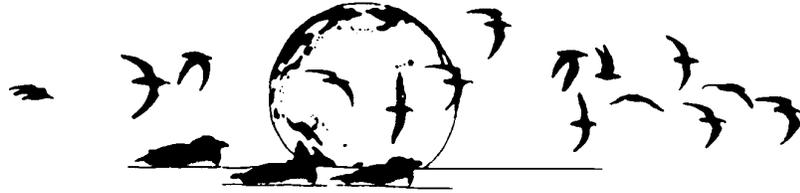


Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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8 April 2004

C. Ing. Alberto Cárdenas Jiménez
Secretario de Medio Ambiente y Recursos Naturales
Blvd. Adolfo Ruiz Cortinez 4209
Col. Jardines en la Montaña
C.P 14210 Tlalpan, México, D.F.

RE: ChevronTexaco MIA for Construction of a LNG Plant at Islas Los Coronados

24 March 2003 (DRAFT)

Dear Secretary Jiménez:

On behalf of the Pacific Seabird Group (PSG), we would like to express our deep concerns regarding the proposal by ChevronTexaco Corporation to build a liquid natural gas (LNG) facility 600 meters off Islas Los Coronados, Baja California. PSG is an international non-profit organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds with a membership drawn from the entire Pacific basin, including Mexico, Canada, Russia, Japan, China, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. Several of the ornithologists in PSG are very familiar with Islas Los Coronados and their importance for breeding colonies of several rare and threatened species of seabirds.

In our review of the Manifestacion de Impactos Ambientales (MIA) for the LNG project, we found that impacts to seabirds were not covered adequately. This is a gross oversight. Islas Los Coronados support at least 4,600 breeding birds of 10 species of seabirds (Table 1). Of these species, the three storm-petrels and the Cassin's Auklet are considered threatened and the murrelet is listed as endangered in Mexico. The pelican is listed as endangered in the United States and the murrelet was recently listed as threatened in the State of California. Los Coronados is an important nesting site for these rare species. These islands support the largest known breeding population of Xantus's Murrelets in the world, and the only breeding population

of Ashy Storm-Petrels in Mexico. Because of the significant seabird resources dependent on Islas Los Coronados, a number of major efforts have been made therein recent years to survey and protect the seabirds and other natural resources. These efforts include removing feral cats, goats, and burros, which prey upon seabirds or degrade their nesting habitat.

Table 1. Status of breeding seabirds on Islas Los Coronados. Island populations are in numbers of breeding birds. B = Breeding (population size unknown).

Species	Mexican Status	Island Population
Leach's Storm-petrel (<i>Oceanodroma leucorhoa chapmani</i>)	Threatened	>200
Ashy Storm-petrel (<i>Oceanodroma homochroa</i>)	Threatened	4-6
Black Storm-petrel (<i>Oceanodroma melania</i>)	Threatened	500+
Brown Pelican (<i>Pelecanus occidentalis</i>)		1200
Double-crested Cormorant (<i>Phalacrocorax auritus</i>)		600
Brandt's Cormorant (<i>Phalacrocorax penicillatus</i>)		100
Pelagic Cormorant (<i>Phalacrocorax pelagicus</i>)		6
Western Gull (<i>Larus occidentalis</i>)		500
Xantus's Murrelet (<i>Synthliboramphus hypoleucus scrippsi</i>)	Endangered	1500-2500
Cassin's Auklet (<i>Ptychoramphus aleuticus</i>)	Threatened	B

Many species of seabirds are extremely sensitive to human disturbance which can cause failed breeding attempts and abandonment of nesting areas. The construction and operation of the proposed LNG facility at Islas Los Coronados will dramatically increase levels of disturbance to seabirds. Disturbance will take several forms, including: (1) bright lights at night from the facility and visiting tanker vessels; (2) noise from the facility; (3) noise from helicopters visiting the facility; (4) ingress and egress of tanker vessels; and (5) other vessels transporting personnel and supplies. Any one of these factors could have a serious impact on the islands' seabirds, but taken together the cumulative disturbance caused by the proposed facility could have disastrous consequences for these colonies, none of which have been considered in the MIA.

Many of the threatened and endangered species seabirds that use the island are nocturnal species that only come and go from their nests under the cover of darkness. These species are very sensitive even to dim lights at night. Lights affect nocturnal seabirds in two ways: (1) light attracts seabirds and causes them to become disoriented, thereby disrupting their normal activities and causing mortality as birds fly into lights or structures around the lights. For example, lights can disorient very young Xantus's Murrelets, which depart the colony with the parent birds at only two to three days of age. When the chicks become disoriented, they can become separated from the parents, which leads to certain death. (2) Light can increase seabird susceptibility to predation both by illuminating areas at sea and on the colony. Therefore, lights near the colony may prevent adults from visiting their nests, increase mortality, and dramatically increase their susceptibility to natural predators. Frequent exposure to even dim bright lights at or near the nesting colonies will likely cause many, if not most, birds to either die or abandon the Los Coronados Islands a breeding site.

We are also concerned about impacts from seawater chlorination described in the MIA. Without careful study, it is not possible to conclude that the incidental mortality of larval fish and invertebrates due to this process will be insignificant. The ocean waters around Islas Los

Coronados are highly productive and very important foraging areas for breeding, migrant, and wintering seabirds. The loss of large numbers of prey could be detrimental to seabirds that depend on Islas Los Coronados for foraging at various times of year. Degraded water quality around Islas Los Coronados may also result from this project, such as from the seawater chlorination process. A gas spill from the facility or pipeline could have devastating effects on the local avifauna, especially rare species such as the Xantus's Murrelet.

It is our considered opinion that the construction and operation of a LNG facility so close to Islas Los Coronados will have detrimental effects on the local marine ecosystem surrounding the islands and, in particular, the seabirds that nest upon the islands. We urge you to consider these important resources in considering the proposed construction of the LNG facility near Islas Los Coronados. The MIA needs to consider the potential impacts of this project on the islands' rare and diverse populations of breeding seabirds, and plan carefully to mitigate these impacts. Islas Los Coronados are critical habitat for several seabird species, and these resources should be protected.

Thank you for your time and consideration of this important matter.

Sincerely,

Daniel Roby
Chair

cc: Dr. Carlos de la Parra, Delegado Federal, SEMARNAT
David J. O'Reilly, CEO, ChevronTexaco Corporation
Governor Arnold Schwarzenegger, California
U.S. Senator Dianne Feinstein, California
U.S. Senator Barbara Boxer, California
Congressman Bob Filner, Chula Vista, California
Terry Tamminen, Secretary, Cal/EPA
Harvey Morris, Senior Attorney, California Public Utilities Commission