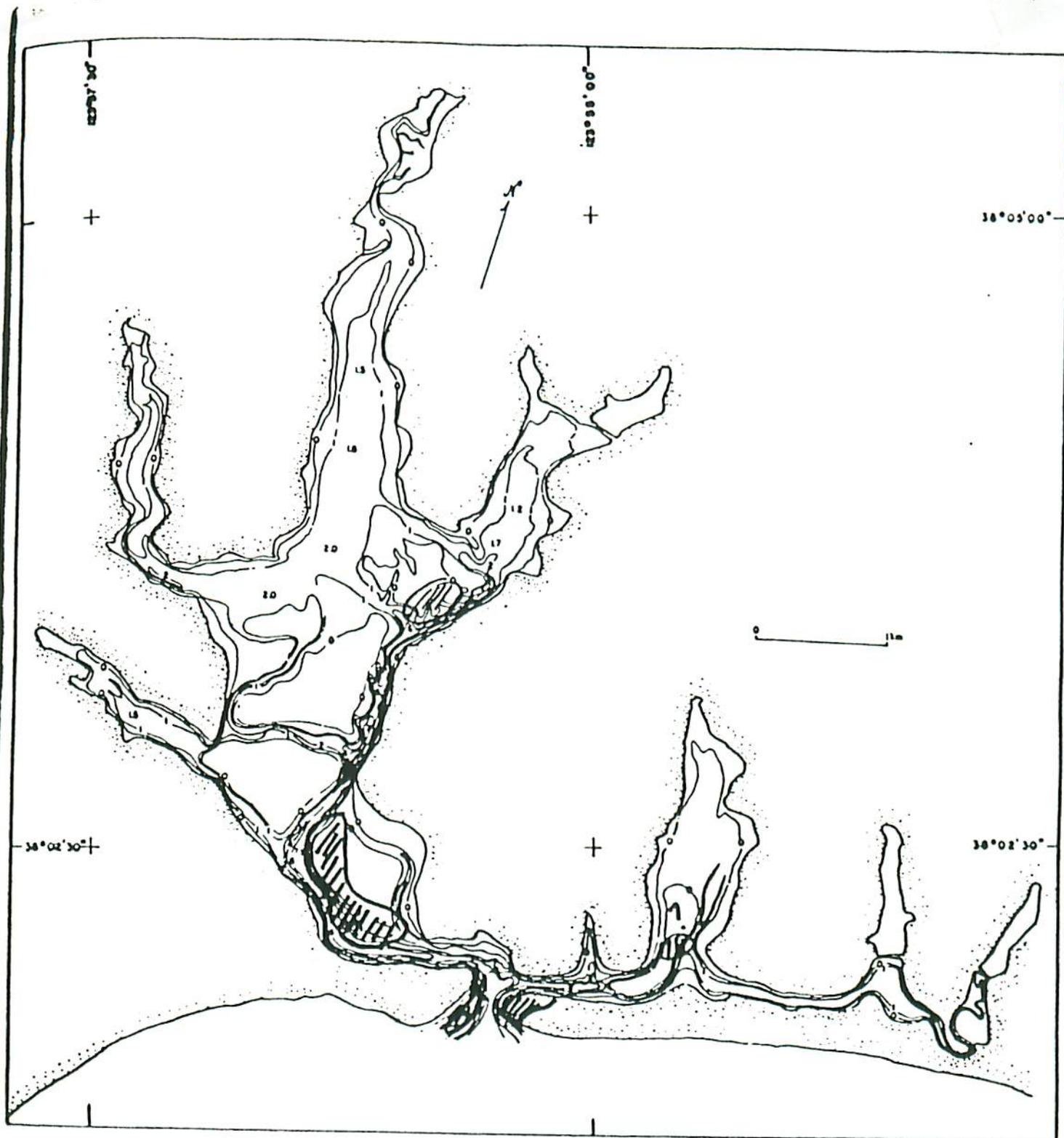
Hanan, D.A., E. Konno, M. Beeson. 1991. Harbor Seal Census in California, May-June 1990. NMFS Admin. Report. LJ-91-05.

cc:

Joseph Cordaro, Chief NMFS
Sarah Allen, PRBO



Haul out sites for harbor seals from Miller.
Breeding Season. Map from R. Anima, Fig 7.



Haul out sites for harbor seals, non-breeding season. Bathymetric map by R. Anima. Haul out sites from Miller.