



North Coast Resource Conservation & Development Council

August 11, 2020

California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

Dear California State Lands Commissioners:

We are writing to request that the California State Lands Commission include an update to Commission regulations governing seabed mining on California Submerged Lands as an objective in the Commission's 2021-2025 Strategic Plan. As leaders of a nonprofit organization focusing on natural resource conservation and other environmental protections, our mission statement is inextricably linked to the health of California's marine resources.

We are specifically asking for a prohibition on seabed mining for hard minerals, including but not limited to phosphorite, metals, and metal-enriched sands, on or under California Submerged Lands, and request that the Strategic Plan update prioritize this proactive reform.

The ocean, especially the nearshore ocean, is facing a compounding array of stressors that will increasingly challenge our ability to understand and co-exist with a healthy ocean, including:

- Industrialization
- Climate change
- Ocean acidification

In this context, it is critical to identify and address emerging and future threats, including activities that might harm sensitive seafloor habitats that provide critical ecosystem functions and services. Rooted in the increased demands of a growing population, dwindling terrestrial sources, or technological advances that either require novel minerals or facilitate their profitable extraction, a growing body of evidence points to accelerating interest in the exploitation of ocean minerals, including those found in the nearshore areas along continental margins.

Scientists are warning that the ecological impacts of seabed mining could be profound. Without action by the Commission, mining could someday occur in California's nearshore waters, with significant negative impacts, including:

- Smothering or toxicity from sediment plumes;
- Increased noise;
- Loss of biodiversity;
- Light pollution; and,
- Physical disturbance of the seabed, up to and including the removal of plants, animals, and substrate.

Negative social and economic impacts of marine mining could also be severe for stakeholders and communities dependent on existing ocean uses like fishing, tourism and cultural resources.

One of the first core tenets of an ecosystem-based approach to resource management is to avoid sensitive areas. Given its importance to marine mammals, economically important fisheries, tourism, and other important, water-dependent societal uses, the three-mile wide nearshore area regulated by the state is a highly sensitive area that is incompatible with a high impact activity like seafloor mining. For this reason, the current regulatory regime of lease applications on a case-by-case basis merits reconsideration and the preclusion of hard mineral mining on submerged lands would be a more proactive and durable solution to this emerging threat.

We appreciate the opportunity to engage with the Commission and look forward to continued collaboration as you develop the new Strategic Plan.

Sincerely,

A handwritten signature in blue ink that reads "Oona Heacock". The signature is fluid and cursive, with the first name "Oona" being more prominent than the last name "Heacock".

Oona Heacock
Executive Director