

Biology Department
University of California
Los Angeles, CA 90024
15 March 1984

Mr. Jefferey Zippin
Minerals Management Service MS 644
12203 Sunrise Valley Drive
Reston, Virginia 22091

Dear Mr. Zippin,

A major concern of the Pacific Seabird Group is the dissemination of information relevant to the study and conservation of seabirds. Two of our members, Drs. Michael Graybill and Janet Hodder, have recently brought to the attention of our conservation committee the proposal to lease the Gorda Ridge area off the coast of northern California and southern Oregon for exploration, development, and mining of polymetallic sulfides. Their major concern is that the draft EIS had, what they judged to be, inadequate information on the biological resources of the area; in particular, they felt the information presented for seabirds was of poor quality or often inaccurate. I have consulted other knowledgeable seabird researchers in the Oregon region and they agree that it is appropriate for the Pacific Seabird Group to comment on this matter.

The islands off the northern California and southern Oregon coastline contain breeding sites for large numbers of seabirds, a number of which are known to be offshore feeders whose feeding range lies within the proposed Gorda Ridge lease site. Moreover, it is widely recognized that some of the metals thought to be present, or other metals which might possibly be present in association with them, are known to have adverse effects on birds. Therefore, the Pacific Seabird Group wishes to alert the preparators of the draft environmental impact statement of the potential negative impacts on seabirds of the proposed activities in the Gorda Ridge area, and to strongly recommend that the Minerals Management Service delay leasing activities until sufficient information is available judge the possible effects of the proposed activities on biological communities, especially seabirds nesting adjacent to and/or frequenting the proposed Gorda Ridge lease site. A decision to lease when the biological consequences of the proposed activities of an as yet undeveloped technology are completely unknown would establish an unwise precedent.

Our organization would like to be kept abreast of plans for this site. If you wish further information from our organization on this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Judith Latta Hand".

Judith Latta Hand, Ph.D.
Chairman

cc: Hodder
Graybill
Anderson
Vermeer
Sekora