



Marine Turtle Specialist Group

Species Survival Commission / IUCN- The World Conservation Union

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Dear Mr. Campbell:

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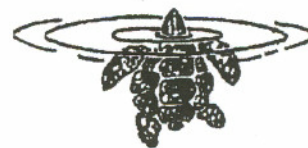
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SPECIES SURVIVAL COMMISSION

I am writing to express my concern for the future of the Padre Island National Seashore and more specifically, for the Kemp's ridley sea turtle, considered the most endangered of all the world's sea turtle species. The proposal to allow additional oil and gas extraction at Padre jeopardizes the future of the park itself – presently considered “the largest *undeveloped* stretch of barrier island in the world.” It also threatens to reverse the results achieved by the investment of millions of dollars and pesos by the U.S. and Mexican governments since the 1960s. Furthermore, it is a slap in the face to the hundreds of devoted volunteers, government employees, shrimp fishermen and other industry representatives that have contributed thousands of man & woman-hours, suffering discomforts and putting their lives and livelihoods on the line to save the Kemp's ridley sea turtle from extinction.

According to Public Law 87-712 (September 28, 1962) Padre Island National Seashore was established, “in order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped”. Owing in part to the collective vision of the members of the 87th Congress who assembled that day to enact this law, and to nearly three decades of international collaboration between the Republic of Mexico, the U.S. Government, the state of Texas, and a variety of private entities such as the Gladys Porter Zoo in Brownsville, the Kemp's ridley sea turtle is faring better today than it once was. These magnificent creatures have begun to return to their historic nesting grounds at Padre Island National

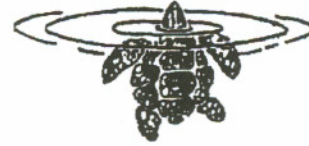


Seashore – a final refuge along the otherwise fully developed Texas coastline. Padre Island National Seashore is now the most important Kemp's ridley nesting beach in the U.S., with 55% of all nests in the U.S. And thanks to the protections offered by the National Seashore, nesting appears to be increasing at Padre. Nonetheless, this is just the beginning of the up-swing, and even today the Kemp's ridley still remains Endangered according to U.S. government criteria, and *Critically Endangered* according to the IUCN *Red List*.

Oil exploration and extraction have documented impacts on nesting, foraging, and migrating sea turtles, including significant proxy effects from vehicle traffic and platform removal. Gas flares have been shown to disorient hatchling turtles (Pendoley 2001); heavy crude tar balls seal the mouths and nostrils of turtles and are a significant threat at-sea (Balazs 1985); and the explosive removal of offshore oil platforms, an eventuality which has been a significant concern of NOAA-NMFS in the Gulf of Mexico (Klima, Gitschlag and Renaud 1989), are all among the thus far documented threats to sea turtles posed by oil extraction. While the Park Service has demonstrated an interest in mitigating the impacts of oil extraction on Padre, the current proposal does not adequately address all of the threats.

While recognizing that the mineral rights beneath the park belong to private entities, I believe that our *public* rights to the park and to our international shared resources are being compromised under the current proposal for increased drilling. The 9B Regulations (Title 36 C.F.R Part 9, Subpart B) state that the National Park System's obligation is to "insure that activities undertaken pursuant to [nonfederal oil and gas rights] are conducted in a manner consistent with the purposes for which the National Park System and each unit thereof were created, to prevent or minimize damage to the environment and other resource values, and to insure to the extent feasible that all units of the National Park System are left unimpaired for the enjoyment of future generations." Oil and gas extraction at Padre are a direct contradiction to these terms, being not only inconsistent with the purposes for which the National Seashore was created, but also by impairing the enjoyment of future generations.

I have a personal stake in the survival of the Kemp's ridley, having spent months working the beaches in Mexico in the early 1980's. I cut my teeth as a young biologist helping to re-establish the nesting population of Kemp's ridleys in Texas, carefully tending to the eggs in Mexico, shipping them north to Padre, and following the hatchlings on to Galveston where they were head-started and later released. These were the baby turtles that are now adults, coming ashore to nest at Padre and representing one of the greatest conservation success stories of the Century. But the success is just beginning. I strongly urge you to do what you can to let the recovery of the Kemp's ridley run its course, to allow no further oil and gas extraction at Padre Island National Seashore, and to assure that these maligned reptiles are allowed to thrive again, thus fulfilling the labors the countless many who have fought over the past quarter century to bring the Kemp's ridley back from the brink of extinction.



Thank you in advance, and if the IUCN Marine Turtle Specialist Group can be of any assistance in your endeavors to help the Kemp's ridley, we stand at the ready.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Mast', with a long, sweeping horizontal line extending to the right.

Roderic B. Mast
Co-Chairman

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