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DON GILMAN

September 13, 1989

Trustee Council P.O. Box 20792 Juneau, Alaska 99802

Dear Sirs,

The Kenai Peninsula Borough has reviewed the State/Federal Natural Resource Damage Assessment Plan for the Exxon Valdez Oil Spill, August 1989, Public Review Draft. Our comments are outlined below.

Comments Regarding the Introduction of the Assessment Plan

One year is not sufficient to fully assess the damage to natural resources since impacts to fish and other resources will not be evident for three or more years. For example, the plan states that the damage to Pacific herring in Prince William Sound will not be known for at least three years.

The responsible party's involvement in the assessment should be limited to providing financial assistance to the Trustee to assure the objectivity of the assessment.

The chronology of the spill (page 6 to 11) is oriented toward Prince William Sound which lessens the importance of events that occurred in the Gulf of Alaska and Cook Inlet. More emphasis should be placed on the events in the Gulf and Cook Inlet such as the closure of much of the fishing season.

Figure 4 should be updated in the final assessment plan to accurately represent the full extent of the movement of oil. Studies should include all areas impacted by the spill.

The transport and fate of the oil in Cook Inlet is not discussed. There are indications that debris from the spill will accumulate (on the west side of Cook Inlet. This should be addressed.

The discussion of impacts to sea mammals and birds impacted in \neg the Gulf of Alaska and Cook Inlet should be discussed in more detail.

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