

Drakes Bay Oyster Company

17171 Sir Francis Drake Boulevard
Inverness, CA 94937
(415) 669-1149

April 27, 2010

Mr. John Carlson Jr.
Executive Director
California Department of Fish and Game
1416 Ninth Street, Room 1207-5
Sacramento, CA 94244

Re: Lease No. M-438-01

Dear Mr. Carlson,

Drakes Bay Oyster Company (DBOC) requests that the following native species be added to the list of approved species for cultivation on lease No. M-438-01:

1. Olympia oyster (*Ostrea conchaphila*) Olympia oysters are indigenous to Drakes Estero and currently exist in Drakes Estero.
2. Purple Hinged Rock Scallops (*Hinnites multirugosus*). Purple Hinged Rock Scallops are indigenous to Drakes Estero and currently exist in Drakes Estero. Purple Hinged Rock Scallops are already an approved cultured species in Drakes Estero on lease No. M-438-02 which is located within M-438-01.

Currently, Pacific oysters (*C. gigas*), European Flat oysters (*Ostrea edulis*) and Manila clams (*Venerupis phippinarum*) are approved for cultivation on M-438-01. The net effect of this request will be to add two native species of bivalve shellfish to lease M-438-01.

No new culture methods will be required to grow these additional shellfish species and all seed stock will be certified by CDFG before planting. To produce seed, DBOC will obtain CDFG broodstock collection permits for both Olympia oysters and Purple Hinged Rock Scallops. This broodstock, once approved by CDFG, will be spawned on-farm and larvae collected for seed production. All seed produced at the DBOC hatchery will be used only on M-438-01.

Currently, DBOC produces mostly Pacific oysters. These requested species will allow DBOC to diversify its operation by producing traditional, indigenous shellfish. Although there is significant local demand, these native shellfish species are not grown commercially in California.

The addition of these species to Lease No. M-438-01 will not constitute an expansion of use. These species will be grown using the same historic Drakes Estero shellfish beds. The Olympia oysters and Rock Scallops will displace Pacific oysters, not add to the overall production. Actually, both of the requested traditional shellfish take 2-3 times longer than the fast growing non-native Pacific oysters to reach harvest size. Therefore, adding these native species to M-438-01 will likely reduce the overall production of shellfish in Drakes Estero.

Sincerely,

Kevin Lunny
Drakes Bay Oyster Company