with wildlife in the area, assuming minerals were present which could be exploited. The greatest value of these areas is the wildlife which abounds, and the reason why wilderness designation is sought is the protection of this wildlife. Mineral exploitation would be inconsistent with the State's expressed concern for marine resource management.

One aspect of concern which the State has expressed in considering wilderness for Drake's Estero is the Johnson Oyster Company operations. Wilderness status does not mean an end to the harvesting of oysters in the Estero, or a prohibition on the use of motorboats by the company in carrying out its operations (it would prohibit any other use of motorboats in the Estero). The Wilderness Act permits prior non-conforming commercial uses to continue, and the Secretary of the Interior can authorize the continued use of motorboats in support of the enterprise. Departmental memoranda express this quite clearly and the regional solicitor has interpreted the act to permit specifically this commercial operation.

We would like to urge the Resource's Agency to support wilderness status for tidelands at Point Reyes National Seashore. Point Reyes is only 50 miles from San Francisco. No metropolitan area can offer wilderness to its inhabitants such as that offered at Point Reyes. It has beaches and lagoons, bays, forests, rolling hills, sand dunes, unique flora and fauna, and numerous climatic and ecosystems. It is a laboratory for the scientist and student. But more importantly, it offers to many urban and suburban children, an accessible and demonstrable natural area which they could encounter nowhere else; how fortunate for us to have it available for our children.

It consists of four areas, each unique, each important. The Southern end contains the Black Forest, lakes and some seashore. The Central area consists of rolling hills on each side of Maddy Hollow. Exotics such as the fallow and axis deer roam these hills. The Esteros are wildlife rich, containing some species unique to Point Reyes. A seal rookery is located here. The fourth area is Tomales Point and the Great Beach, which has rolling hills with cliffs precipitously dropping to the sea. Here a herd of Tule Elk may be reintroduced. It seems only fitting that the beach be classified as wilderness in a National Seashore.

Even the Park Service recognizes that these areas qualify as wilderness. Its Environmental Impact Report is replete with concessions that each of these areas has wilderness qualities. While the Report stated that Drake's Estero could not qualify as wilderness due to the presence of the Oyster operation, that position is clearly in conflict with Departmental policies and opinion of counsel. If Point Reyes has wilderness qualities, if wilderness qualities need protection and affirmation in these times of massive development, overcrowding and polluting, the State can lend its powerful voice in support of its people by urging that the largest amount of acreage possible be declared wilderness at Point Reyes.

Sincerely,

Larry Kolb
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